



# SAN FRANCISCO PLANNING DEPARTMENT

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## Executive Summary EIR Certification/CEQA Findings Conditional Use Authorization/Planned Unit Development

HEARING DATE: FEBRUARY 27, 2020

*Record No.:* 2017-003559CUAENV  
*Project Address:* 3700 CALIFORNIA STREET  
*Zoning:* RH-2 (Residential - House, Two-Family) and  
RM-2 (Residential - Mixed, Moderate Density) Zoning Districts  
40-X and 80-E Height and Bulk Districts  
*Block/Lot:* 1015/001, 052 & 053; 1016/001-009; 1017/027 & 028  
*Project Sponsor:* Denise Pinkston  
TMG Partners  
100 Bush Street  
San Francisco, CA 94104  
*Property Owner:* Sutter Bay Hospitals  
San Francisco, CA 94107  
*Staff Contact:* Christopher May – (415) 575-9087  
[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)  
*Recommendation:* **Approval with Conditions**

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

### PROJECT DESCRIPTION

The Project includes the demolition of five of the six existing hospital buildings on the nearly 5-acre project site encompassing three blocks, including a five-story accessory parking garage; demolition of a two-level, below-grade parking structure; renovation and adaptive re-use of a portion of the Marshal Hale hospital building at 3698 California Street to residential use; retention and renovation of the existing nine-unit residential building at 401 Cherry Street; and construction of 31 new residential buildings. The Project will provide a total of 273 residential units comprised of 14 single-family homes and 19 multi-family residential buildings ranging from three to seven stories in height, with 69 studios and one-bedroom units, 88 two-bedroom units, 96 three-bedroom units, and 20 four-bedroom units. A total of 416 parking spaces would be provided, consisting of 392 spaces within the shared below-grade garages and 24 private spaces located within the 12 proposed single-family dwellings. The project would provide 400 weather-protected Class 1 bicycle parking spaces and 39 publicly accessible Class 2 bicycle parking spaces on each of the four street frontages. The proposed project would include shared onsite amenity space, comprised of a resident fitness facility, and approximately 86,200 square feet of private and common open space areas for residents, which may include common roof deck areas for some of the buildings. The 14 existing parcels that make up the project site would be merged and subdivided into 16 parcels. The portions of the Subject site located on Assessor's Blocks 1015, 1016, and 1017 are herein referred to as Block A, Block B, and Block C, respectively. The proposed buildings are referred to in the plans and herein based on the block designation and number, e.g. Building B6.

## **REQUIRED COMMISSION ACTION**

In order for the Project to proceed, the Commission must:

1. Certify the Final Environmental Impact Report ("FEIR") pursuant to the California Environmental Quality Act ("CEQA");
2. Adopt findings under CEQA and adopting a Mitigation Monitoring and Reporting Program ("MMRP");
3. Grant a Conditional Use Authorization, pursuant to Planning Code Sections 209.1, 209.2, 253, and 303 to allow a building or structure exceeding 40 feet in height in an RH district and to permit a building or structure exceeding 50 feet in height in an RM district, to permit the change of use from an institutional use to a residential use for the existing building at 3698 California Street, the demolition of five institutional use buildings (formerly d.b.a. California Pacific Medical Center) and the construction of 31 new buildings ranging from four to eight stories and containing 264 new dwelling units at 3700 California Street (and including 3698 California Street, 401 & 460 Cherry Street, 3773, 3801 & 3905 Sacramento Street).
4. Grant, as a Conditional Use, a Planned Unit Development pursuant to Planning Code Section 304, to authorize modifications to the following Planning Code Sections: 1) rear yard (Section 134); 2) dwelling unit exposure (Section 140); 3) street frontage (Section 144); (4) moderation of building fronts (Section 144.1); and (5) measurement of building heights (Sections 260 and 261).

## **ISSUES AND OTHER CONSIDERATIONS**

- **Public Comment & Outreach.**
  - **Support/Opposition:** The Department has received five letters in support of the Project, including one from the Pacific Heights Neighborhood Association and one from the Presidio Heights Association of Neighbors. The Department has received one letter in opposition to the project, objecting primarily to the proposed building heights on Block C.
  - **Outreach:** In accordance with the requirements of the Development Agreement (Board File No. 120366), the Project Sponsor undertook a Community Visioning Plan, leading to the creation of a Visioning Advisory Committee including representatives from:
    - Pacific Heights Residents Association
    - Presidio Heights Association of Neighbors
    - Jordan Park Improvement Association
    - Laurel Heights Improvement Association
    - Lake Street Residents Association
    - Laurel Village Merchants Association
    - Neighborhood Association of Presidio Planning
    - Sacramento Street Merchants

The Visioning Advisory Committee held four workshops, including a community open house in April, 2016, which was attended by approximately 70 members of the public.



- **Conditional Use Authorization.** Pursuant to Planning Code Sections 253, and 303, the Project is required to obtain Conditional Use Authorization to allow a building or structure exceeding 40 feet in height in an RH district and to permit a building or structure exceeding 50 feet in height in an RM district; and to allow a PUD with the requested modifications from the requirements of the Planning Code.
- **Dwelling Unit Density.** The Planning Code permits a maximum of 2 dwelling units per lot in the RH-2 Zoning District and 3 dwelling units per lot or up to one dwelling unit per 600 square feet of lot area in the RM-2 Zoning District. Based on the proportions of the subject site within those two zoning designations, a maximum of 320 dwelling units are permitted. The Project proposes a total of 273 dwelling units.
- **Planned Unit Development.** The project requests modifications from Planning Code Requirements for:
  - **Rear Yard (Section 134).** Aside from two of the 12 proposed single-family dwellings, the remaining single-family dwellings and multi-unit residential buildings will not provide Code-complying rear yards. However, the Project as a whole provides for a greater amount of open space accessible to residents of the development, in lieu of Code-complying required rear yards.
  - **Dwelling Unit Exposure (Section 140).** In total, 248 of the 264 proposed new dwelling units will have Code-complying dwelling unit exposure while the remaining 16 dwelling units face onto open areas that do not meet the minimum horizontal dimension requirements.
  - **Street Frontage (Section 144).** The multi-unit building on the northwest corner of California and Cherry Streets proposes a pair of garage doors on both frontages that are not separated by a minimum of six feet. The remaining buildings within the Project will meet the street frontage requirements.
  - **Moderation of Building Fronts (Section 144.1):** Three of the multi-unit buildings propose massing with significant variation, but not in technical compliance with the façade modulation requirements of the Planning Code. Each of these buildings, however, have been designed to be compatible with the character of the surrounding neighborhood and have incorporated architectural features such as include Juliette balconies, pilasters, and a variety of facade materials and color schemes to accomplish these objectives.
  - **Measurement of Height (Planning Code Sections 260 and 261).** The project site is located on a south-facing hillside which slopes relatively steeply down to the south and gradually down to the west. As measured at the sidewalk, the grade decreases by approximately 44 feet from the northeast corner of the project site to the southwest corner. The underlying topography presents challenges in redeveloping the site in a manner consistent with the surrounding context. As such, several buildings are seeking a minor deviation that would allow their heights to be measured from the curb level from the highest elevation of the laterally-sloping lots, rather than the midpoint, which is not in technical compliance with the requirements of Planning Code Sections 260 and 261, but would otherwise comply with the applicable 40-foot and 80-foot height limits.

- **Design Review Comments:** The project has changed in the following significant ways since the original submittal to the Department in December, 2017:
  - The total number of dwelling units has increased from 258 to 273;
  - The total amount of usable open space, both private and common, has increased from 86,693 square feet to 87,950 square feet; and
  - The size of the shared interior amenity space has increased from 14,787 square feet to 19,279 square feet.

## **ENVIRONMENTAL REVIEW**

On June 13, 2019, the Department published the 3700 California Street Draft Environmental Impact Report ("DEIR") for public review (Case No. 2017-003559ENV). The DEIR was available for public comment until September 24, 2019. On September 19, 2019, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting to solicit comments regarding the DEIR. On February 12, 2020, the Department published a Comments and Responses to Comments ("RTC") document, responding to comments made regarding the DEIR prepared for the Project. On February 27, 2020, 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 February 27, 2020, the Commission must adopt the CEQA Findings for the FEIR, prior to the approval of the Project (See Case No. 2017-003559ENV).

## **BASIS FOR RECOMMENDATION**

The Department finds that the Project is, on balance, consistent with the Community Visioning Plan provisions set forth in the Development Agreement (Board File No. 120366) and the Objectives and Policies of the General Plan. The Project will address the need for new housing by adding 264 dwelling units to the City's housing stock, including family-sized units with two bedrooms or more in approximately 80% of the units. Additionally, the Project also proposes a variety of different housing types accommodating residents' different life stages, including single-family homes as well as multi-family units with studios, 1-bedroom, 2-bedroom, 3-bedroom and 4-bedroom units. The Project will contribute to the City's affordable housing supply via compliance with the Section 415 Inclusionary Affordable Housing requirements. The Project has been designed to be consistent with the scale of the surrounding neighborhood and responds appropriately to the immediate context. The Project also respects its location and topography, by situating the buildings and setting the heights appropriately. The Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity.

## **ATTACHMENTS:**

Draft Motion – Conditional Use Authorization with Conditions of Approval  
Draft Motion – CEQA Findings  
Exhibit B – Plans and Renderings  
Exhibit C – MMRP  
Exhibit D – Land Use Data  
Exhibit E – Maps and Context Photos  
Exhibit F - Project Sponsor Brief  
Exhibit G - Inclusionary Affordable Housing Affidavit  
Exhibit H – Anti-Discriminatory Housing Affidavit

Exhibit I – First Source Hiring Affidavit



# SAN FRANCISCO PLANNING DEPARTMENT

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## Planning Commission Draft Motion

HEARING DATE: FEBRUARY 27, 2020

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

Reception:  
**415.558.6378**

Fax:  
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Planning  
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*Staff Contact:* Christopher May – (415) 575-9087  
[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)

ADOPTING FINDINGS RELATING TO A CONDITIONAL USE AUTHORIZATION PURSUANT TO PLANNING CODE SECTIONS 209.1, 209.2, 253, 303 AND 304 TO PERMIT A BUILDING OR STRUCTURE EXCEEDING 40 FEET IN HEIGHT IN AN RH DISTRICT, TO PERMIT A BUILDING OR STRUCTURE EXCEEDING 50 FEET IN HEIGHT IN AN RM DISTRICT, AND FOR A PLANNED UNIT DEVELOPMENT (“PUD”) FOR A PROJECT TO THE CHANGE OF USE FROM AN INSTITUTIONAL USE TO A RESIDENTIAL USE FOR THE EXISTING BUILDING AT 3698 CALIFORNIA STREET, THE DEMOLITION OF FIVE INSTITUTIONAL USE BUILDINGS (FORMERLY D.B.A. CALIFORNIA PACIFIC MEDICAL CENTER) AND THE CONSTRUCTION OF 31 NEW BUILDINGS RANGING FROM THREE TO SEVEN STORIES AND CONTAINING 264 NEW DWELLING UNITS AND 9 EXISTING DWELLING UNITS WITHIN THE RH-2 (RESIDENTIAL-HOUSE, TWO-FAMILY) AND RM-2 (RESIDENTIAL - MIXED, MODERATE DENSITY) ZONING DISTRICTS AND 40-X AND 80-E HEIGHT AND BULK DISTRICTS, AND ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT. THE PROJECT IS SEEKING MODIFICATIONS FOR THE REAR YARD, DWELLING UNIT EXPOSURE, STREET FRONTAGE, MODERATION OF BUILDING FRONTS AND BUILDING HEIGHT MEASUREMENT REQUIREMENTS OF PLANNING CODE SECTIONS 134, 140, 144, 144.1, 260 AND 261.

### PREAMBLE

In August 2013, the City and County of San Francisco (hereinafter “the City”) and Sutter West Bay Hospitals (doing business as CPMC), entered into a development agreement (Board File No. 120366) regarding redevelopment of some of CPMC’s existing facilities, which were no longer needed by CPMC when its new hospital campus at Geary Street and Van Ness Avenue became operational in the spring of 2019.

On November 3, 2017, the Project Sponsor had on file a complete environmental evaluation application with the Department for environmental review for the Project.

On December 13, 2017, Denise Pinkston of TMG Partner (hereinafter "Project Sponsor") filed Application No. 2017-003559CUA (hereinafter "Application") with the Planning Department (hereinafter "Department") for a Conditional Use Authorization pursuant to Planning Code Sections 303 and 253 to permit a building or structure exceeding 40 feet in height in an RH district and to permit a building or structure exceeding 50 feet in height in an RM district, for Planned Unit Development pursuant to Planning Code Section 304, with modifications to the rear yard, dwelling unit exposure, street frontage, moderation of building fronts and building height requirements of Planning Code Sections 134, 140, 144, 144.1, 260 and 261, to permit the change of use from an institutional use to a residential use for the existing building at 3698 California Street, the demolition of five institutional use buildings (formerly d.b.a. California Pacific Medical Center) and the construction of 31 new buildings ranging from three to seven stories and containing 264 new dwelling units and 9 existing dwelling units (hereinafter "Project"), Block 1015 Lots 001, 052 & 053; Block 1016 Lots 001-009; and Block 1017 Lots 027 & 028 at 3700 California Street (and including 3698 California Street, 401 & 460 Cherry Street, 3773, 3801 & 3905 Sacramento Street, hereinafter "Project Site").

On December 24, 2019, the Project Sponsor filed building permit application Nos. 2019.1224.0616-0646, 2019.1224.0649 and 2019.1224.0653 for the Project.

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 19, 2018.

On June 13, 2019, the Department published a Draft EIR ("DEIR") for public review (Case No. 2017-003559ENV). The DEIR was available for public comment until September 24, 2019. On September 19, 2019, the Planning Commission ("Commission") conducted a duly noticed public hearing at a regularly scheduled meeting to solicit comments regarding the DEIR. On February 12, 2020, the Department published a Comments and Responses document, responding to comments made regarding the DEIR prepared for the Project.

On February 27, 2020, the Commission reviewed and considered the Final EIR ("FEIR") and found that the contents of said report and the procedures through which the FEIR was prepared and publicized in compliance with the California Environmental Quality Act (California Public Resources Code Section 21000 et seq.) ("CEQA"), 14 California Code of Regulations Sections 15000 et seq ("the CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

The Commission found that the FEIR was adequate, accurate, and objective, reflected the independent analysis and judgment of the Department and the Commission, and that the summary of comments and responses contained no significant revisions to the DEIR, and certified the FEIR by Motion No. XXXXX for the Project in compliance with CEQA, the CEQA Guidelines, and Chapter 31.

Department staff prepared a Mitigation Monitoring and Reporting program (“MMRP”), which material was made available to the public and this Commission for this Commission’s review, consideration and action. These improvement and mitigation measures are set forth in their entirety in the MMRP attached to the draft Motion as Exhibit C.

On February 27, 2020, the Commission adopted Motion No. XXXXX adopting CEQA findings, and adopting the MMRP, which findings and adoption of the MMRP are hereby incorporated by reference as though fully set forth herein.

On February 27, 2020, the San Francisco Planning Commission (hereinafter “Commission”) conducted a duly noticed public hearing at a regularly scheduled meeting on Conditional Use Authorization Application No. 2017-003559CUA.

The Planning Department Commission Secretary is the custodian of records; the File for Record No. 2017-003559CUA is located at 1650 Mission Street, Suite 400, San Francisco, California.

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 Authorization as requested in Application No. 2017-003559CUA, 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 includes the demolition of five of the six existing hospital buildings on the project site, including a five-story accessory parking garage; demolition of a two-level, below-grade parking structure; renovation and adaptive re-use of a portion of the Marshal Hale hospital building at 3698 California Street to residential use; retention and renovation of the existing nine-unit residential building at 401 Cherry Street; and construction of 31 new residential buildings, including some accessory amenity spaces comprised of landscaped common areas and a resident fitness facility. With project development, the residential buildings on the project site would contain 273 residential units comprised of 14 single-family homes and 19 multi-family residential buildings with 69 studios and one-bedroom units, 88 two-bedroom units, 96 three-bedroom units, and 20 four-bedroom units. The proposed project would be constructed on three blocks, with residential buildings ranging from three to seven stories (36 to 80 feet). With the exception of 12 of the 14 proposed single-family homes that would be on separate lots, all

residential buildings would be situated above below-grade parking podiums on each block. A total of 416 parking spaces would be provided, consisting of 392 subterranean spaces in podiums and 24 private spaces located within the 12 single family residences on separate lots. The project would provide 400 weather-protected Class 1 bicycle parking spaces and 39 publicly accessible Class 2 bicycle parking spaces on each of the four street frontages. The proposed project would include shared onsite amenity space, comprised of a resident fitness facility, and approximately 86,200 square feet of private and common open space areas for residents, which may include common roof deck areas for some of the buildings. The 14 existing parcels that make up the project site would be merged and subdivided into 16 parcels.

3. **Site Description and Present Use.** The Project is located on the former California Pacific Medical Center (CPMC) campus at 3700 California Street in the Presidio Heights neighborhood of San Francisco. The approximately 214,000-square-foot, 4.9-acre irregularly shaped project site encompasses 14 parcels on one full city block (Block 1016, Lots 001–009) and portions of two other blocks (Block 1015, Lots 001, 052, and 053, and Block 1017, Lots 027 and 028). The project site is bounded by Sacramento Street to the north, residential uses to the east, California Street to the south, and medical office and residential uses to the west. Cherry Street runs north/south through Blocks 1015 and 1016, while Maple Street runs north/south through Blocks 1016 and 1017. The project site is located on a south-facing hillside which has a ground surface that slopes relatively steeply down to the south and gradually down to the west. As measured at the sidewalk, the grade decreases by approximately 44 feet from the northeast corner of the project site to the southwest corner. From west to east, the three blocks that make up the project site are referred to herein as Block A, Block B, and Block C, respectively. The project site is located primarily within the RM-2 (Residential, Mixed – Moderate Density) Zoning District, with portions also in the RH-2 (Residential, House – Two-Family) Zoning District. In addition, the majority of the project site is located in the 80-E Height and Bulk District, with the exception of two lots that cover approximately 8 percent of the project site and are in the 40-X Height and Bulk District. The project site is currently occupied by approximately 734,000 square feet of improvements within seven buildings, including approximately 622,000 square feet of hospital/medical office facilities associated with CPMC; a nine-unit, approximately 7,000-square-foot residential building at 401 Cherry Street, proposed to be retained; and approximately 105,000 square feet of enclosed parking area within two parking garages. These buildings range from three to eight stories (25 to 112 feet), with the most prominent building being the six-story hospital at 3700 California Street. The project site includes a total of 333 enclosed parking spaces and 106 surface parking spaces.
4. **Surrounding Properties and Neighborhood.** The Project Site is located within the RH-2 (Residential, House – Two-Family) and RM-2 (Residential, Mixed – Moderate Density) Zoning Districts and is surrounded primarily by residential uses within the same Zoning Districts as well as the RH-1(D) (Residential, House – One-Family Detached), RH-3 (Residential, House – Three-Family) and RM-1 (Residential, Mixed – Low Density) Zoning Districts. While the majority of the Project site is within the 80-E Height and Bulk District, the surrounding neighborhoods are all within the 40-X Height and Bulk District. The immediate context is characterized primarily by



three-to-four-story multi-family residential buildings. The project site is well served by public transit, being located on the 1-California, 1AX-California A Express, 1BX-California B Express, 2-Clement and 33-Ashbury/18<sup>th</sup> MUNI bus lines.

5. **Public Outreach and Comments.** The Department received public comment during the environmental review process, some comments concerned the merits of the project and were therefore outside of the scope of EIR. Comments outside the scope of the EIR included concerns about the amount of parking, building heights, views, and overall increased traffic. Since the notice period for this hearing, the Department has received two letters directly in support of the Project; one from the Pacific Heights Neighborhood Association and one from the Presidio Heights Association of Neighbors. The Department has received one letter in opposition to the project, objecting primarily to the proposed building heights on Block C. The Project sponsor has submitted a detailed outreach report (attached), outlining the numbers and details of outreach conducted with local residents and neighborhood associations, over the past several years. In addition, the sponsor has submitted letters of support from neighborhood residents, merchants groups and neighborhood groups in support of a project that provides a significant amount of new housing on this underutilized site.
6. **Planning Code Compliance.** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code in the following manner:
  - A. **Minimum Lot Width and Area.** Planning Code Section 121 states that in Zoning Districts other than RH-1(D), the minimum lot width shall be 25 feet and the minimum lot area shall be 2,500 square feet; except that the minimum lot area for any lot having its street frontage entirely within 125 feet of the intersection of two streets that intersect at an angle of not more than 135 degrees shall be 1,750 square feet.

*Block A: The Project will create five separate lots for the proposed single-family dwellings (Lots A1-A4 and A6), and one larger lot (Lot A7) for one multi-unit building, in addition to existing Lot A5 occupied by the existing nine-unit residential building at 401 Cherry Street, all of which will comply with the lot width and area requirements.*

*Block B: The Project will create four separate lots for the proposed single-family dwellings (Lots B3-B6), and one larger lot to be occupied by 14 multi-unit buildings (Buildings B1-B2, B7-B18), all of which will comply with the lot width and area requirements.*

*Block C: The Project will create three separate lots for the proposed single-family dwellings (Lots C1-C3), and one larger lot to be occupied by five multi-unit buildings (Buildings C4-C8), all of which will comply with the lot width and area requirements.*
  - B. **Front Setback.** Planning Code Section 132 states that the minimum front setback depth shall be based on the average of adjacent properties or a Legislated Setback. If only one of the

adjacent buildings has a front setback, or if there is only one adjacent building, then the required setback for the subject property shall be equal to one-half the front setback of such adjacent building. On a corner lot, a front setback area shall be required only along the street elected by the owner as the front of the property. Along such street, the required setback for the subject lot shall be equal to one-half the front setback of the adjacent building.

*Most existing buildings on the project site, aside from the existing nine-unit residential building at 401 Cherry Street and the building at 3698 California Street are proposed to be demolished, and as such, there will be a limited number of adjacent buildings for the purposes of determining required front setbacks.*

*Block A: Building A1 is adjacent to a non-project residential building with no front setback and Buildings A2-A3 are not adjacent to any existing buildings and therefore require no front setbacks. Building A5 (401 Cherry Street) has no front setback and will be retained, and since it is built up to property lines, no front setback is required for the proposed adjacent Buildings A4 and A6. Building A7 is a corner lot and the Project sponsor has elected to designate Cherry Street for the purposes of determining the front setback area. The adjacent building to the north on Cherry Street has no front setback; therefore, no front setback is required for the proposed Building A7. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block A, in excess of the minimum required by the Planning Code.*

*Block B will be entirely new construction, and therefore none of the proposed buildings will require a front setback. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block B, in excess of the minimum required by the Planning Code.*

*Block C: Building C1 is adjacent to a non-project residential building with an irregular setback of up to 5'-6", which is matched by Building C1 with a required setback of 2'-9" using an alternate method of averaging, resulting in a front setback ranging from 9'-2" to 25'-3". Buildings C2 and C3 are not adjacent to any existing buildings and therefore require no front setbacks. The existing Marshal Hale building (Building C6), to be retained, as well as Buildings C4, C5, C7 and C8 are on the same lot with frontage on three streets. The Project sponsor has elected to designate California Street for the purposes of determining the front setback area. The adjacent non-project residential building to the east has no front setback; therefore, Buildings C4-C8 require no front setback. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block C, in excess of the minimum required by the Planning Code.*

- C. **Landscaping and Permeability.** Planning Code Sections 132(g) and 132(h) requires that a minimum of 20% of the required setback area shall be and remain unpaved and devoted to

plant material, including the use of climate appropriate plant material, and that at least 50% of the required front setback area be permeable so as to increase stormwater infiltration.

*Block A: None of the buildings on Block A have a required front setback area; therefore, the landscaping and permeability requirements of Planning Code Sections 132(g) and 132(h) do not apply. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block A, in excess of the minimum required by the Planning Code.*

*Block B: None of the buildings on Block B have a required front setback area; therefore, the landscaping and permeability requirements of Planning Code Sections 132(g) and 132(h) do not apply. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block B, in excess of the minimum required by the Planning Code.*

*Block C: Buildings C2-C8 do not have a required front setback area; therefore, the landscaping and permeability requirements of Planning Code Sections 132(g) and 132(h) do not apply. Building C1 is providing a front setback area of approximately 517 square feet and has a required front setback area of approximately 82 square feet; therefore, approximately 16 square feet will be required to be unpaved and devoted to plant material, and approximately 41 square feet will be required to be permeable. In order to provide opportunities for enhanced landscaping and improvements to the pedestrian realm, the Project sponsor has elected to provide increased front setbacks for some of the buildings on Block C, in excess of the minimum required by the Planning Code.*

- D. Rear Yard.** Section 134 requires the project to provide a rear yard of at least 45 percent of the lot depth at grade level and at each succeeding level or story of the building in both the RH-2 and RM-2 Zoning Districts. Where applicable, Planning Code Section 134(c) allows for the reduction in the rear yard requirement to the average between the depths of the rear building walls of the two adjacent buildings to a depth equal to 25 percent of the total depth of the lot on which the building is situated, or to less than 15 feet, whichever is greater. On a corner lot, the required rear yard shall be reduced to a line on the subject lot which is at the depth of the rear building wall of the one adjacent building.

*Block A: The Project proposes to retain the existing building at the corner of Sacramento and Cherry Streets (Building A5), which is non-compliant, as it has no rear yard. As such, the adjacent building (Building A4) requires a rear yard of only 31'-3" and complies by providing a rear yard of approximately 38 feet. The five remaining buildings on Block A (Buildings A1, A2, A3, A6 and A7) require modifications to the rear yard requirements of the Planning Code. Buildings A1, A2 and A3 each require a rear yard of 45 feet, but propose rear yards of approximately 40 feet. Building A6 requires a rear yard of 59'-10", but proposes a rear yard of approximately 54 feet. Building A7 is located on a corner lot, and therefore it requires a rear yard matching the rear yard of the adjacent building, or 25% of the lot depth, whichever is greater. In this instance, the greater rear yard would be equal to 25% of the lot depth,*

*which would encompass an area of approximately 4,450 square feet. The Project proposes a rear yard of approximately 3,168 square feet for Building A7, representing approximately 18% of the lot area.*

*Block B: The four single-family dwellings (Buildings B3, B4, B5 and B6) each require a rear yard of 45 feet, but propose rear yards of approximately 40 feet and therefore require exceptions to the rear yard requirements of the Planning Code. While the larger, 99,390 square-foot lot occupied by the 12 proposed multi-unit buildings (Buildings B7-B18) and the two single-family dwellings (Buildings B1 and B2) is a corner lot, it is unique in that it has no abutting buildings and therefore is not eligible for a rear yard reduction pursuant to Planning Code Section 134(e). As such, this lot requires a rear yard equal to 45% of the lot depth, which would encompass an area of approximately 44,725 square feet. The Project proposes an irregularly shaped rear yard of approximately 20,872 square feet for Buildings B1-B2 and B7-B18, representing approximately 21% of the lot area. The Project proposes additional landscaped areas along the outer edges of Block B, which, when added to the proposed rear yard area, results in approximately 32% of the total block remaining open and unoccupied by any buildings.*

*Block C: One single-family dwelling (Building C1) requires a rear yard of 39'-3", based on the adjacent conditions, and complies by providing a rear yard of approximately 44'-6", while the other two single-family dwellings require exceptions to the rear yard requirements of the Planning Code. The single-family dwellings (Buildings C2 and C3) require rear yards of 50'-11" and 46'-2", respectively, and the Project proposes rear yards of approximately 45'-2" and 33'-11", respectively. The larger corner lot occupied by five proposed multi-unit buildings (Buildings C4-C8) abuts a building with a rear yard greater than 45 of its lot depth; therefore it is not eligible for a rear yard reduction pursuant to Planning Code Section 134(e). As such, this lot requires a rear yard equal to 45% of the lot depth, which would encompass an area of approximately 26,591 square feet in this instance. The Project will provide an irregularly shaped rear yard of approximately 15,954 square feet for Buildings C4-C8, representing approximately 27% of the lot area. The Project proposes additional landscaped areas along the outer edges of Block C, which, when added to the proposed rear yard area, results in approximately 39% of the total block remaining open and unoccupied by any buildings.*

*The rear yard requirements will be modified for the aforementioned non-complying buildings through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

- E. **Usable Open Space.** Planning Code Section 135 requires 125 square feet of usable open space for each dwelling unit if all private, or 166 square feet of common usable open space per unit in the RH-2 Zoning District. In the RM-2 Zoning District, Planning Code Section 135 requires 80 square feet of usable open space for each dwelling unit if all private, or 106 square feet of common usable open space per unit. Any space credited as private usable open space shall have a minimum horizontal dimension of six feet and a minimum area of 36 square feet if located on a deck, balcony, porch or roof. 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. The area of an inner court 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 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.

*The Project site, as a whole, will provide a combination of private and common usable open space in amounts that exceed those required by the Planning Code, however some individual buildings on their own may be deficient. Ninety-one of the proposed units will have access to approximately 47,508 square feet of private usable open space, for an average of approximately 522 square feet per unit. The remaining 173 proposed new dwelling units will have access to approximately 40,442 square feet of common usable open space, for an average of approximately 234 square feet per unit.*

*Block A: The Project proposes to retain the existing building at the corner of Sacramento and Cherry Streets (Building A5), which is non-compliant, as it has no private or common usable open space. The single-family dwellings (Buildings A1-A4 and A6) will each provide private usable open space ranging from approximately 959 square feet to approximately 2,749 square feet per unit. Four of the units within the proposed multi-unit building (Building A7) have access to private usable open space via terraces on the roof and a portion of the interior courtyard totaling approximately 4,396 square feet, or approximately 1,100 square feet per unit. The remaining 25 units in Building A7 will have access to common usable open space via a roof deck and the interior courtyard totaling approximately 3,851 square feet, or approximately 154 square feet per unit.*

*Block B: The single-family rowhouses (Buildings B1 and B2) will have access to approximately 1,326 square feet and 785 square feet of private usable open space per unit, respectively. The single-family dwellings (Buildings B3-B6) will each provide approximately 1,125 square feet of private usable open space per unit. Three units within the proposed multi-unit building (Building B7) have access to private usable open space via terraces on portions of the roof totaling approximately 1,814 square feet, or approximately 605 square feet per unit. The remaining 22 units in Building B7 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 3,077 square feet, or approximately 140 square feet per unit. Six units within the proposed multi-unit building (Building B8) have access to private usable open space via terraces on portions of the roof totaling approximately 2,542 square feet, or approximately 424 square feet per unit. The remaining 10 units in Building B8 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 1,399 square feet, or approximately 140 square feet per unit. Three units within the proposed multi-unit building (Building B9) have access to private usable open space via terraces on portions of the roof totaling approximately 3,075 square feet, or approximately 1,025 square feet per unit. The remaining 12 units in Building B9 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 1,679 square feet, or approximately 140 square feet per unit. Three units within the proposed multi-unit building (Building B10) have access to private usable open space via terraces on portions of the roof totaling approximately 1,000 square feet, or approximately 333 square feet per unit. The remaining 14 units in*

*Building B10 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 1,958 square feet, or approximately 140 square feet per unit. Two units within the proposed multi-unit building (Building B11) have access to private usable open space via terraces on portions of the roof totaling approximately 258 square feet, or approximately 129 square feet per unit. The remaining 8 units in Building B11 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 1,119 square feet, or approximately 140 square feet per unit. Seven units within the proposed multi-unit building (Building B12) have access to private usable open space via terraces on portions of the roof totaling approximately 2,608 square feet, or approximately 373 square feet per unit. The remaining 27 units in Building B12 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 3,778 square feet, or approximately 140 square feet per unit. The four-unit building (Building B13) provides private usable open space via terraces on portions of the roof and a portion of the interior courtyard totaling approximately 923 square feet, or approximately 231 square feet per unit. Four of the four-unit buildings (Buildings B14-B17) each provide private usable open space via terraces on portions of their roofs and portions of the interior courtyard totaling approximately 1,013 square feet per building, or approximately 253 square feet per unit. The four-unit building (Building B18) provides private usable open space via terraces on portions of the roof and a portion of the interior courtyard totaling approximately 867 square feet, or approximately 217 square feet per unit.*

*Block C: The single-family dwellings (Buildings C1-C3) will each provide private usable open space ranging from approximately 1,048 square feet to approximately 1,544 square feet per unit. Six units within the proposed multi-unit building (Building C4) have access to private usable open space via terraces on portions of the roof and portions of the interior courtyard totaling approximately 2,612 square feet, or approximately 435 square feet per unit. The remaining 16 units in Building C4 will have access to common usable open space via a portion of the interior courtyard totaling approximately 4,655 square feet, or approximately 291 square feet per unit. Thirteen units within the proposed multi-unit building (Building C5) have access to private usable open space via terraces on portions of the roof and portions of the interior courtyard totaling approximately 5,076 square feet, or approximately 390 square feet per unit. The remaining 15 units in Building C5 will have access to common usable open space via a roof deck and a portion of the interior courtyard totaling approximately 5,099 square feet, or approximately 340 square feet per unit. Five units within the proposed multi-unit building (Building C6) have access to private usable open space via terraces within portions of the front setback areas along California and Maple Streets totaling approximately 866 square feet, or approximately 173 square feet per unit. The remaining 18 units in Building C6 will have access to common usable open space via portions of the interior courtyard and portions of the front setback areas along California and Maple Streets totaling approximately 8,217 square feet, or approximately 457 square feet per unit. The four units in Building C7 will have access to common usable open space via a portion of the interior courtyard totaling approximately 2,090 square feet, or approximately 523 square feet per unit. One unit within the proposed multi-unit building (Building C8) will have access to private usable open space via a terrace on a portion of the interior courtyard totaling approximately 149 square feet. The remaining two units in Building C8 will have access to common usable open space via a portion of the interior courtyard totaling approximately 582 square feet, or approximately 291 square feet per unit.*

- F. **Streetscape and Pedestrian Improvements.** Planning Code Section 138.1 requires projects meeting certain criteria to provide streetscape and pedestrian elements in conformance with the Better Streets Plan.

*The project is on a lot that is greater than one-half acre in total area, includes more than 50,000 gross square feet of new construction, contains 150 feet of total lot frontage on one or more publicly-accessible rights-of-way; has a frontage encompasses the entire block face between the nearest two intersections with any other publicly-accessible right-of-way and includes new construction of 10 or more dwelling units. As such, the project is required to provide streetscape and pedestrian improvements in conformance with the Better Streets Plan.*

*At the request of the Street Design Advisory Team (SDAT), which is composed of representatives from the San Francisco Planning Department, the Department of Public Works (DPW), and the San Francisco Municipal Transportation Agency (SFMTA), the project sponsor has agreed to implement several streetscape improvements including the conversion of the existing perpendicular on-street parking on the west side of Maple Street to parallel parking spaces, as well as the widening of the existing sidewalks to 15 feet. Other streetscape improvements include the creation of sidewalk bulbouts at the northwest corner of California and Cherry Streets, at the southeast corner of Sacramento and Cherry Streets, at the northwest corner of California and Maple Streets, and at the southeast corner of Sacramento and Maple Streets. The existing colored curbs, which are based on hospital and medical office uses formerly occupying the Project site, will be reconfigured in accordance with the Better Streets Plan.*

*Generally, one street tree is required for every 20 feet of street frontage. The Public Works Director may waive or modify these requirements of when inadequate sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-existing surface, sub-surface, or above-grade features render installation of the required trees in the required fashion impossible, impractical, and/or unsafe. Payment of an in-lieu fee is required for each tree not provided. With approximately 2,672 linear feet of street frontage, 134 street trees are required. The project will provide 108 street trees (32 existing street trees plus an additional 76 new street trees), and thus will seek a DPW waiver for 26 trees. Of the 173 total number of trees on the site, 47 are proposed to be retained, while the remaining 126 are proposed to be removed and will be replaced by an additional 224 new trees. The Project proposes to eliminate seven of the 14 existing curb cuts, with the remainder being reused. An additional nine new curb cuts are also proposed. Certain Project streetscape improvements include enhanced paving and landscaping where a 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.*

- G. **Dwelling Unit Exposure.** Planning Code Section 140 requires that at least one room of all dwelling units face onto a public street or public alley at least 30 feet in width, a side yard at



least 25 feet in width, a rear yard meeting the requirements of the Code or other open area that meets minimum requirements for area and horizontal dimensions.

*Block A: The five proposed single-family dwellings (Buildings A1-A4 and A6) will each obtain adequate dwelling unit exposure by directly facing either Sacramento or Cherry Streets. Each of the nine units within the existing building at the corner of Sacramento and Cherry Streets (Building A5), have adequate dwelling unit exposure onto either Sacramento or Cherry Streets. Twenty-five of the proposed units in the multi-unit building (Building A7) will obtain adequate dwelling unit exposure by directly facing California Street while the remaining four units will obtain adequate dwelling unit exposure by directly facing the proposed Code-complying inner court.*

*Block B: The six proposed single-family rowhouses and dwellings (Buildings B1--B6) will each obtain adequate dwelling unit exposure by directly facing either Sacramento or Cherry Streets. Twenty-three of the 25 units in the multi-unit building (Building B7) will obtain adequate dwelling unit exposure by directly facing either California or Cherry Streets or by directly facing the proposed Code-complying inner court. The remaining two units will face onto portions of the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure. Twelve of the 16 units in the multi-unit building (Building B8) will obtain adequate dwelling unit exposure by directly facing California Street or by directly facing the proposed Code-complying inner court. The remaining four units will face onto portions of the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure. Ten of the 15 units in the multi-unit building (Building B9) will obtain adequate dwelling unit exposure by directly facing California Street. The remaining five units will face onto portions of the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure. All 17 units in the multi-unit building (Building B10) will obtain adequate dwelling unit exposure by directly facing either California or Maple Streets. All 10 units in the multi-unit building (Building B11) will obtain adequate dwelling unit exposure by directly facing Maple Street. Thirty-one of the 34 units in the multi-unit building (Building B12) will obtain adequate dwelling unit exposure by directly facing either Sacramento or Cherry Streets or by directly facing the proposed Code-complying inner court. The remaining three units will face onto portions of the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure. Three of the 4 units in the multi-unit building (Building B13) will obtain adequate dwelling unit exposure by directly facing Sacramento Street or by directly facing the proposed Code-complying inner court. The remaining unit will face onto portions of the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure. All four units in each of the multi-unit buildings (Buildings B14-B17) will obtain adequate dwelling unit exposure by directly facing the proposed Code-complying inner court. Three of the 4 units in the multi-unit building (Building B18) will obtain adequate dwelling unit exposure by directly facing Sacramento Street or by directly facing the proposed Code-complying inner court. The remaining unit will face onto portions of*

*the inner court that do not meet the minimum horizontal requirements pursuant to Planning Code Section 140 and therefore will not have adequate dwelling unit exposure.*

*Block C: The three proposed single-family dwellings (Buildings C1—C3) will each obtain adequate dwelling unit exposure by directly facing Sacramento Street. All 80 units in the multi-unit buildings (Buildings C4-C8) will obtain adequate dwelling unit exposure by directly facing either Sacramento, Maple or California Streets or by directly facing the proposed Code-complying inner court.*

*In total, 248 of the 264 proposed new dwelling units will have Code-complying dwelling unit exposure while the dwelling unit exposure requirements will be modified for the remaining 16 dwelling units through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

- H. Street Frontage in Residential Districts.** Section 144 of the Planning Code requires that no more than one-third of the width of the ground story of a dwelling along the front lot line, or along a street side lot line, or along a building wall that is setback from any such lot line, shall be devoted to entrances to off-street parking, except that in no event shall a lot be limited by this requirement to a single such entrance of less than ten feet in width. In addition, no entrance to off-street parking on any lot shall be wider than 20 feet, and where two or more separate entrances are provided there shall be a minimum separation between such entrances of six feet.

*Block A: The five proposed single-family dwellings (Buildings A1-A4 and A6) will each have a garage door of approximately 10 feet in width. The existing multi-unit building at the corner of Sacramento and Cherry Streets does not have any off-street parking. The proposed multi-unit building (Building A7) proposes a pair of garage doors on both the California and Cherry Street frontages, with each garage door measuring approximately 10 feet in width; however, neither pair maintains a minimum separation of six feet between the garage doors. As such, the street frontage requirements will be modified for Building A7 through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

*Block B: The four proposed single-family dwellings (Buildings B3-B6) will each have a garage door of approximately 10 feet in width. The remaining multi-unit buildings (Buildings B1, B2 and B7-B18) share a below-grade off-street parking garage accessed by one garage door measuring approximately 15 feet wide on Cherry Street and one garage door measuring approximately 15 feet wide on Maple Street.*

*Block C: The three proposed single-family dwellings (Buildings C1-C3) will each have a garage door of approximately 10 feet in width. The remaining multi-unit buildings (Buildings C4-C8) share a below-grade off-street parking garage accessed by one garage door measuring approximately 15 feet wide on California Street and one garage door measuring approximately 15 feet wide on Maple Street.*

- I. Moderation of Building Fronts in RM-2 Districts.** Planning Code Section 144.1 requires that new dwellings within the RM-2 Zoning District are 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. In the case of every dwelling in such districts on a lot with a width of more than 35 feet, there shall be a stepping of the building along the front lot line, or along the front of the building where it is set back from such lot line, either by the variation of the upper limit of the front elevation of the building, at intervals of not more than 35 feet, by a minimum of two feet in height, or by the variation of the depth of the front building wall from the front lot line, at intervals of not more than 35 feet, by a minimum of two feet in depth.

*Block A: The five proposed single-family dwellings and the existing multi-unit building at the corner of Sacramento and Cherry Street (Buildings A1-A6) are located within the RH-2 Zoning District; therefore Section 144.1 of the Planning Code does not apply to those buildings. The proposed multi-unit building (Building A7) proposes massing with significant variation, but not in technical compliance with the requirements of Planning Code Section 144.1 and therefore requires a modification through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

*Block B: The proposed single-family rowhouses and dwellings (Buildings B1-B6) are located within the RH-2 Zoning District; therefore Section 144.1 of the Planning Code does not apply to those buildings. The multi-unit buildings (Buildings B8-B13 and B18) all propose significant façade modulation compliant with the requirements of Planning Code Section 144.1. The proposed multi-unit building (Building B7) proposes massing with significant variation, but not in technical compliance with the requirements of Planning Code Section 144.1 and therefore requires a modification through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

*Block C: The three proposed single-family dwellings (Buildings C1-C3) will be on lots of less than 35 feet in width; therefore Section 144.1 of the Planning Code does not apply to those buildings. The project proposes to convert the existing building at the northeast corner of California and Maple Streets (Building C6), which is non-compliant, to residential uses. The multi-unit buildings (Buildings C5, C7 and C8) all propose significant façade modulation compliant with the requirements of Planning Code Section 144.1. The proposed multi-unit building (Building C4) proposes massing with significant variation, but not in technical compliance with the requirements of Planning Code Section 144.1 and therefore requires a modification through the Planned Unit Development process. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

- J. **Off-Street Parking.** Planning Code Section 151 has no minimum off-street parking requirements for residential uses and permits a maximum of 1.5 off-street parking spaces per dwelling unit.

*The twelve single-family buildings (Buildings A1-A4, A6, B3-B6, and C1-C3) will be provided with 1.5 spaces per unit (rounded up to two spaces per unit), for total of 24 spaces. The remaining 261 units in multi-family buildings will be provided 1.5 spaces per unit, or 392 parking spaces. Each block complies also independently for the multi-family units, i.e. Block A provides 57 spaces for 38 units, Block B provides 215 spaces (plus 5 optional car share spaces) for 143 units, and Block C provides 120 spaces for 80 units.*

- K. **Off-Street Freight Loading.** Section 152.1 of the Planning Code requires three off-street loading spaces plus one additional off-street loading space for each additional 400,000 square feet of occupied floor area in excess of 500,000 square feet of occupied floor area for residential uses. Off-street loading spaces must have minimum dimensions of 35 feet in length, 12 feet in width, and 14 feet of vertical clearance.

*The Project proposes approximately 627,591 square feet of residential uses; therefore, three off-street loading spaces are required. Three off-street loading spaces meeting the minimum dimensions will be provided in the central below-grade parking garage in Block B.*

- L. **General Standards of Off-Street Parking, Freight Loading, and Service Vehicle Facilities.** Planning Code Section 155 requires that off-street parking spaces are required to be located on the same lot as the use they serve and must have adequate means of ingress from and egress to a street. In addition, the Planning Code requires that for each 25 off-street parking spaces provided, one such space shall be designed and designated for persons with disabilities.

*The project will provide off-street parking for all of the proposed new residential buildings on the same lot as the buildings they serve. Each of the single-family dwellings will have private garages with two spaces each, while the remaining multi-unit buildings will have shared access to large below-grade garages. The Project will provide 16 off-street parking spaces designed and designated for persons with disabilities.*

- M. **Bicycle Parking.** Planning Code Section 155.2 requires at least one Class 1 bicycle parking space for each dwelling unit up to 100 units, plus one Class 1 space for every 4 dwelling units over 100. Additionally, the Planning Code requires one Class 2 bicycle space for every 20 dwelling units.

*The project is required to provide a minimum of 143 Class 1 bicycle parking spaces and 14 Class 2 bicycle spaces. In order to meet its obligations under the Transportation Demand Management (TDM) program (see Subsection M below), the project will provide 50 Class 1 bicycle parking spaces throughout the buildings on Block A, 290 Class 1 bicycle parking spaces throughout the buildings on Block B, 60 Class 1 bicycle parking spaces throughout the buildings on Block C, and 39 Class 2 bicycle parking spaces on each of the street frontages. The project therefore complies with these requirements.*

- N. **Car Sharing.** Planning Code Section 166 requires car share parking spaces in newly constructed buildings containing residential uses if off-street parking is provided. For projects

proposing 201 or more new dwelling units, two car sharing spaces are required plus one additional space for every 200 dwelling units over 200.

*The project proposes 264 new dwelling units and therefore two car sharing spaces are required. The project will provide six car sharing spaces within the below-grade garage on Block B and one car sharing space within the below-grade garage on Block C.*

- O. **Unbundled Parking.** Planning Code Section 167 requires all off-street parking spaces accessory to residential uses in new structures of 10 dwelling units or more, or in 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 purchase fees for dwelling units for the life of the dwelling units.*

- P. **Transportation Demand Management (TDM) Plan.** Pursuant to Planning Code Section 169 and the TDM Program Standards, the Project shall finalize a TDM Plan prior Planning Department approval of the first Building Permit or Site Permit. Development Projects that file a Development Application on or after September 5, 2016, and before January 1, 2018, shall be subject to 75% of the applicable TDM target.

*As currently proposed, the Project will achieve its required 23 points (75% of the 31 base points) through the following TDM measures:*

- Unbundled Parking
- Bicycle Parking (Option C)
- Bicycle Repair Station
- Bicycle Maintenance Services
- Car-share Membership and Parking (Option E)
- Delivery Supportive Amenities
- Family TDM Amenities (Options A and B)
- Family TDM Package
- Multimodal Wayfinding Signage
- Real Time Transportation Displays
- Contributions or Incentives for Sustainable Transportation (Option B)
- Tailored Transportation Marketing Services (Option D)

- Q. **Dwelling Unit Density.** Planning Code Sections 209.1 and 209.2 permit a maximum of two dwelling units per lot in the RH-2 Zoning District and three dwelling units per lot or up to one dwelling unit per 600 square feet of lot area in the RM-2 Zoning District.

*Block A: The five proposed single-family dwellings (Buildings A1-A4 and A6) are located within the RH-2 Zoning District; therefore, a maximum of two dwelling units are permitted on each lot. The existing multi-unit building at the corner of Sacramento and Cherry Street (Building A5) is also located within the RH-2 Zoning District; therefore, a maximum of two dwelling units are permitted. That building is non-conforming, as it exceeds the maximum permitted density by seven units. The proposed multi-unit building (Building A7) is located on a lot measuring approximately 17,602 square feet and is located within the RM-2 Zoning District; therefore, a maximum of 29 dwelling units are permitted. The Project proposes 29 dwelling units within Building A7 and is therefore compliant with this requirement.*

*Block B: The two proposed single-family rowhouses (Buildings B1 and B2) are located within the RH-2 Zoning District, but are proposed to remain on the larger parcel with Buildings B7-B18 so that their shared parking facilities meet the locational requirements of Planning Code Section 150. Those two single-family rowhouses (Buildings B1 and B2), will be developed with one dwelling unit each, and therefore will not exceed the applicable density for that portion of the site. The four proposed single-family dwellings (Buildings B3-B6) are located within the RH-2 Zoning District; therefore, a maximum of eight dwelling units are permitted. The remaining multi-unit buildings (Buildings B7-B18) are located on a lot measuring approximately 91,040 square feet and are located within the RM-2 Zoning District; therefore, a maximum of 152 dwelling units are permitted. The Project proposes 141 dwelling units within Buildings B7-B18 and is therefore compliant with this requirement.*

*Block C: The two proposed single-family dwellings (Buildings C1 and C2) are located within the RM-2 Zoning District on lots measuring approximately 3,392 square feet; therefore, a maximum of six dwelling units are permitted on each lot. The other proposed single-family dwelling (Building C3) is also located within the RM-2 Zoning District on a lot measuring approximately 3,077 square feet; therefore, a maximum of five dwelling units are permitted on that lot. The remaining multi-unit buildings (Buildings C4-C8) are located on a lot measuring approximately 59,088 square feet and are located within the RM-2 Zoning District; therefore, a maximum of 98 dwelling units are permitted. The Project proposes 80 dwelling units within Buildings C4-C8, and is therefore compliant with this requirement.*

- R. **Building Heights in RH and RM Districts.** Planning Code Section 253 states that any building or structure exceeding 40 feet in height in an RH District, or 50 feet in height in an RM District, or a building over 40 feet in height in an RM District with more than 50 feet of street frontage on the front façade shall require Conditional Use Authorization by the Planning Commission. In reviewing any such proposal, the Planning Commission shall consider the expressed purposes of the Planning Code, of the RH or RM Districts, and of the height and bulk districts, as well as the criteria stated in Planning Code Section 303(c) 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.

*Block A: Buildings A1-A6 are located within an RH District, but are 40 feet or less in height; therefore, Section 253 of the Planning Code does not apply to those buildings. Building A7 is located within an RM District and proposes a building height of 65 feet; therefore, Conditional Use Authorization is required. The additional required findings are listed below under Subsection 7.*

*Block B: Buildings B1-B6 are located within an RH District, but are 40 feet or less in height; therefore, Section 253 of the Planning Code does not apply to those buildings. Buildings B13-B18 are located within an RM District but are 40 feet or less in height; therefore, Section 253 of the Planning Code does not apply to those buildings. Building B7 is located within an RM District and proposes a building height of 80 feet; therefore, Conditional Use Authorization is required. Building B8 is located within an RM District and proposes a building height of 65 feet; therefore, Conditional Use Authorization is required. Building B9 is located within an RM District and proposes a building height of 62 feet; therefore, Conditional Use Authorization is required. Building B10 is located within an RM District and proposes a building height of 80 feet; therefore, Conditional Use Authorization is required. Building B11 is located within an RM District and proposes a building height of 58 feet; therefore, Conditional Use Authorization is required. Building B12 is located within an RM District and proposes a building height of 80 feet; therefore, Conditional Use Authorization is required. The additional required findings are listed below under Subsection 7.*

*Block C: Buildings C1-C3 and C6-C8 are located within an RM District, but are 50 feet or less in height; therefore, Section 253 of the Planning Code does not apply to those buildings. Building C4 is located within an RM District and proposes a building height of 57 feet; therefore, Conditional Use Authorization is required. Building C5 is located within an RM District and proposes a building height of 80 feet; therefore, Conditional Use Authorization is required. Conditional Use Authorization is required. The additional required findings are listed below under Subsection 7.*

- S. **Building Height.** Planning Code Section 260 requires that the height of buildings not exceed the limits specified in the Zoning Map and defines rules for the measurement of building height. Building height is measured from curb level at the center of each proposed building, with the upper measurement being the highest point of a flat roof, or the midpoint for sloped roofs. Buildings that have frontage on two or more streets are permitted to choose the street or streets from which measurements are taken. Planning Code Section 261(c)(1) further restricts the height of the front portion dwellings in RH-2 Districts to 30 feet at the front lot line or required front setback; then at such setback, shall increase at an angle of 45 degrees toward the rear of the lot until the height limit is reached. When a building is part of a Planned Unit Development pursuant to Planning Code Section 304(d)(6), exceptions from the provisions of building height are allowed, however those exceptions shall be confined to minor deviations from the measurement of height, and no such deviation shall depart from the purposes or intent of those provisions.



*Block A: Buildings A1-A6 are located within the RH-2 Zoning District and a 40-foot height limit on the Zoning Map. Of these, Buildings A3 and A4 are Code-compliant, as they are 40 feet or less in height as measured from the center line of the building at curb level from the Sacramento Street frontage and are within the additional height limits applicable to the front of the property. Building A5 is an existing building that conforms to the 40-foot height limit as measured from the center line of the building at curb level from the Sacramento Street frontage, but is nonconforming as it relates to the additional height limits applicable to the front of the property. Buildings A1, A2 and A6 are 40 feet or less in height and are within the additional height limits applicable to the front of the property, however their heights have been taken at the curb level from the highest elevation of the laterally-sloping lots, rather than the midpoint, which is not in technical compliance with the requirements of Planning Code Sections 260 and 261. As such, an exception for the minor deviation from the measurement of height is required through the Planned Unit Development process for Buildings A1, A2 and A6. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8. Building A7 is located within an 80-foot height limit on the Zoning Map, and is 65 feet in height, as measured from the center line of the building at curb level from the Cherry Street frontage. It is located within the RM-2 Zoning District; therefore, there are no additional height limits applicable to the front of the property.*

*Block B: Buildings B1-B6 are located within the RH-2 Zoning District and a 40-foot height limit on the Zoning Map. Of these, Buildings B1 and B2 are Code-compliant, as they are 40 feet or less in height and are within the additional height limits applicable to the front of the property. Buildings B3-B6 are 40 feet or less in height and are within the additional height limits applicable to the front of the property, however their heights have been taken at the curb level from the highest elevation of the laterally-sloping lots, rather than the midpoint, which is not in technical compliance with the requirements of Planning Code Sections 260 and 261. As such, an exception for the minor deviation from the measurement of height is required through the Planned Unit Development process for Buildings B3-B6. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8. Buildings B7-B18 are located within an 80-foot height limit on the Zoning Map and are located within the RM-2 Zoning District; therefore, there are no additional height limits applicable to the front of the property. Building B7 is Code-compliant, as it is 80 feet in height, as measured from the center line of the building at curb level from the Cherry Street frontage. Building B8 is Code-compliant, as it is 65 feet in height, as measured from the center line of the building at curb level from the California Street frontage. Building B9 is Code-compliant, as it is 62 feet in height, as measured from the center line of the building at curb level from the California Street frontage. Building B10 is Code-compliant, as it is 80 feet in height, as measured from the center line of the building at curb level from the Maple Street frontage. Building B11 is Code-compliant, as it is 58 feet in height, as measured from the center line of the building at curb level from the California Street frontage. Building B12 is Code-compliant, as it is 80 feet in height, as measured from the center line of the building at curb level from the Sacramento Street frontage. Buildings B13-B18 are Code-compliant, as they are 40 feet in height, as measured from the center line of the building at curb level from the Sacramento Street frontage.*

*Block C: All of the buildings on Block C are located within an 80-foot height limit on the Zoning Map and are located within the RM-2 Zoning District; therefore, there are no additional height limits applicable to the front of the property. Buildings C1 and C2 are Code-compliant, as they are 37 feet in height, as measured from the center line of the building at curb level from the Sacramento Street frontage. Building C3 is Code-compliant, as it is 40 feet in height, as measured from the center line of the building at curb level from the Sacramento Street frontage. Building C4 is Code-compliant, as it is 57 feet in height, as measured from the center line of the building at curb level from the Sacramento Street frontage. Building C5 is Code-compliant, as it is 80 feet in height, as measured from the center line of the building at curb level from the Maple Street frontage. Building C6 is Code-compliant, as it is 36 feet in height, as measured from the center line of the building at curb level from the California Street frontage. Building C7 is Code-compliant, as it is 47 feet in height, as measured from the center line of the building at curb level from the California Street frontage. Building B8 is Code-compliant, as it is 41 feet in height, as measured from the center line of the building at curb level from the California Street frontage.*

- T. **Bulk.** Planning Code Section 270 states that in the 'E' Bulk District, the maximum length of a building is 110 feet with a maximum diagonal dimension of 140 feet above 65 feet. There are no maximum building dimensions for buildings within the 'X' Bulk District.

*Block A: Buildings A1-A6 are located within the 'X' Bulk District; therefore, their horizontal dimensions are not restricted. Building A7 is located within the 'E' Bulk District, however it does not exceed 65 feet in height; therefore, its horizontal dimensions are not restricted.*

*Block B: Buildings B1-B6 are located within the 'X' Bulk District; therefore, their horizontal dimensions are not restricted. Buildings B8, B9, B11 and B13-B18 are located within the 'E' Bulk District, however they do not exceed 65 feet in height; therefore, their horizontal dimensions are not restricted. Building B7 proposes a building length of approximately 108'-4" and a diagonal dimension of approximately 131 feet for the portion above 65 feet; therefore, it complies with the bulk restrictions of Planning Code Section 270. Building B10 proposes a building length of approximately 94'-6" and a diagonal dimension of approximately 109'-4" for the portion above 65 feet; therefore, it complies with the bulk restrictions of Planning Code Section 270. Building B12 proposes a building length of approximately 105'-8" and a diagonal dimension of approximately 119'-10" for the portion above 65 feet; therefore, it complies with the bulk restrictions of Planning Code Section 270.*

*Block C: All of the buildings on Block C are located within the 'E' Bulk District, however Buildings C1-C4 and C6-C8 do not exceed 65 feet in height; therefore, their horizontal dimensions are not restricted. Building C5 proposes a building length of approximately 97'-6" and a diagonal dimension of approximately 118'-8" for the portion above 65 feet; therefore, it complies with the bulk restrictions of Planning Code Section 270.*

- U. **Shadow.** Planning Code Section 295 states that no building permit authorizing the construction of any structure that will cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission may be

issued except upon prior action of the Planning Commission pursuant to the provisions of this Section.

*The Planning Department prepared an initial shadow fan that indicated that the Project will not cast a shadow on any properties under the jurisdiction of the San Francisco Recreation and Park Department.*

- V. **Planned Unit Development.** Planning Code Section 304 states that for projects on lots in excess of half an acre, Planned Unit Developments may be 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. Planned Unit Developments shall be permitted only as Conditional Uses and in cases of outstanding overall design, complementary to the design and values of the surrounding area, such projects may merit modifications of certain Planning Code provisions.

*The project proposes the development of a 4.9-acre site and the project is therefore eligible to be reviewed as a Planned Unit Development via Conditional Use Authorization. The criteria and limitations pursuant to Planning Code Section 304 are listed below under Subsection 8.*

- W. **Transportation Sustainability Fee.** Planning Code Section 411A is applicable to any development project that results in the construction of more than twenty (20) new dwelling units.

*The Project proposes the construction of 264 new dwelling units and is therefore subject to the Transportation Sustainability Fee. These fees must be paid prior to the issuance of the first construction document.*

- X. **Inclusionary Affordable Housing Program.** Planning Code Section 415 sets forth the requirements and procedures for the Inclusionary Affordable Housing Program. Under Planning Code Section 415.3, the current percentage requirements apply to projects that consist of ten or more units. Pursuant to Planning Code Section 415.5, the Project must pay the Affordable Housing Fee ("Fee"). This Fee is made payable to the Department of Building Inspection ("DBI") for use by the Mayor's Office of Housing and Community Development for the purpose of increasing affordable housing citywide. The applicable percentage is dependent on the number of units in the project, the zoning of the property, if the project is a rental or ownership project, and the date that the project submitted a complete Project Application.

*The Project Sponsor has submitted an 'Affidavit of Compliance with the Inclusionary Affordable Housing Program: Planning Code Section 415,' to satisfy the requirements of the Inclusionary Affordable Housing Program through payment of the Fee, in an amount to be established by the Mayor's Office of Housing and Community Development. The applicable percentage is dependent on the total number of units in the project, the zoning of the property, whether the project is rental or ownership, and the date that the project submitted a complete Project Application. A complete Project Application*

*was submitted on December 13, 2017; therefore, pursuant to Planning Code Section 415.3 the Inclusionary Affordable Housing Program requirement for the Affordable Housing Fee is at a rate equivalent to an off-site requirement of 33%. This project is an ownership project.*

- Y. **First Source Hiring.** The Project is subject to the requirements of the First Source Hiring Program as they apply to permits for residential development (Section 83.4(m) of the Administrative Code), 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 Project Sponsor submitted a First Source Hiring Affidavit and prior to issuance of a building permit will execute a First Source Hiring Memorandum of Understanding and a First Source Hiring Agreement with the City's First Source Hiring Administration.*

- Z. **Child Care Fee.** Planning Code Section 414A requires payment of a child care impact fee for a project that results in one net new dwelling unit.

*The Project proposes 264 new dwelling units and will be required to pay a fee for each net new gross square foot of residential development, which will be paid before the issuance of the first construction document.*

7. **Conditional Use Findings.** Planning Code Section 303 establishes criteria for the Planning Commission to consider when reviewing applications for Conditional Use authorization. On balance, the project complies 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 desirable because it would redevelop an approximately 4.9-acre site that has historically been used for hospital and medical office uses, which are no longer needed. The proposed additional 264 dwelling units are more compatible with the surrounding residential context in terms of density, use, building scale and design.*

- 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 surrounding neighborhood is an established residential neighborhood that has few infill development opportunities. The Project proposes single-family and multi-family residential uses, which is consistent with the RH-2 and RM-2 zoning and is compatible with the surrounding neighborhood character. The height and placement, and the overall massing and density, of the proposed buildings relative to the site topography is consistent with the applicable zoning controls. The Project will result in a high-quality development, including private and shared usable open spaces areas, significant landscaping, and streetscape and pedestrian improvements.*

- 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 provides a total of 392 off-street parking spaces for the residential uses, with two spaces per unit for the 12 single-family units located on separate fee lots, and 1.5 spaces per unit for the multi-family units. With the exception of the single-family homes, all of the multi-family parking spaces will be provided within three centrally located below-grade garages located within each block. The multi-family housing garages will be provided with two exit and/or entrance points, minimizing the need for excessive curb cuts and driveways so that the garages will be accessed only via five entrance points and six exit points. The Project is required to provide three loading spaces for the residential uses, which are proposed in the below-grade garage in Block B. The Project is also seeking few strategically located yellow loading spaces along the street, and thus overall, the loading demand for the Project is anticipated to be satisfied by loading proposed by the Project, without having any impact on the neighborhood.*

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

*The Project proposes only residential uses, which are not expected to generate any noxious or offensive emissions, noise, glare, dust 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, as well as the conclusions reached in the Project's FEIR on file with the Planning Department, no noxious emissions such as noise, glare, dust or 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;

*With the exception of two existing buildings (the nine-unit residential building at 401 Cherry Street and the older part of the Marshal Hale building at 3698 California Street) that are proposed to be*

*retained, the Project consists primarily of new construction, with the opportunity to create open spaces, landscaping and other areas. The Project will include private and common open spaces areas significantly in excess of the Planning Code requirements. Landscaping will be created within interior courtyards, rear yards as well as front yard setbacks. The Project will also propose widening of the Maple Street sidewalks, and appropriate sidewalk and street improvements through-out the perimeter of the site thereby resulting in a high-quality residential development within an attractive, safe and comfortable pedestrian environment.*

- 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 complies with all relevant requirements and standards of the Planning Code and is consistent with the Community Visioning Plan provisions set forth in the Development Agreement (Board File No. 120366). The Project will be, on balance, consistent with the General Plan, as detailed below in Subsection 9.*

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

*The Project is consistent with the stated purposes of the RH-2 and RM-2 Zoning Districts in that the residential uses will be within the permitted residential density and will be compatible with the surrounding neighborhood. The Project proposes a mixture of dwelling types that broaden the range of unit sizes in a variety of structures with usable open space at ground level and on upper levels for private and shared use by all residents.*

8. **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 subject property is located within the RH-2 and RM-2 Zoning Districts, both of which require a rear yard equal to 45 percent of the total depth of the lot on which the building is situated, starting at grade level and at each succeeding story of the building. or the average of adjacent neighbors' setbacks. If averaged, the rear yard must no less than 25% of lot depth*

*or 15 feet, whichever is greater. On a corner lot, the required rear yard shall be reduced to a line on the subject lot which is at the depth of the rear building wall of the one adjacent building.*

*Overall, the single-family dwellings (Buildings A4 and C1) will provide Code-complying rear yards. The Project will retain the existing nonconforming 9-unit residential building at 401 Cherry Street (Building A5). The proposed single-family dwellings (Buildings A1-A3, A6, B3-B6 and C2-C3), and the multi-unit buildings (Buildings A7, B1, B2, B7-B18 and C4-C8) require an exception from the requirements of Planning Code Section 134.*

*The Project site is unusually large and is topographically more complex than the standard 25-foot by 100-foot residential lot in San Francisco. After the proposed merger and subdivision of the lots, the reconfigured site will contain several large parcels occupied by multi-family buildings and will have several parcels with street frontage on two or more streets. Strict compliance with the rear yard requirements would be impractical and would not result in an optimal design for the placement and configuration for the Project buildings. The Project proposes a design that is of a compatible character to the surrounding neighborhood, and provides a significant amount of private and common usable open space significantly more than the minimum usable open space requirements. The Project site, as a whole, will provide a combination of private and common usable open space in amounts that exceed those required by the Planning Code, however some individual buildings on their own may be deficient. Ninety-one of the proposed units will have access to approximately 47,508 square feet of private usable open space, for an average of approximately 522 square feet per unit. The remaining 173 proposed new dwelling units will have access to approximately 40,442 square feet of common usable open space, for an average of approximately 234 square feet per unit. The overall lot coverage for the entire project is approximately 64%, which is roughly consistent with the 45% rear yard requirement in ensuring that significant portions of the site will be preserved in an unimproved condition.*

*The rear yard requirements in the Planning Code are, in general, intended to assure the protection and continuation of established mid-block landscaped open space and the maintenance of a scale of development appropriate to each district, consistent with the location of adjacent buildings. Requiring the Project to strictly conform to the rear yard requirements would not further these goals, since the Project already creates and/or continues mid-block open space areas, but does so by taking into consideration the site's topography and size, among other factors, as a whole. A strict adherence to the rear yard requirement stated in the Planning Code would result in a compromising design and would not produce the type of superior site layout and open space features proposed by the Project. Overall, the Project will result in a high-quality residential development with a carefully created design and character that warrants well-reasoned modifications to the Planning Code. Granting the requested modification to the rear yard requirement will assure a construction of a Planned Unit Development with a modified rear yard area that is enjoyable, usable and desirable to the Project occupants.*

- ii. **Dwelling Unit Exposure (Section 140):** *The Planning Code requires that at least one room in a residential dwelling unit face directly onto a public street, Code-complying rear yard, or an inner*



court that is unobstructed and meets certain horizontal dimensions. In total, 248 of the 264 proposed new dwelling units will have Code-complying dwelling unit exposure while the remaining 16 dwelling units require a modification. The Commission finds that a modification is warranted in this instance, as the strict application of the Planning Code's dwelling unit exposure provision would require the elimination of several units, resulting in a project that will not increase the City's housing stock, or would require alterations to the buildings that would reduce the number of family-sized dwelling units.

- iii. **Street Frontages (Section 144):** *The Planning Code requires that no more than one-third of the width of the ground story of a dwelling along a street frontage shall be devoted to entrances to off-street parking, except that in no event shall a lot be limited by this requirement to a single such entrance of less than ten feet in width. In addition, no entrance to off-street parking on any lot shall be wider than 20 feet, and where two or more separate entrances are provided there shall be a minimum separation between such entrances of six feet. The 12 proposed single-family dwellings (Buildings A1-A4, A6, B3-B6 and C1-C3) will each have a garage door of approximately 10 feet in width. The existing multi-unit building at the corner of Sacramento and Cherry Streets does not have any off-street parking. The multi-unit buildings on Block B (Buildings B1, B2 and B7-B18) share a below-grade off-street parking garage accessed by one Code-complying garage door measuring approximately 15 feet wide on Cherry Street and another Code-complying garage door measuring approximately 15 feet wide on Maple Street. The multi-unit buildings on Block C (Buildings C4-C8) share a below-grade off-street parking garage accessed by one Code-complying garage door measuring approximately 15 feet wide on California Street and another Code-complying garage door measuring approximately 15 feet wide on Maple Street. The proposed multi-unit building (Building A7) proposes a pair of garage doors on both the California and Cherry Street frontages, with each garage door measuring approximately 10 feet in width; however, neither pair maintains a minimum separation of six feet between the garage doors. As such, Building A7 requires a modification to the street frontage requirements. This modification is warranted, as Building A7 proposes to replace an existing six-story parking garage structure that currently has three garage entrances totaling approximately 61 linear feet with a residential building with two consolidated garage entrances totaling approximately 40 linear feet. The two proposed entries to the below-grade off-street parking area will feature two smaller sets of doors, rather than one large opening in order to maintain an appropriate scale compatible with the surrounding neighborhood.*
- iv. **Moderation of Building Fronts (Section 144.1):** *The Planning Code requires that new dwellings within the RM-2 Zoning District on lots greater than 35 feet in width shall step the building façade either vertically or horizontally in order to ensure that new buildings are compatible with the established mixture of nearby residential buildings. The Project proposes nine proposed single-family dwellings (A1-A4, A6 and B3-B6) and two single-family rowhouses (Buildings B1 and B2) located within the RH-2 Zoning District, as well as three single-family dwellings (Buildings C1-C3) within the RM-2 Zoning District on lots less than 35 feet in width; therefore, the Planning Code does not require the moderation of building fronts for those buildings. The multi-unit buildings (Buildings B8-B13, B18, C5, C7 and C8) all propose significant façade modulation in accordance with the Planning Code requirements. The remaining multi-unit buildings (Building*

*A7, B7 and C4) proposes massing with significant variation, but not in technical compliance with the requirements of the Planning Code. Each of these buildings, however, have been designed to be consistent with the intent of the façade modulation requirements, which is to break down building scale and massing, so that the buildings are perceived at an appropriate scale. Architectural features such as include Juliette balconies, pilasters, and overall variation in building facade materials and color scheme accomplish these objectives.*

- v. **Building Height (Sections 260 and 261):** *The Planning Code Section building height limits and defines rules for the measurement of building height. When a building is part of a Planned Unit Development, exceptions from the provisions of building height are allowed, however those exceptions shall be confined to minor deviations from the measurement of height, and no such deviation shall depart from the purposes or intent of those provisions. The project site is located on a south-facing hillside which has a ground surface that slopes relatively steeply down to the south and gradually down to the west. As measured at the sidewalk, the grade decreases by approximately 44 feet from the northeast corner of the project site to the southwest corner. All of the Project buildings comply with the applicable 40-foot and 80-foot height limits; however, the underlying topography presents challenges in redeveloping the site in a manner consistent with the surrounding context. As such, several buildings are seeking a PUD exception allowing a minor deviation from the way in which height is measured under Section 260 and 261. Buildings A1, A2, A6, and B3-B6 are 40 feet or less in height and are within the additional height limits applicable to the front of the property, however their heights have been taken at the curb level from the highest elevation of the laterally-sloping lots, rather than the midpoint, which is not in technical compliance with the requirements of Planning Code Sections 260 and 261.*

- 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:

- i. Affirmatively promote applicable objectives and policies of the General Plan;

*As is further explained in Subsection 9, the Project is, on balance, consistent with the objectives and policies of the General Plan.*

- ii. Provide off street parking adequate for the occupancy proposed.

*The project proposes two off-street parking spaces for each of the single family dwellings and 1.5 off-street parking spaces for each of the multi-family dwelling units in accordance with the requirements of Planning Code Section 151.*

- iii. Provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by the Code.

*The Project will meet and significantly exceed the usable open space requirements of the Planning Code by providing both private and common usable open space across the Project site.*

- iv. 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 PUD will not be substantially equivalent to a reclassification of property.

*The redevelopment of the Project Site is regulated by the underlying RH-2 and RM-2 zoning designations, principally permitting up to two units per lot for the RH-2 Zoning Districts, and up to one unit per 600 square feet of lot area for the portions of the site within the RM-2 Zoning District. The properties within the RH-2 Zoning Districts will be primarily developed with an existing nine-unit building at 401 Cherry Street, and single-family buildings on separate parcels, with five such buildings on Block A and an additional five such buildings on Block B. The portions of the Project site within the RM-2 Zoning District encompass approximately 175,082 square feet, and thus could accommodate up to 292 units as-of-right. With the total proposed 273 dwelling units, the project density is consistent with the applicable zoning designations.*

- v. 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 (Neighborhood Commercial Cluster) Districts under the Code.

*The Project proposes only residential uses, and does not propose any commercial uses.*

- vi. 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 site is located within the 40-X and 80-E Height and Bulk districts. All of the Project buildings comply with the height limit; however, several buildings are seeking a PUD exception allowing a minor deviation from the way in which height is measured under Section 260 and 261. Buildings A1, A2, A6, and B3-B6 are 40 feet or less in height and are within the additional height limits applicable to the front of the property, however their heights have been taken at the curb level from the highest elevation of the laterally-sloping lots, rather than the midpoint, which is not in technical compliance with the requirements of Planning Code Sections 260 and 261.*

- vii. 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 Planning Code.

*The Project is not located in an NC District, and thus this criteria does not apply.*

- viii. In NC Districts, not violate the use limitations by story set forth in Article 7 of the Planning Code.

*The Project is not located in an NC District, and thus this criteria does not apply.*

- ix. 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.

*The Project is not located in an RTO or NCT District, and thus this criteria does not apply.*

- x. Provide street trees as per the requirements of Section 138.1 of the Code.

*With approximately 2,672 linear feet of street frontage, 134 street trees are required, pursuant to Planning Code Section 138.1. The project will provide 108 street trees (32 existing street trees plus an additional 76 new street trees), and thus will seek a DPW waiver for 26 trees. Of the 173 total number of trees on the entire site, 47 are proposed to be retained, while the remaining 126 are proposed to be removed and will be replaced by an additional 224 new trees.*

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

*The project will provide landscaping within front setback areas that are not occupied by pedestrian and vehicle entrances.*

9. **General Plan Compliance.** The Project is, on balance, consistent with the following Objectives and Policies of the 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 1.10**

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 4.5**

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 5:**

ENSURE THAT ALL RESIDENTS HAVE EQUAL ACCESS TO AVAILABLE UNITS.

**Policy 5.4**

Provide a range of unit types for all segments of need, and work to move residents between unit types as their needs change.

**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 11.5**

Ensure densities in established residential areas promote compatibility with prevailing neighborhood character.

**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 12.2**

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

**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 1.3**

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

**OBJECTIVE 3:**

MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.

**Policy 3.1**

Promote harmony in the visual relations and transitions between new and older buildings.

**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 3.6**

Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

**TRANSPORTATION ELEMENT**

**Objectives and Policies**

**OBJECTIVE 2:**

USE THE TRANSPORTATION SYSTEM 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.

**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.

**Policy 23.2**

Widen sidewalks where intensive commercial, recreational, or institutional activity is present, sidewalks are congested, where sidewalks are less than adequately wide to provide appropriate pedestrian amenities, or where residential densities are high.

**Policy 23.3**

Maintain a strong presumption against reducing sidewalk widths, eliminating crosswalks and forcing indirect crossings to accommodate automobile traffic.

**Policy 23.6**

Ensure convenient and safe pedestrian crossings by minimizing the distance pedestrians must walk to cross a street.

**OBJECTIVE 24:**

IMPROVE THE AMBIENCE OF THE PEDESTRIAN ENVIRONMENT.

**Policy 24.2**

Maintain and expand the planting of street trees and the infrastructure to support them.

**Policy 24.3**

Install pedestrian-serving street furniture where appropriate.

**Policy 24.4**

Preserve pedestrian-oriented building frontages.

**OBJECTIVE 28:**

PROVIDE SECURE AND CONVENIENT PARKING FACILITIES FOR BICYCLES.

**Policy 28.1**

Provide secure bicycle parking in new governmental, commercial, and residential developments.

**Policy 28.3**

Provide parking facilities which are safe, secure, and convenient.

**RECREATION AND OPEN SPACE ELEMENT**

**Objectives and Policies**

**OBJECTIVE 4:**

PROVIDE OPPORTUNITIES FOR RECREATION AND THE ENJOYMENT OF OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD.

**Policy 4.5**

Require private usable outdoor open space in new residential development.

**Policy 4.6**

Encourage an equitable distribution of growth according to infrastructure and site capacity.

*The Project proposes 264 new dwelling units, in addition to the nine existing dwelling units in the building at 401 Cherry Street, which is proposed to be preserved. The Project will address the need for family housing by including at least two bedrooms in approximately 70% of the units. Additionally, the Project also proposes a variety of different housing types accommodating residents' different life stages, including single-family homes as well as multi-family units with studios, 1-bedroom, 2-bedroom, 3-bedroom and 4-bedroom units. The Project will also contribute to the City's affordable housing supply via compliance with the Section 415 Inclusionary Affordable Housing requirements.*

*The Project is in proximity to ample public transportation, being located on the 1-California, 1AX-California A Express, 1BX-California B Express, 2-Clement and 33-Ashbury/18th MUNI bus lines. As part of the Transportation Demand Management Plan, the Project will include various features that are intended to*



*decrease auto usage and increase other modes of transportation. For example, the amount of bicycle parking provided by the Project will be well in excess of the minimum amount required by the Planning Code. Additionally, the Project will provide cargo-bikes, bicycle repair station and maintenance services, and other features to encourage cycling. The Project will also consist of an overall makeover of the existing sidewalk and adjacent on-street parking areas, which are currently configured based on the existing hospital and medical uses. In addition to installation of street trees and streetscape improvements, the Project will widen the Maple Street sidewalks by eliminating the perpendicular parking and replacing it with parallel parking. A significant amount of landscaping will be added, and overall the Project will contribute positively to a more pedestrian-oriented, active street frontage.*

*The Project has been designed to be consistent with the scale of the surrounding neighborhood and responds appropriately to the immediate context. The existing hospital and medical uses have largely ceased at the site, and in its place, the Project proposes residential uses that are architecturally compatible with the surrounding context. The Project also respects its location and topography, by situating the buildings and setting the heights appropriately. The Project represents the sensitive in-fill of a now-underutilized site in an existing established residential neighborhood. The Project provides ample common usable open space to the building residents, as well as private terraces directly accessible to 91 of the units, which are, on average, well in excess of the minimum private open space dimensions. On balance, the Project is consistent with the Objectives and Policies of the General Plan.*

**10. 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 site does not propose any neighborhood-serving retail uses. The Project will provide a total of 273 dwelling units, which will enhance the nearby retail uses by providing new residents, who may patron and/or own these businesses.*

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

*The only existing residential building, with nine units at 401 Cherry Street, will be retained and renovated. With the net addition of 264 units, the Project will increase the City's housing supply and will contribute to neighborhood character with proposed compatible and high-quality design.*

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

*The Project does not currently possess any existing affordable housing. The Project will comply with the City's Inclusionary Housing Program by paying the in-lieu fee, in accordance with the requirements of Planning Code Section 415.*

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

*The Project Site is well served by nearby public transportation options, being located along the 1-California, 1AX-California A Express, 1BX-California B Express, 2-Clement and 33-Ashbury/18th MUNI bus lines. The Project also provides off-street parking at the principally permitted amounts and sufficient bicycle parking for residents and their guests.*

- 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 or any industrial or retail sector uses; therefore, none will be displaced.*

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

*The Project will be designed and will be constructed to conform to the structural and seismic safety requirements of the Building Code. This proposal will not impact the property's ability to withstand an earthquake.*

- G. That landmarks and historic buildings be preserved.

*The Project will preserve the historic Marshal Hale building on the northeast corner of California and Maple Streets, and will convert it to residential use. The buildings that are proposed for demolition are not historic.*

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

*The Project will have no impact on any parks or open space, including their access to sunlight and vistas.*

11. 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.

12. 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 and Planned Unit Development Application No. 2017-003559CUA** subject to the following conditions attached hereto as “EXHIBIT A” in general conformance with plans on file, dated February 27, 2020, 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 February 27, 2020.

Jonas P. Ionin  
Commission Secretary

AYES:

NAYS:

ABSENT:

**Draft Motion**  
**Hearing Date: February 27, 2020**

**RECORD NO. 2017-003559CUA**  
**3700 California Street**

ADOPTED: February 27, 2020

## EXHIBIT A

### AUTHORIZATION

This authorization is for a Conditional Use to allow a building or structure exceeding 40 feet in height in an RH district and to permit a building or structure exceeding 50 feet in height in an RM district, and to allow a Planned Unit Development pursuant to Planning Code Section 304, with modifications to the rear yard, dwelling unit exposure, street frontage, moderation of building fronts and building height requirements of Planning Code Sections 134, 140, 144.1 and 261, to permit the change of use from an institutional use to a residential use for the existing building at 3698 California Street, the demolition of five institutional use buildings (formerly d.b.a. California Pacific Medical Center) and the construction of 31 new buildings ranging from three to seven stories and containing 264 new dwelling units and 9 existing dwelling units located at 3700 California Street (and including 3698 California Street, 401 & 460 Cherry Street, 3773, 3801 & 3905 Sacramento Street), Block 1015 Lots 001, 052 & 053; Block 1016 Lots 001-009; and Block 1017 Lots 027 & 028, within the RH-2 and RM-2 Zoning Districts and the 40-X and 80-E Height and Bulk Districts; in general conformance with plans, dated February 27, 2020, and stamped "EXHIBIT B" included in the docket for Record No. 2017-003559CUA and subject to conditions of approval reviewed and approved by the Commission on February 27, 2020 under Motion No XXXXX. 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 February 27, 2020 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. XXXXX 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 for three (3) years from the effective date of the Motion. The Department of Building Inspection shall have issued a Building Permit or Site Permit to construct the project and/or commence the approved use within this three-year period.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*

2. **Expiration and Renewal.** Should a Building or Site Permit be sought after the three (3) year period has lapsed, 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](http://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. Failure to do so shall be grounds for the Commission to consider revoking the approval if more than three (3) years have passed since this Authorization was approved.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://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](http://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.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*

6. **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](http://www.sf-planning.org)*

## DESIGN – COMPLIANCE AT PLAN STAGE

7. **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 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

8. **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 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

9. **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 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

10. **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. The



Project will be expected to provide a lighting design and photometric studies to verify that illumination levels for the public right of way meet City requirements. City Charter Section 8B.121 and City Administrative Code Section 25.6, states that the PUC has exclusive charge of the construction, management, supervision, maintenance, extension, expansion, operation, use and control of all water, clean water and energy supplies and utilities of the City. This includes the authority to determine the intensity of illumination, number and spacing of lighting facilities and other details necessary to secure satisfactory street lighting. The project sponsor will be expected to propose a street lighting plan and provide photometric studies for the proposed lighting design. Fixtures and poles selected outside of the SFPUC catalogue will be maintained by the property owner(s).

*For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

11. **Streetscape Plan.** Pursuant to Planning Code Section 138.1, 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 complete final design of all required street improvements, including procurement of relevant City permits, prior to issuance of first architectural addenda, and shall complete construction of all required street improvements prior to issuance of first temporary certificate of occupancy.

*For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

12. **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 in consultation with Public Works shall require that any required electrical transformers be installed onsite in a transformer room. The transformer room must be shown on the plans for review by the Planning Department and Public Works during the planning phase of the project prior to applying for a Building Permit and Public Works Permits. The above requirement shall adhere to the Memorandum of Understanding regarding Electrical Transformer Locations for Private Development Projects between Public Works and the Planning Department dated January 2, 2019.

*For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works at 415-554-5810, <http://sfdpw.org>*

13. **MUNI Shelter and Overhead Wiring.** The construction of the new bus-bulbout on California Street between Street and Commonwealth Avenue provides an opportunity to relocate the shelter and create a more generous and accessible path of travel along California Street. 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 and will continue to work with SFMTA regarding the potential relocation of the bus shelter.

*For information about compliance, contact San Francisco Municipal Railway (Muni), San Francisco Municipal Transit Agency (SFMTA), at 415-701-4500, [www.sfmta.org](http://www.sfmta.org)*

14. **Landscaping.** Pursuant to Planning Code Section 132, the Project Sponsor shall submit a site plan to the Planning Department prior to Planning approval of the building permit application indicating that 50% of the required front setback areas shall be surfaced in permeable materials and further, that 20% of the required front setback areas shall be landscaped with approved plant species. The size and species of plant materials and the nature of the permeable surface shall be as approved by the Department of Public Works.

*For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

## PARKING AND TRAFFIC

15. **Transportation Demand Management (TDM) Program.** Pursuant to Planning Code Section 169, the Project shall finalize a TDM Plan prior to the issuance of the first Building Permit or Site Permit to construct the project and/or commence the approved uses. 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.

Prior to the issuance of the first Building Permit or Site Permit, 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 to document compliance with the TDM Program. This Notice shall provide the finalized TDM Plan for the Project, including the relevant details associated with each TDM measure included in the Plan, as well as associated monitoring, reporting, and compliance requirements.

*For information about compliance, contact the TDM Performance Manager at [tdm@sfgov.org](mailto:tdm@sfgov.org) or 415-558-6377, [www.sf-planning.org](http://www.sf-planning.org).*

16. **Car Share.** Pursuant to Planning Code Section 166, no fewer than two (2) 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. The Project sponsor is proposing an additional five (5) car share spaces to meet their TDM Program requirements.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

17. **Bicycle Parking.** Pursuant to Planning Code Sections 155, 155.1, and 155.2, the Project shall provide no fewer than 157 bicycle parking spaces (143 Class 1 spaces 14 Class 2 spaces). 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](mailto: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.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*

18. **Parking Maximum.** Pursuant to Planning Code Section 151 or 151.1, the Project shall provide no more than off-street parking spaces.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*

19. **Off-Street Loading.** Pursuant to Planning Code Section 152, the Project will provide 3 off-street loading spaces.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*

20. **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](http://www.sf-planning.org)*

## PROVISIONS

21. **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 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

22. **First Source Hiring.** The Project shall adhere to the requirements of the First Source Hiring Construction and End-Use Employment Program approved by the First Source Hiring Administrator, pursuant to Section 83.4(m) of the Administrative Code. The Project Sponsor shall comply with the requirements of this Program regarding construction work and on-going employment required for the Project.

*For information about compliance, contact the First Source Hiring Manager at 415-581-2335, [www.onestopSF.org](http://www.onestopSF.org)*

23. **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 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

24. **Residential Child Care Impact Fee.** The Project is subject to the Residential Child Care Fee, as applicable, pursuant to Planning Code Section 414A.

*For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org)*

25. **Affordable Units.** The following Inclusionary Affordable Housing Requirements are those in effect at the time of Planning Commission action. In the event that the requirements change, the Project Sponsor shall comply with the requirements in place at the time of issuance of first construction document for each building permit.

- a. **Requirement.** Pursuant to Planning Code Section 415.5, the Project Sponsor must pay an Affordable Housing Fee at a rate equivalent to the applicable percentage of the number of units in an off-site project needed to satisfy the Inclusionary Affordable Housing Program Requirement for the principal project. The applicable percentage for this project is thirty-three percent (33%) because it is an ownership project. The Project Sponsor shall pay the applicable Affordable Housing Fee prior to the issuance of the first construction document for each building permit.

*For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org) or the Mayor's Office of Housing and Community Development at 415-701-5500, [www.sf-moh.org](http://www.sf-moh.org).*

- b. **Other Conditions.** The Project is subject to the requirements of the Inclusionary Affordable Housing Program under Section 415 et seq. of the Planning Code and the terms of the City and County of San Francisco Inclusionary Affordable Housing Program Monitoring and Procedures Manual ("Procedures Manual"). The Procedures Manual, as amended from time to time, is incorporated herein by reference, as published and adopted by the Planning Commission, and as required by Planning Code Section 415. Terms used in these conditions of approval and not otherwise defined shall have the meanings set forth in the Procedures Manual. A copy of the Procedures Manual can be obtained at the Mayor's Office of Housing and Community Development ("MOHCD") at 1 South Van Ness Avenue or on the Planning Department or Mayor's Office of Housing and Community Development's websites, including on the internet at: <http://sf-planning.org/Modules/ShowDocument.aspx?documentid=4451>.

As provided in the Inclusionary Affordable Housing Program, the applicable Procedures Manual is the manual in effect at the time the subject units are made available for sale or rent. *For information about compliance, contact the Case Planner, Planning Department at 415-575-9087, [www.sf-planning.org](http://www.sf-planning.org) or the Mayor's Office of Housing and Community Development at 415-701-5500, [www.sf-moh.org](http://www.sf-moh.org).*

- i. The Project Sponsor must pay the Fee in full sum to the Development Fee Collection Unit at the DBI for use by MOHCD prior to the issuance of the first construction document for each building permit.
- ii. Prior to the issuance of the first construction permit by the DBI for the Project, the Project Sponsor shall record a Notice of Special Restriction on the property that records a copy of this approval. The Project Sponsor shall promptly provide a copy of the recorded Notice of Special Restriction to the Department and to MOHCD or its successor.
- iii. If project applicant fails to comply with the Inclusionary Affordable Housing Program requirement, the Director of DBI shall deny any and all site or building permits or certificates of occupancy for the development project until the Planning Department notifies the Director of compliance. A Project Sponsor's failure to comply with the requirements of Planning Code Sections 415 et seq. shall constitute cause for the City to record a lien against the development project and to pursue any and all other remedies at law, including interest and penalties, if applicable.

## MONITORING - AFTER ENTITLEMENT

26. **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](http://www.sf-planning.org)*

27. **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](http://www.sf-planning.org)*

28. **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](http://www.sf-planning.org)*

## OPERATION

29. **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>*

30. **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](http://www.sf-planning.org)*

31. **Lighting.** All Project lighting shall be directed onto the Project site and immediately surrounding sidewalk area only, and designed and managed so as not to be a nuisance to adjacent residents. Nighttime lighting shall be the minimum necessary to ensure safety, but shall in no case be directed so as to constitute a nuisance to any surrounding property.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, [www.sf-planning.org](http://www.sf-planning.org)*





# SAN FRANCISCO PLANNING DEPARTMENT

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## Planning Commission Draft Motion No. XXXXX HEARING DATE: FEBRUARY 27, 2020

*Record No.:* 2017-003559ENV  
*Project Address:* 3700 California Street  
*Permit Applic. Nos:* 2019.1224.0616-0646, 2019.1224.0649 and 2019.1224.0653  
*Zoning:* RH-2 (Residential, House – Two Family) and RM-2 (Residential, Mixed – Moderate Density) Zoning Districts  
80-E and 40-X Height and Bulk Districts  
*Block/Lot:* 1015/001, 052 & 053; 1016/001-009; 1017/027 & 028  
*Project Sponsor* Denise Pinkston  
TMG Partners  
100 Bush Street  
San Francisco, CA 94104  
*Property Owner:* Sutter Bay Hospitals  
San Francisco, CA 94107  
*Staff Contact:* Christopher May – (415) 575-9087  
[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

ADOPTING ENVIRONMENTAL FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, INCLUDING FINDINGS OF FACT, FINDINGS REGARDING IMPACTS FOUND NOT TO BE SIGNIFICANT THAT DO NOT REQUIRE MITIGATION, FINDINGS REGARDING POTENTIALLY SIGNIFICANT IMPACTS THAT CAN BE REDUCED TO LESS-THAN-SIGNIFICANT LEVELS THROUGH MITIGATION, AND EVALUATION OF MITIGATION MEASURES, RELATED TO APPROVALS FOR THE 3700 CALIFORNIA STREET RESIDENTIAL PROJECT ("PROJECT"), LOCATED ON LOTS 001, 052 AND 053 ON ASSESSOR'S BLOCK 1015, LOTS 001-009 ON ASSESSOR'S BLOCK 1016, AND LOTS 027 AND 028 ON ASSESSOR'S BLOCK 1017.

### PREAMBLE

The 3700 California Street Project proposes redevelopment on a portion of the current site of the California Pacific Medical Center (CPMC) campus at 3700 California Street in the Presidio Heights neighborhood of San Francisco. The approximately 214,000-square-foot, 4.9-acre irregularly shaped Project site encompasses 14 parcels on one full city block (Block 1016, Lots 001–009) and portions of two other blocks (Block 1015, Lots 001, 052, and 053, and Block 1017, Lots 027 and 028). The Project site is bounded by Sacramento Street to the north, residential uses to the east, California Street to the south, and medical office and residential uses to the west. The Project site is located primarily within an RM-2 (Residential, Mixed – Moderate Density) Zoning District, with portions also in an RH-2 (Residential, House – Two Family) Zoning District. Majority of the Project site is located in an 80-E Height and Bulk district, with the exception of two lots that cover approximately 8 percent of the Project site and are in a 40-X height and bulk district.

The Project proposes demolition of five of the six existing hospital buildings on the Project site, including an accessory off-street parking garage; renovation and adaptive re-use of a portion of the Marshal Hale

hospital building at 3698 California Street to residential use; retention and renovation of the existing nine-unit residential building at 401 Cherry Street; and construction of 31 new residential buildings, including some accessory amenity spaces. The residential buildings on the project site would contain 273 dwelling units, reflecting the design and scale of the existing neighborhood, including 14 single-family homes and 19 multi-family residential buildings with studios and one-, two-, three-, and four-bedroom units. The proposed Project would be constructed on three blocks, with residential buildings ranging from three to seven stories (36 to 80 feet). With the exception of 12 of the single-family homes that would be on separate lots, all residential buildings would be situated above below-grade parking podiums on each block. A total of 416 parking spaces would be provided, consisting of 392 subterranean spaces and 24 private spaces for the 12 single-family residences on separate lots. The proposed Project would include shared onsite amenity space and approximately 88,100 square feet of private and common open space areas. The project sponsor is seeking Conditional Use Authorization and Planned Unit Development approval for height and certain planning code exceptions. The existing 14 lots on the project site would be merged and subdivided into 16 parcels.

The Project Sponsor filed an Environmental Evaluation Application for the Project with the San Francisco Planning Department ("Department") on March 17, 2017.

Pursuant to and in accordance with the requirements of Section 21094 of CEQA and Sections 15063 and 15082 of the CEQA Guidelines, the Department, as lead agency, published and circulated a Notice of Preparation ("NOP") on September 19, 2018, which solicited comments regarding the scope of the environmental impact report ("EIR") for the proposed project. The NOP and its 30-day public review comment period were advertised in a newspaper of general circulation in San Francisco and mailed to governmental agencies, organizations and persons interested in the potential impacts of the proposed project.

During the approximately 30-day public scoping period that ended on October 19, 2018, the Department accepted comments from agencies and interested parties that identified environmental issues that should be addressed in the EIR. Comments received during the scoping process were considered in preparation of the Draft EIR.

The Department prepared the Draft EIR, which describes the Project and the environmental setting, analyzes potential impacts, identifies mitigation measures for impacts found to be significant or potentially significant, and evaluates alternatives to the Project. The Draft EIR assesses the potential construction and operational impacts of the Project on the environment, and the potential cumulative impacts associated with the Project in combination with other past, present, and future actions with potential for impacts on the same resources. The analysis of potential environmental impacts in the Draft EIR utilizes significance criteria that are based on the San Francisco Planning Department Environmental Planning Division guidance regarding the environmental effects to be considered significant. The Environmental Planning Division's guidance is, in turn, based on CEQA Guidelines Appendix G, with some modifications.

The Department published a Draft EIR for the Project on June 13, 2019, and circulated the Draft EIR to local, state, and federal agencies and to interested organizations and individuals for public review. On July 10, 2019, the Department also distributed notices of availability of the Draft EIR; published notification of its availability in a newspaper of general circulation in San Francisco; posted the notice of availability at the San Francisco County Clerk's office; and posted notices at locations within the project area. The Planning



Commission held a public hearing on September 19, 2019, to solicit testimony on the Draft EIR during the public review period. A court reporter, present at the public hearing, transcribed the oral comments verbatim, and prepared written transcripts. The Department also received written comments on the Draft EIR, which were sent through mail, hand delivery, or email. The public comment period on the Draft EIR ended on September 24, 2019.

The Department then prepared the Responses to Comments on Draft EIR document ("RTC"). The RTC document was published on February 13, 2020, and includes copies of all of the comments received on the Draft EIR and written responses to each comment.

In addition to describing and analyzing the physical, environmental impacts of the revisions to the Project, the RTC document provided additional, updated information, clarification and modifications on issues raised by commenters, as well as Planning Department staff-initiated text changes to the Draft EIR. The Final Environmental Impact Report (Final EIR), which includes the Draft EIR, the RTC document, the Appendices to the Draft EIR and Attachments to the RTC document, and all of the supporting information, has been reviewed and considered. The RTC document and its attachments and all supporting information do not add significant new information to the Draft EIR that would individually or collectively constitute significant new information within the meaning of Public Resources Code Section 21092.1 or CEQA Guidelines Section 15088.5 so as to require recirculation of the Final EIR (or any portion thereof) under CEQA. The RTC document and attachments and all supporting information contain no information revealing (1) any new significant environmental impact that would result from the Project or from a new mitigation measure proposed to be implemented, (2) any substantial increase in the severity of a previously identified environmental impact, (3) any feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project, but that was rejected by the project sponsor, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The Commission reviewed and considered the Final EIR for the Project and found the contents of said report and the procedures through which the Final EIR was prepared, publicized and reviewed complied with the California Environmental Quality Act (Public Resources Code section 21000 et seq.) ("CEQA"), the CEQA Guidelines (14 Cal. Code Reg. section 15000 et seq.), and Chapter 31 of the San Francisco Administrative Code.

The Commission found the Final EIR was adequate, accurate and objective, reflected the independent analysis and judgment of the Department and the Planning Commission, and that the summary of comments and responses contained no significant revisions to the Draft EIR, and certified the Final EIR for the Project in compliance with CEQA, the CEQA Guidelines, and Chapter 31 by its Motion No. \_\_\_\_.

The Planning Commission Secretary is the Custodian of Records for the Planning Department materials, located in the File for Case No. 2017-003559ENV, at 1650 Mission Street, Fourth Floor, San Francisco, California.

On February 27, 2020, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on Case No. 2017-003559ENV to consider the approval of the Project. 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 Project, the Planning Department staff, expert consultants and other interested parties.

This Commission has reviewed the entire record of this proceeding, the Environmental Findings below, regarding mitigation measures, improvement measures, and environmental impacts analyzed in the FEIR, and the proposed MMRP attached as Exhibit C and incorporated fully by this reference, which includes both mitigation measures and improvement measures. The entire record, including Exhibit C, was made available to the public.

**MOVED**, that the Planning Commission hereby adopts these findings under the California Environmental Quality Act, and adopts the MMRP attached as Exhibit C, based on substantial evidence in the entire record of this proceeding.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on February 27, 2020.

Jonas P. Ionin  
Commission Secretary

AYES:

NAYS:

ABSENT:

ADOPTED: February 27, 2020

# ATTACHMENT A

## 3700 CALIFORNIA STREET RESIDENTIAL PROJECT

### California Environmental Quality Act findings:

#### FINDINGS OF FACT, AND EVALUATION OF MITIGATION MEASURES

#### SAN FRANCISCO PLANNING COMMISSION

February 27, 2020

In determining to approve the 3700 California Street Residential Project ("Project"), as described in Section I.A, Project Description, below, the following findings of fact and decisions regarding mitigation measures are made and adopted, based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act, California Public Resources Code Sections 21000-21189.3 ("CEQA"), particularly Sections 21081 and 21081.5, the Guidelines for implementation of CEQA, California Code of Regulations, Title 14, sections 15000-15387 ("CEQA Guidelines"), particularly sections 15091 through 15092, and Chapter 31 of the San Francisco Administrative Code.

This document is organized as follows:

**Section I** provides a description of the project proposed for adoption, project objectives, the environmental review process for the project, the approval actions to be taken and the location of records;

**Section II** identifies the impacts found not to be significant that do not require mitigation;

**Section III** identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures;

**Section IV** addresses (lack of) significant impacts that cannot be avoided or reduced to less-than-significant levels and describes any applicable mitigation measures as well as the disposition of the mitigation measures;

**Section V** addresses mitigation measures considered but rejected as infeasible for economic, legal, social, technological, or other considerations; and

**Section VI** addresses the (lack of) need for a statement of overriding considerations setting forth specific reasons in support of the actions for the project.

The Mitigation Monitoring and Reporting Program ("MMRP") for the mitigation measures that have been proposed for adoption is attached with these findings as Exhibit 1 to Attachment A to Motion No. XXXXX. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. The MMRP provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project ("Final EIR") that is required to reduce or avoid a significant adverse impact. The MMRP also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in the MMRP.

These findings are based upon substantial evidence in the entire record before the San Francisco Planning Commission (the "Commission"). The references set forth in these findings to certain pages or sections of the Draft Environmental Impact Report ("Draft EIR" or "DEIR") or the Responses to Comments document ("RTC") in the Final EIR are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

I. PROJECT DESCRIPTION, OBJECTIVES, ENVIRONMENTAL REVIEW PROCESS, APPROVAL ACTIONS, AND RECORDS

A. Project Description

The 3700 California Street Project proposes redevelopment on a portion of the current site of the California Pacific Medical Center (CPMC) campus at 3700 California Street in the Presidio Heights neighborhood of San Francisco. The approximately 214,000-square-foot, 4.9-acre irregularly shaped Project site encompasses 14 parcels on one full city block (Block 1016, Lots 001–009) and portions of two other blocks (Block 1015, Lots 001, 052, and 053, and Block 1017, Lots 027 and 028). The Project site is bounded by Sacramento Street to the north, residential uses to the east, California Street to the south, and medical office and residential uses to the west. The Project site is located primarily within an RM-2 (Residential, Mixed – Moderate Density) Zoning District, with portions also in an RH-2 (Residential, House – Two Family) Zoning District. Majority of the Project site is located in an 80-E Height and Bulk district, with the exception of two lots that cover approximately 8 percent of the Project site and are in a 40-X height and bulk district.

The Project proposes demolition of five of the six existing hospital buildings on the Project site, including an accessory off-street parking garage; renovation and adaptive re-use of a portion of the Marshal Hale hospital building at 3698 California Street to residential use; retention and renovation of the existing nine-unit residential building at 401 Cherry Street; and construction of 31 new residential buildings, including some accessory amenity spaces. The residential buildings on the project site would contain 273 dwelling units, reflecting the design and scale of the existing neighborhood, including 14 single-family homes and 19 multi-family residential buildings with studios and one-, two-, three-, and four-bedroom units. The proposed Project would be constructed on three blocks, with residential buildings ranging from three to seven stories (36 to 80 feet). With the exception of 12 of the single-family homes that would be on separate lots, all residential buildings would be situated above below-grade parking podiums on each block. A total of 416 parking spaces would be provided, consisting of 392 subterranean spaces and 24 private spaces for the 12 single-family residences on separate lots. The proposed Project would include shared onsite amenity space and approximately 88,100 square feet of private and common open space areas. The project sponsor is seeking Conditional Use Authorization and Planned Unit Development approval for height and certain planning code exceptions. The existing 14 lots on the project site would be merged and subdivided into 16 parcels.

B. Project Objectives

The Project Sponsor seeks to achieve the following objectives by undertaking the Project:

1. Develop the project site in a manner that is consistent with existing residential neighborhood character and the Neighborhood Vision Plan with the Visioning Advisory Committee.

2. Create housing that is attractive to families by providing new adequately sized units with two or more bedrooms and family-friendly amenities, including onsite recreational facilities, private and shared gardens, and open space.
3. Develop new residential uses that “knit together” the project site and existing neighborhood through architectural, site, landscape design, and overall development scale, thereby extending the existing neighborhood fabric through the site.
4. Develop building and landscape designs that reflect the diversity of existing San Francisco neighborhoods.
5. Under the Transportation Demand Management (TDM) Plan, encourage a reduction in the number of person trips by automobile through the following: enhanced sidewalks, shared cargo bikes, shared cars, utility carts, subsidized clipper cards, secure bike parking, onsite delivery services and storage facilities for delivered goods, and onsite family-friendly recreational amenities.
6. Promote sustainability through environmentally sensitive design features including those required by the San Francisco Public Utilities Commission’s (SFPUC’s) Non-Potable Water Ordinance as well as the City and County of San Francisco’s (City’s) Stormwater Management Requirements, Green Building Ordinance, Better Roofs Ordinance, and Better Streets Design Guidelines.
7. Retain the existing 401 Cherry Street apartment building on the corner of Cherry Street and Sacramento Street to avoid the loss of existing housing units.
8. Preserve and incorporate the historic portion of the Marshal Hale building (fronting California Street) into the proposed design.
9. Provide off-street parking that is adequate for the occupancy proposed.

C. Environmental Review

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 19, 2018.

On June 13, 2019, 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. Also, on June 13, 2019, 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. Due to an error in the initial notice, the department re-issued the public notice on June 19, 2019 which 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.

A notice of completion was filed with the State Secretary of Resources via the State Clearinghouse on June 13, 2019.

The planning commission held a duly advertised public hearing on said DEIR on September 19, 2019 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 September 24, 2019.

The department prepared responses to comments on environmental issues received at the public hearing and in writing during the 103-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 response to comments document, published on February 13, 2020, distributed to the commission and all parties who commented on the DEIR, and made available to others upon request at the department.

A final EIR (hereinafter "FEIR") was 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.

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.

On February 27, 2020, the commission reviewed and considered the information contained in the FEIR 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 that the FEIR reflected the independent judgement and analysis of the City and County of San Francisco, was adequate, accurate and objective, and that the responses to comments document contained no significant revisions to the DEIR that would require recirculation of the document pursuant to CEQA Guideline section 15088.5, and certified the FEIR as complete, and in compliance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

#### D. Approval Actions

The Project requires the following approvals:

1. Actions by the San Francisco Planning Commission
  - Certification of Environmental Impact Report (EIR) and adoption of findings under the CEQA.

- Adoption of Findings of Consistency with the general plan and priority policies of Planning Code section 101.1.
  - Conditional use authorization to permit development of buildings with heights in excess of 50 feet in an RM district and in excess of 40 feet in an RH district, all within the 80-E height and bulk district, as well as planned unit development approval of rear yard modifications (Planning Code section 134), building front moderations (section 144.1), minor deviation from height measurement (sections 261 and 304(d)(6)), and dwelling unit exposure (section 140).
  - Approval of a Transportation Demand Management Plan (Planning Code section 169) to provide a strategy for managing the transportation demands created by the project.
  - Approval of a Streetscape Plan (Planning Code section 138.1).
2. Actions by the San Francisco Board of Supervisors
- Approval of General Plan Referral for subdivision and changes to public streets and sidewalks.
  - Approval of Final Subdivision Map(s), including any dedications and easements for public improvements, and acceptance of public improvements, as necessary
3. Actions by San Francisco Department of Building Inspection
- Review and approval of demolition, grading, and building permits.
4. Actions by San Francisco Public Works
- Approval of the merger of 14 existing parcels and the subsequent subdivision into 16 new parcels.
  - If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a street space permit from the Bureau of Street Use and Mapping.
  - Approval of a permit to remove significant trees on privately owned property.
  - Approval of a permit to remove and plant street trees and partial waiver from Public Works Code section 806(d) to provide 31 fewer street trees than required.
  - Approval of construction within the public right-of-way (e.g., curb cuts, bulb-outs, sidewalk extensions, and new crosswalk).
  - Approval of an encroachment permit or a street improvement permit for streetscape improvements
5. Actions by San Francisco Municipal Transportation Agency
- Approval of modifications to on-street loading and other colored curb zones.
  - Approval of a special traffic permit from the Sustainable Streets Division if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s).
  - Approval of the placement of bicycle racks in the public right-of-way.
6. Actions by San Francisco Public Utilities Commission
- Review and approval of construction permit for non-potable water system.

- Review and approval of plumbing plans and documentation for non-potable water reuse system per the Non-potable Water Ordinance.
- Review and approval of erosion and sediment control plan per Public Works Code article 4.1.
- Review and approval of changes to sewer laterals (connections to the City sewer system).
- Review and approval of changes to existing publicly owned fire hydrants, water service laterals, water meters, and/or water mains.
- Review and approval of size and location of new fire, standard, and/or irrigation water service laterals.
- Review and approval of post-construction stormwater design guidelines, including a Stormwater Control Plan, in accordance with City's 2016 Stormwater Management Requirements and Design Guidelines.
- Review and approval of Project's landscape and irrigation plans per the Water Efficient Irrigation Ordinance and the SFPUC Rules & Regulations Regarding Water Service to Customers.
- Review and approval of groundwater dewatering wells (if they are to be used during construction), per San Francisco Health Code article 12B (Soil Boring and Well Regulation Ordinance) (joint approval with the San Francisco Department of Public Health).

7. Actions by San Francisco Department of Public Health

- Review and approval of a site mitigation plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance).
- Review and approval of a construction dust control plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance).
- Review and approval of design and engineering plans for a non-potable water reuse system and testing prior to issuance of a Permit to Operate.
- Review and approval of groundwater dewatering wells (if they are to be used during construction), (joint approval with the San Francisco Public Utilities Commission)

8. Actions by other Government Agencies

- Bay Area Air Quality Management District approval of any necessary air quality permits for installation, operation, and testing (e.g., Authority to Construct/Permit to Operate) of individual air pollution sources, such as boilers.

E. Findings About Significant Environmental Impacts and Mitigation Measures

The following Sections II and III set forth the findings about the determinations of the Final EIR regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide written analysis and conclusions regarding the environmental impacts of the Project and the mitigation measures included as part of the Final EIR and adopted as part of the Project.



In making these findings, the opinions of the Planning Department and other City staff and experts, other agencies and members of the public have been considered. These findings recognize that the determination of significance thresholds is a judgment within the discretion of the City and County of San Francisco; the significance thresholds used in the Final EIR are supported by substantial evidence in the record, including the expert opinion of the Final EIR preparers and City staff; and the significance thresholds used in the Final EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

These findings do not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the Final EIR (which includes the Initial Study, Draft EIR, and Response to Comments document) and these findings hereby incorporate by reference the discussion and analysis in the Final EIR supporting the determination regarding the Project impacts and mitigation measures designed to address those impacts. For ease of reference only, the page of the Initial Study (IS), Draft EIR (DEIR) or Response to Comments document (RTC) is noted after the impact number where the primary discussion and analysis of that impact can be found. In making these findings, the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures are hereby ratified, adopted and incorporated in these findings, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the mitigation measures set forth in the Final EIR and the attached MMRP are hereby adopted and incorporated, to substantially lessen or avoid the potentially significant impacts of the Project. Accordingly, in the event a mitigation measure recommended in the Final EIR has inadvertently been omitted in these findings or the MMRP, such mitigation measure is nevertheless hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measure in the Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final EIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the numbers contained in the Final EIR.

In Sections II and III below, the same findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance are the conclusions of the Final EIR, or the mitigation measures recommended in the Final EIR for the Project, being rejected.

#### F. Location and Custodian of Records

The public hearing transcripts and audio files, a copy of all letters regarding the Final EIR received during the public review period, the administrative record, and background documentation for the Final EIR are located at the Planning Department, 1650 Mission Street, San Francisco. The Planning Commission Secretary, Jonas P. Ionin, is the Custodian of Records for the Planning Department and the Planning Commission.

## II. IMPACTS FOUND NOT TO BE SIGNIFICANT AND THUS DO NOT REQUIRE MITIGATION

Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Res. Code § 21002; CEQA Guidelines §§ 15126.4, subd. (a)(3), 15091). As more fully described in the Final EIR and the Initial Study, and based on the evidence in the whole record of this proceeding, it is hereby found that implementation of the Project would not result in any significant impacts in the following areas and that these impact areas therefore do not require mitigation:

#### Land Use

- Impact LU-1 (IS 13): The proposed Project would not physically divide an established community.
- Impact LU-2 (IS 14): The proposed Project would not cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
- Impact C-LU-1 (IS 16): The proposed Project, in combination with reasonably foreseeable future projects, would not cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

#### Population and Housing

- Impact PH-1 (IS 16): The proposed Project would not directly or indirectly induce substantial unplanned population growth.
- Impact PH-2 (IS 21): The proposed Project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing.
- Impact C-PH-1 (IS 22): The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative population and housing impacts.

#### Transportation and Circulation

- Impact TR-1 (DEIR 4.2-51): Construction of the proposed Project would not result in substantial interference with people walking, biking, riding transit, or driving, nor would it result in potentially hazardous conditions.
- Impact TR-2 (DEIR 4.2-55): The proposed Project would not cause substantial additional VMT or substantially induce automobile travel.
- Impact TR-3 (DEIR 4.2-56): The proposed Project would not cause any major traffic hazards.
- Impact TR-4 (DEIR 4.2-59): The proposed Project would not cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity or cause a substantial increase in delays or operating costs such that significant adverse impacts on transit could result.
- Impact TR-5 (DEIR 4.2-61): The proposed Project would not result in potentially hazardous conditions or interfere with accessibility to the Project vicinity.
- Impact TR-6 (DEIR 4.2-64): The proposed Project would not result in potential hazardous conditions for people bicycling and would not interfere with bicycle accessibility to the Project site or adjoining areas.
- Impact TR-7 (DEIR 4.2-65): The proposed Project would accommodate its commercial vehicle and passenger loading demand, and proposed Project loading operations would not create potentially hazardous conditions or significant delays for transit, bicyclists, or people walking.
- Impact TR-8 (DEIR 4.2-66): The proposed Project would not result in significant impacts on emergency access to the Project site or adjacent locations.

- Impact TR-9 (DEIR 4.2-67): The proposed Project would not result in a substantial parking deficit, and thus, the Project's parking supply would not create potentially hazardous conditions or significant delays that would affect transit, bicyclists, or people walking.
- Impact C-TR-1 (DEIR 4.2-71): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative construction-related transportation impacts.
- Impact C-TR-2 (DEIR 4.2-72): The proposed Project, in combination with reasonably foreseeable future projects, would not cause any major traffic hazards.
- Impact C-TR-3 (DEIR 4.2-73): The proposed Project, in combination with reasonably foreseeable future projects, would not result in significant transit impacts.

#### Noise

- Impact NO-3 (DEIR 4.3-39): Operation of the proposed Project would not result in a substantial periodic or permanent increase in ambient noise levels.
- Impact C-NO-2 (DEIR 4.3-43): Construction activities from the proposed Project, in combination with reasonably foreseeable projects, would not generate excessive ground-borne vibration.
- Impact C-NO-3 (DEIR 4.3-44): Operation of the proposed Project, in combination with reasonably foreseeable projects, would not result in a substantial periodic or permanent increase in ambient noise levels in the Project vicinity, above levels existing without the Project.

#### Air Quality

- Impact AQ-1 (DEIR 4.4-36): During construction, the proposed Project would generate fugitive dust and criteria air pollutants, but would not contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase in criteria air pollutants.
- Impact AQ-2 (DEIR 4.4-43): At Project buildout, operation of the proposed Project would not result in emissions of criteria air pollutants at levels that would violate an air quality standard or result in a cumulatively considerable net increase in criteria air pollutants.
- Impact AQ-4 (DEIR 4.4-51): The proposed Project would not conflict with implementation of the 2017 Bay Area Clean Air Plan.
- Impact C-AQ-1 (DEIR 4.4-54): The proposed Project, in combination with reasonably foreseeable future cumulative projects, would not result in significant health risk impacts on sensitive receptors.

#### Greenhouse Gas Emissions

- Impact C-GG-1 (IS 47): The proposed Project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.

#### Wind

- Impact WI-1 (IS 50): The proposed Project would not create wind hazards in publicly accessible areas of substantial pedestrian use.
- Impact C-WI-1 (IS 53): The proposed Project, in combination with reasonably foreseeable future projects in the project site vicinity, would not result in cumulative wind impacts.

#### Shadow

- Impact SH-1 (IS 54): The proposed Project would not create new shadow that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces.

#### Recreation

- Impact RE-1 (IS 59): The proposed Project 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 or the construction of new facilities would be required.
- Impact RE-2 (IS 61): Construction of open space as part of the proposed Project would not result in substantial adverse physical environmental impacts beyond those analyzed and disclosed in the initial study.
- Impact C-RE-1 (IS 62): Impact C-RE-1: The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on recreational facilities or resources.

#### Utilities and Service Systems

- Impact UT-1 (IS 65): Implementation of the proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, nor would it result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.
- Impact UT-2 (IS 67): Adequate water supplies are available to serve the proposed Project and reasonably foreseeable future development 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 the proposed Project. 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 Project would not make a considerable contribution to impacts from increased rationing.
- Impact UT-3 (IS 72): The proposed Project would not generate solid waste in excess of applicable standards or local infrastructure capacity or otherwise impair attainment of solid waste reduction goals, and construction and operation of the proposed Project would comply with all applicable statutes and regulations related to solid waste.
- Impact C-UT-1 (IS 75): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on utilities and service systems.

#### Public Services

- Impact PS-1 (IS 77): The proposed Project would increase demand for fire and police protection, schools, and other public services but not to the extent that would require new or physically altered fire, police, school, or other public facilities, the construction of which could result in significant environmental impacts.
- Impact C-PS-1 (IS 84): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on public services.

#### Biological Resources

- Impact BI-3 (IS 91): The proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

#### Geology and Soils

- Impact GE-1 (IS 95): The proposed Project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, liquefaction, lateral spreading, or landslides.
- Impact GE-2 (IS 102): The proposed Project would not result in substantial soil erosion or the loss of topsoil.
- Impact GE-3 (IS 103): The proposed Project would not create substantial risks to life or property as a result of being located on expansive soil.
- Impact C-GE-1 (IS 107): The proposed Project, in combination with reasonably foreseeable future projects in the Project site vicinity, would not result in cumulative impacts related to geology, soils, seismicity, and paleontological resources.

#### Hydrology and Water Quality

- Impact HY-1 (IS 109): The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or conflict with or obstruct implementation of a water quality control plan.
- Impact HY-2 (IS 114): The proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a sustainable groundwater management plan.
- Impact HY-3 (IS 115): The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite; or impede or redirect floodflows.
- Impact C-HY-1 (IS 115): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts related to hydrology and water quality.

#### Hazards and Hazardous Materials

- Impact HZ-1 (IS 120): The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Impact HZ-2 (IS 123): The proposed Project would not 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.
- Impact HZ-3 (IS 131): The proposed Project 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.
- Impact HZ-4 (IS 133): The proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

- Impact C-HZ-1 (IS 134): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts related to hazards and hazardous materials.

#### Mineral Resources

- Impact MI-1 (IS 135): The proposed Project would not a) result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or b) result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.
- Impact C-MI-1 (IS 136): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on mineral resources.

#### Energy

- Impact EN-1 (IS 137): The proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- Impact C-EN-1 (IS 141): The proposed Project, in combination with reasonably foreseeable future projects, would not result in cumulative energy impacts.

#### Agriculture and Forestry Resources

- Not applicable.

#### Wildfire

- Not applicable.

### III. FINDINGS OF POTENTIALLY SIGNIFICANT IMPACTS THAT CAN BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH THE IMPOSITION OF MITIGATION MEASURES

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potentially significant impacts if such measures are feasible (unless mitigation to such levels is achieved through adoption of a project alternative). The following findings concern mitigation measures set forth in the Final EIR for the Project. The full text of the mitigation measures is contained in the Final EIR and in Exhibit C, the Mitigation Monitoring and Reporting Program. The impacts identified herein would be reduced to a less-than-significant level through implementation of the mitigation measures contained in the Final EIR, included in the Project, or imposed as conditions of approval.

The Commission recognizes that some of the mitigation measures are partially within the jurisdiction of other agencies. The Commission urges these agencies to assist in implementing these mitigation measures, and finds that these agencies can and should participate in implementing these mitigation measures.

#### Cultural Resources

- Impact CR-1 (IS 24): The proposed Project could cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.

Based on a Historic Resource Evaluation Report prepared for the Project site, the existing Marshal Hale building at 3698 California Street was found to be eligible for listing in the California Register. The Marshal Hale building was determined to be significant under California Register Criterion 2 (Architecture) as a distinctive example of an Art Deco institutional building with Art Moderne design elements. The Project proposes to adaptively reuse the Marshal Hale building, and the Project has the potential to adversely impact this historic resource.

Mitigation Measure M-CR-1: Historic Preservation Plan and Protective Measures for 3698 California Street

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-CR-1 would reduce impact CR-1 to a less-than-significant level.

- Impact CR-2 (IS 32): Project-related activities could cause a substantial adverse change in the significance of an archaeological resource, pursuant to section 15064.5.

Based on a preliminary archaeological review for the proposed Project by the Planning Department, the closest previously recorded prehistoric resource, a surface concentration of lithic debitage, was identified approximately 2,000 feet north of the Project site. However, more recent geographic information system modeling of prehistoric sensitivity ranks the Project site as highly sensitive for the presence of undiscovered near-surface and buried prehistoric archaeological resource. The Project site is also adjacent to the former location of the northern entrance to the historic Lone Mountain Cemetery, as depicted on an 1869 map. The Project has the potential to adversely impact prehistoric and historical archaeological resources, if such resources are present within the Project site.

Mitigation Measure M-CR-2: Archaeological Testing

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-CR-2 would reduce impact CR-2 to a less-than-significant level.

- Impact CR-3 (IS 39): Project-related activities could disturb human remains, including those interred outside of formal cemeteries.

Based on preliminary archaeological review, Project site has low potential for encountering early historic burials during Project-related ground disturbance due to its proximity to the Lone Mountain Cemetery. In the event that construction activities disturb unknown human remains within the Project site, any inadvertent damage to human remains would be considered a significant impact.

Mitigation Measure M-CR-2: Archaeological Testing

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-CR-2 would reduce impact CR-3 to a less-than-significant level.

- Impact C-CR-1 (IS 39): The proposed Project, in combination with reasonably foreseeable future projects, could result in cumulative cultural resource impacts.

The Project site is adjacent to the former location of the northern entrance to the historic Lone Mountain Cemetery. Other reasonably foreseeable projects are within the boundaries of the Lone Mountain Cemetery, and with the exception of the Project, the other identified reasonably foreseeable projects are also within the boundaries of the later Laurel Hill Cemetery. The Project are is also considered highly sensitive for the presence of undiscovered near-surface and buried prehistoric archaeological resources. Cumulatively, development in the Project vicinity has the potential to result in impacts on human remains and related archaeological features, which is a potentially significant cumulative impact.

#### Mitigation Measure M-CR-2: Archaeological Testing

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-CR-2 would reduce impact C-CR-2 to a less-than-significant level.

#### Tribal Cultural Resources

- Impact TCR-1 (IS 41): Project-related activities could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074.

CEQA Section 21074.2 requires the lead agency to consider the effect of a project on tribal cultural resources. As defined in Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to the California Native American tribe that are listed, or determined to be eligible for listing, in a national, state, or local register of historical resources. Pursuant to State law under Assembly Bill 52 (Public Resources Code section 21080.3(d)), the Planning Department contacted Native American individuals and organizations for the San Francisco area, providing description of the Project and requesting comments on the identification, presence, and significance of tribal cultural resources in the Project vicinity. The Planning Department received no responses concerning the Project.

Based on the background research there are no known tribal cultural resources in the Project area; however, based on the preliminary archaeological review, the Project site has been assessed as having high sensitivity for the potential presence of prehistoric archaeological resources, which could also be tribal cultural resources. If tribal cultural resources are discovered during construction, such discovered would be considered a significant impact.

#### Mitigation Measure M-CR-3: Tribal Cultural Resources Interpretive Program

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-CR-3 would reduce impact TCR-1 to a less-than-significant level.



- Impact C-TCR-1 (IS 42): The proposed Project, in combination with reasonably foreseeable future projects, could result in cumulative tribal cultural resources impacts.

The Project site is adjacent to, and the reasonably foreseeable projects are within the boundaries of, the historic Lone Mountain Cemetery and the later Laurel Hill Cemetery. The area is considered highly sensitive for the presence of undiscovered near-surface and buried prehistoric archaeological resources. Cumulatively, development in the Project vicinity has the potential to cause impacts on tribal cultural resources, and the Project's impact could be cumulatively considerable if the Project were to expose tribal cultural resources.

Mitigation Measure M-CR-2: Archaeological Testing

Mitigation Measure M-CR-3: Tribal Cultural Resources Interpretive Program

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measures M-CR-2 and M-CR-3 would reduce impact C-TCR-1 to a less-than-significant level.

#### Noise

- Impact NO-1 (DEIR 4.3-30): Construction of the proposed Project could generate substantial temporary or periodic increases in ambient noise levels in the Project vicinity.

Certain equipment used in the Project construction have the potential to cause significant noise impact to sensitive receptors at distances up to 100 feet from the construction activity by exposing them to noise increase of 10 dBA or greater. The noise increase could be as high as 25 dBA, which would be substantially greater than 10 dBA and noticeable to sensitive receptors. Thus, the Project's construction activities could result in temporary or periodic construction noise that would be substantially above ambient noise level, which is considered to be significant.

Mitigation Measure M-NO-1: Construction Noise Control

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-NO-1 would reduce impact NO-1 to a less-than-significant level.

- Impact NO-2 (DEIR 4.3-36): Construction of the proposed Project could generate excessive ground-borne vibration or ground-borne noise levels.

Ground-borne vibrations from certain aspects of Project construction have the potential to affect the existing offsite structures nearest to the Project site. The construction of the Project would use heavy equipment that could generate temporary ground-borne vibration, such as bulldozers and loaded trucks. A medical office building at 3838 California Street is located adjacent to the Project site, and could contain vibration-sensitive equipment for medical uses, such as equipment found in hospital operating rooms, optical microscopes, cell probing devices, and scanning electron microscopes. Interference with the operation of vibration-sensitive equipment at the 3838 California Street building could occur, which would be considered a significant impact.

Mitigation Measure M-NO-2: Vibration-Sensitive Equipment at 3868 California Street

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-NO-2 would reduce impact NO-2 to a less-than-significant level.

- Impact C-NO-1 (DEIR 4.3-41): Construction activities for the proposed Project, in combination with reasonably foreseeable projects, could result in a substantial temporary increase in noise.

Construction noise from the three reasonably foreseeable projects could overlap with construction noise from the proposed Project. Construction noise from the proposed Project and from some of the reasonably foreseeable projects could overlap and be noticeably audible at nearby sensitive receptors, causing an increase in ambient noise levels that would be greater than 10 dBA. Thus, cumulative noise impacts could be significant.

#### Mitigation Measure M-NO-1: Construction Noise Control

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-NO-1 would reduce impact C-NO-1 to a less-than-significant level.

### Air Quality

- Impact AQ-3 (DEIR 4.4-45; RTC 5-29): Construction and operation of the proposed Project would generate toxic air contaminants, including DPM, at levels that could expose sensitive receptors to substantial pollutant concentrations.

Based on the draft 2020 Citywide Health Risk Assessment database and the updated draft air pollutant exposure zone (APEZ) map, the Project site is located within an APEZ. The updated analysis shows that under both the existing-plus-project and cumulative-plus-project conditions the Project would result in a significant health risk impact to on- and off-site sensitive receptors during the Project's construction activities.

#### Mitigation Measure AQ-3: Construction Emissions Minimization

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-AQ-3 would reduce impact AQ-3 to a less-than-significant level.

### Biological Resources

- Impact BI-1 (IS 86): The proposed Project could have a substantial adverse effect, either directly or through habitat modifications, on 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.

Existing structures on the Project site could support a variety of nesting resident and migratory birds, and existing trees and landscape vegetation could offer suitable nesting habitat for additional bird species. The proposed Project would remove some of the existing street, significant, and non-regulated on-site trees. If Project construction occurs during nesting season (January 15 through August 15), the Project may result in direct mortality of adult or young birds, destruction of active nests, and/or disturbance or nesting displacement of nesting birds, which would be a significant effect.

Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-BI-1 would reduce impact BI-1 to a less-than-significant level.

- Impact BI-2 (IS 90): The proposed Project could 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.

The Project site is used by native resident birds and is located within a bird migratory route. Construction activities have the potential to result in direct mortality for nesting birds, which would be a significant impact.

Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-BI-1 would reduce impact BI-2 to a less-than-significant level.

- Impact C-BI-1 (IS 92): The proposed Project, in combination with reasonably foreseeable projects, could result in cumulative biological resources impacts.

Three reasonably foreseeable future projects within 0.25 mile of the Project site could have an impact on nesting and migratory birds, similarly to the proposed Project. The cumulative impacts on nesting birds could be significant because reasonably foreseeable projects would remove a substantial number of trees that provide nesting habitat for avian species, which could result in a significant impact.

Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-BI-1 would reduce impact C-BI-1 to a less-than-significant level.

Geology and Soils

- Impact GE-4 (IS 103): The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Construction of the Project's below-grade parking levels and foundations would on Blocks A and B extent into the Colma formation and sediments. In total, Project would involve excavation of approximately 39,769 cubic yards of Colma formation sediments and thus the Project has the potential to disturb significant paleontological resources, which is considered a significant impact.

Mitigation Measure M-GE-4: Inadvertent Discovery of Paleontological Resources

The Commission finds that, for the reasons set forth in the Final EIR, implementing Mitigation Measure M-GE-4 would reduce impact GE-4 to a less-than-significant level.

IV. FINDINGS OF POTENTIALLY SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH THE IMPOSITION OF MITIGATION MEASURES

Based on substantial evidence in the Final EIR, the Planning Commission finds that there are no potentially significant impacts that cannot be avoided or reduced to a less-than-significant level through the imposition of mitigation measures.

V. MITIGATION MEASURES REJECTED AS INFEASIBLE

No mitigation measures identified in the Final EIR are rejected as infeasible.

VI. RECIRCULATION OF THE DRAFT EIR IS NOT REQUIRED.

The Planning Commission recognizes that the Final EIR incorporates information obtained and produced after the DEIR was completed, and that it contains additions, clarifications, and modifications, including minor changes to the project description, assessment of air quality impacts and inclusion of mitigation measure M-AQ-3 Construction Emissions Minimization. The Planning Commission has reviewed and considered the FEIR and all of this information. In certifying the FEIR, the Planning Commission found that the FEIR does not add significant new information to the DEIR that would require recirculation of the EIR under CEQA. The Planning Commission finds, for the reasons set forth in the Final EIR, that the new information added to the DEIR does not involve a new significant environmental impact, a substantial increase in the severity of a significant environmental impact, or a feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project that the Project Sponsors declines to adopt. No information indicates that the DEIR was inadequate or conclusory.

VII. EVALUATION OF AND FINDINGS RELATED TO PROJECT ALTERNATIVES ARE NOT REQUIRED

The Final EIR analyzed three alternatives to the Project – the No-Project Alternative, the Reduced Construction Alternative, and the Rehabilitation/Reuse Alternative. Because the Project will not result in significant environmental impacts that will not be avoided or substantially lessened by mitigation measures, the Planning Commission does not need to consider these alternatives included in the EIR or find them infeasible. (Public Resources Code section 21081(a)(1)-(2) and CEQA Guidelines section 15091(a)(1)-(2).)

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS NOT REQUIRED

The Planning Commission finds that, based on the evidence presented in these findings and in the Final EIR, the Project will not result in any significant impacts that cannot be mitigated to a less-than-significant level. Therefore, a statement of overriding considerations under CEQA section 21081(b) and CEQA Guidelines section 15093 is not required.

# **Exhibit B:**

## **Plans and Renderings**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# 3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## PLANNING COMMISSION HEARING SUBMITTAL

PLANNING DEPARTMENT CASE NO. 2017-003559CUA

FEBRUARY 27, 2020





Civil

	DATE	DESCRIPTION	SCALE
C-00.00 : CIVIL SHEET INDEX			
C-00.00		SHEET INDEX	1" = 80'
C-00.05			
C-00.10			
C-00.15			
C-00.20			
C-01.00 : STREET IMPROVEMENTS			
C-01.00		STREET IMPROVEMENTS - WEST	1" = 40'
C-01.05		STREET IMPROVEMENTS - EAST	1" = 40'
C-01.10			
C-01.15			
C-01.20			
C-02.00 : STREET GRADING			
C-02.00		STREET GRADING - WEST	1" = 40'
C-02.05		STREET GRADING - EAST	1" = 40'
C-A-10			
C-A-15			
C-A-20			
C-03.00 : UTILITIES - COMBINED SEWER			
C-03.00		COMBINED SEWER - WEST	1" = 40'
C-03.05		COMBINED SEWER - EAST	1" = 40'
C-B-10			
C-B-15			
C-B-20			
C-04.00 : UTILITIES - DOMESTIC/FIRE WATER			
C-04.00		DOMESTIC/FIRE WATER - WEST	1" = 40'
C-04.05		DOMESTIC/FIRE WATER - EAST	1" = 40'
C-04.10		FIRE HYDRANT COVERAGE	1" = 80'
C-C-15			
C-C-20			
C-05.00 : UTILITIES - GAS			
C-05.00		GAS - WEST	1" = 40'
C-05.05		GAS - EAST	1" = 40'
C-05.10			
C-05.15			
C-05.20			
C-06.00 : UTILITIES - ELECTRICAL			
C-06.00		ELECTRICAL - WEST	1" = 40'
C-06.05		ELECTRICAL - EAST	1" = 40'
C-06.10			
C-06.15			
C-06.20			
C-07.00 : UTILITIES - COMMUNICATIONS			
C-07.00		COMMUNICATIONS - WEST	1" = 40'
C-07.05		COMMUNICATIONS - EAST	1" = 40'
C-07.10			
C-07.15			
C-07.20			

Landscape Architecture

	DATE	DESCRIPTION	SCALE
L-01.00 : OVERALL LANDSCAPE PLAN			
L-01.00		OVERALL LANDSCAPE PLAN	1" = 60'-0"
L-01.01		STREETScape PLAN - BLOCK A	1" = 40'-0"
L-01.02		SIDEWALK ENCROACHMENT - BLOCK A	1" = 20'-0"
L-01.03		STREETScape PLAN - BLOCK B	1" = 40'-0"
L-01.04		SIDEWALK ENCROACHMENT - BLOCK B	1" = 20'-0"
L-01.05		STREETScape PLAN - BLOCK C	1" = 40'-0"
L-01.06		SIDEWALK ENCROACHMENT - BLOCK C	1" = 20'-0"
L-02.00 : TREE SUMMARY			
L-02.00		TREE PLANTING AND REMOVAL SUMMARY	N/A
L-02.01		EXISTING TREE PLAN	1" = 60'-0"
L-02.02		PROPOSED & EXISTING STREET TREE PLAN	1" = 60'-0"
L-02.03		PRECEDENT NEIGHBORHOOD STREET TREES & FRONTAGE	N/A
L-03.00 : STREET FURNISHING PLAN			
L-03.00		STREET FURNISHING PLAN	1" = 60'-0"
L-03.01		PRECEDENT FURNISHING & ENHANCED PAVING AT STREET	N/A
L-04.00 : PUBLIC R.O.W. SECTION PLAN - SACRAMENTO STREET			
L-04.00		PUBLIC R.O.W. SECTION PLAN - SACRAMENTO STREET	1" = 60'-0"
L-04.01		SACRAMENTO STREET - BLOCK A	1" = 30'-0" / 1" = 10'-0"
L-04.02		SACRAMENTO STREET - BLOCK B - WEST	1" = 30'-0" / 1" = 10'-0"
L-04.03		SACRAMENTO STREET - BLOCK B - EAST	1" = 30'-0" / 1" = 10'-0"
L-04.04		SACRAMENTO STREET - BLOCK C	1" = 30'-0" / 1" = 10'-0"

L-05.00 : PUBLIC R.O.W. SECTION PLAN - CALIFORNIA STREET			
L-05.00		PUBLIC R.O.W. SECTION PLAN - CALIFORNIA STREET	1" = 60'-0"
L-05.01		CALIFORNIA STREET - BLOCK A	1" = 30'-0" / 1" = 10'-0"
L-05.02		CALIFORNIA STREET - BLOCK B - WEST	1" = 30'-0" / 1" = 10'-0"
L-05.03		CALIFORNIA STREET - BLOCK B - EAST	1" = 30'-0" / 1" = 10'-0"
L-05.04		CALIFORNIA STREET - BLOCK C - WEST	1" = 30'-0" / 1" = 10'-0"
L-05.05		CALIFORNIA STREET - BLOCK C - EAST	1" = 30'-0" / 1" = 10'-0"
L-06.00 : PUBLIC R.O.W. SECTION PLAN - CHERRY STREET			
L-06.00		PUBLIC R.O.W. SECTION PLAN - CHERRY STREET	1" = 60'-0"
L-06.01		CHERRY STREET - NORTH	1" = 30'-0"
L-06.02		CHERRY STREET - NORTH	1" = 30'-0" / 1" = 10'-0"
L-06.03		CHERRY STREET - SOUTH	1" = 30'-0"
L-06.04		CHERRY STREET - SOUTH	1" = 30'-0" / 1" = 10'-0"
L-07.00 : PUBLIC R.O.W. SECTION PLAN - MAPLE STREET			
L-07.00		PUBLIC R.O.W. SECTION PLAN - MAPLE STREET	1" = 60'-0"
L-07.01		MAPLE STREET - NORTH	1" = 30'-0"
L-07.02		MAPLE STREET - NORTH	1" = 30'-0" / 1" = 10'-0"
L-07.03		MAPLE STREET - MID BLOCK	1" = 30'-0"
L-07.04		MAPLE STREET - MID BLOCK	1" = 30'-0" / 1" = 10'-0"
L-07.05		MAPLE STREET - SOUTH	1" = 30'-0" / 1" = 10'-0"

Architecture

	DATE	DESCRIPTION	SCALE
A-00.00 : EXISTING SITE			
		COVER SHEET	N.T.S.
A-00.00		DRAWING LIST	N.T.S.
A-00.10		EXISTING SITE PLAN: LAND USE & BLDG HEIGHTS	1/64"=1'-0"
A-00.11		EXISTING SITE PLAN DIAGRAMS: ZONING, HEIGHT & BULK DISTRICTS, EXISTING LOT LINES	1/64"=1'-0"
A-00.12		EXISTING SITE PLAN: VEHICULAR CURB CUTS	1/64"=1'-0"
A-00.13		EXISTING SITE PHOTOS: OVERALL AERIAL VIEW	N.T.S.
A-00.14		EXISTING SITE PHOTOS: BLOCK A	N.T.S.
A-00.15		EXISTING SITE PHOTOS: BLOCK B	N.T.S.
A-00.16		EXISTING SITE PHOTOS: BLOCK C	N.T.S.
A-01.00 : OVERALL PROJECT			
A-01.10		PROPOSED SITE PLAN: PROPOSED BUILDING TYPE, NUMBER OF UNITS, LEVELS ABOVE SIDEWALK GRADE	1/64"=1'-0"
A-01.11		PROPOSED SITE PLAN DIAGRAMS: ZONING, HEIGHT & BULK DISTRICTS, PROPOSED LOT LINES	1/64"=1'-0"
A-01.12		PROPOSED SITE PLAN: VEHICULAR CURB CUTS	1/64"=1'-0"
A-01.13		PROPOSED SITE PLAN: COLOR CURBS	1/64"=1'-0"
A-01.14		PROPOSED SITE PLAN: ROOF PLAN	1/64"=1'-0"
A-01.15		PROPOSED SITE PLAN: ROOF & LANDSCAPE PLAN	1/64"=1'-0"
A-A.00 : BLOCK A			
A-A.00		BLOCK A TITLE SHEET	1/32"=1'-0"
A-A.10		BUILDING HEIGHT COMPLIANCE DIAGRAM - SACRAMENTO	1/32"=1'-0"
A-A.11		BUILDING HEIGHT COMPLIANCE DIAGRAM - CHERRY	1/32"=1'-0"
A-A.12		BUILDING HEIGHT COMPLIANCE DIAGRAM - CALIFORNIA	1/32"=1'-0"
A-A.20		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A1	1"=20'-0"
A-A.21		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A2	1"=20'-0"
A-A.22		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A3	1"=20'-0"
A-A.23		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A4	1"=20'-0"
A-A.24		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A5	1"=20'-0"
A-A.25		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - A6	1"=20'-0"
A-A.30		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - A7 (CALI & CHERRY: A7)	1/32"=1'-0"
A-A.35		PROJECTIONS OVER STREET - A5	1"=20'-0"
A-A.40		FRONT SETBACKS	1/32"=1'-0"
A-A.45		REAR SETBACKS & SECTION 134 - A1-A6 /WHOLE BLOCK	1/32"=1'-0"
A-A.46		OPEN SPACE DIAGRAM	1/32"=1'-0"
A-A.50		PARKING PLAN COMPLIANCE DIAGRAM - LL2	1/32"=1'-0"
A-A.51		PARKING PLAN COMPLIANCE DIAGRAM - LL1	1/32"=1'-0"
A-A.52		PARKING PLAN COMPLIANCE DIAGRAM - EASEMENT	1/32"=1'-0"
A-B.00 : BLOCK B			
A-B.00		BLOCK B TITLE SHEET	1/32"=1'-0"
A-B.10		BUILDING HEIGHT COMPLIANCE DIAGRAM - SACRAMENTO	1/32"=1'-0"
A-B.11		BUILDING HEIGHT COMPLIANCE DIAGRAM - CHERRY	1/32"=1'-0"
A-B.12		BUILDING HEIGHT COMPLIANCE DIAGRAM - CALIFORNIA	1/32"=1'-0"
A-B.13		BUILDING HEIGHT COMPLIANCE DIAGRAM - MAPLE	1/32"=1'-0"

A-B.14		BUILDING HEIGHT COMPLIANCE DIAGRAM - MEWS LANE	1/32"=1'-0"
A-B.15		BLOCK B: BULK LIMIT COMPLIANCE DIAGRAM	1/32"=1'-0"
A-B.20		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B1	1"=20'-0"
A-B.21		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B2	1"=20'-0"
A-B.22		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B3	1"=20'-0"
A-B.23		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B4	1"=20'-0"
A-B.24		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B5	1"=20'-0"
A-B.25		RH-2 BUILDING HEIGHT COMPLIANCE DIAGRAM - B6	1"=20'-0"
A-B.30		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - SACRAMENTO: B12, B13, B18	1/32"=1'-0"
A-B.31		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - CHERRY: B7	1/32"=1'-0"
A-B.32		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - CALIFORNIA: B7, B8, B9, B10	1/32"=1'-0"
A-B.33		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - MAPLE: B10, B11, B12	1/32"=1'-0"
A-B.40		FRONT SETBACKS	1/32"=1'-0"
A-B.45		REAR SETBACKS & SECTION 134- B3-B6 / WHOLE BLOCK	1/32"=1'-0"
A-B.46		OPEN SPACE DIAGRAM	1/32"=1'-0"
A-B.50		PARKING PLAN COMPLIANCE DIAGRAM - LL2	1/32"=1'-0"
A-B.51		PARKING PLAN COMPLIANCE DIAGRAM - LL1	1/32"=1'-0"
A-C.00 : BLOCK C			
A-C.00		BLOCK C TITLE SHEET	1/32"=1'-0"
A-C.10		BUILDING HEIGHT COMPLIANCE DIAGRAM - SACRAMENTO	1/32"=1'-0"
A-C.11		BUILDING HEIGHT COMPLIANCE DIAGRAM - MAPLE	1/32"=1'-0"
A-C.12		BUILDING HEIGHT COMPLIANCE DIAGRAM - CALIFORNIA	1/32"=1'-0"
A-C.13		BLOCK C: BULK LIMIT COMPLIANCE DIAGRAM	1/32"=1'-0"
A-C.30		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - SACRAMENTO & MAPLE: C4, C5	1/32"=1'-0"
A-C.31		RM-2 BUILDING FRONTAGE MODULATION DIAGRAM - CALIFORNIA: C6, C7	1/32"=1'-0"
A-C.40		FRONT SETBACKS	1/32"=1'-0"
A-C.45		REAR SETBACKS & SECTION 134 - C1-C3 (WHOLE BLOCK )	1/32"=1'-0"
A-C.46		COMMON OPEN SPACE	1/32"=1'-0"
A-C.50		PARKING PLAN COMPLIANCE DIAGRAM - LL2	1/32"=1'-0"
A-C.51		PARKING PLAN COMPLIANCE DIAGRAM - LL1	1/32"=1'-0"
A-04.00 : SITE SECTIONS			
A-04.00		SITE SECTIONS TITLE SHEET	N.T.S.
A-04.01		W-E SITE SECTION A	1/64"=1'-0"
A-04.02		E-W SITE SECTION B	1/64"=1'-0"
A-04.10		BLOCK A TITLE SHEET	N.T.S.
A-04.11		N-S SECTION 1	1/32"=1'-0"
A-04.12		N-S SECTION 2	1/32"=1'-0"
A-04.13		W-E SECTION A	1/32"=1'-0"
A-04.20		BLOCK B TITLE SHEET	N.T.S.
A-04.21		N-S SECTION 3	1/32"=1'-0"
A-04.22		N-S SECTION 4	1/32"=1'-0"
A-04.23		N-S SECTION 5	1/32"=1'-0"
A-04.24		N-S SECTION 6	1/32"=1'-0"
A-04.25		W-E SECTION A	1/32"=1'-0"
A-04.26		E-W SECTION B	1/32"=1'-0"
A-04.30		BLOCK C TITLE SHEET	N.T.S.
A-04.31		N-S SECTION 7	1/32"=1'-0"
A-04.32		N-S SECTION 8	1/32"=1'-0"
A-04.33		W-E SECTION A	1/32"=1'-0"
A-05.00 : MATERIALS			
A-05.00		PROJECT SUMMARY TITLE SHEET	N.T.S.
A-05.10		BLOCK A - SACRAMENTO STREET	1/32"=1'-0"
A-05.11		BLOCK A - CHERRY STREET	1/32"=1'-0"
A-05.12		BLOCK A - CALIFORNIA STREET	1/32"=1'-0"
A-05.20		BLOCK B - SACRAMENTO STREET	1/32"=1'-0"
A-05.21		BLOCK B - CHERRY STREET	1/32"=1'-0"
A-05.22		BLOCK B - CALIFORNIA STREET	1/32"=1'-0"
A-05.23		BLOCK B - MAPLE STREET	1/32"=1'-0"
A-05.24		BLOCK B - MEWS	1/32"=1'-0"
A-05.30		BLOCK C - SACRAMENTO STREET	1/32"=1'-0"
A-05.31		BLOCK C - MAPLE STREET	1/32"=1'-0"
A-05.32		BLOCK C - CALIFORNIA STREET	1/32"=1'-0"
A-05.40		MATERIAL BOARDS	N.T.S.
A-05.41		STONE	N.T.S.
A-05.42		STONE	N.T.S.
A-05.43		CAST STONE & GFRC	N.T.S.
A-05.50		BRICK	N.T.S.
A-05.60		STUCCO	N.T.S.
A-05.61		STUCCO	N.T.S.
A-05.70		WOOD SHINGLES	N.T.S.
A-05.71		WOOD CLAPBOARD/ENGINEERED WOOD CLAPBOARD	N.T.S.
A-05.72		PAINTED WOOD / ENGINEERED WOOD	N.T.S.
A-05.73		PAINTED WOOD / ENGINEERED WOOD	N.T.S.
A-05.80		PAINTED METAL	N.T.S.
A-05.81		METAL	N.T.S.
A-05.90		ASPHALT SHINGLES	N.T.S.
A-05.91		ROOF TILES	N.T.S.
A-06.00 : RENDERINGS			
A-06.00		RENDERINGS TITLE SHEET	N.T.S.
A-06.10		EIR VIEWS	N.T.S.

A-06.11		JORDAN AVENUE - EXISTING	N.T.S.
A-06.12		JORDAN AVENUE - PROPOSED	N.T.S.
A-06.13		COMMONWEALTH AVENUE - EXISTING	N.T.S.
A-06.14		COMMONWEALTH AVENUE - PROPOSED	N.T.S.
A-06.15		PARKER AVENUE - EXISTING	N.T.S.
A-06.16		PARKER AVENUE - PROPOSED	N.T.S.
A-06.17		CALIFORNIA STREET - EXISTING	N.T.S.
A-06.18		CALIFORNIA STREET - PROPOSED	N.T.S.
A-06.19		CHERRY STREET - EXISTING	N.T.S.
A-06.20		CHERRY STREET - PROPOSED	N.T.S.
A-06.21		SACRAMENTO STREET - EXISTING	N.T.S.
A-06.22		SACRAMENTO STREET - PROPOSED	N.T.S.
A-06.30		ADDITIONAL VIEWS	N.T.S.
A-06.31		CALIFORNIA STREET	N.T.S.
A-06.32		CALIFORNIA STREET	N.T.S.
A-06.33		MAPLE STREET	N.T.S.
A-06.34		SACRAMENTO STREET	N.T.S.
A-06.40		AERIAL VIEW	N.T.S.
A-06.41		AERIAL VIEW - EXISTING	N.T.S.
A-06.42		AERIAL VIEW - PROPOSED	N.T.S.
A-07.00 : PROJECT SUMMARY			
A-07.00		PROJECT SUMMARY TITLE SHEET	N.T.S.
A-07.01		PROJECT SUMMARY	N.T.S.
A-07.10		PROPOSED SITE PLAN DIAGRAMS: LOT COVERAGE	1/64"=1'-0"
A-07.11		PROPOSED SITE PLAN DIAGRAMS: OPEN SPACE	1/64"=1'-0"

UNIT LAYOUTS			
A0.01-C: BLOCK A			
A0.01-A		BLOCK A UNIT COUNT	N.T.S.
A2.01-A1		BUILDING PLANS - A1	1/16"=1'-0"
A2.G1-A5		BUILDING PLANS - BASEMENT - A5	1/16"=1'-0"
A2.01-A5		BUILDING PLANS -FLOORS 1,2,3 - A5	1/16"=1'-0"
A2.01-A6		BUILDING PLANS - A6	1/16"=1'-0"
A2.G1-A7		BUILDING PLAN - BASEMENT - A7	1/16"=1'-0"
A2.01-A7		BUILDING PLAN - FLOOR 1 - A7	1/16"=1'-0"
A2.02-A7		BUILDING PLAN - FLOOR 2 - A7	1/16"=1'-0"
A2.03-A7		BUILDING PLAN - FLOOR 4 - A7	1/16"=1'-0"
A2.04-A7		BUILDING PLAN - FLOOR 5 - A7	1/16"=1'-0"
A0.01-C: BLOCK B			
A0.01-B		BLOCK B UNIT COUNT	N.T.S.
A2.01-B1		BUILDING PLANS - B1	1/16"=1'-0"
A2.01-B2		BUILDING PLANS - B2	1/16"=1'-0"
A2.01-B3		BUILDING PLANS - B3	1/16"=1'-0"
A2.01-B7		BUILDING PLAN - FLOORS 1 & 2 - B7	1/16"=1'-0"
A2.02-B7		BUILDING PLAN - FLOORS 3 & 4 - B7	1/16"=1'-0"
A2.03-B7		BUILDING PLAN - FLOORS 5 & 6 - B7	1/16"=1'-0"
A2.04-B7		BUILDING PLAN - FLOOR 7 - B7	1/16"=1'-0"
A2.01-B8		BUILDING PLAN - FLOOR 1 - B8	1/16"=1'-0"
A2.02-B8		BUILDING PLAN - FLOOR 2 - B8	1/16"=1'-0"
A2.03-B8		BUILDING PLAN - FLOOR 3 - B8	1/16"=1'-0"
A2.04-B8		BUILDING PLAN - FLOORS 4 & 5 - B8	1/16"=1'-0"
A2.01-B9		BUILDING PLAN - FLOOR 1 - B9	1/16"=1'-0"
A2.02-B9		BUILDING PLAN - FLOOR 2 - B9	1/16"=1'-0"
A2.03-B9		BUILDING PLAN - FLOORS 3 & 4 - B9	1/16"=1'-0"
A2.04-B9		BUILDING PLAN - FLOOR 5 - B9	1/16"=1'-0"
A2.01-B10		BUILDING PLAN - FLOORS 1 & 2 - B10	1/16"=1'-0"
A2.02-B10		BUILDING PLAN - FLOORS 3 & 4 - B10	1/16"=1'-0"
A2.03-B10		BUILDING PLAN - FLOORS 5 & 6 - B10	1



# ARCHITECTURE

# RAMSA

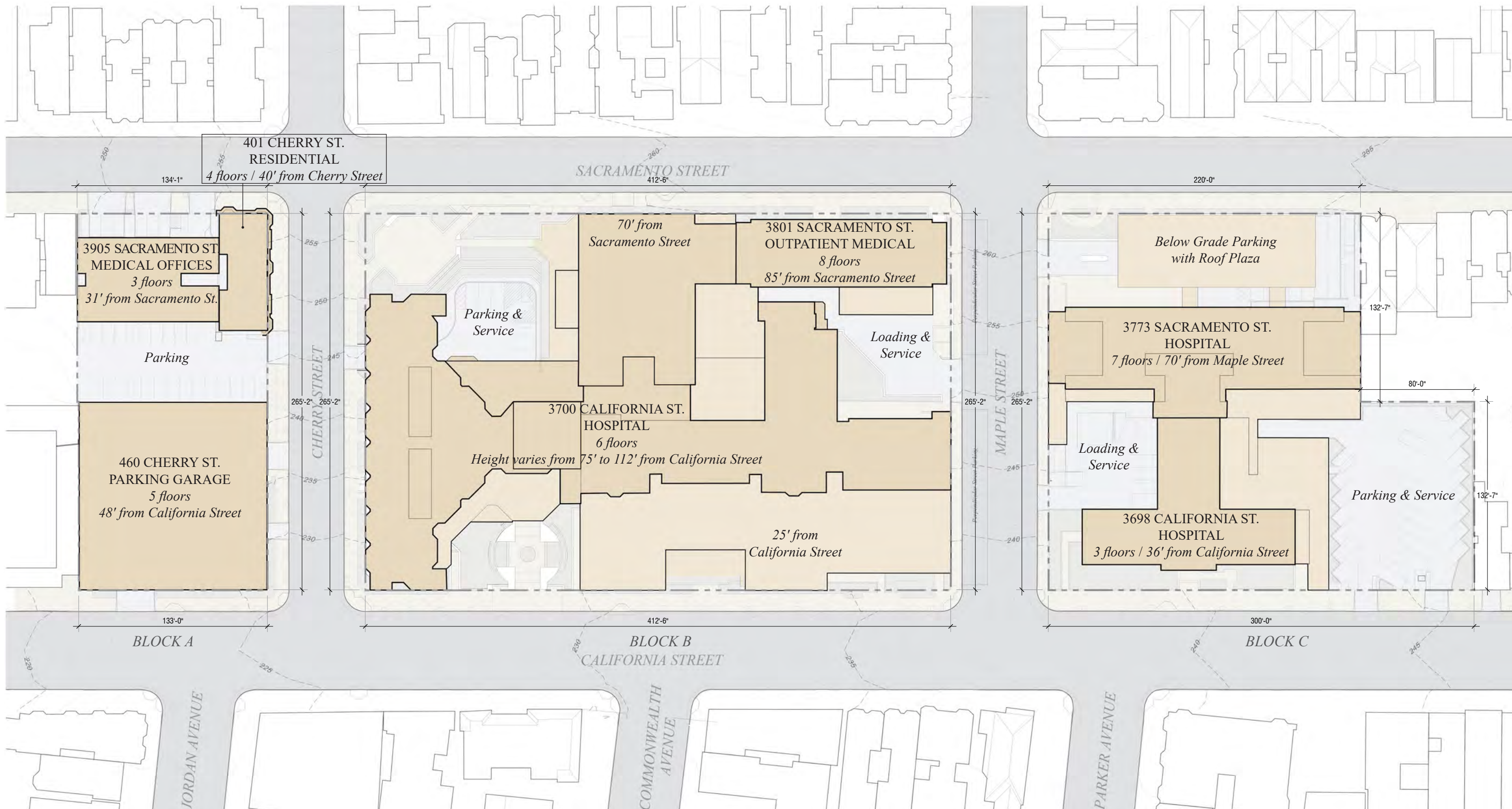
ROBERT A.M. STERN ARCHITECTS

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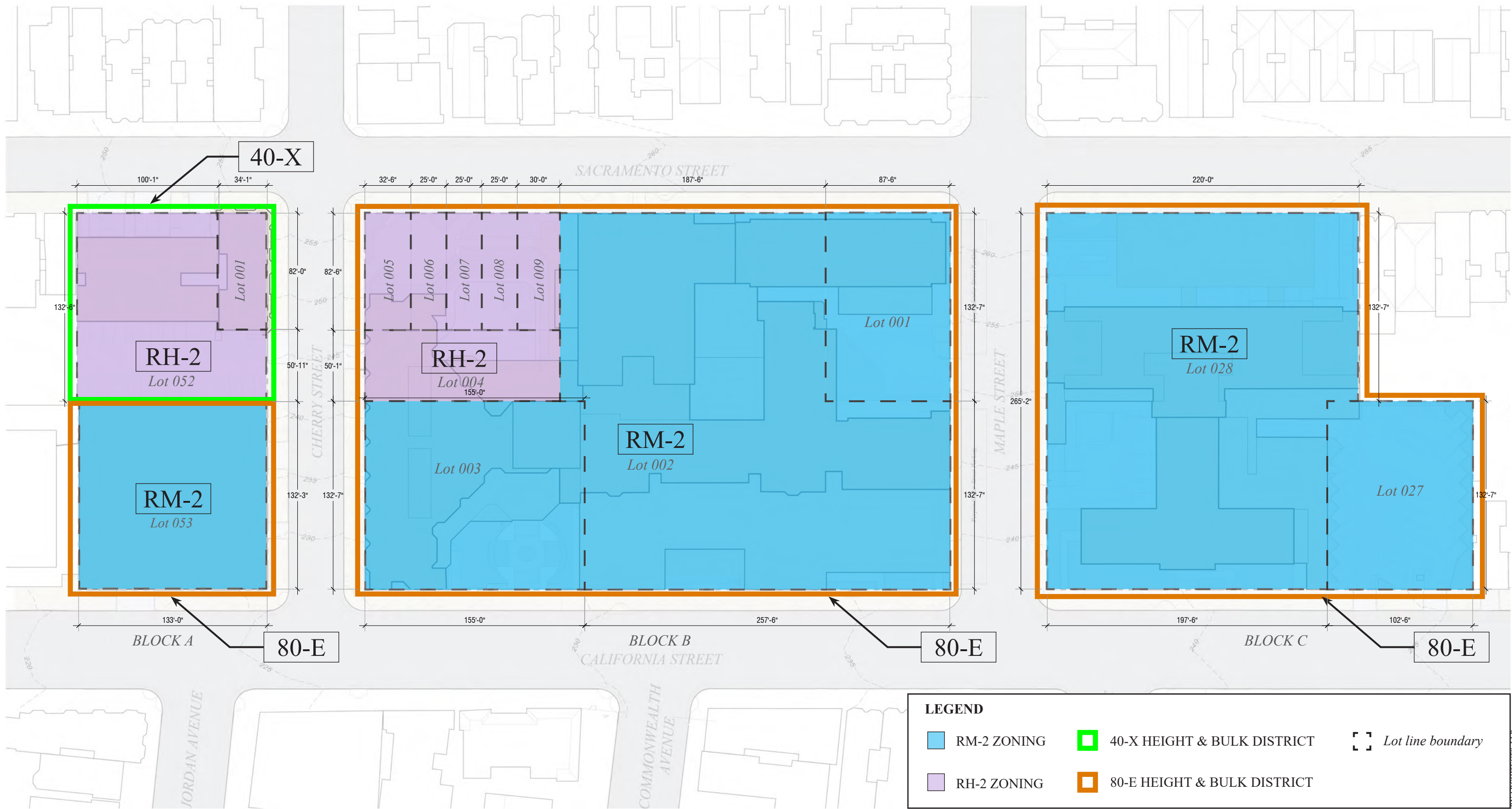
## EXISTING LAND USE & BUILDING HEIGHTS

### EXISTING SITE PLAN

SCALE: 1/64" = 1'

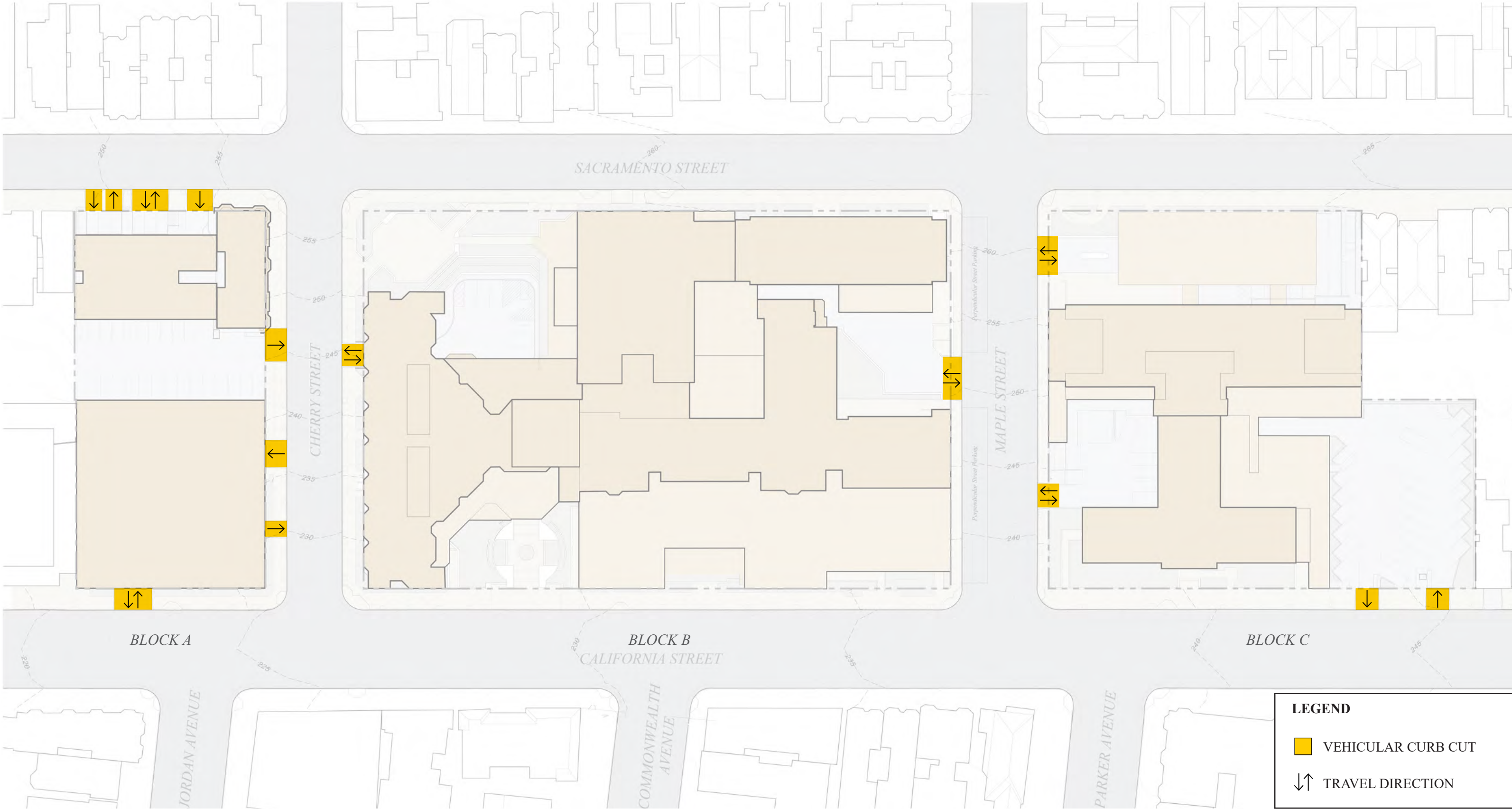








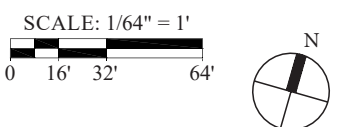
**LEGEND**

RM-2 ZONING	40-X HEIGHT & BULK DISTRICT	Lot line boundary
RH-2 ZONING	80-E HEIGHT & BULK DISTRICT	



**LEGEND**

 VEHICULAR CURB CUT  
 TRAVEL DIRECTION

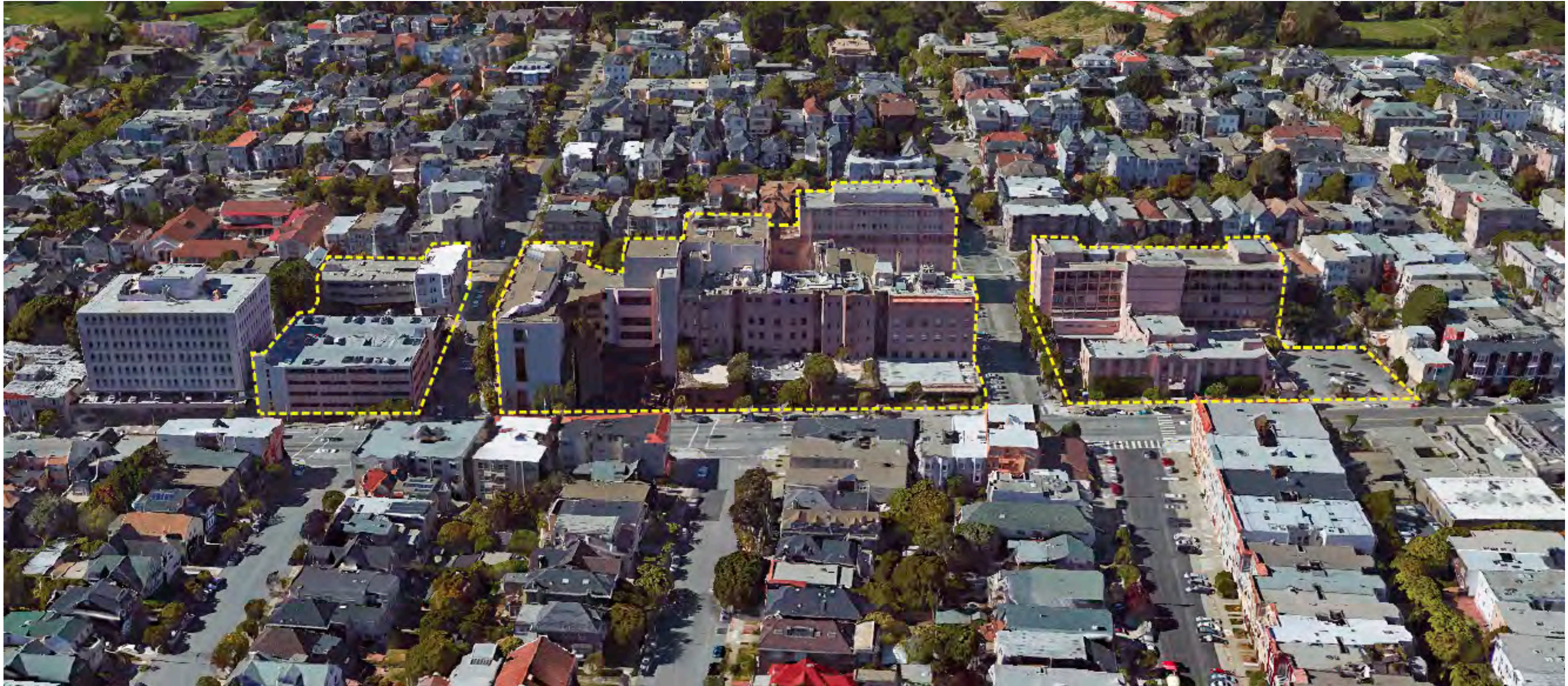


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# EXISTING VEHICULAR CURB CUTS

## EXISTING SITE PLAN: DIAGRAMS



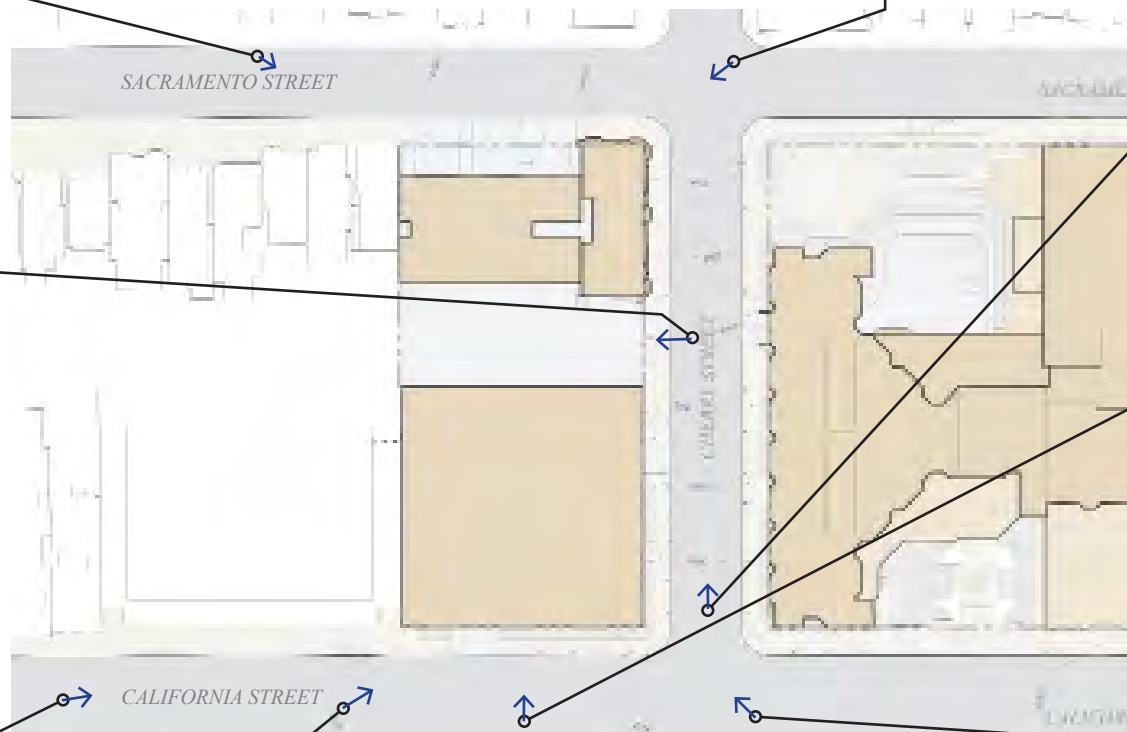
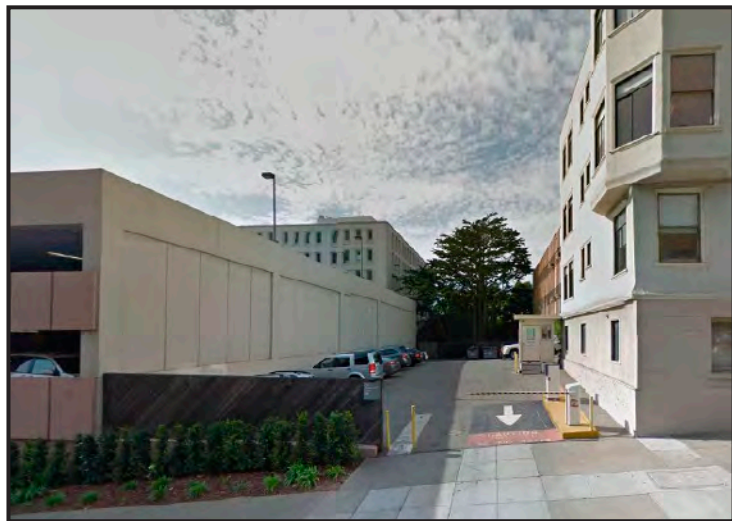
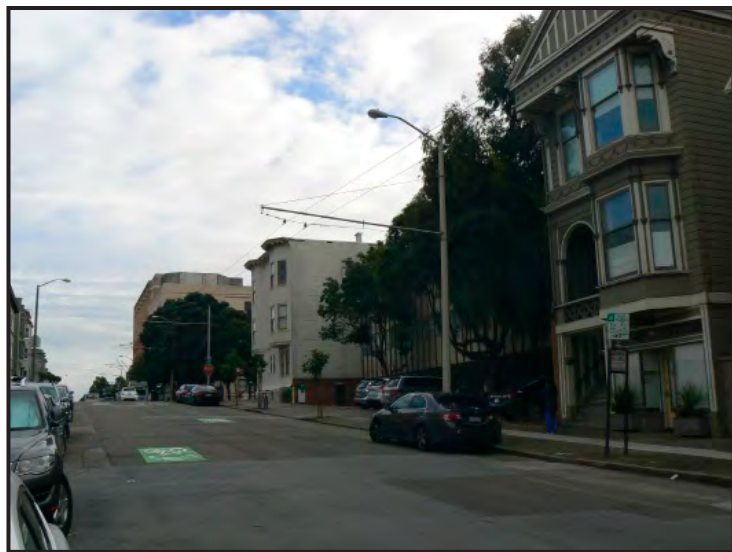


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OVERALL AERIAL VIEW

PHOTOS OF EXISTING SITE





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BLOCK A

PHOTOS OF EXISTING SITE



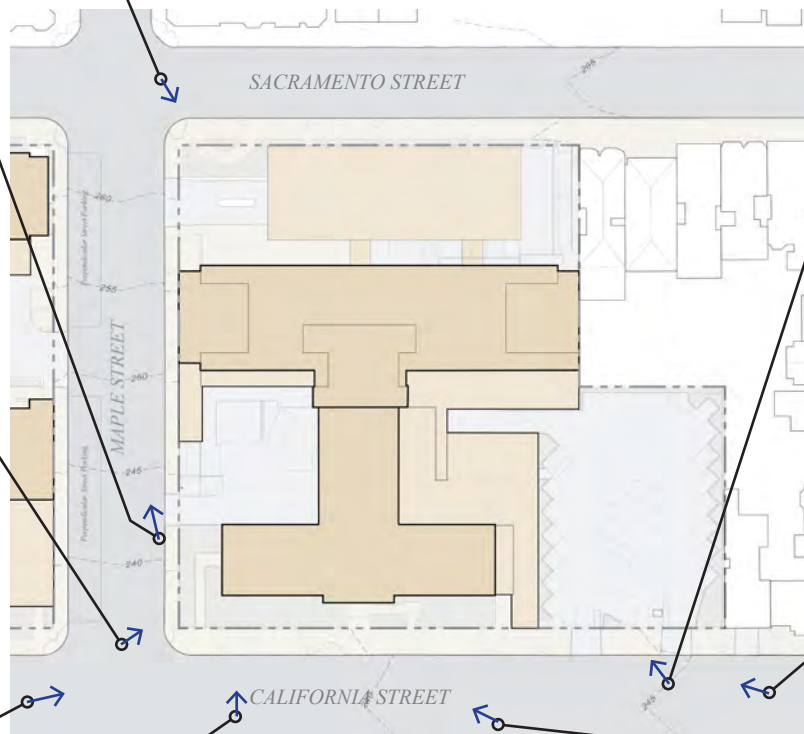


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BLOCK B

# PHOTOS OF EXISTING SITE





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BLOCK C

PHOTOS OF EXISTING SITE





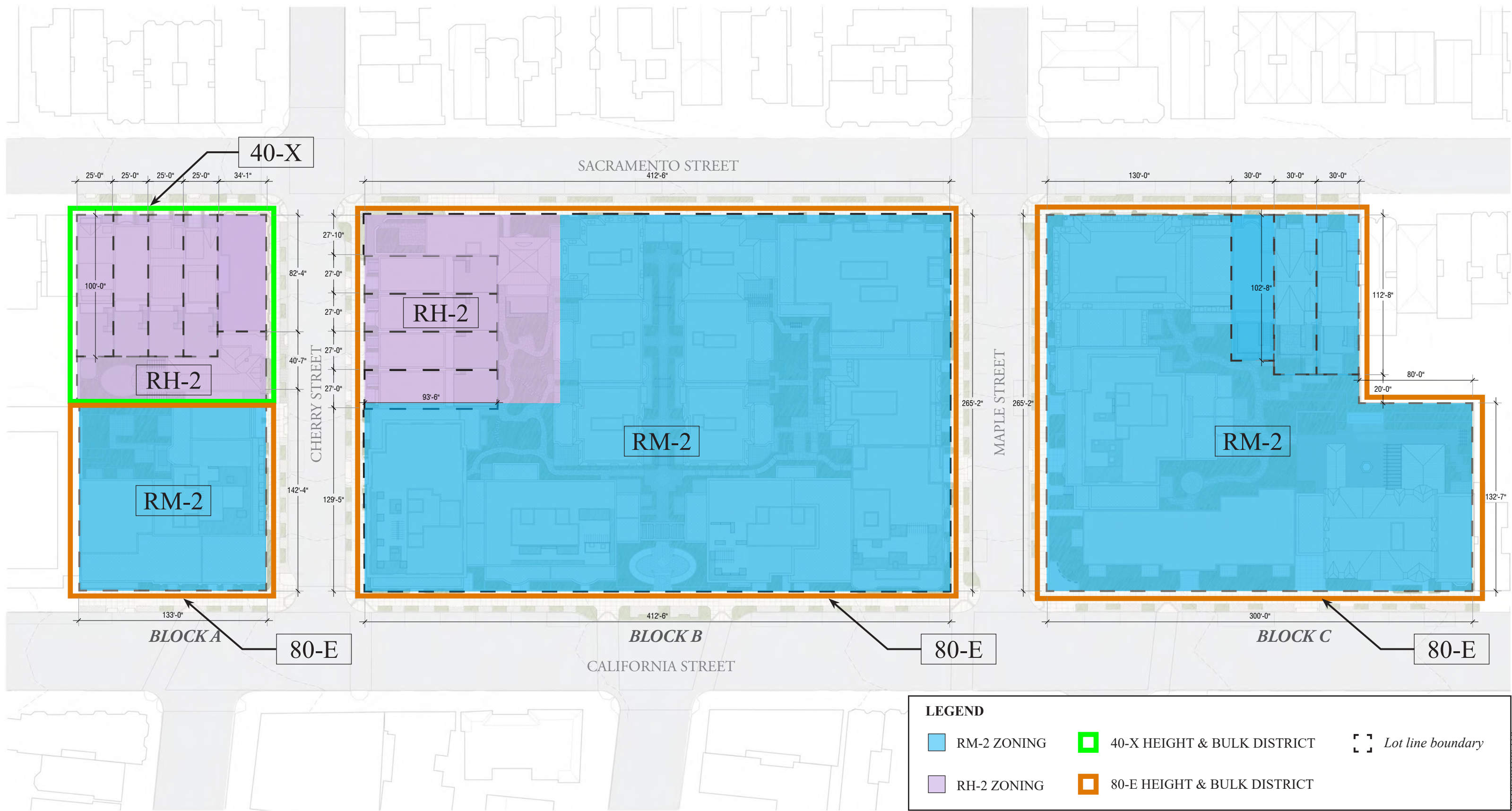
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PROPOSED BUILDING TYPE,  
NUMBER OF UNITS, LEVELS ABOVE SIDEWALK GRADE

PROPOSED SITE PLAN

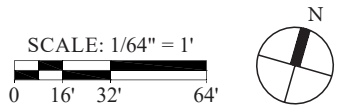




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## ZONING, HEIGHT & BULK DISTRICTS, PROPOSED LOT LINES

### PROPOSED SITE PLAN: DIAGRAMS





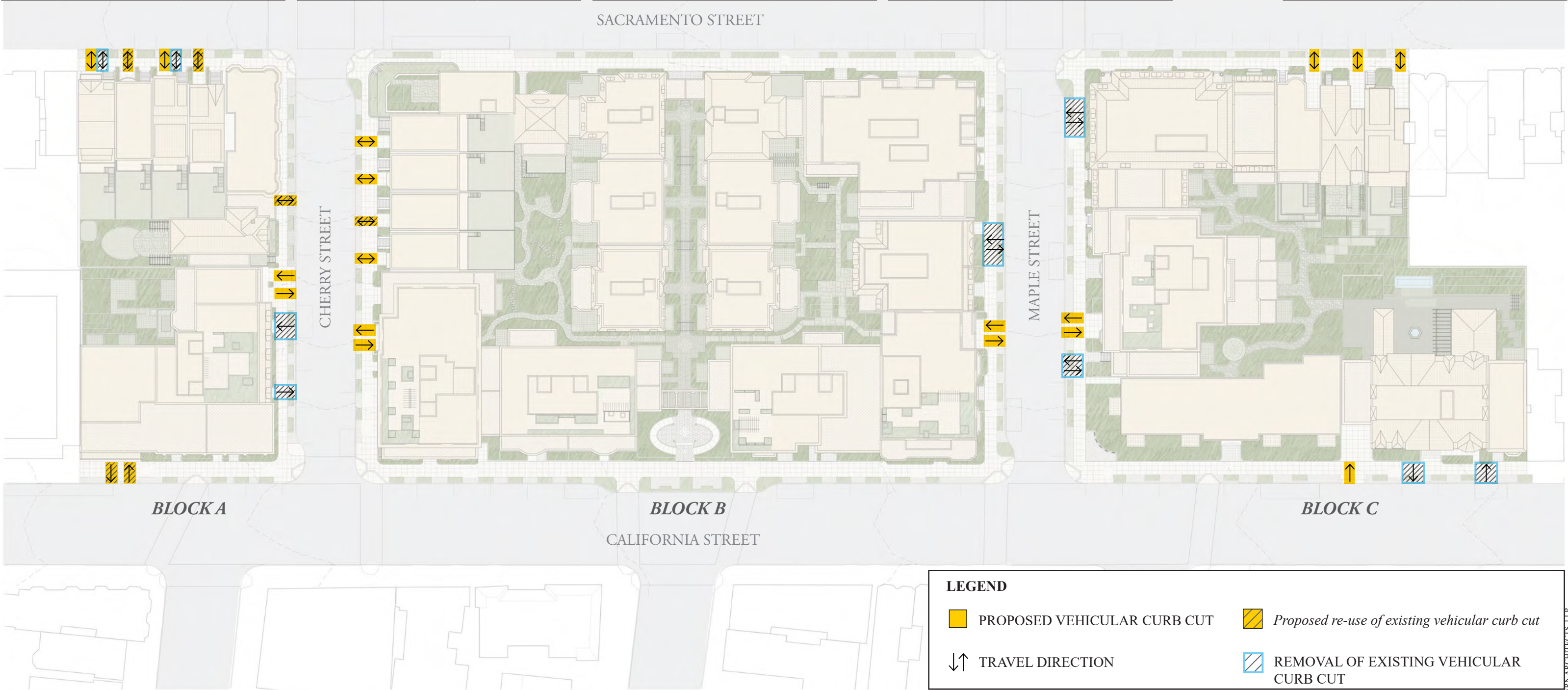
CALIFORNIA STREET	<i>Vehicular Curb Cuts</i>
EXISTING	3
To be re-used	2
To be removed	(2)
PROPOSED	3
Net Change	0

CHERRY STREET	<i>Vehicular Curb Cuts</i>
EXISTING	4
To be re-used	2
To be removed	(2)
PROPOSED	9
Net Change	+5

MAPLE STREET	<i>Vehicular Curb Cuts</i>
EXISTING	3
To be re-used	0
To be removed	(3)
PROPOSED	4
Net Change	+1

SACRAMENTO STREET	<i>Vehicular Curb Cuts</i>
EXISTING	4
To be re-used	2
To be removed	(2)
PROPOSED	7
Net Change	+3

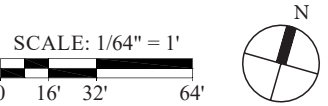
OVERALL SITE	<i>Vehicular Curb Cuts</i>
EXISTING	14
To be re-used	8
To be removed	(7)
PROPOSED	23
Net Change	+9



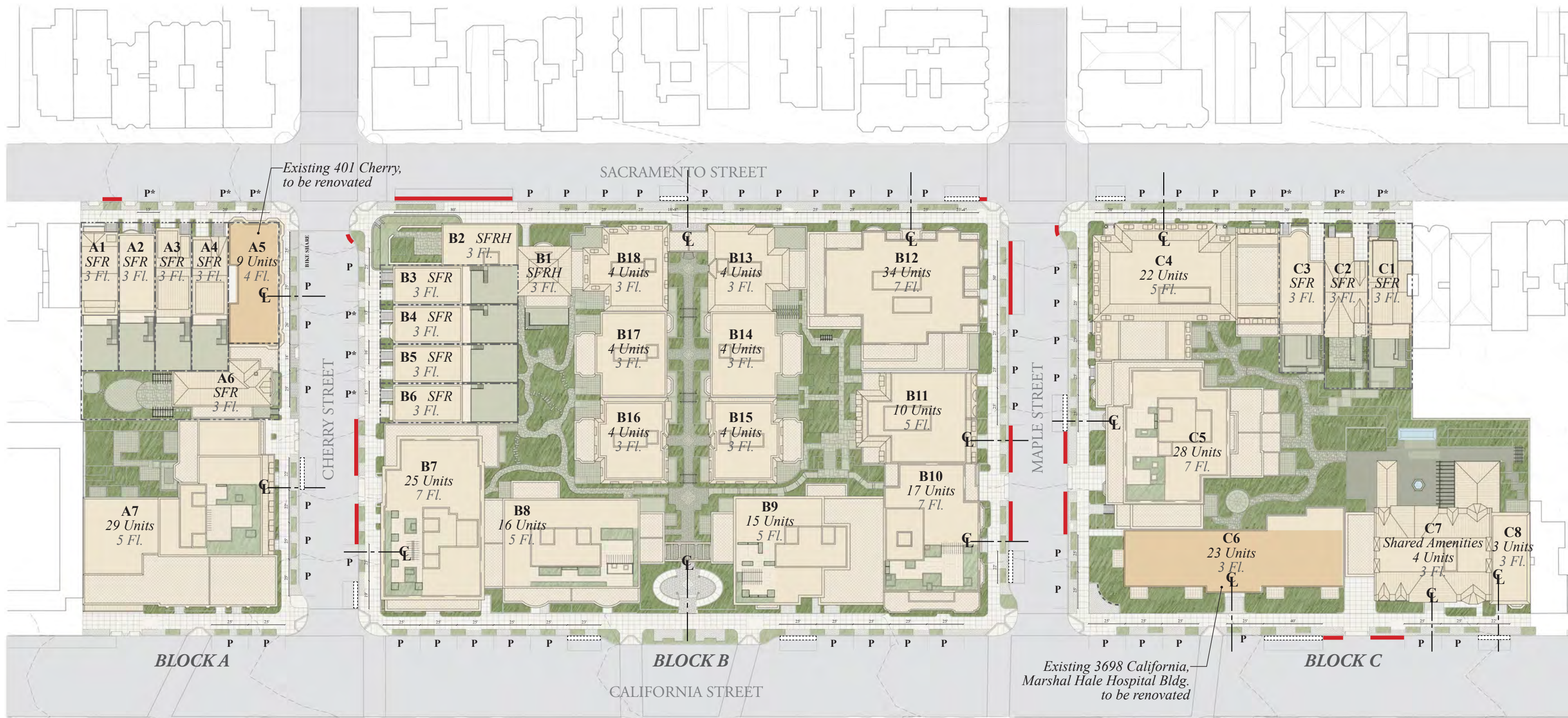
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PROPOSED VEHICULAR CURB CUTS

PROPOSED SITE PLAN: DIAGRAMS







**NOTE**  
 THE CITY OF SAN FRANCISCO WILL NOT STRIPE PARKING SPACES, SO THE PARKING LABELS ARE APPROXIMATIONS OF LOCATIONS WHERE LEGAL PARKING WOULD BE ALLOWED ASSUMING 25 FEET FOR MOST PARKING SPACES, AND 16 TO 20 FEET FOR CONSTRAINED SPACES BETWEEN DRIVEWAYS.

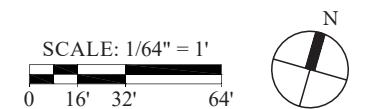
**LEGEND**

- RED CURB ZONE - "NO PARKING ZONE"
- WHITE CURB ZONE - "PASSENGER LOADING AND UNLOADING"
- P PUBLIC PARKING
- P\* CONSTRAINED PUBLIC PARKING
- CL CENTER LINE OF MAIN BUILDING ENTRANCE

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# PROPOSED CURB COLORS & STREET PARKING

## PROPOSED SITE PLAN: DIAGRAMS







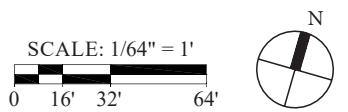
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## ROOF PLAN

## PROPOSED SITE PLAN: DIAGRAMS





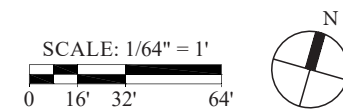


3700 CALIFORNIA STREET

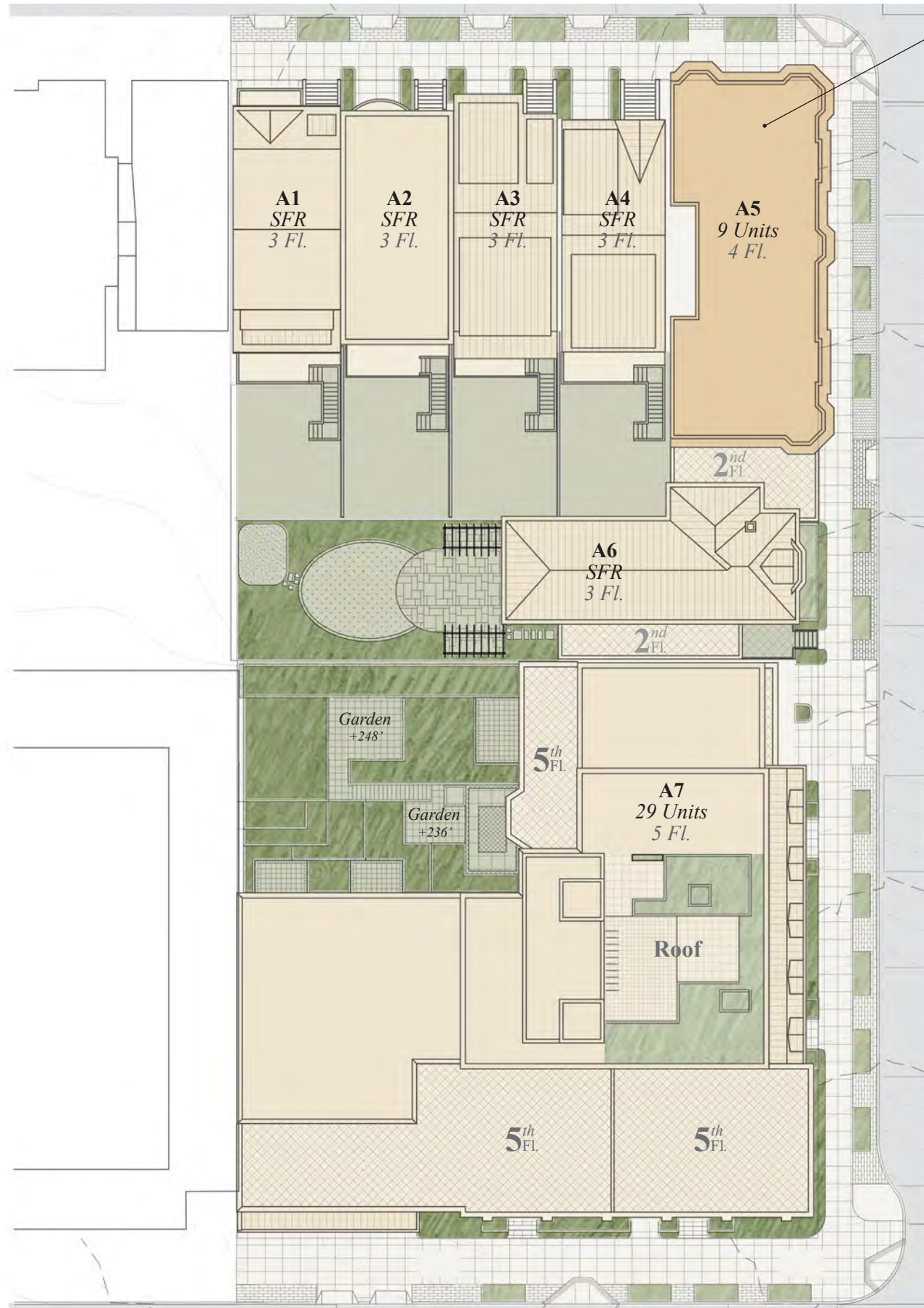
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## ILLUSTRATIVE SITE PLAN

### PROPOSED SITE PLAN: DIAGRAMS



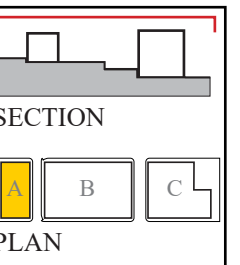




Existing 401 Cherry,  
to be renovated

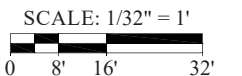
**NOTE:**  
Terraces are labeled  
with occupied floor  
level. Ex: 5<sup>th</sup><sub>Fl.</sub>

KEY



SECTION

PLAN

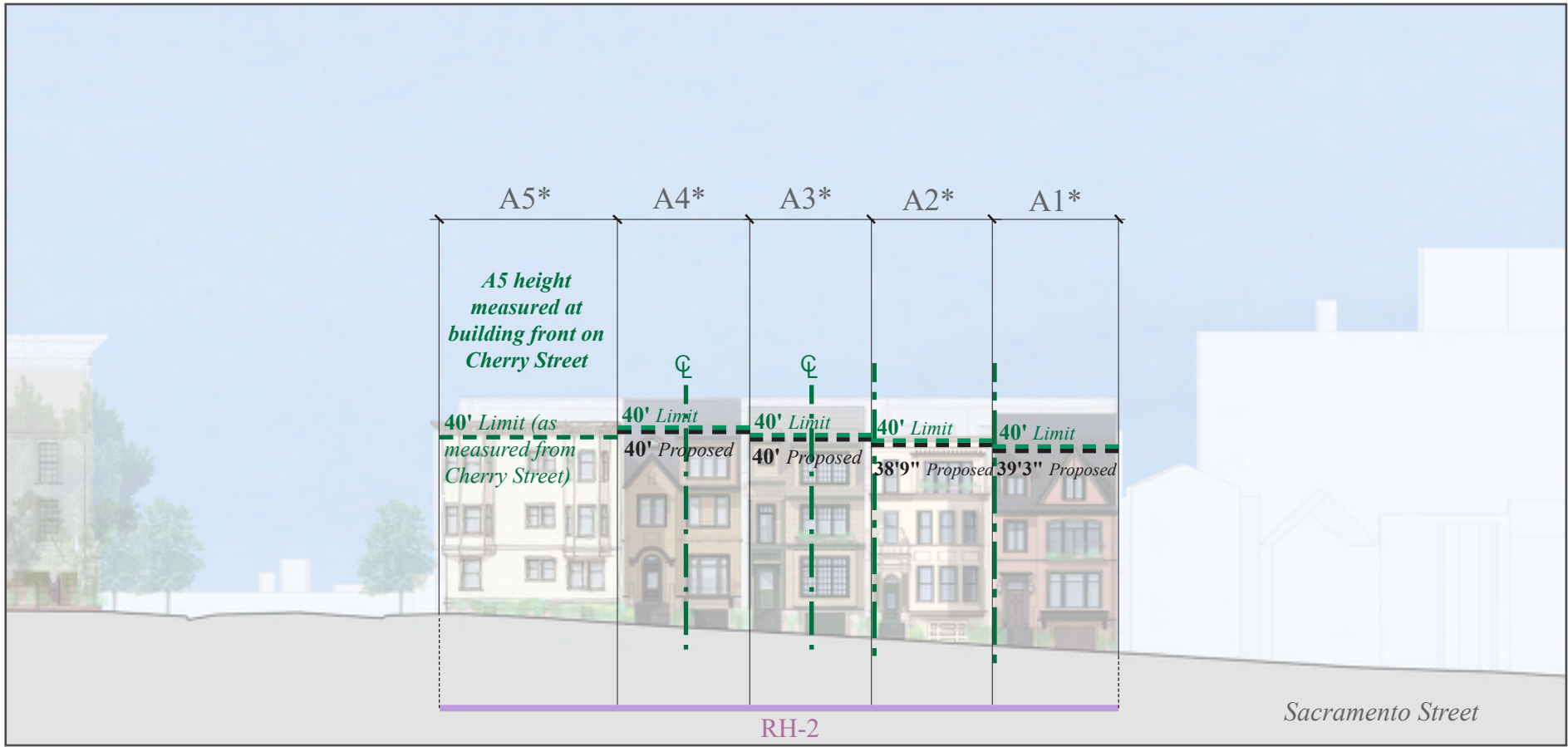


3700 CALIFORNIA STREET

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BLOCK A

BLOCK A TITLE SHEET



*\*Note:* For Block A RH-2 Height Diagrams, refer to pages A-A.20-25.

**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under sub-section (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



KEY PLAN

LEGEND

RM-2 ZONING

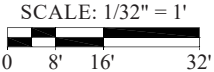
RH-2 ZONING

40' RH-2 HEIGHT LIMIT  
[SECTION 261]

40' HEIGHT LIMIT  
[40-X HEIGHT & BULK DISTRICT]

80' HEIGHT LIMIT  
[80-E HEIGHT & BULK DISTRICT]

ACTUAL HEIGHT

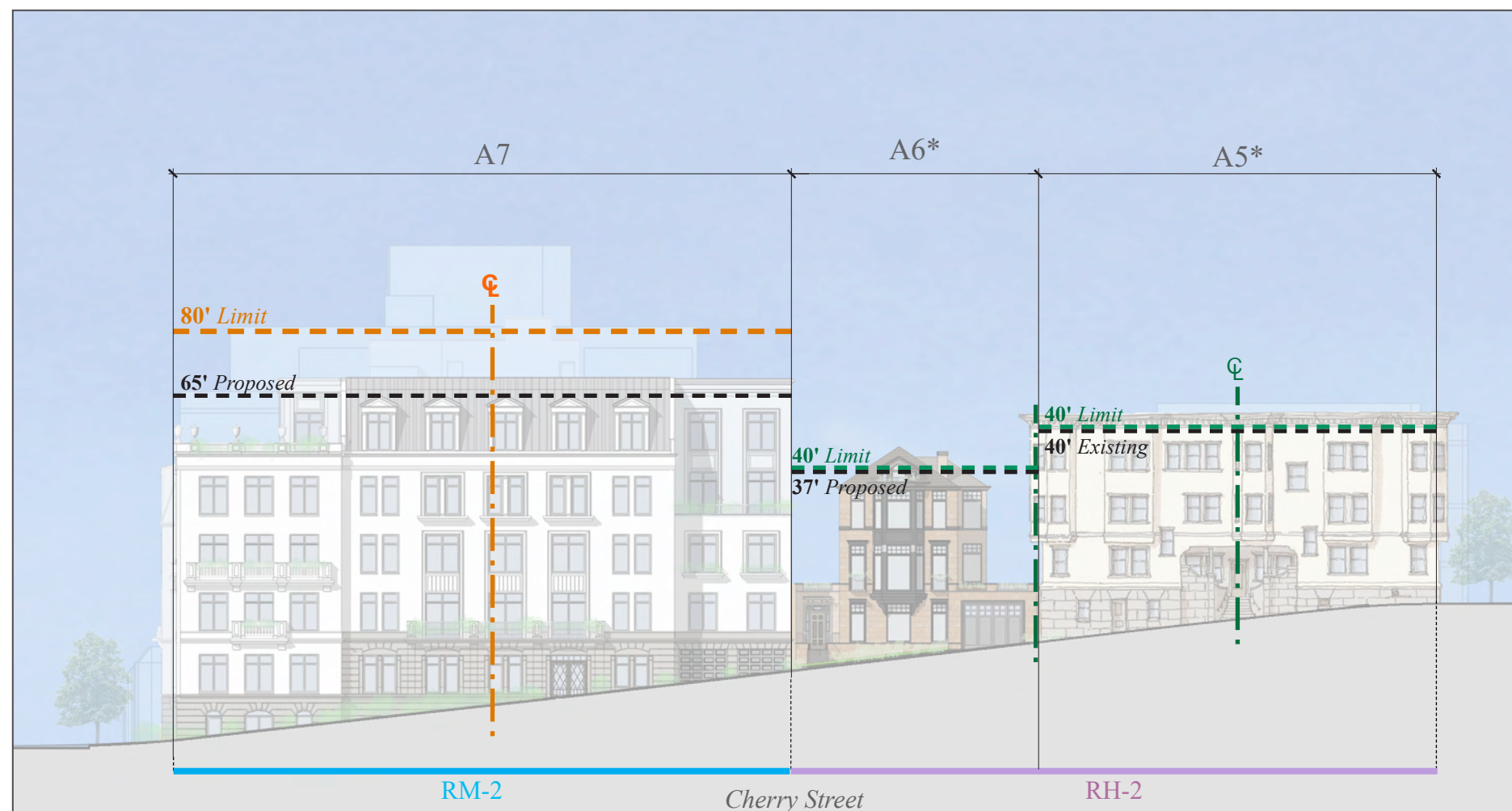


3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

SACRAMENTO STREET

BLOCK A: BUILDING HEIGHT DIAGRAM





**\*Note:** For Block A RH-2 Height Diagrams, refer to pages A-A.20-25.

**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



KEY PLAN

LEGEND	
<span style="color: blue;">—</span>	RM-2 ZONING
<span style="color: purple;">—</span>	RH-2 ZONING
<span style="color: purple;">- - -</span>	40' RH-2 HEIGHT LIMIT [SECTION 261]
<span style="color: green;">- - -</span>	40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
<span style="color: orange;">- - -</span>	80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
<span style="color: black;">- - -</span>	ACTUAL HEIGHT

SCALE: 1/32" = 1'  
0 8' 16' 32'

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CHERRY STREET

## BLOCK A: BUILDING HEIGHT DIAGRAM



**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



LEGEND

RM-2 ZONING

RH-2 ZONING

40' RH-2 HEIGHT LIMIT  
[SECTION 261]

40' HEIGHT LIMIT  
[40-X HEIGHT & BULK DISTRICT]

80' HEIGHT LIMIT  
[80-E HEIGHT & BULK DISTRICT]

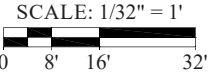
ACTUAL HEIGHT

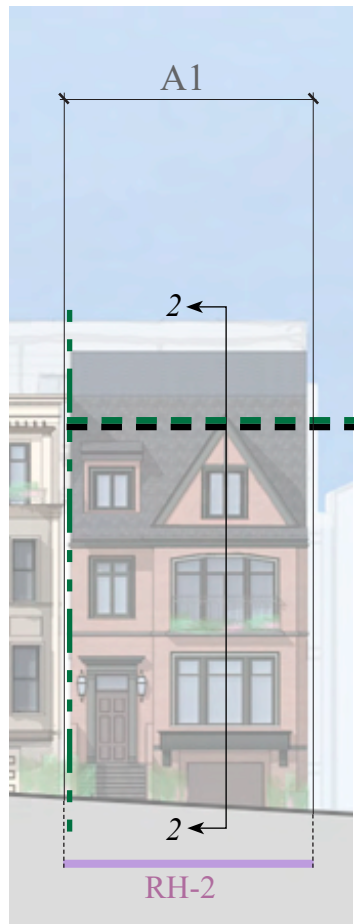
3700 CALIFORNIA STREET

SAN FRANCISCO, CA

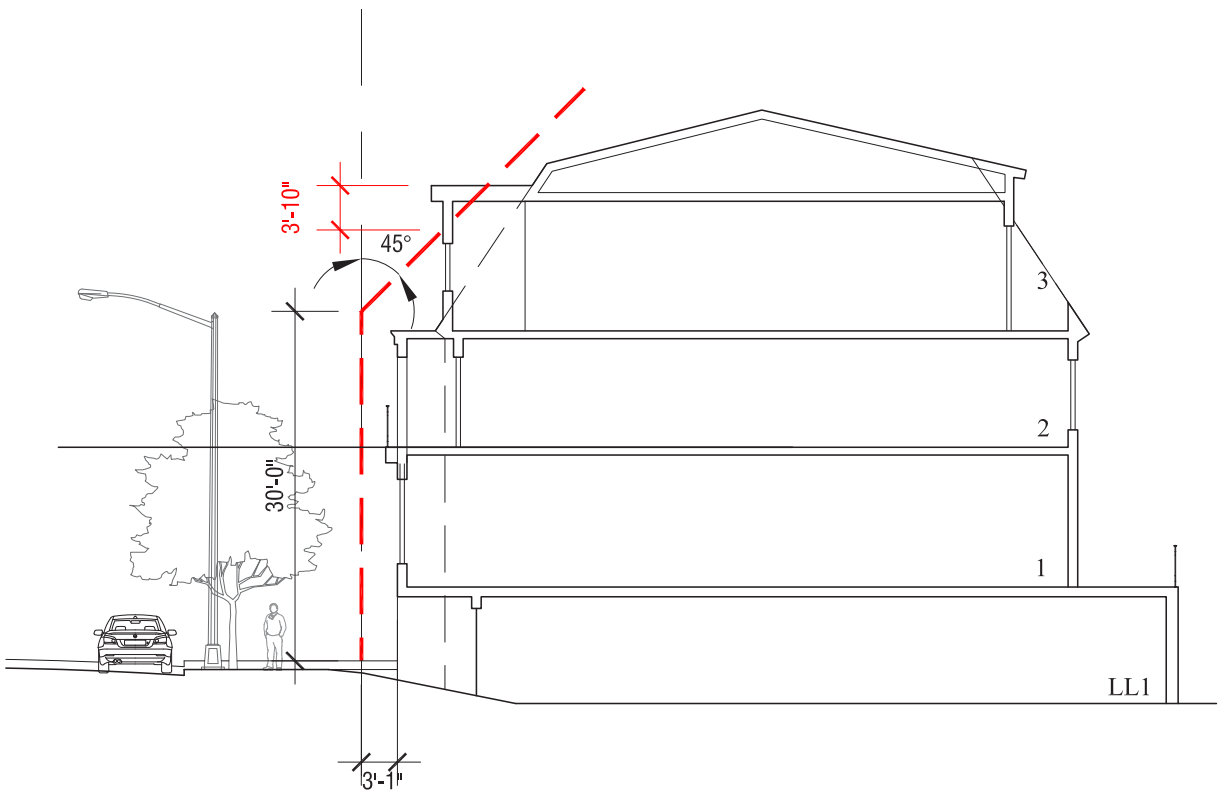
CALIFORNIA STREET

BLOCK A: BUILDING HEIGHT DIAGRAM





1. NORTH ELEVATION



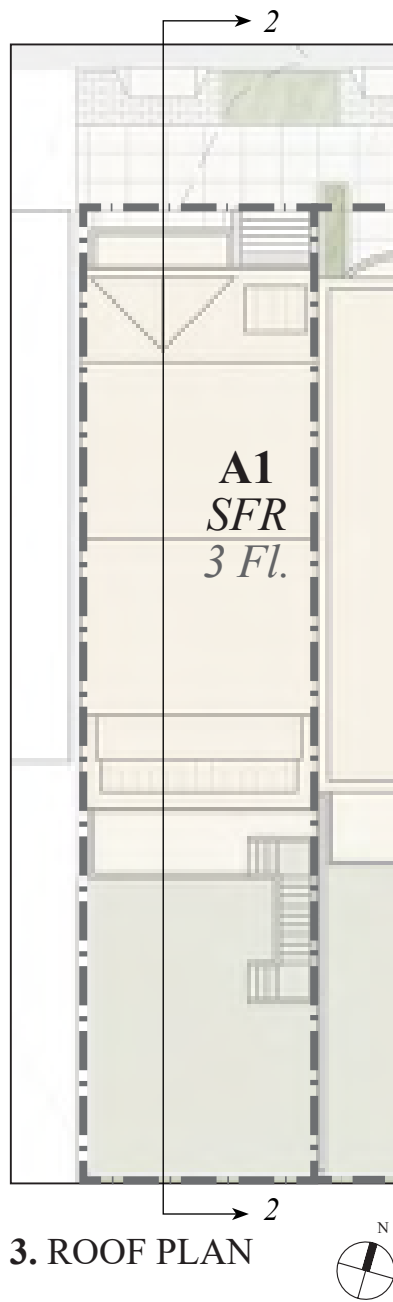
2. N-S SECTION

NOTE: A1 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade. See dormer exemption below.

Applicable Code Sections include:

- Code Section 260(b) Exemptions:

(B) Dormer windows: "This exemption shall be limited to the top 10 feet of such features where the height limit is 65 feet or less..."



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

SCALE: 1" = 20'

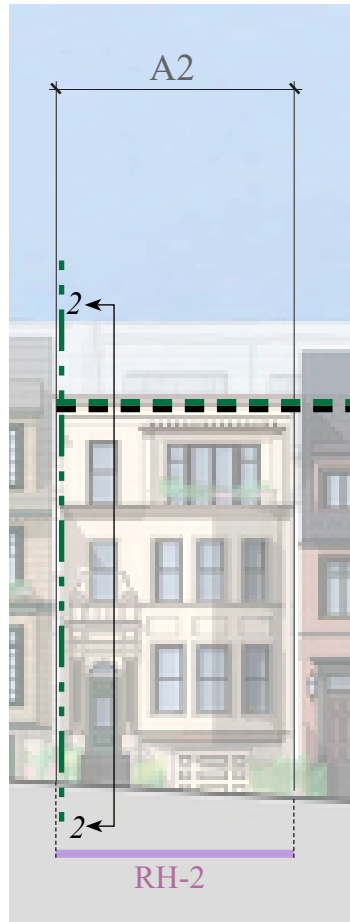
3700 CALIFORNIA STREET

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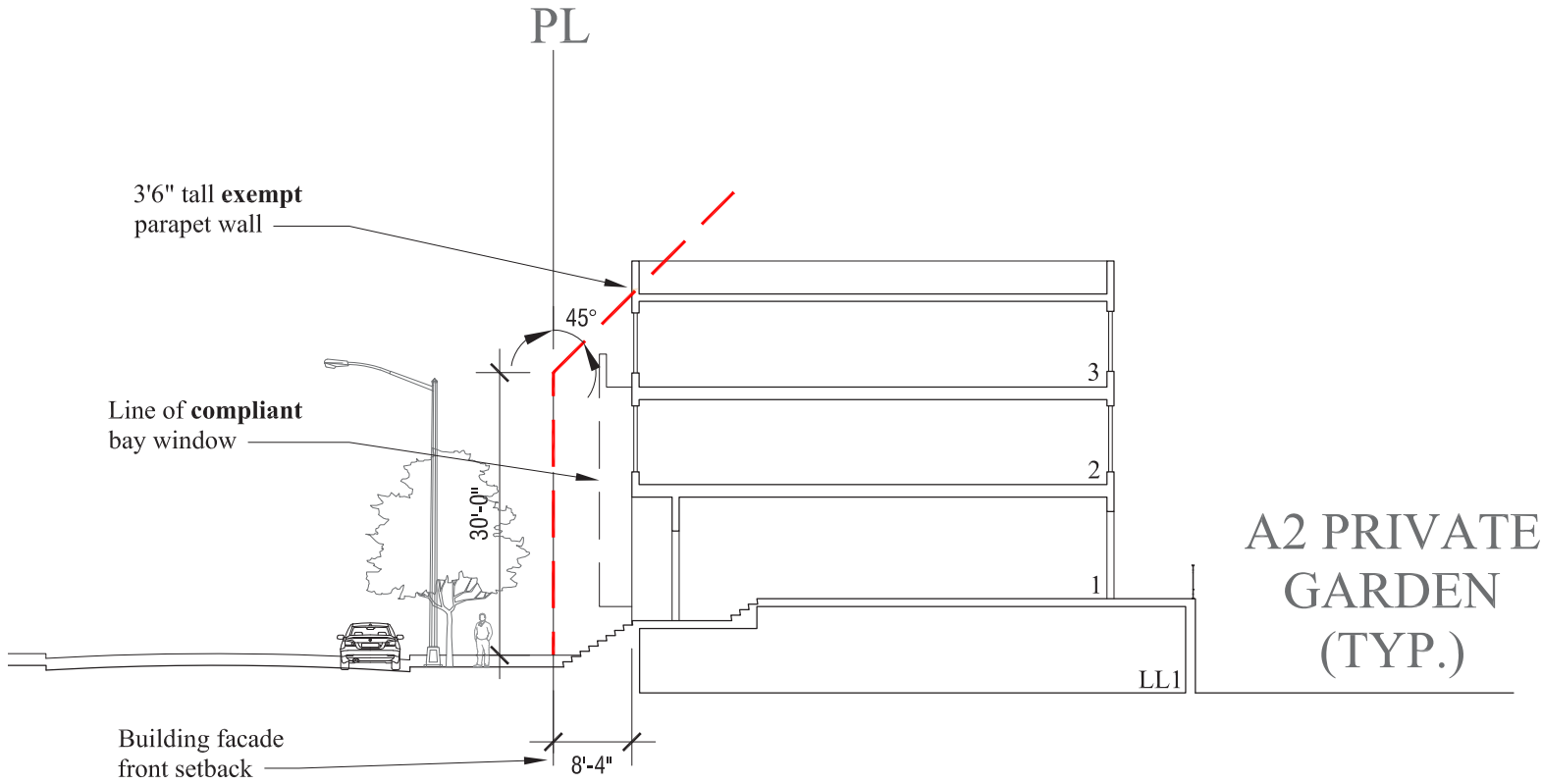
A1

# BLOCK A: RH-2 HEIGHT COMPLIANCE





1. NORTH ELEVATION

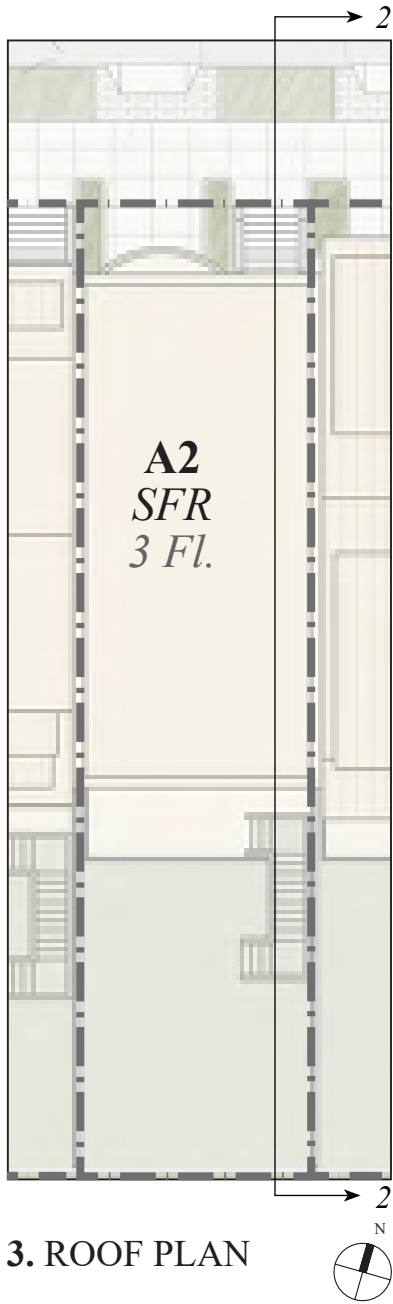


2. N-S SECTION

NOTE: A2 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade. See dormer exemption below.

Applicable Code Sections include:

- Code Section 260(b) Exemptions:
  - (B) Dormer windows: "This exemption shall be limited to the top 10 feet of such features where the height limit is 65 feet or less..."



3. ROOF PLAN



KEY PLAN

**LEGEND**

RH-2 ZONING

40' HEIGHT LIMIT  
[40-X HEIGHT & BULK DISTRICT]

ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

⊕ CENTERLINE OF ENTRY FACADE

--- LINE OF ALLOWABLE RH-2 MASS

PORTION SEEKING EXCEPTION

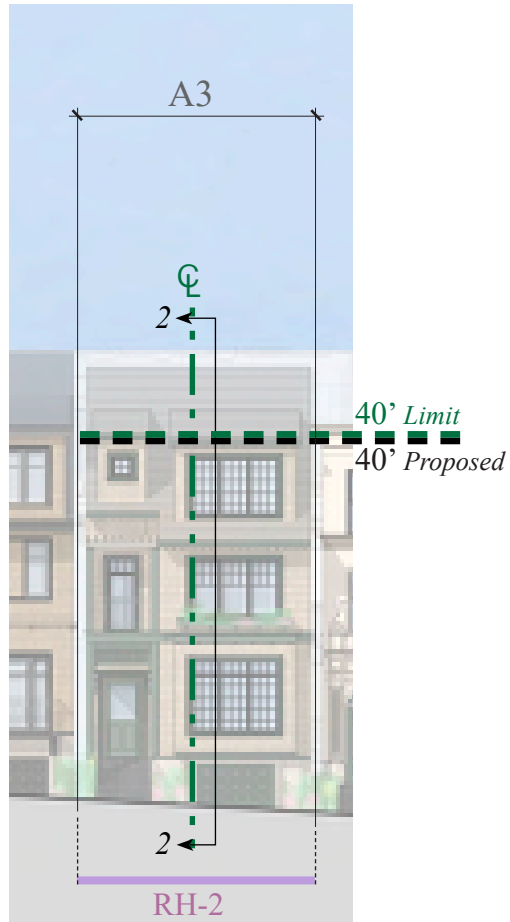
SCALE: 1" = 20'

0 5' 10' 20'

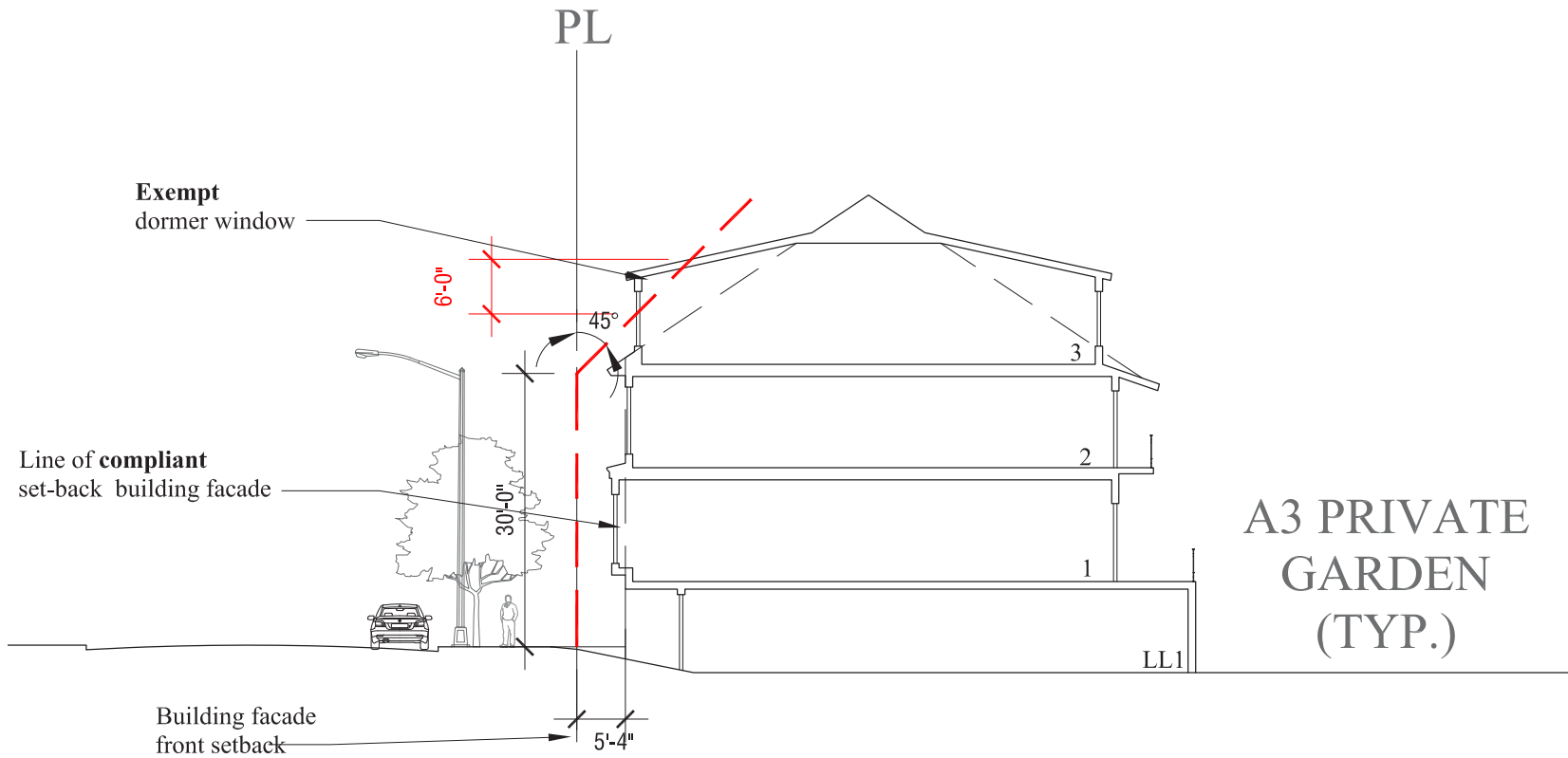
3700 CALIFORNIA STREET SAN FRANCISCO, CA

A2

BLOCK A: RH-2 HEIGHT COMPLIANCE



1. NORTH ELEVATION

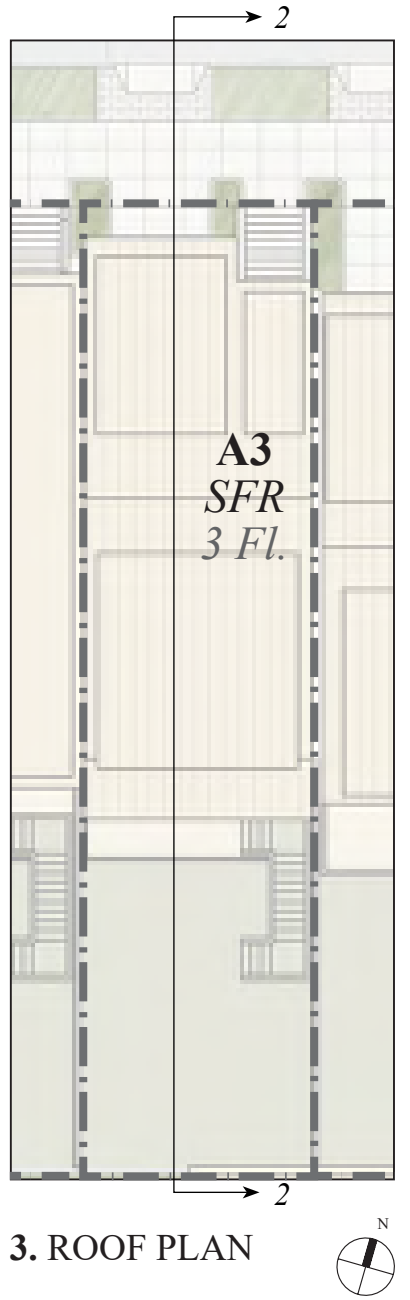


2. N-S SECTION

*NOTE:* A3 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade. See dormer exemption below.

Applicable Code Sections include:

- **Code Section 260(b) Exemptions:**  
*(B) Dormer windows: "This exemption shall be limited to the top 10 feet of such features where the height limit is 65 feet or less..."*



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height measured at the entry facade centerline per Code Section 260(a)(2): "...the height limit of a pitched roof is measured at the midrise of the roof."

- ⊕ CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

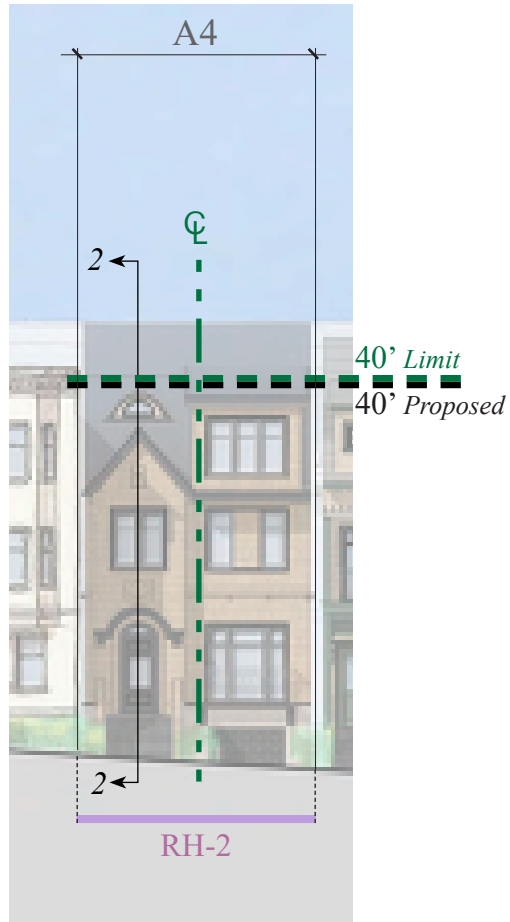
SCALE: 1" = 20'

0 5' 10' 20'

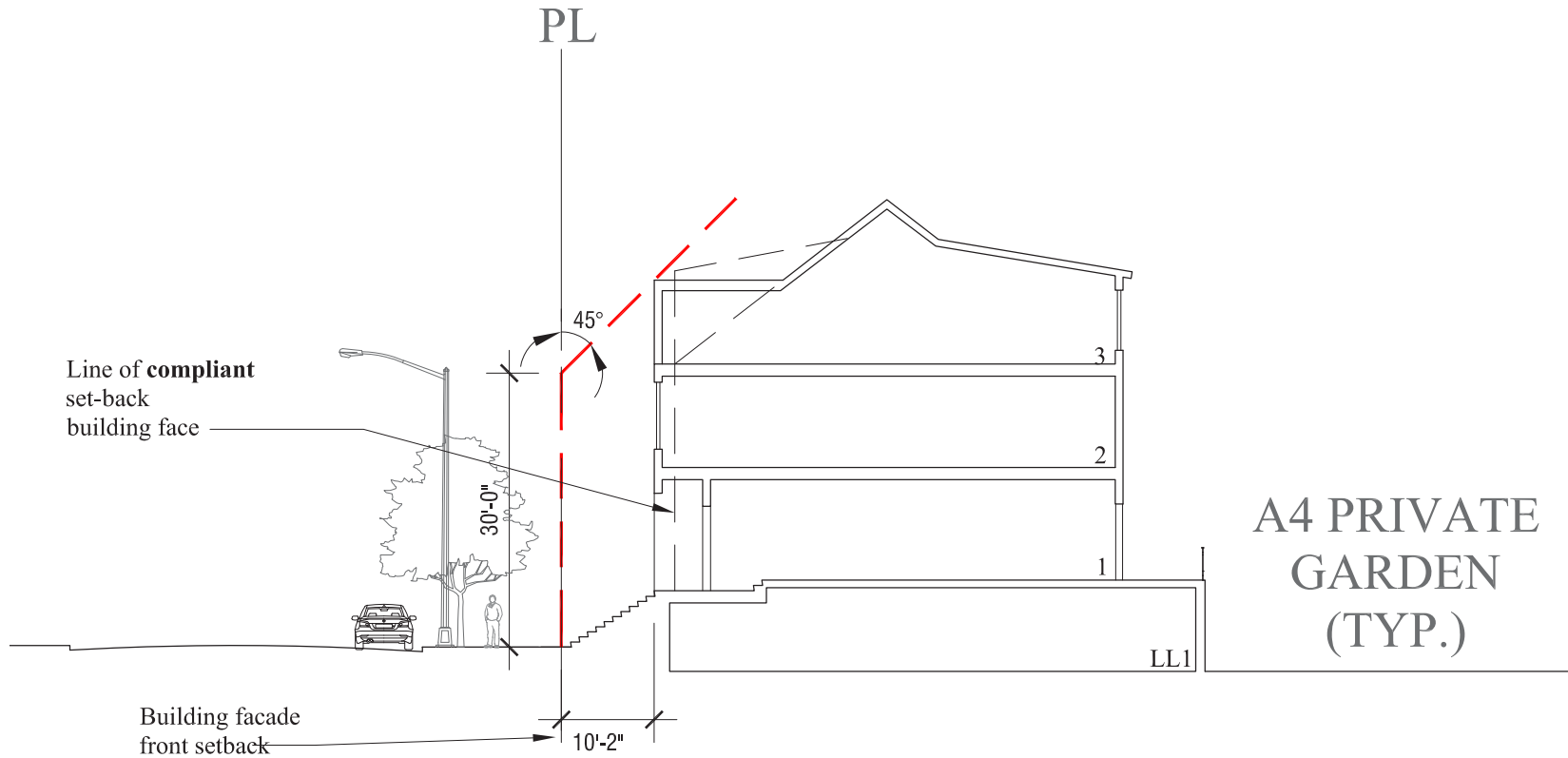
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A3

# BLOCK A: RH-2 HEIGHT COMPLIANCE

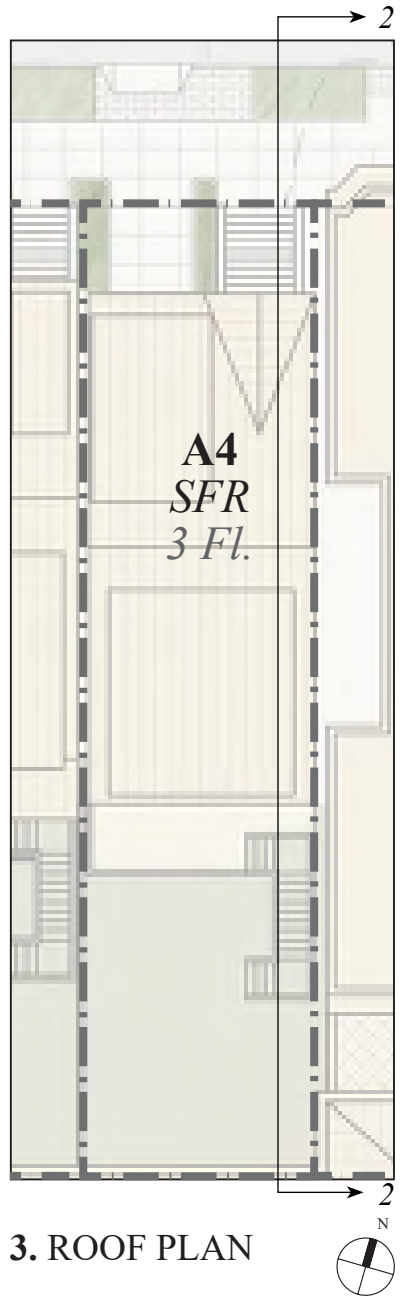


1. NORTH ELEVATION



2. N-S SECTION

NOTE: A4 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



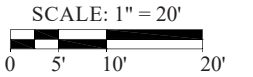
KEY PLAN

**LEGEND**

- RH-2 ZONING
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height measured at the entry facade centerline per Code Section 260(a)(2): "...the height limit of a pitched roof is measured at the midrise of the roof."

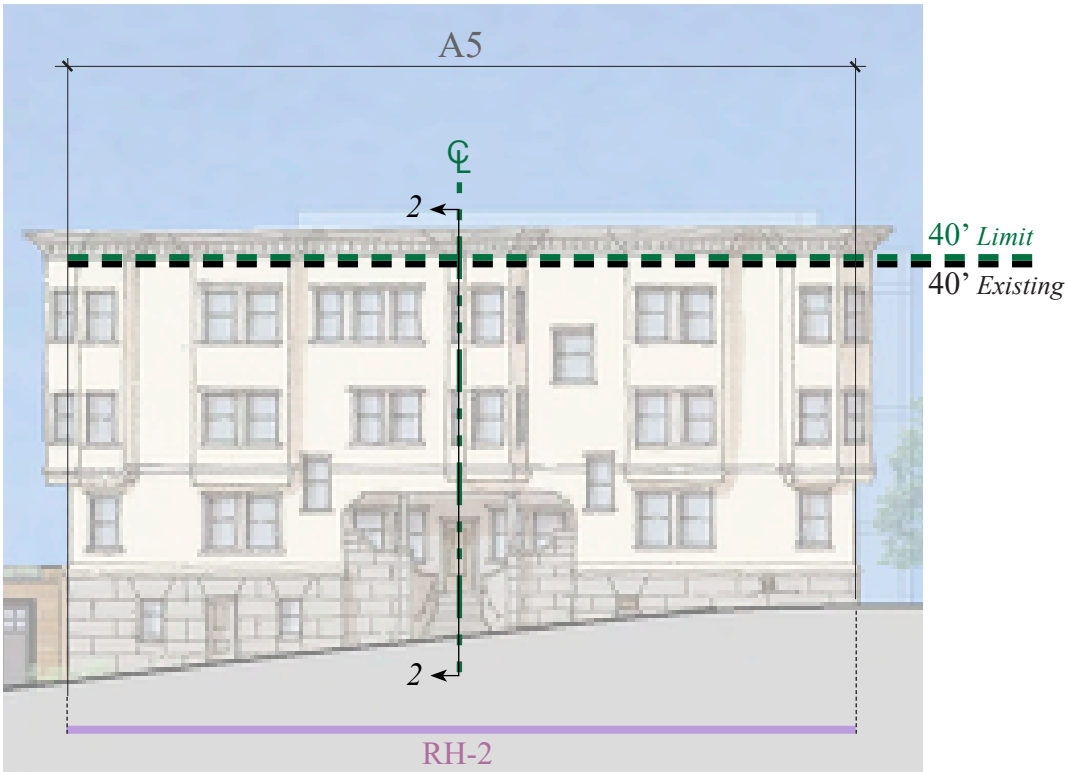
- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION



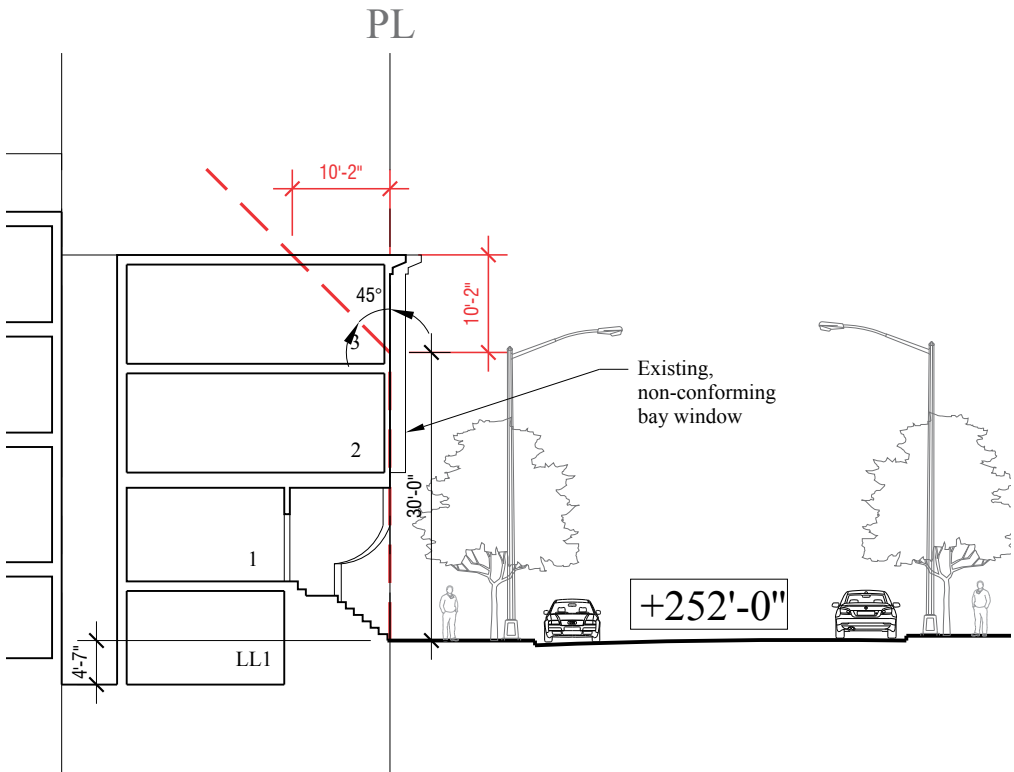
3700 CALIFORNIA STREET SAN FRANCISCO, CA

A4

# BLOCK A: RH-2 HEIGHT COMPLIANCE

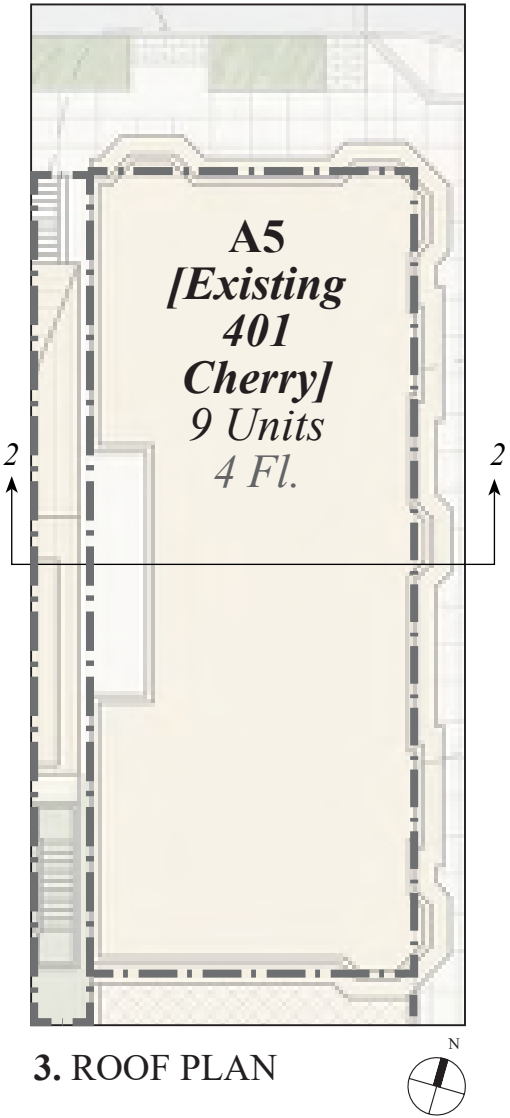


1. EAST ELEVATION



2. E-W SECTION

NOTE: A5 is an existing non-conforming structure that exceeds the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade. The exterior envelope will not be altered; no PUD exception sought.



3. ROOF PLAN



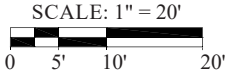
KEY PLAN

**LEGEND**

- RH-2 ZONING
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height measured at the entry facade centerline per Code Section 260(a)(2): "...the height limit of a pitched roof is measured at the midrise of the roof."

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

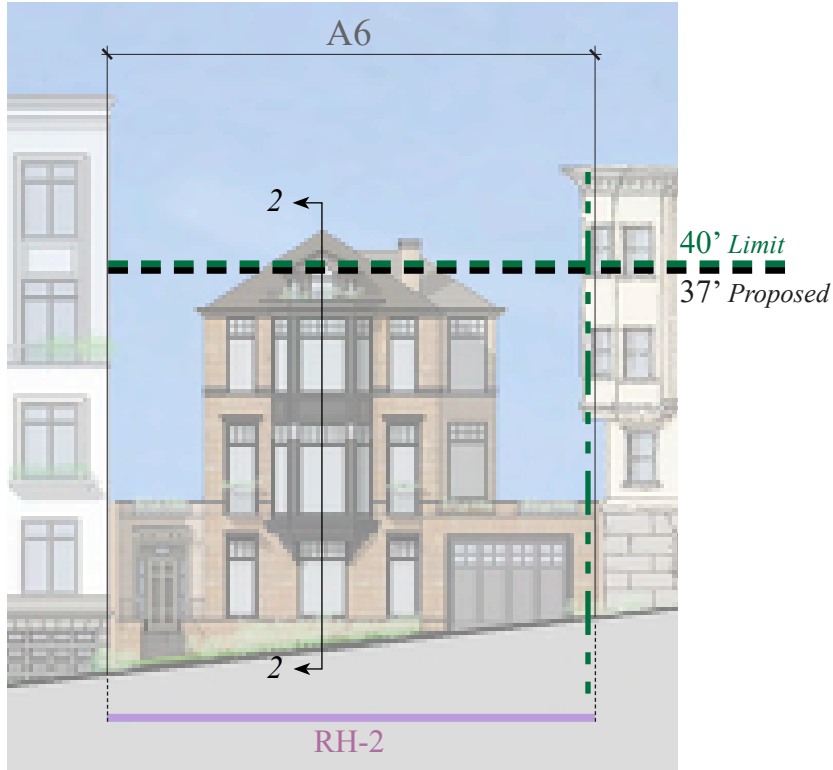


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A5 (EXISTING 401 CHERRY)

BLOCK A: RH-2 HEIGHT COMPLIANCE



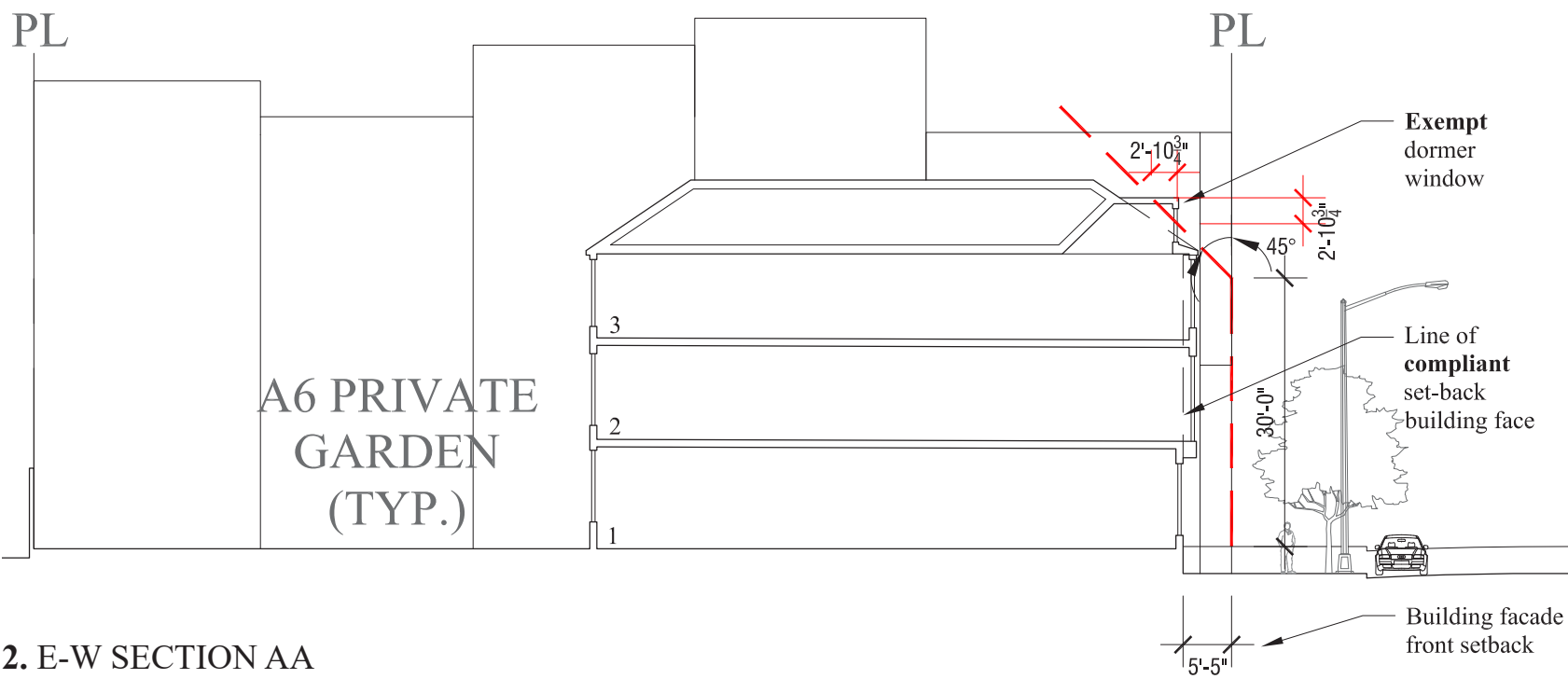


1. EAST ELEVATION

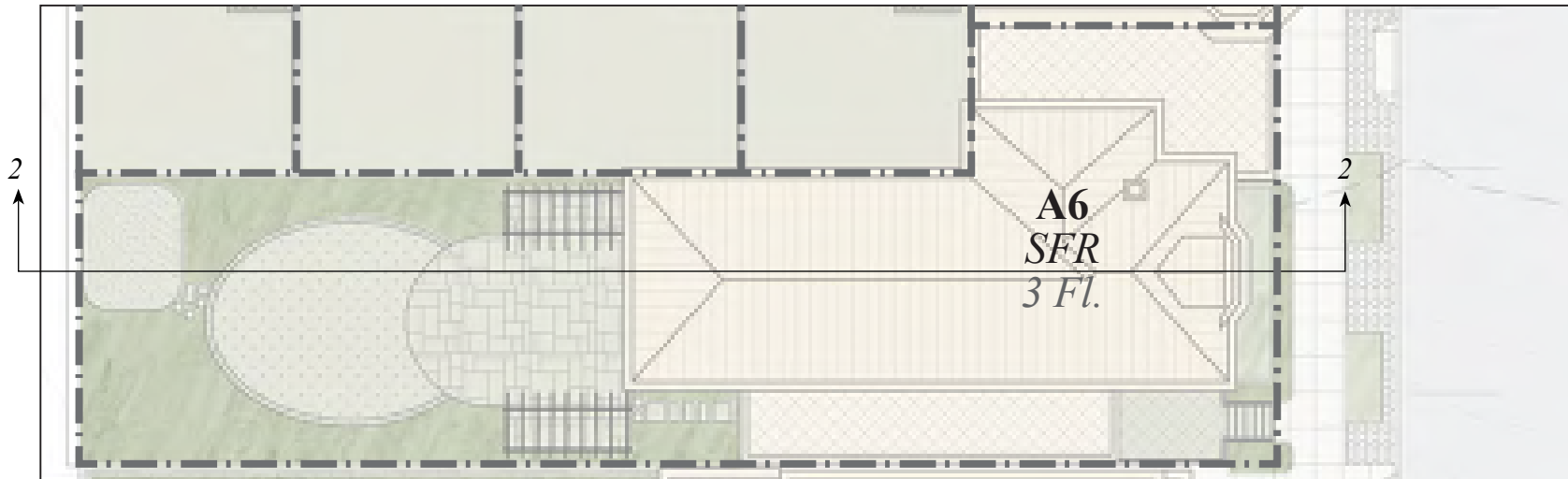
NOTE: A6 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade. See dormer exemption below.

Applicable Code Sections include:

- Code Section 260(b) Exemptions:
  - (B) Dormer windows: "This exemption shall be limited to the top 10 feet of such features where the height limit is 65 feet or less..."



2. E-W SECTION AA



3. ROOF PLAN



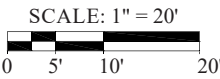
KEY PLAN

**LEGEND**

- RH-2 ZONING
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6); as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

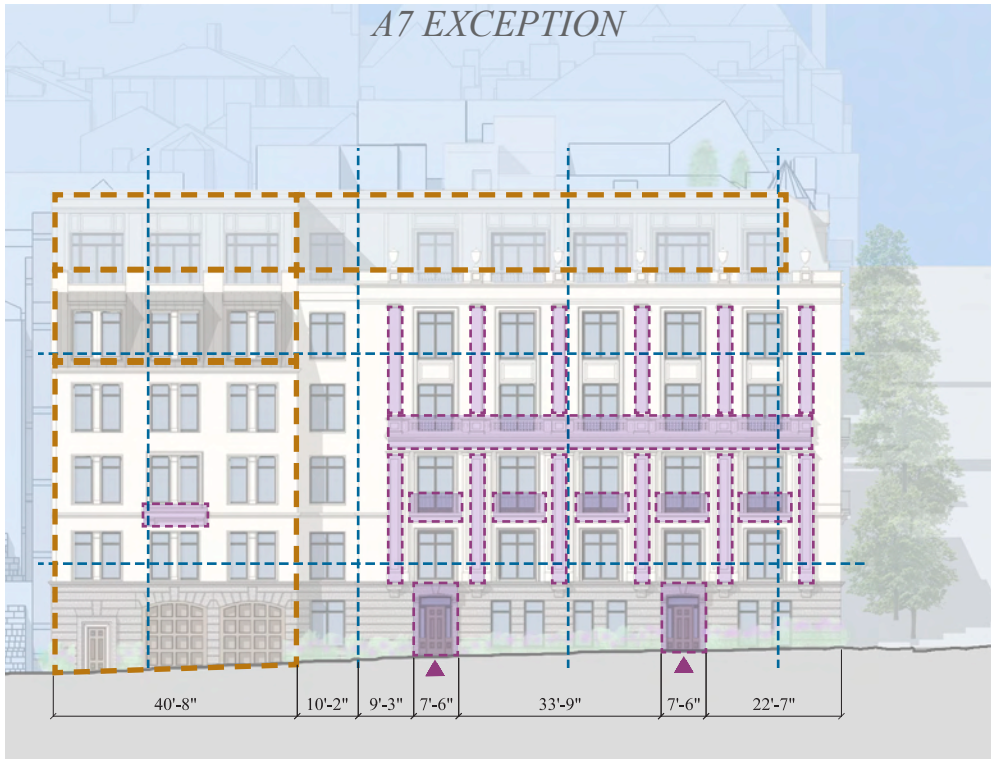


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SAN FRANCISCO, CA

A6

# BLOCK A: RH-2 HEIGHT COMPLIANCE

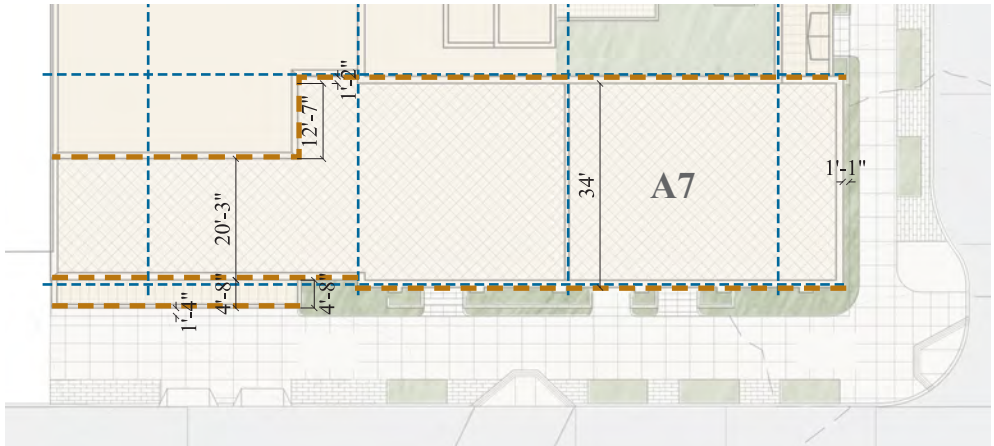




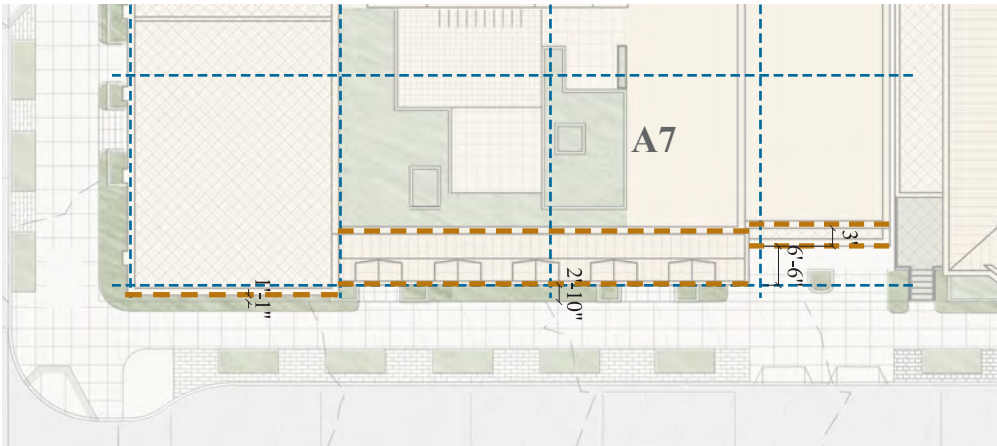
1. SOUTH ELEVATION (Subject to PUD Exception)



3. EAST ELEVATION (Subject to PUD Exception)



2. PLAN AT CALIFORNIA STREET



4. PLAN AT CHERRY STREET

**NOTE:** A7 facade does not vary by a minimum of 2' at intervals that comply with **Code Section 144.1**. (35' horizontal or vertical)  
Seeking exception; facade contains architectural features that contribute to overall variation (See Diagrams 1 and 3)

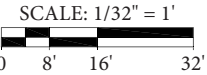


KEY PLAN

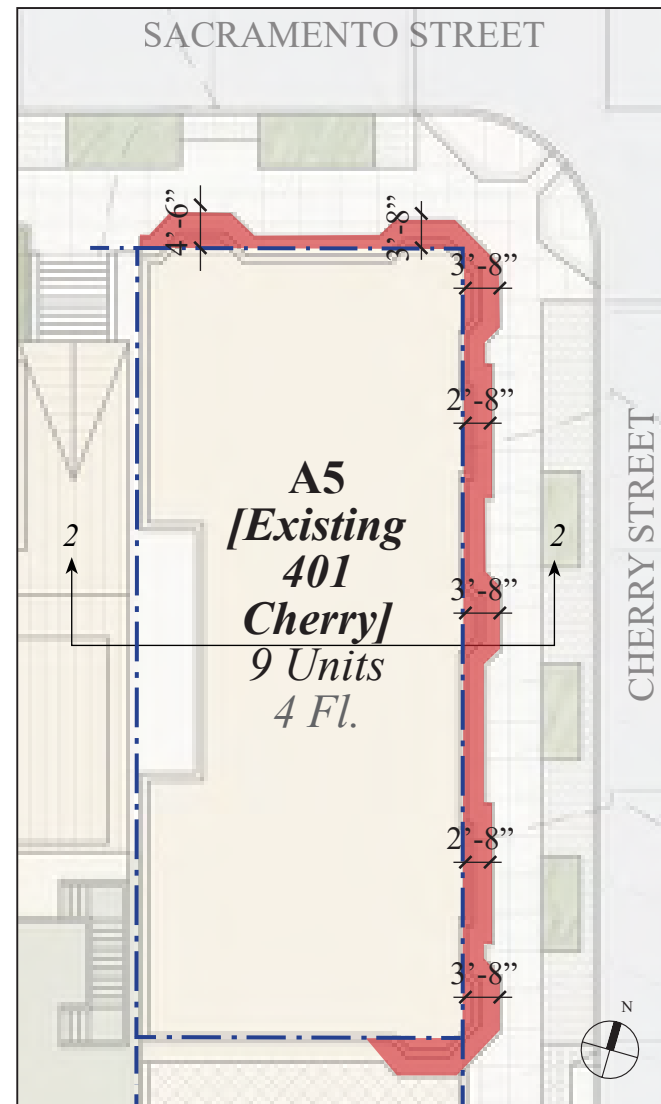
**LEGEND**

- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

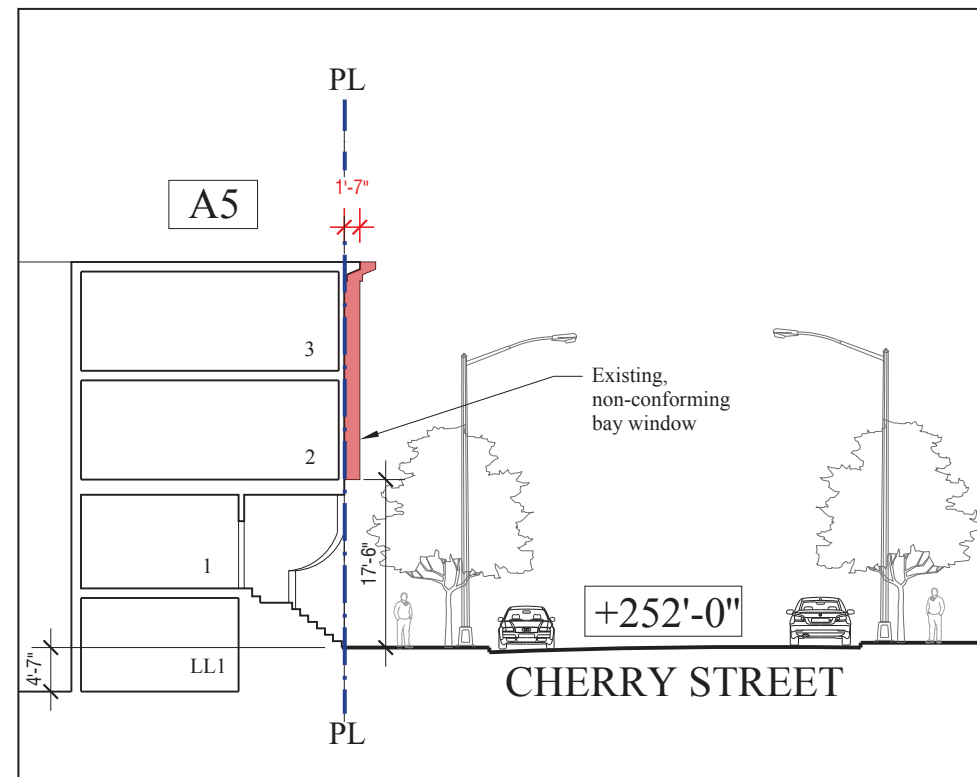
**\*CODE SECTION 144(1)** "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25FT"



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1. ROOF PLAN



2. E-W SECTION

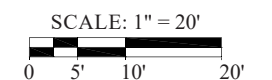
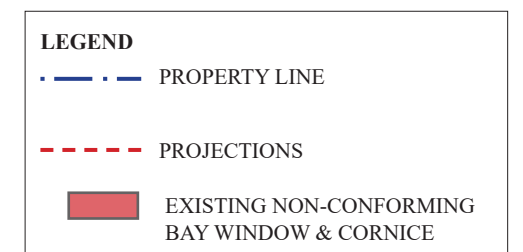


3. EAST ELEVATION

NOTE: A5 is an existing non-conforming structure that exceeds the way in which projections over streets are measured under Section 136. The exterior envelope will not be altered; no PUD exception sought.



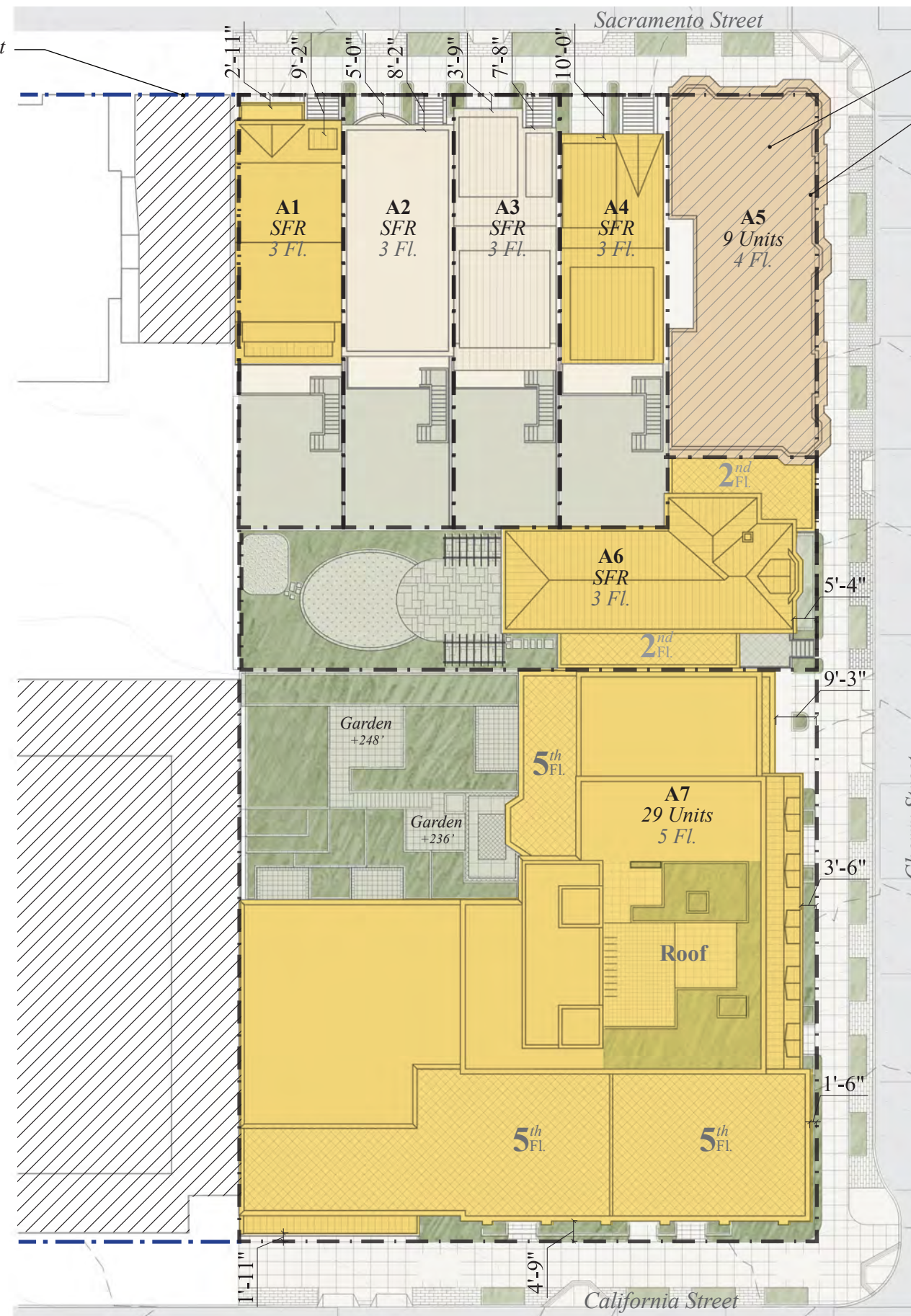
KEY PLAN





0' Setback in adjacent building

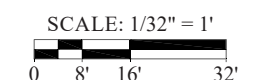
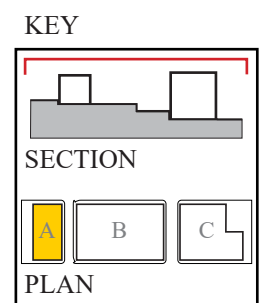
Existing 401 Cherry, to be renovated  
0' Setback in adjacent building



**NOTE:**  
Terraces are labeled with occupied floor level. Ex: 5<sup>th</sup> Fl.

\*NO FRONT SETBACKS REQUIRED BY SECTION 132

- EXISTING BUILDINGS ADJACENT TO SITE
- EXISTING BUILDINGS TO BE RENOVATED
- PROPOSED BLDG ADJACENT TO EXISTING BLDG



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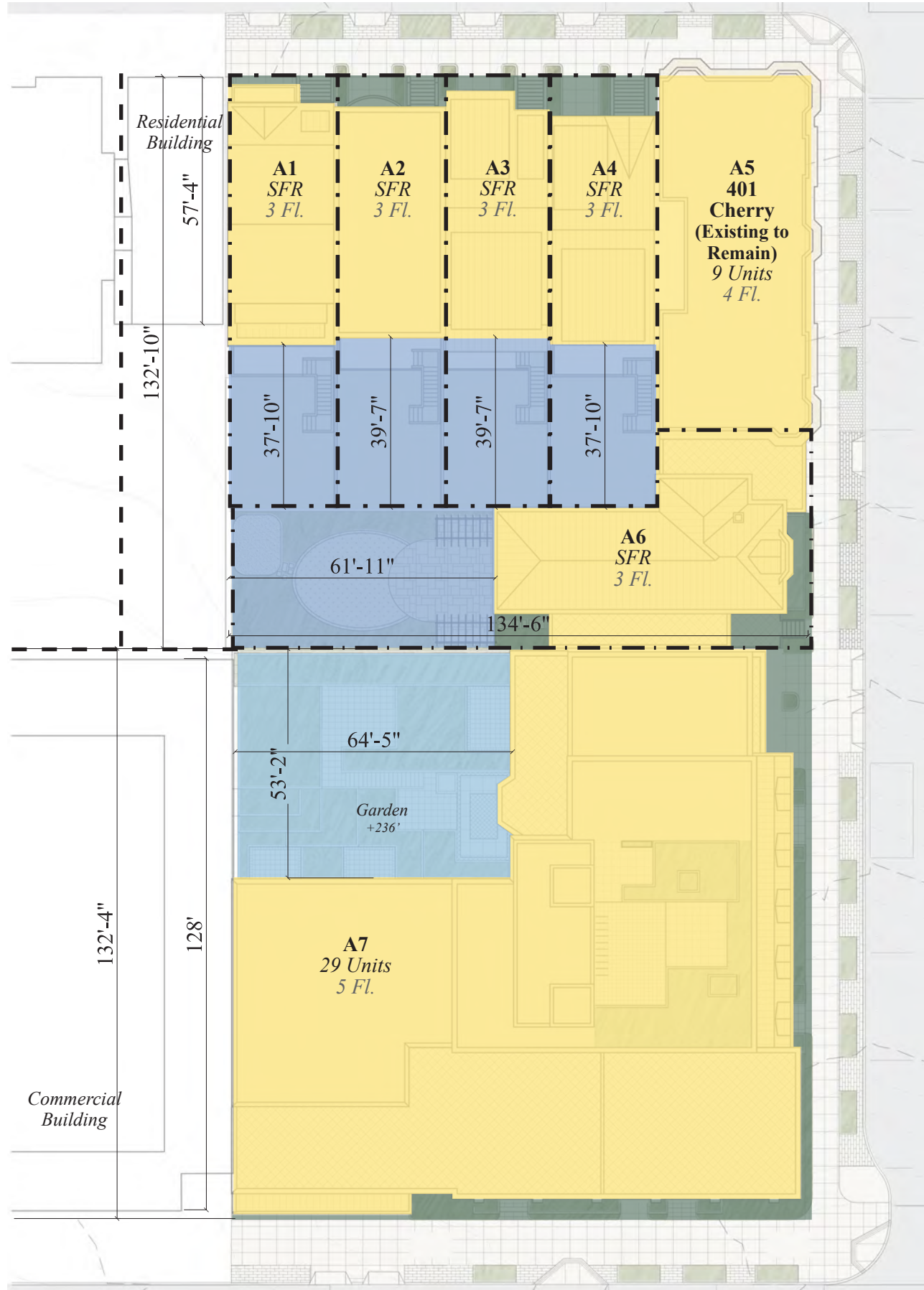
FRONT SETBACKS

BLOCK A: FRONT SETBACKS

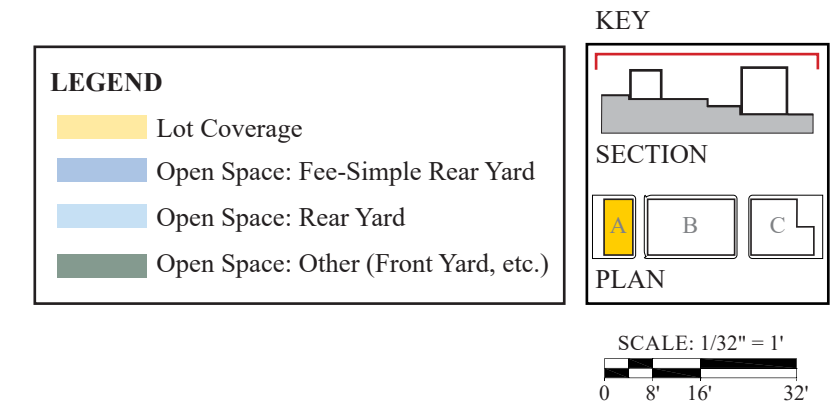


BLOCK A: REAR SETBACKS & SECTION 134

<b>A1</b>	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	4%
Total Proposed Open Space:	44%
Delta Δ :	(1%)
Required Rear Yard Depth:	45%
Proposed Rear Yard Depth:	39.5%
Delta Δ :	(5.5%)
<b>A2</b>	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	8%
Total Proposed Open Space:	48%
Delta Δ :	+3%
Required Rear Yard Depth:	45%
Proposed Rear Yard Depth:	40.2%
Delta Δ :	(4.8%)
<b>A3</b>	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	6%
Total Proposed Open Space:	46%
Delta Δ :	+1%
Required Rear Yard Depth:	45%
Proposed Rear Yard Depth:	40.2%
Delta Δ :	(4.8%)
<b>A4</b>	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	38%
Proposed Open Space (Front Yard):	9%
Total Proposed Open Space:	47%
Delta Δ :	+2%
Sec. 134(c)(1) Averaged Required Rear Yard Depth:	31.25%
Proposed Rear Yard Depth:	38.4%
Delta Δ :	+7.15%



<b>A5*</b>	
Lot Area:	2,806 sf
Existing Open Space (Rear Yard):	0%
Existing Open Space (Front Yard):	0%
Total Existing Open Space:	0%
Delta Δ :	(45%)
Required Rear Yard Depth:	45%
Existing Rear Yard Depth:	0%
Delta Δ :	(45%)
*Existing non-conforming structure; exterior envelope will not be altered.	
<b>A6</b>	
Lot Area:	5,008 sf
Proposed Open Space (Rear Yard):	41%
Proposed Open Space (Front Yard):	5%
Total Proposed Open Space:	46%
Delta Δ :	+1%
Required Rear Yard Depth:	45%
Proposed Rear Yard Depth:	40.7%
Delta Δ :	(4.3%)
<b>A7</b>	
Lot Area:	17,600 sf
Proposed Open Space (Rear Yard):	18%
Proposed Open Space (Front Yard/Easement):	6%
Total Proposed Open Space:	24%
Delta Δ :	+1%
Sec. 134(c)(4)(A) Required Rear Yard Depth:	25%
Proposed Rear Yard Depth:	18%
Delta Δ :	(7%)





- NOTES:**
- 1. Configuration of roof top areas not yet completed and to be provided later. Roof top areas may include any of the following: private or common residential open space (pursuant to Pl. Code Sec. 135), solar areas (pursuant to SF Better Roof Ordinance; Pl. Code Sec. 149), and living roof areas (pursuant to SF Green Building Code), or some combination of any/all of the above.
  - 2. Roof top mechanical equipment and/or other similar feature will be enclosed and/or screened in compliance with Pl. Code Sec. 141 requirements.
  - 3. Code-compliant common open spaces comply with all dimensional requirements.

**LEGEND**

- Code-Compliant Common Open Space
- Code-Compliant Private Open Space
- Additional Common Open Space\*
- Additional Private Open Space\*

*\*Open space that does not meet the dimensional requirements to be code-compliant and is not included in open space calculations. It represents additional common open space areas.*

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BLOCK A: OPEN SPACE

BLOCK A: PRIVATE OPEN SPACE

Building	Zoning	Total # of Units	# of Units w Priv. Open Space	Required	Provided
				if Private	Total Private per building
A1	RH-2	1	1	125.00	1,105
A2	RH-2	1	1	125.00	1,006
A3	RH-2	1	1	125.00	1,006
A4	RH-2	1	1	125.00	959
* A5	RH-2	9	0	0.00	0
A6	RH-2	1	1	125.00	2,749
A7	RM-2	29	4	320.00	4,396
				945	11,221

BLOCK A: COMMON OPEN SPACE

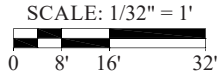
Building	Zoning	Total # of Units	# of Units w.o Priv. Open Space	Required	Provided
				if Common (x1.33)	Total Common per building
A1	RH-2	1	0		
A2	RH-2	1	0		
A3	RH-2	1	0		
A4	RH-2	1	0		
* A5	RH-2	9	9		
A6	RH-2	1	0		
A7	RM-2	29	25	2,660.00	3,851.00
				2,660.00	3,851.00

*\*Existing non-conforming structure; exterior envelope will not be altered.*

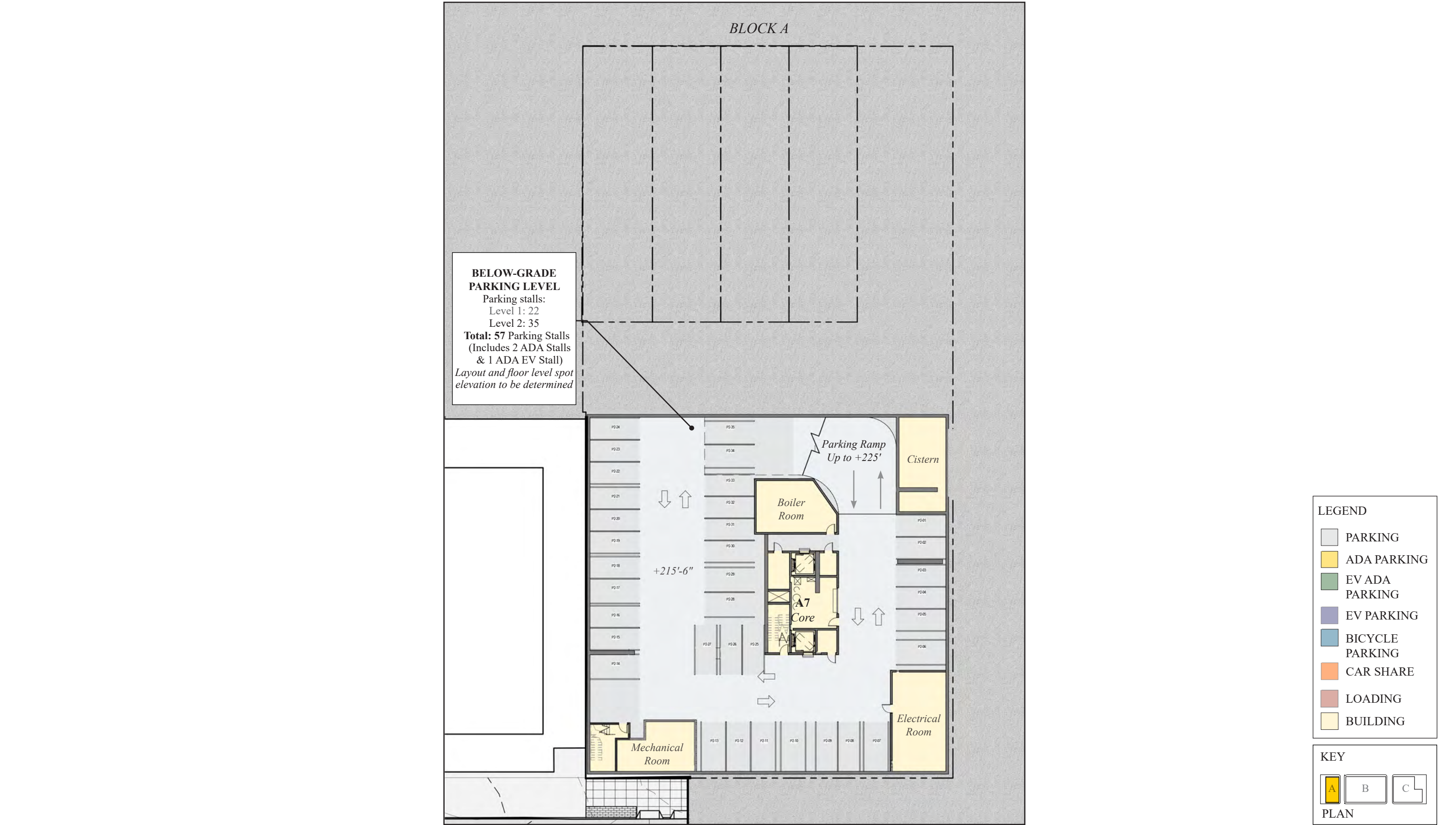
KEY

SECTION

PLAN







3700 CALIFORNIA STREET  
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LOWER LEVEL 2  
(BELOW GRADE PARKING)

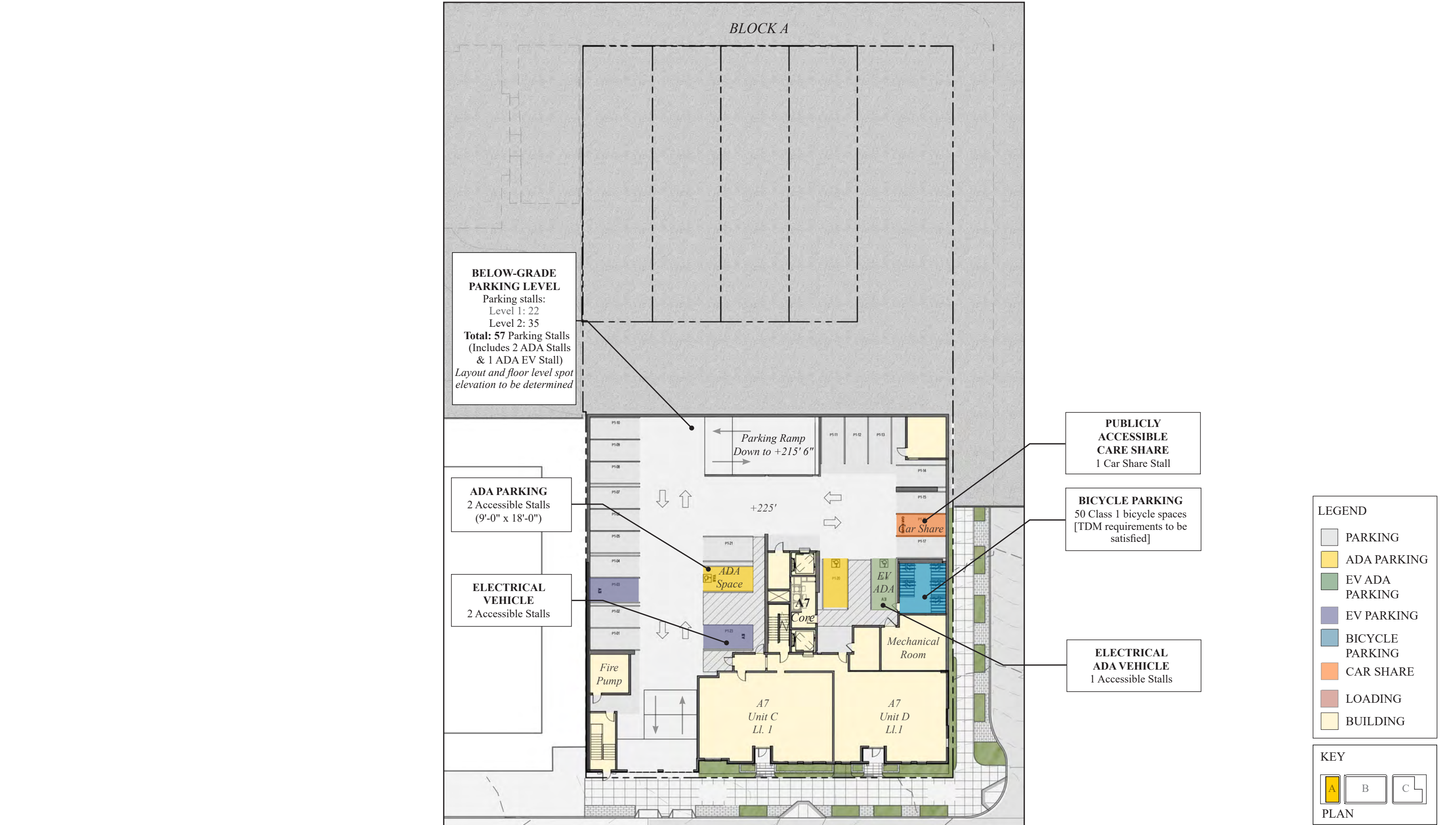
BLOCK A: PARKING DIAGRAM

SCALE: 1/32" = 1'

0 8' 16' 32'

N

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3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

LOWER LEVEL 1  
(GROUND FLOOR AT CALIFORNIA STREET)

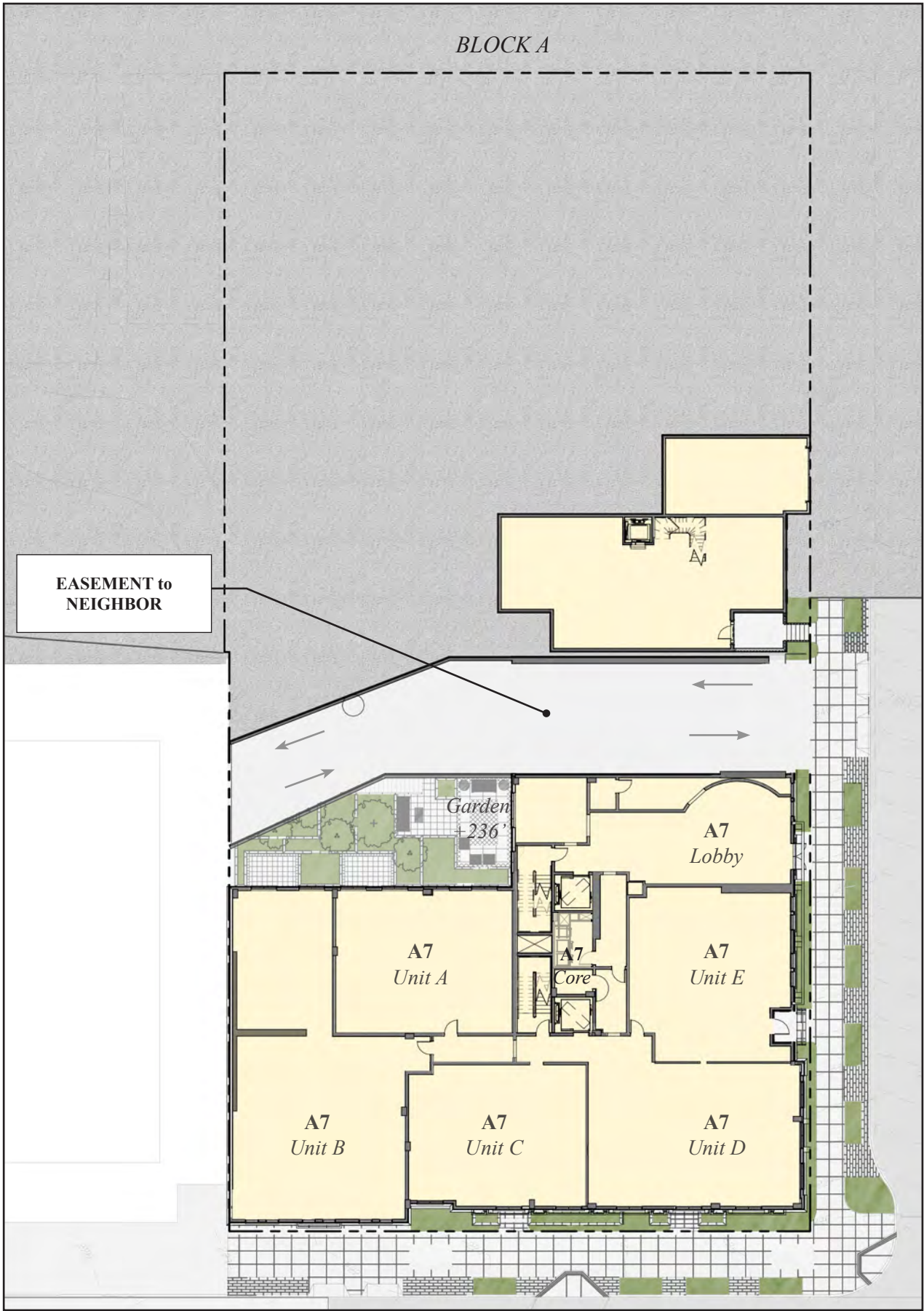
BLOCK A: PARKING DIAGRAM

SCALE: 1/32" = 1'  
0 8' 16' 32'

N

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LEGEND

- PARKING
- ADA PARKING
- EV ADA PARKING
- EV PARKING
- BICYCLE PARKING
- CAR SHARE
- LOADING
- BUILDING

KEY

PLAN

SCALE: 1/32" = 1'

0 8' 16' 32'

N

3700 CALIFORNIA STREET SAN FRANCISCO, CA

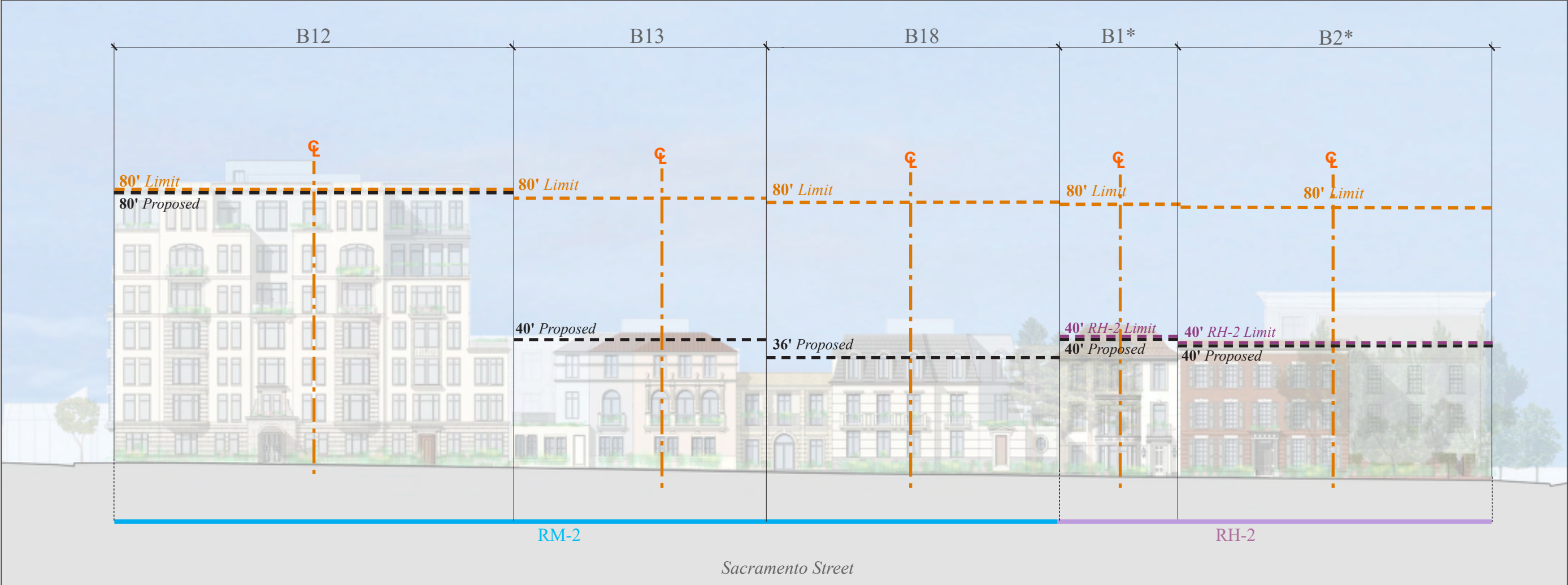
EASEMENT  
(GROUND FLOOR AT CHERRY STREET)

BLOCK A: PARKING DIAGRAM









**\*Note:** For Block B RH-2 Height Diagrams, refer to pages A-B.20-25.

**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.

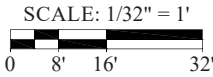
\*Actual height measured at the entry facade centerline



KEY PLAN

**LEGEND**

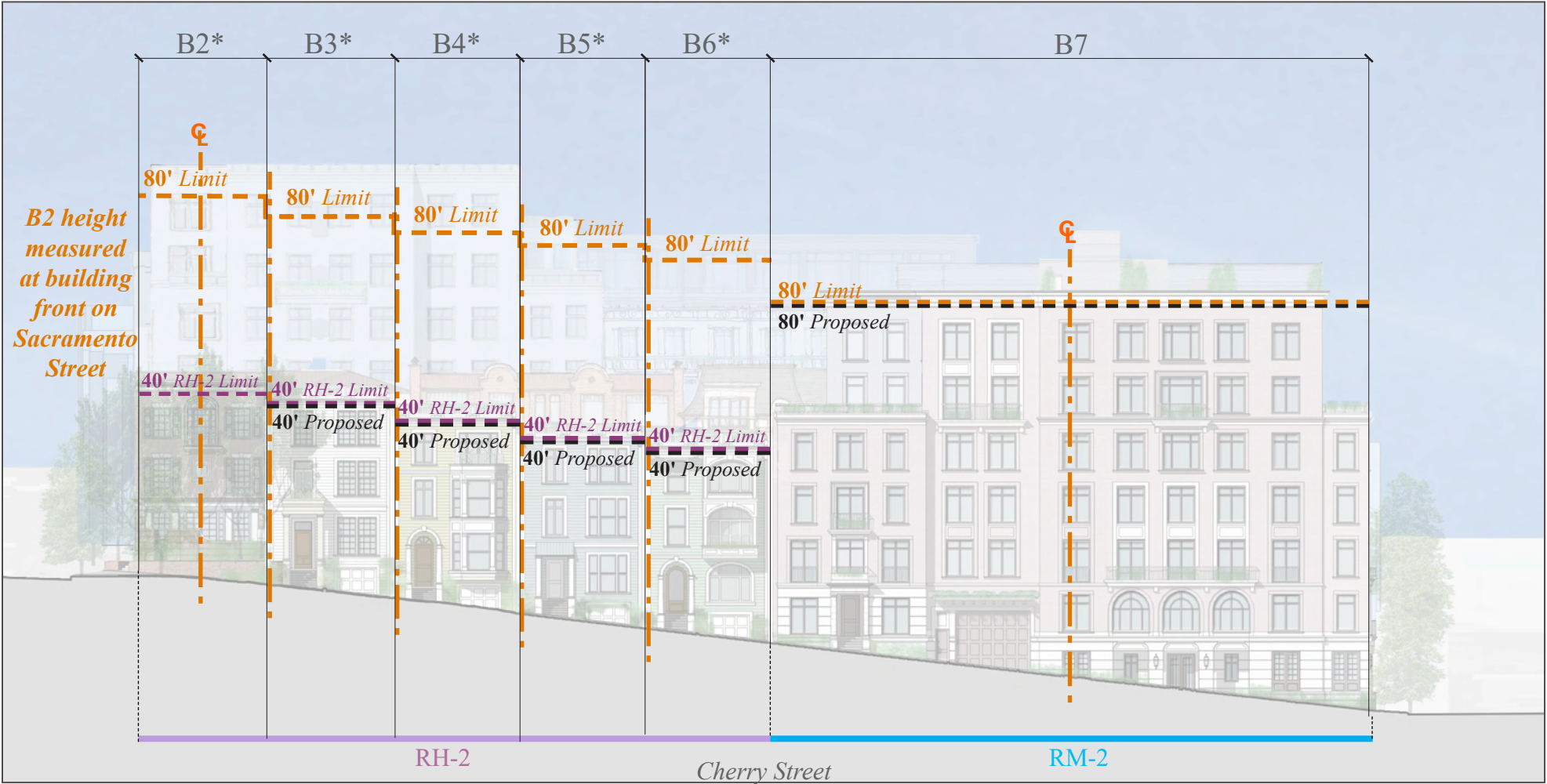
- RM-2 ZONING
- RH-2 ZONING
- 40' RH-2 HEIGHT LIMIT [SECTION 261]
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT



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SAN FRANCISCO, CA

SACRAMENTO STREET

BLOCK B: BUILDING HEIGHT DIAGRAM



**\*Note:** For Block B RH-2 Height Diagrams, refer to pages A-B.20-25.

**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



LEGEND	
<span style="color: blue;">—</span>	RM-2 ZONING
<span style="color: purple;">—</span>	RH-2 ZONING
<span style="color: purple;">- - -</span>	40' RH-2 HEIGHT LIMIT [SECTION 261]
<span style="color: green;">- - -</span>	40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
<span style="color: orange;">- - -</span>	80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
<span style="color: black;">- - -</span>	ACTUAL HEIGHT

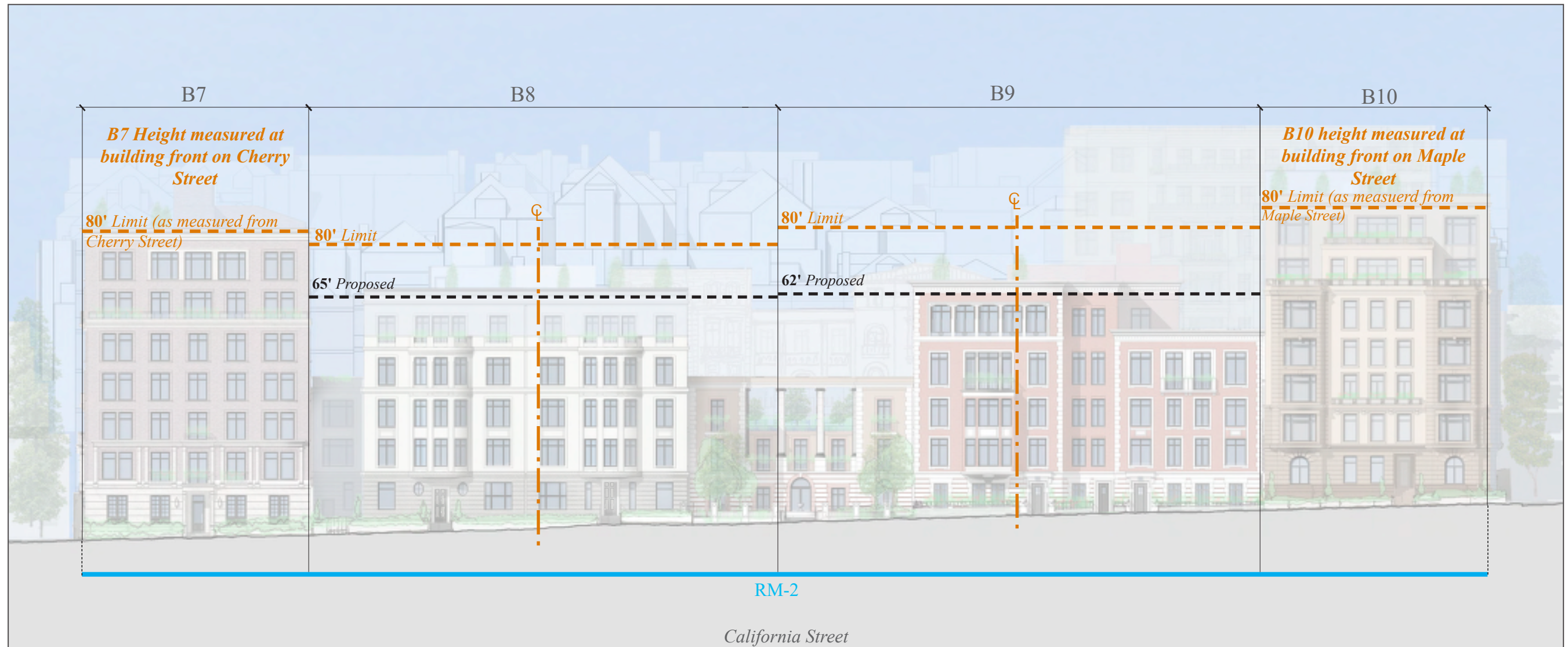
SCALE: 1/32" = 1'  
0 8' 16' 32'

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CHERRY STREET

# BLOCK B: BUILDING HEIGHT DIAGRAM





**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



LEGEND	
<span style="color: blue;">—</span>	RM-2 ZONING
<span style="color: purple;">—</span>	RH-2 ZONING
<span style="color: purple;">- - -</span>	40' RH-2 HEIGHT LIMIT [SECTION 261]
<span style="color: green;">- - -</span>	40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
<span style="color: orange;">- - -</span>	80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
<span style="color: black;">- - -</span>	ACTUAL HEIGHT

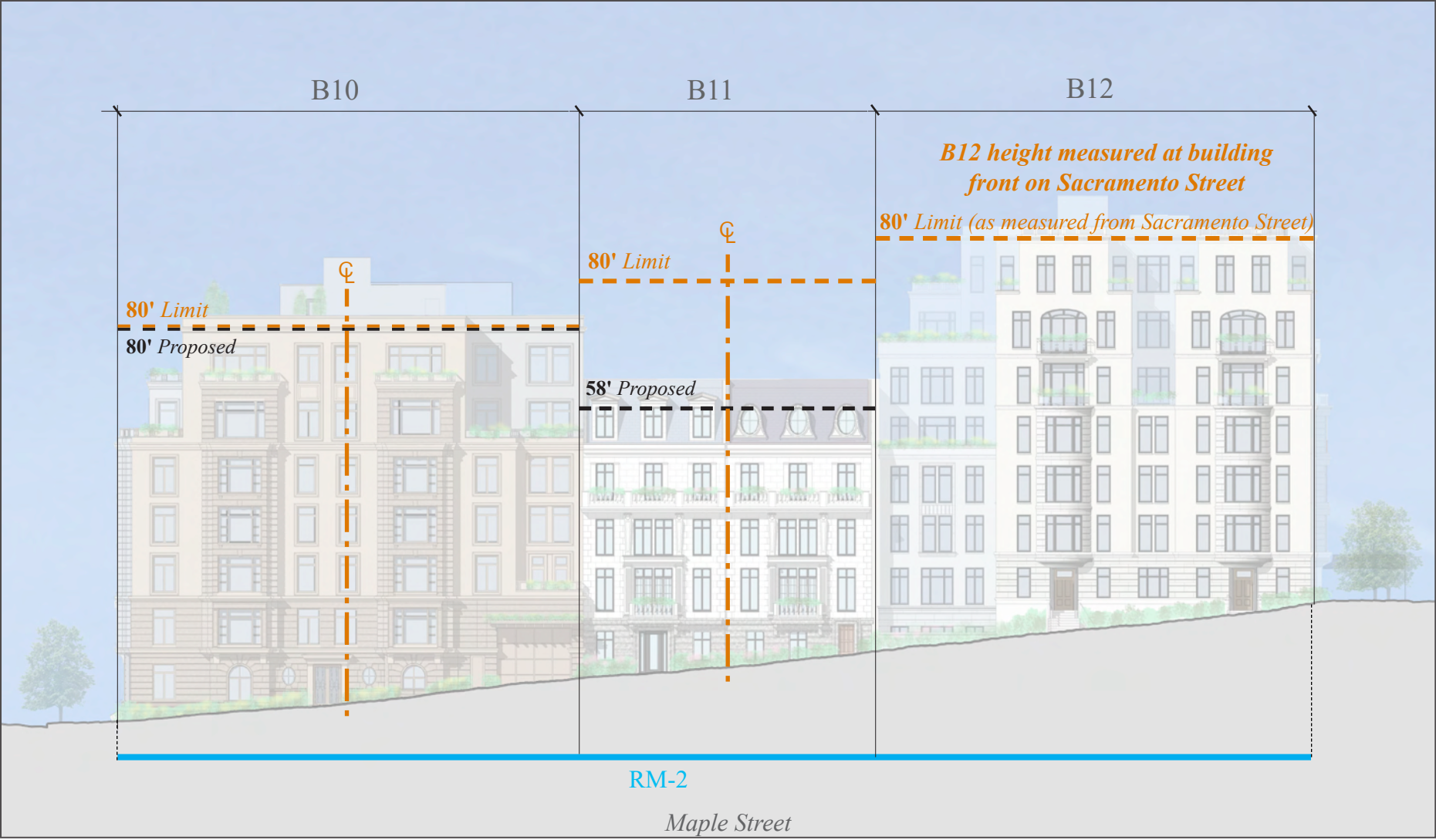
SCALE: 1/32" = 1'  
0 8' 16' 32'

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CALIFORNIA STREET

## BLOCK B: BUILDING HEIGHT DIAGRAM



**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



LEGEND

RM-2 ZONING

RH-2 ZONING

40' RH-2 HEIGHT LIMIT  
[SECTION 261]

40' HEIGHT LIMIT  
[40-X HEIGHT & BULK DISTRICT]

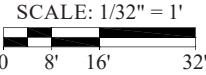
80' HEIGHT LIMIT  
[80-E HEIGHT & BULK DISTRICT]

ACTUAL HEIGHT

3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

MAPLE STREET

BLOCK B: BUILDING HEIGHT DIAGRAM



TMG  
PARTNERS  
MILLER COMPANY  
landscape architects

GROSVENOR  
BDE  
ARCHITECTURE

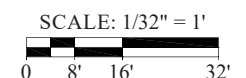
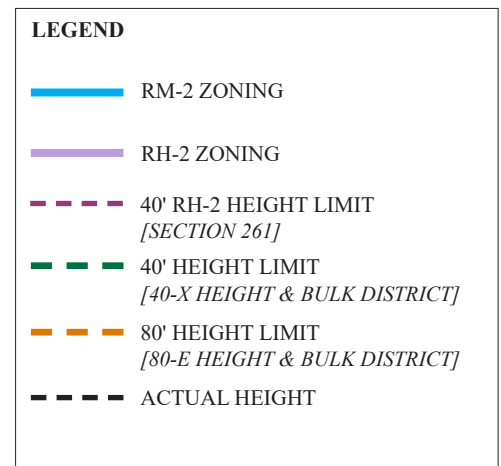
RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF 100+  
YEARS  
ENGINEERS . SURVEYORS . PLANNERS





**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



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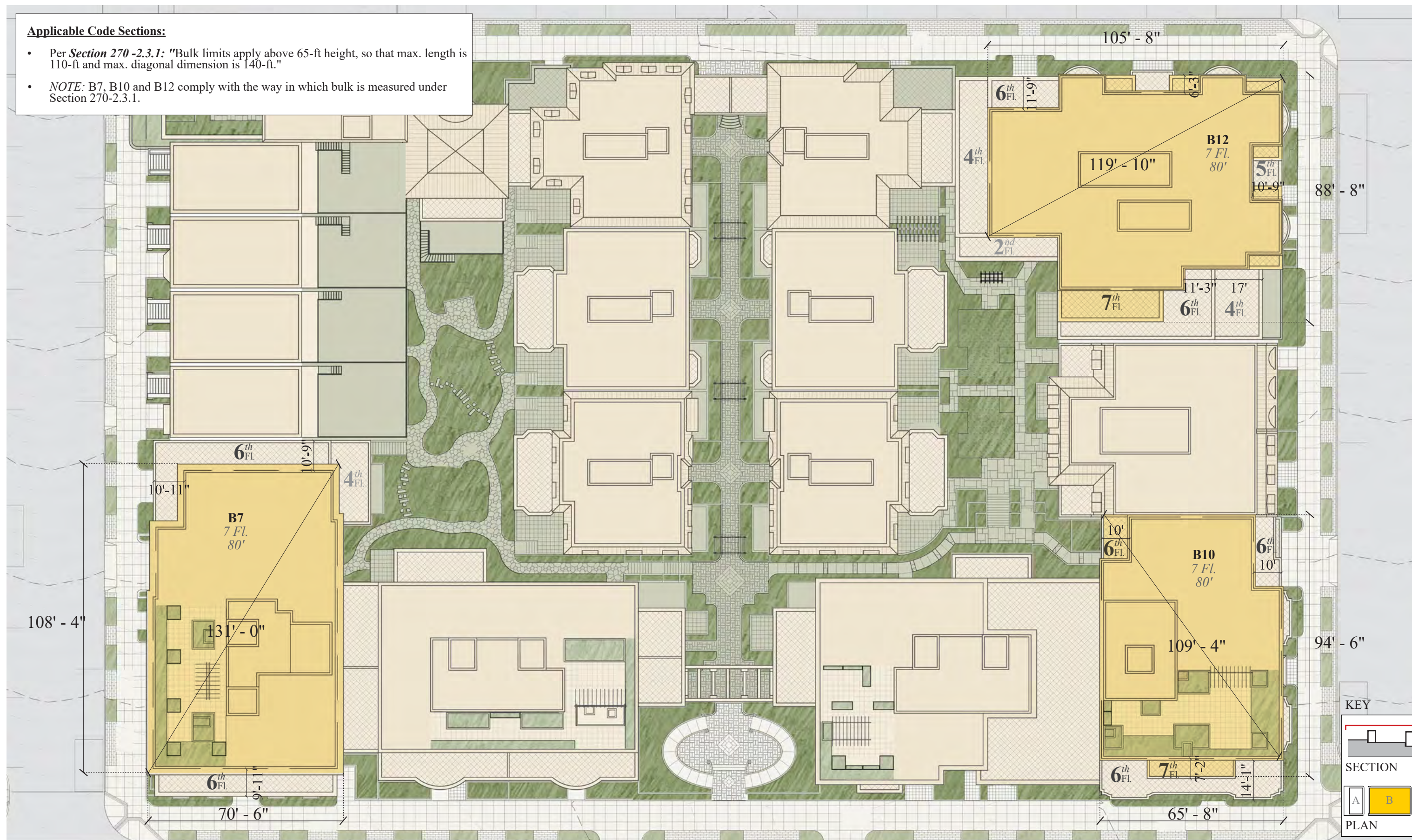
BLOCK B: MEWS LANE

**BLOCK B: BUILDING HEIGHT DIAGRAM**



**Applicable Code Sections:**

- Per **Section 270 -2.3.1:** "Bulk limits apply above 65-ft height, so that max. length is 110-ft and max. diagonal dimension is 140-ft."
- **NOTE:** B7, B10 and B12 comply with the way in which bulk is measured under Section 270-2.3.1.



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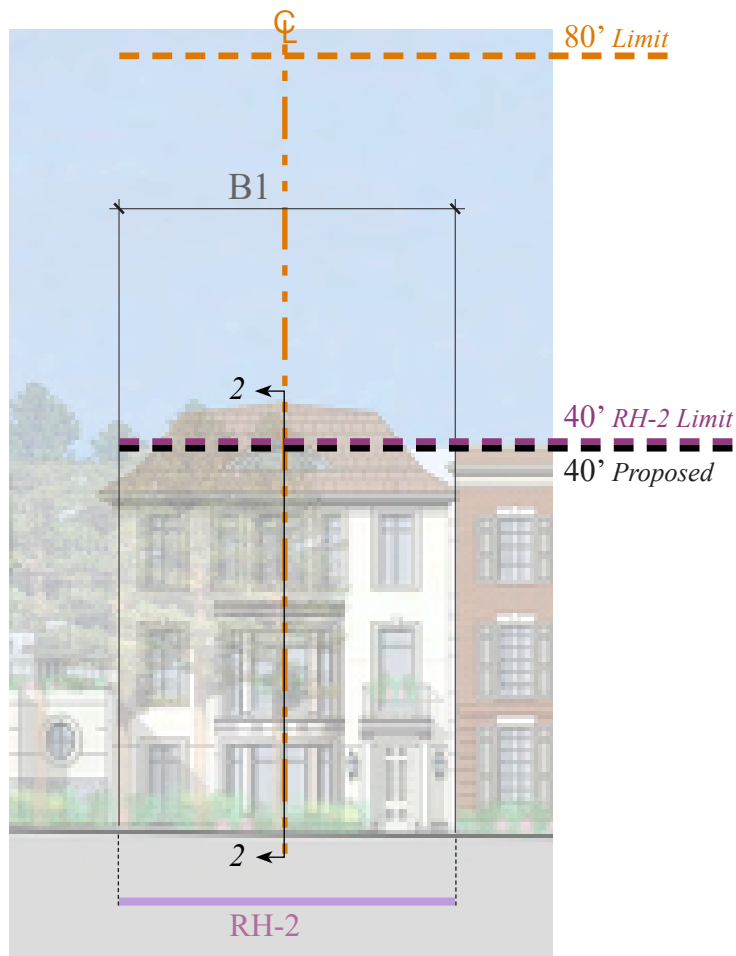
## BULK LIMIT COMPLIANCE DIAGRAM

### BLOCK B: BULK COMPLIANCE DIAGRAM

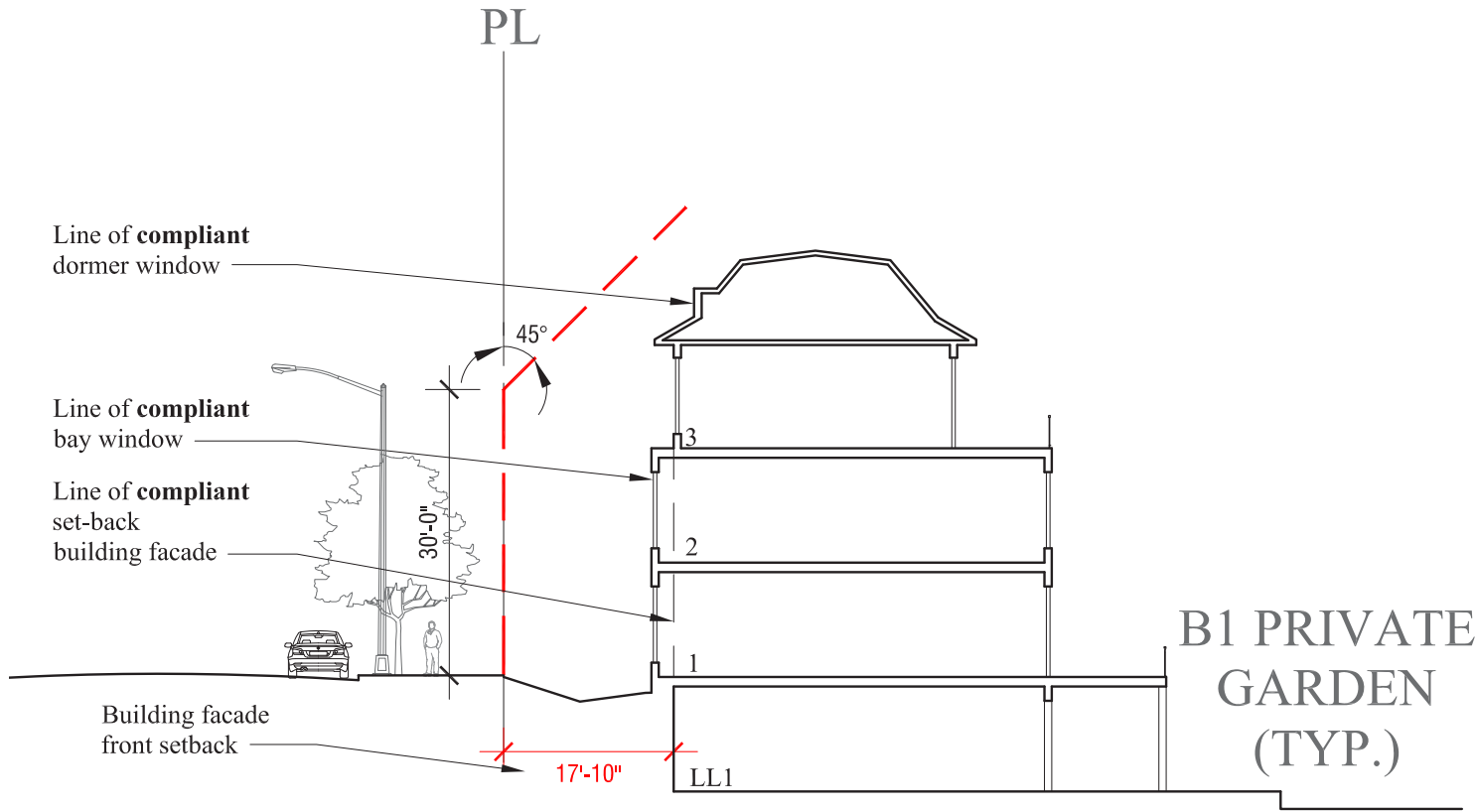
PUD/CU SUBMITTAL  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

A-B.15



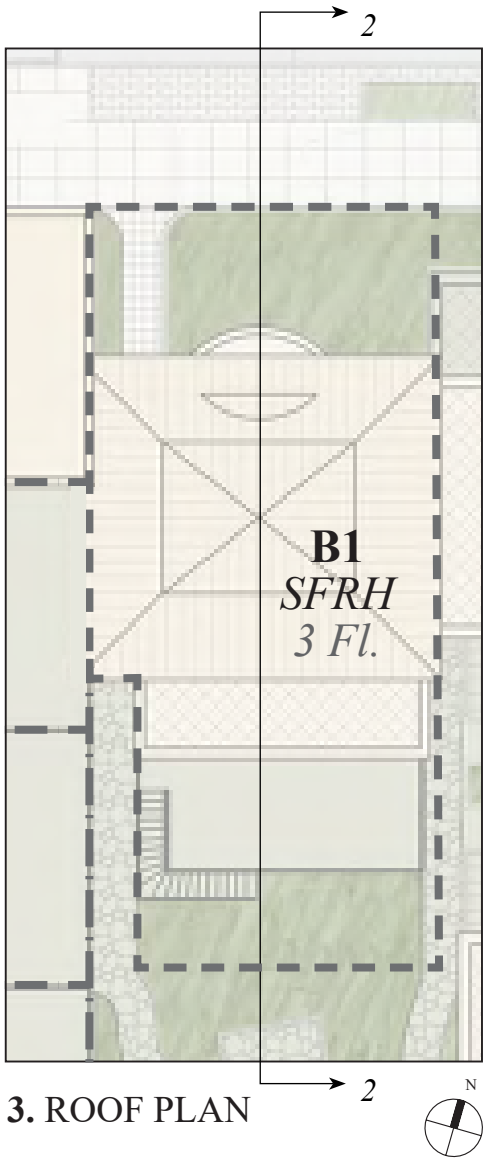


1. NORTH ELEVATION



2. N-S SECTION AA

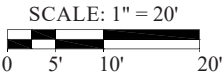
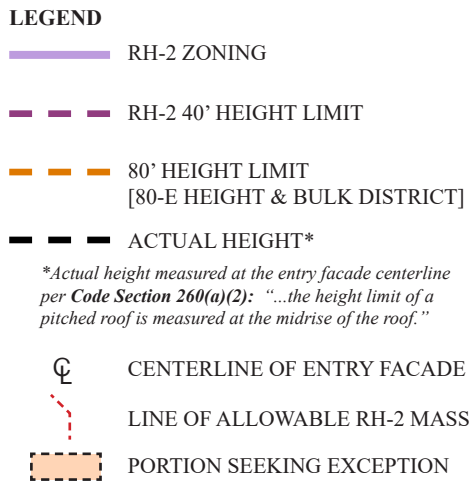
NOTE: B1 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

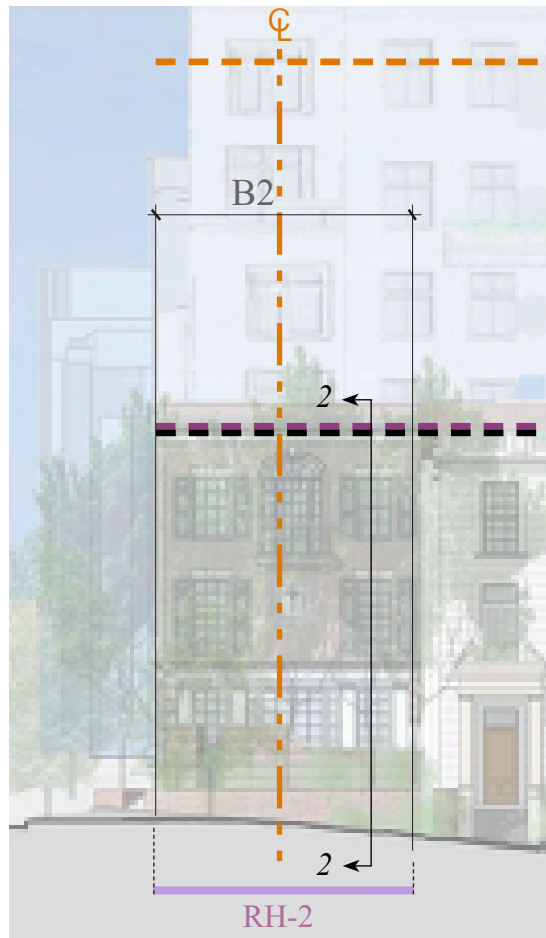


3700 CALIFORNIA STREET SAN FRANCISCO, CA

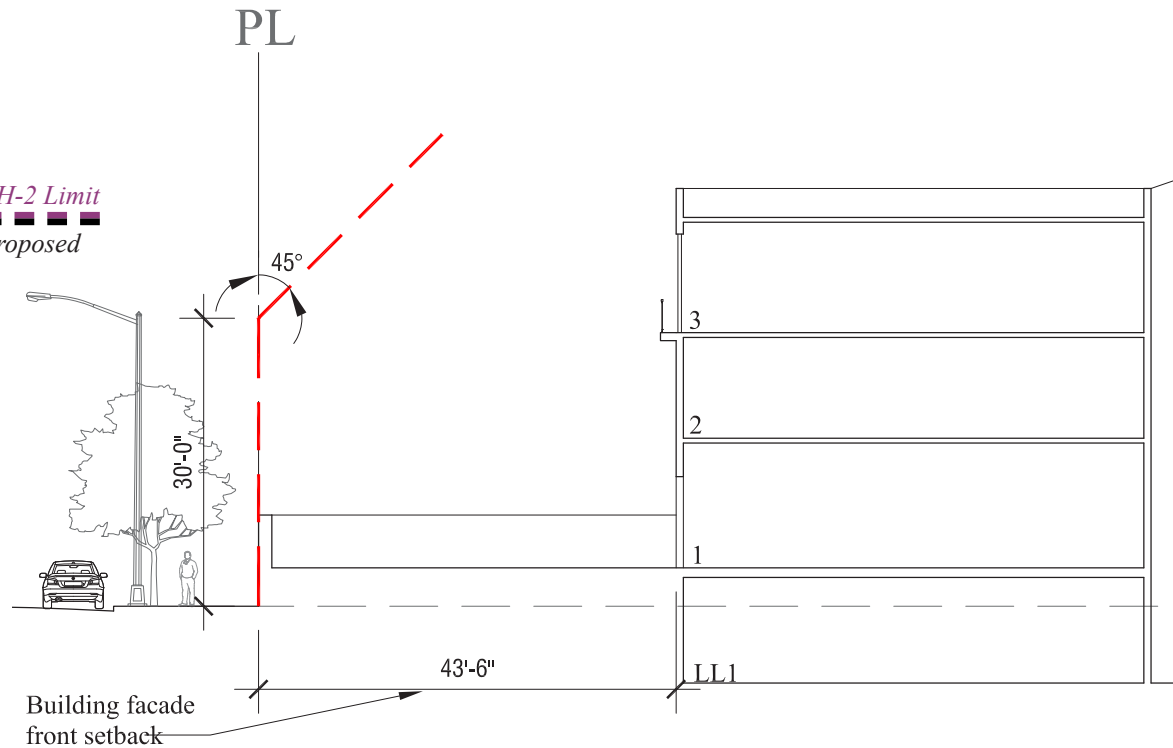
B1

# BLOCK B: RH-2 HEIGHT COMPLIANCE



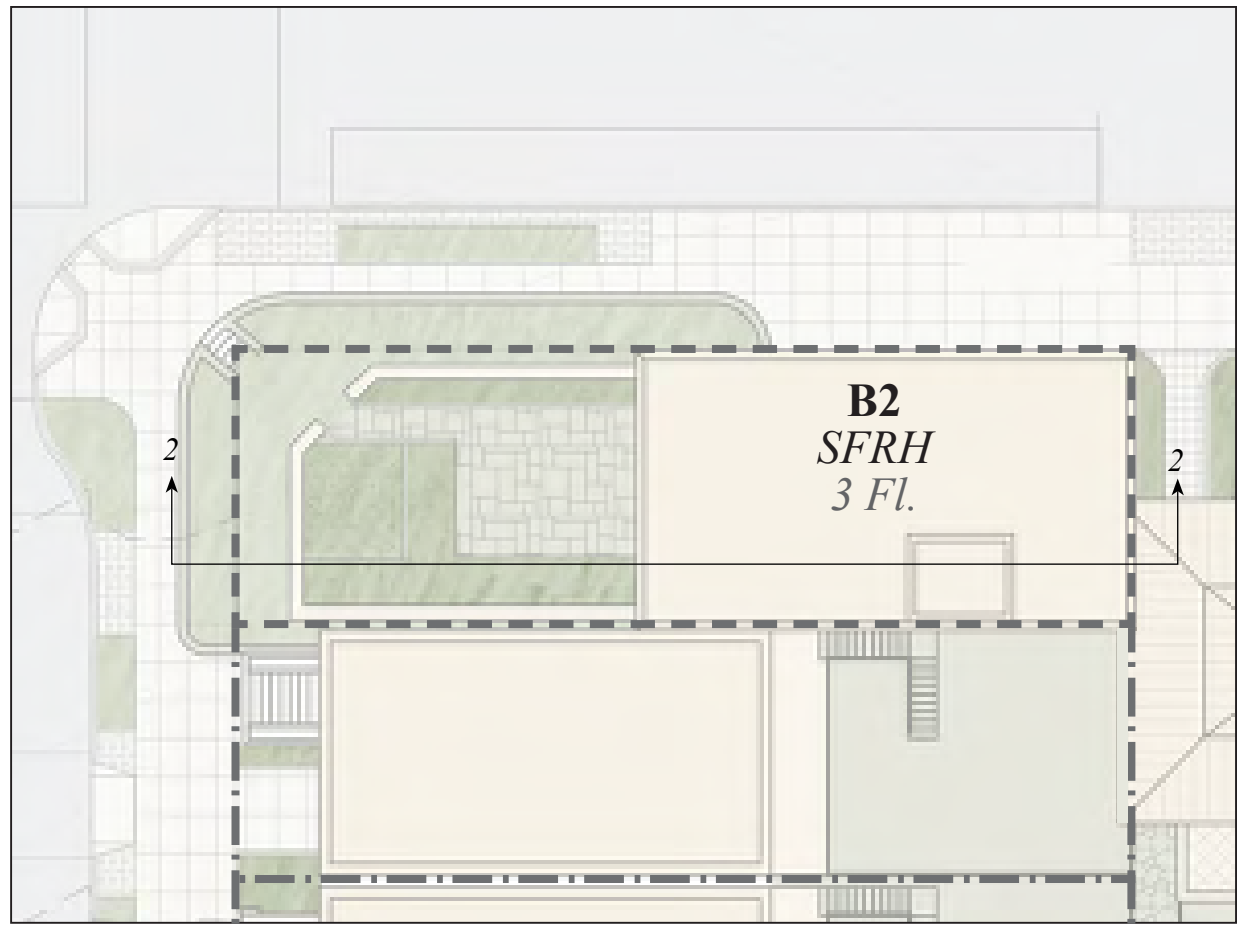


1. WEST ELEVATION



2. E-W SECTION AA

NOTE: B2 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- RH-2 40' HEIGHT LIMIT
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height measured at the entry facade centerline per Code Section 260(a)(2): "...the height limit of a pitched roof is measured at the midrise of the roof."

- ⊥ CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

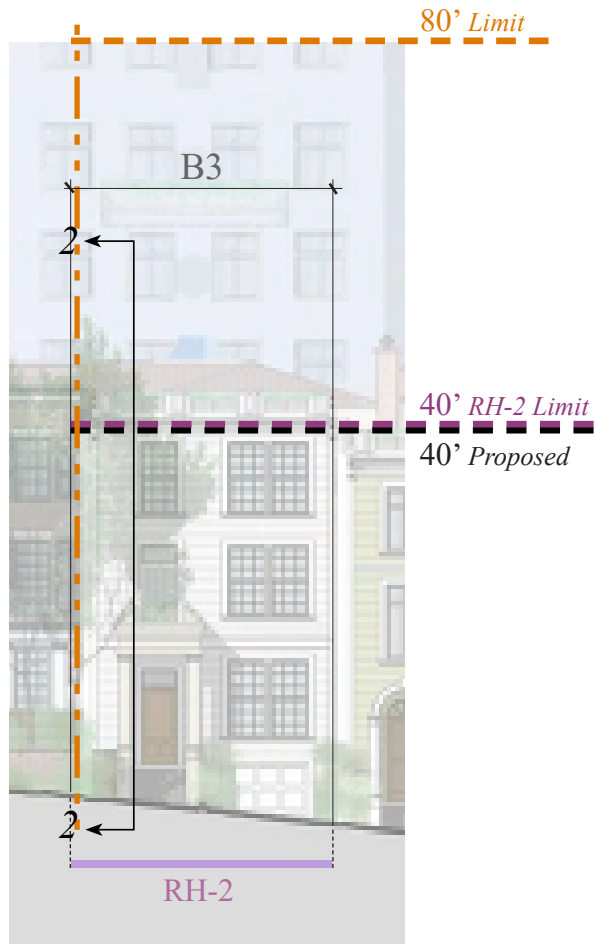
SCALE: 1" = 20'

0 5' 10' 20'

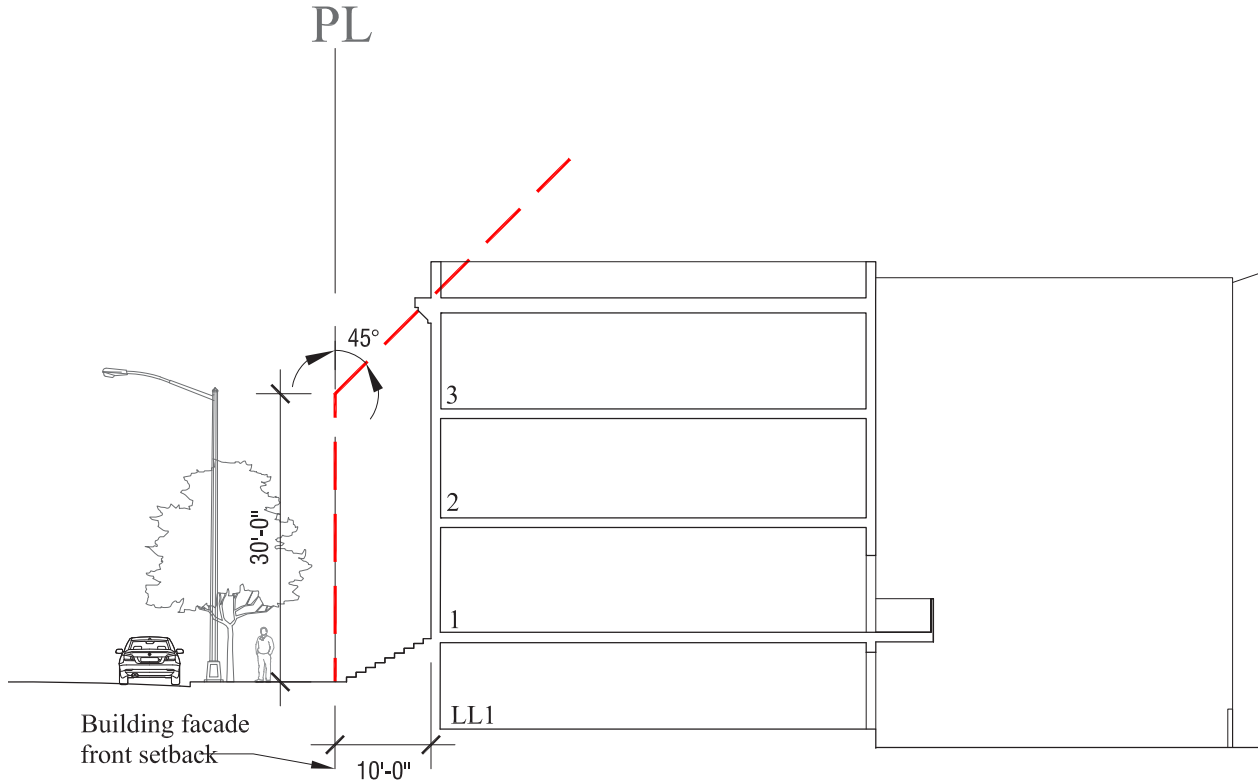
3700 CALIFORNIA STREET SAN FRANCISCO, CA

B2

# BLOCK B: RH-2 HEIGHT COMPLIANCE

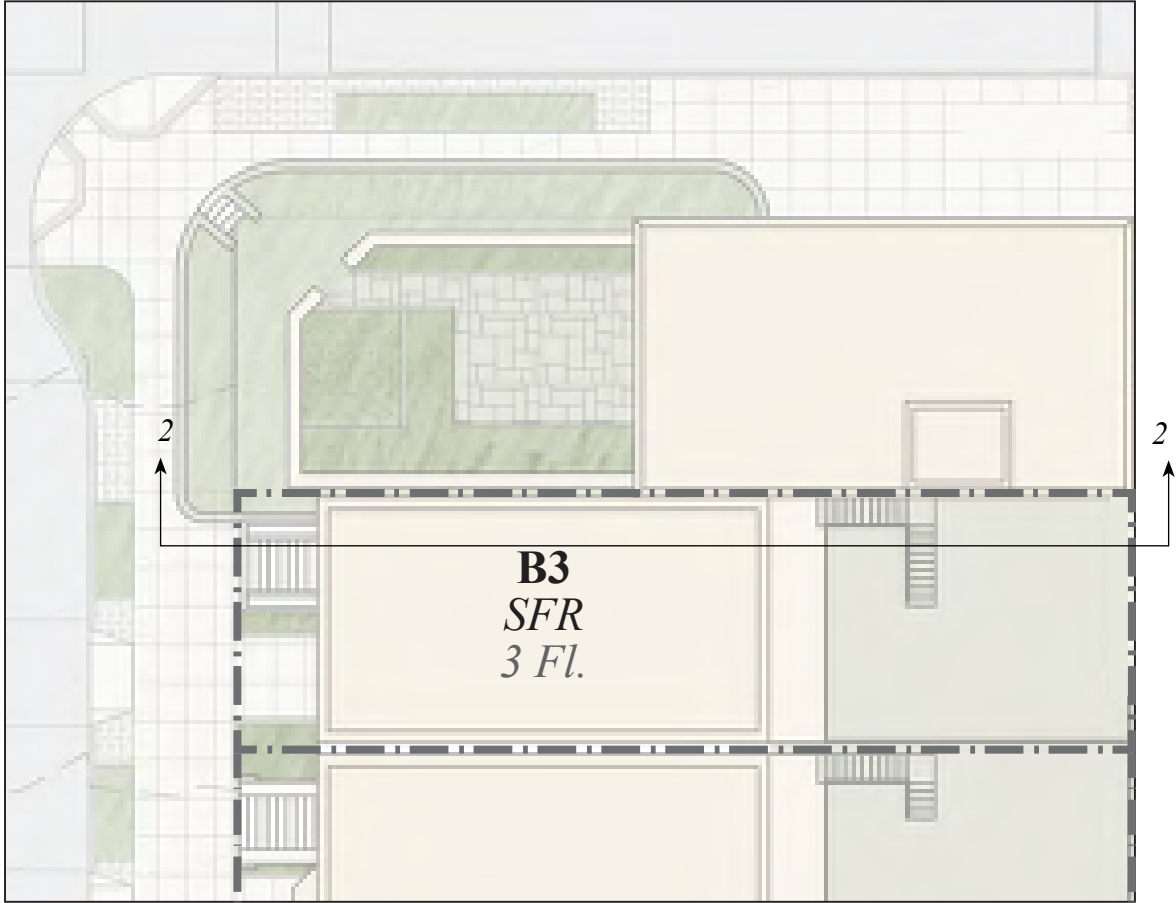


1. WEST ELEVATION



2. E-W SECTION

NOTE: B3 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- - - RH-2 40' HEIGHT LIMIT
- - - 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- - - ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- - - LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

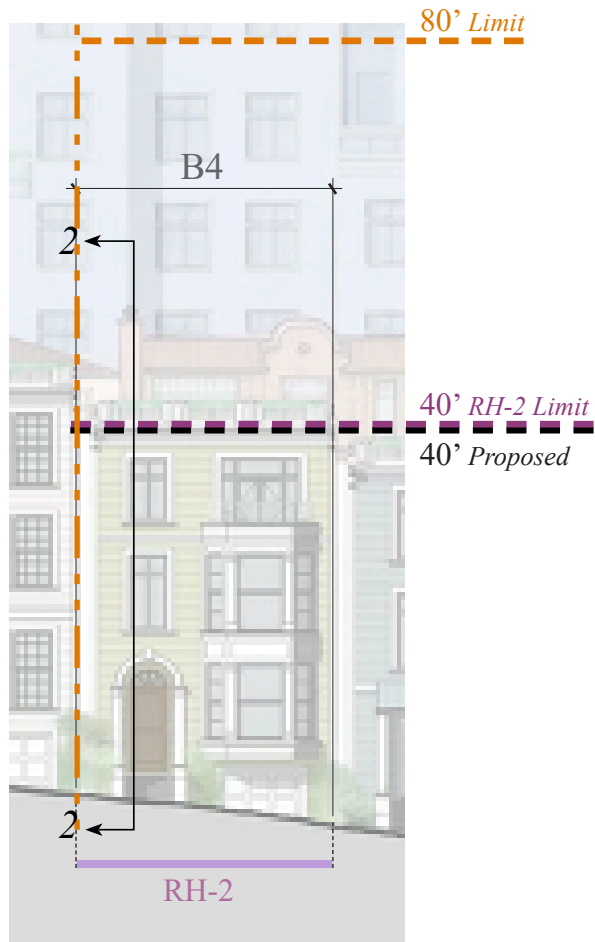
SCALE: 1" = 20'

0 5' 10' 20'

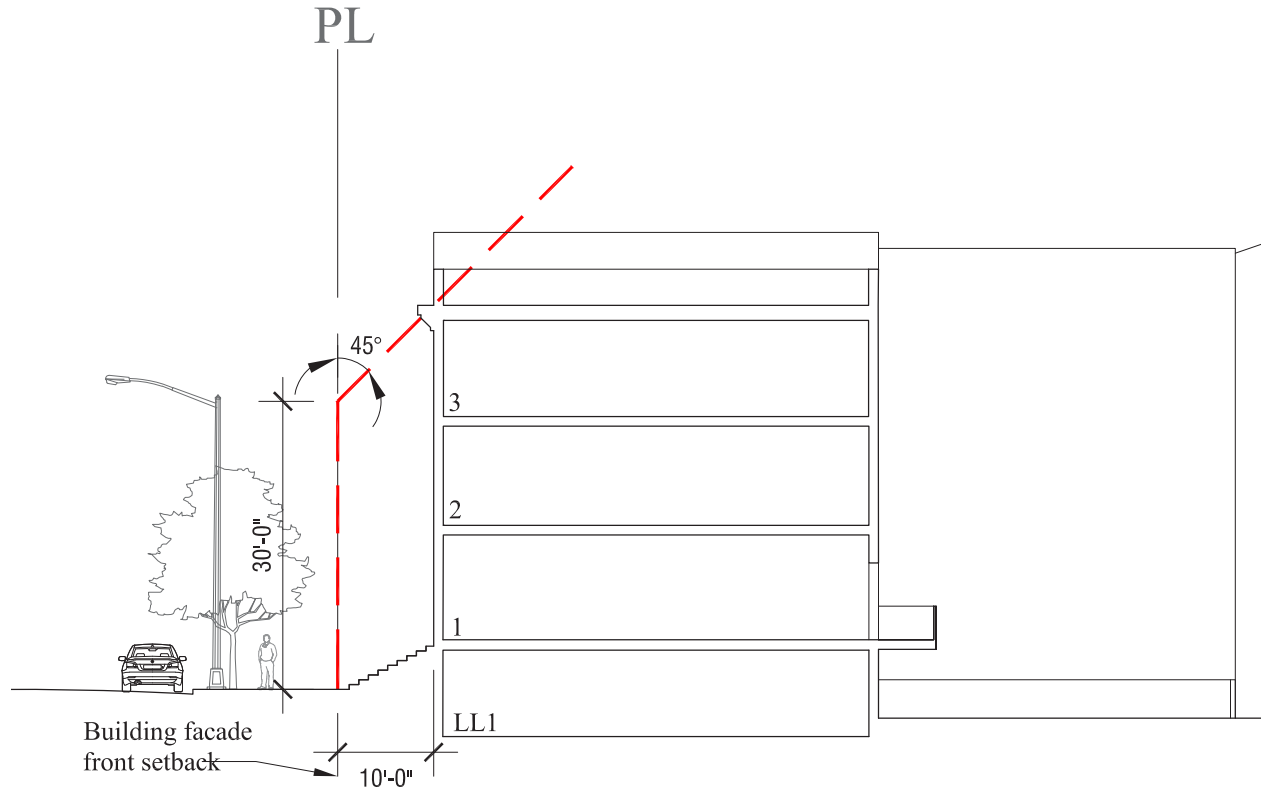
3700 CALIFORNIA STREET SAN FRANCISCO, CA

B3

# BLOCK B: RH-2 HEIGHT COMPLIANCE

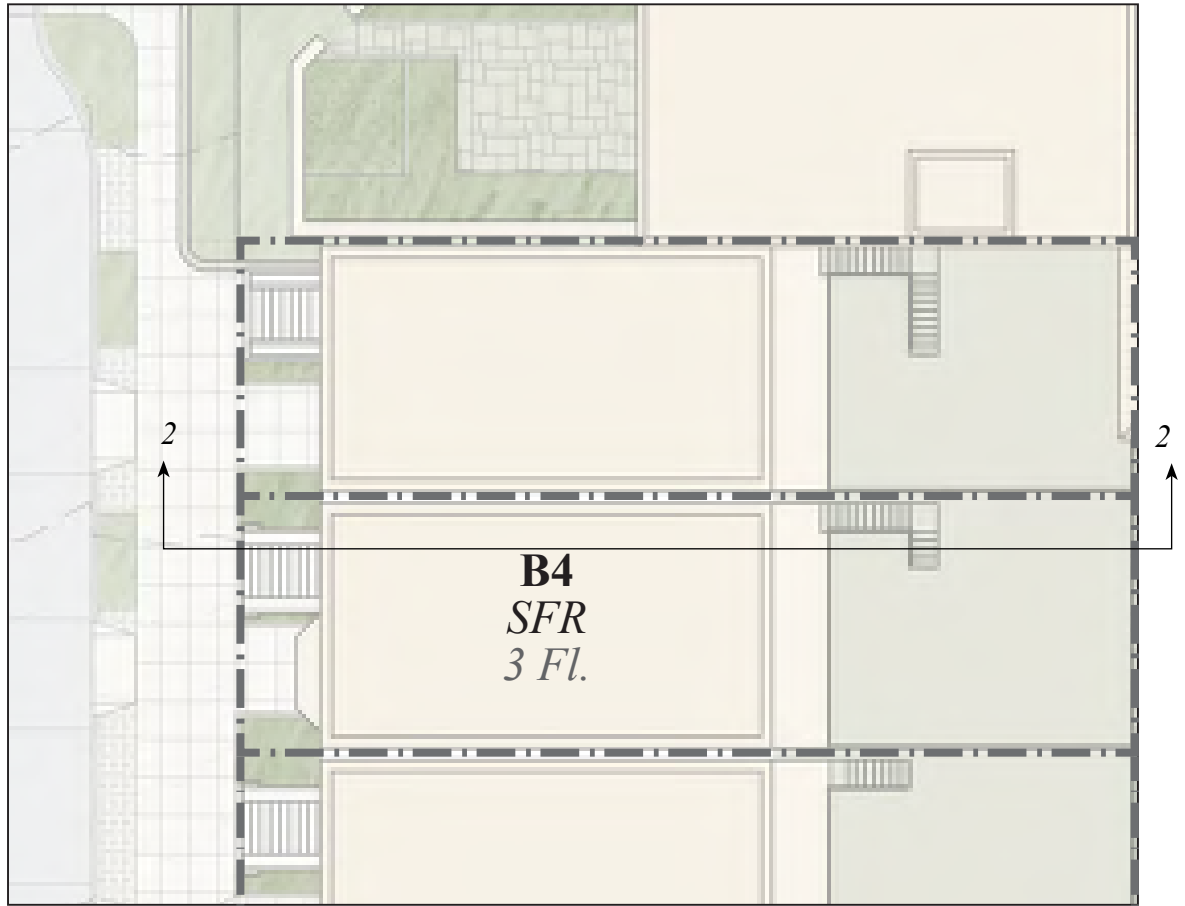


1. WEST ELEVATION



2. E-W SECTION

NOTE: B4 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- RH-2 40' HEIGHT LIMIT
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

SCALE: 1" = 20'

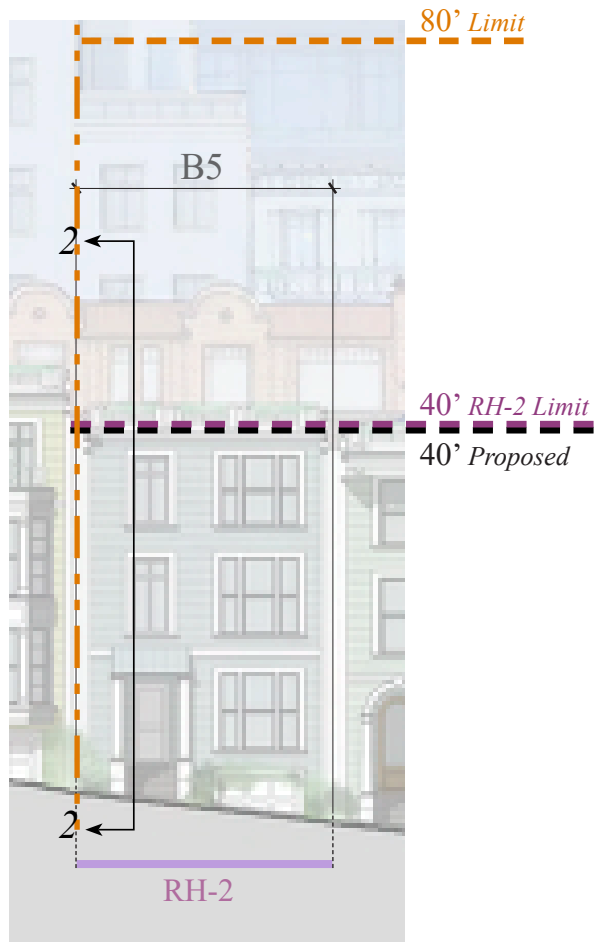
0 5' 10' 20'

3700 CALIFORNIA STREET SAN FRANCISCO, CA

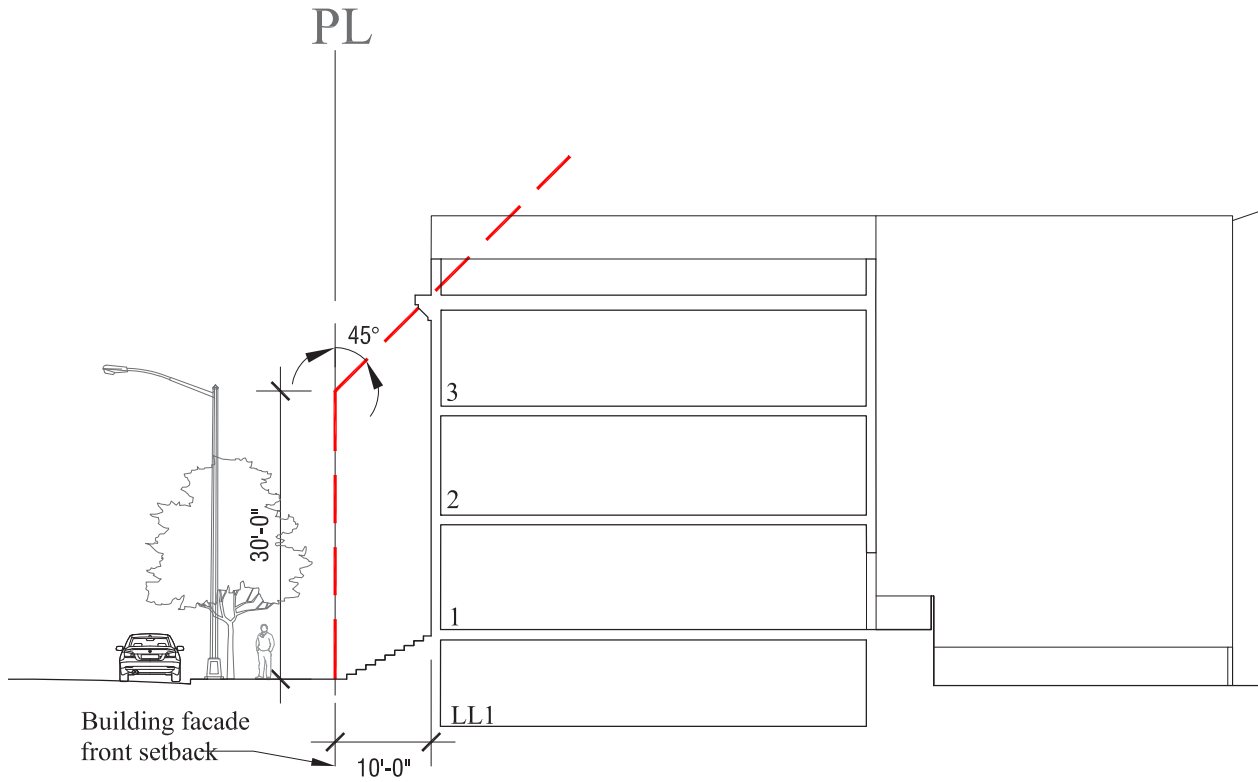
B4

# BLOCK B: RH-2 HEIGHT COMPLIANCE





1. WEST ELEVATION



2. E-W SECTION

NOTE: B5 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- RH-2 40' HEIGHT LIMIT
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

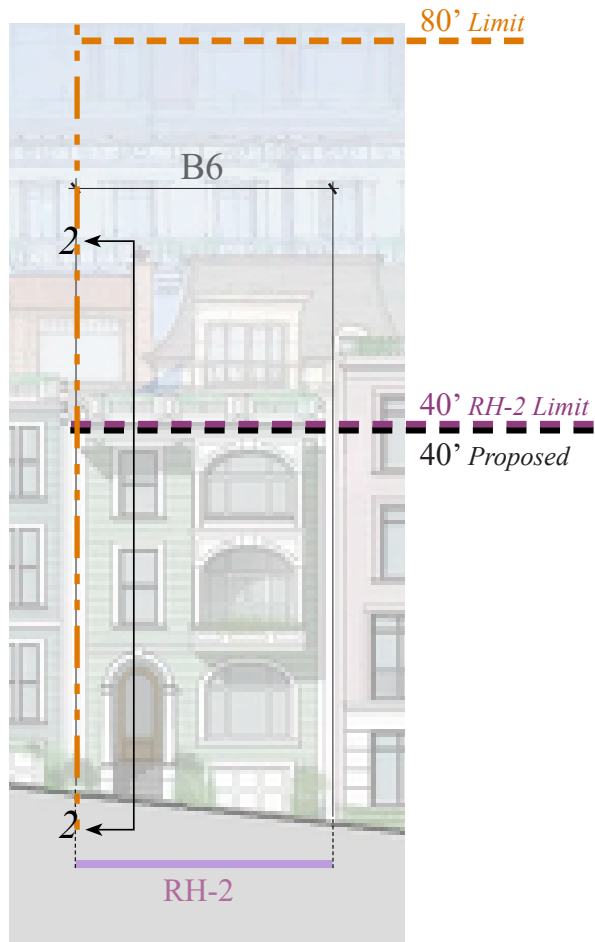
SCALE: 1" = 20'

0 5' 10' 20'

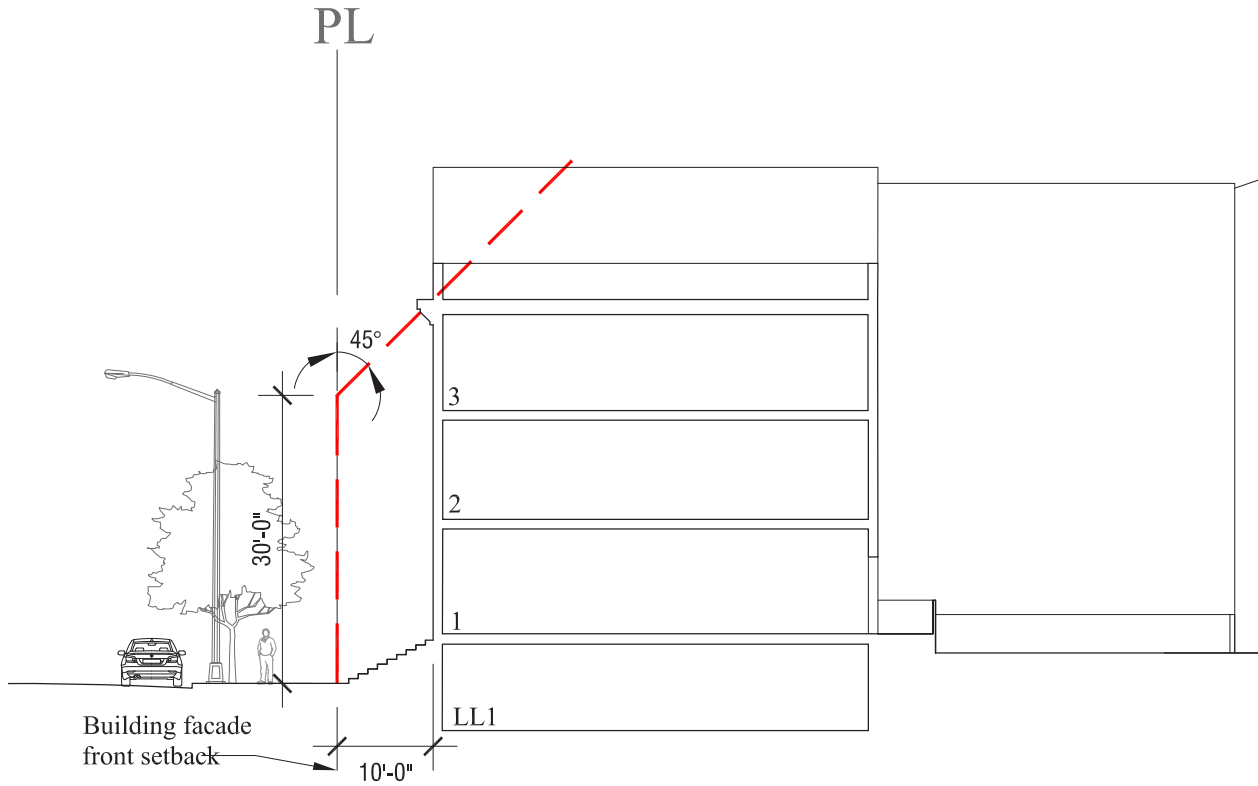
3700 CALIFORNIA STREET SAN FRANCISCO, CA

B5

# BLOCK B: RH-2 HEIGHT COMPLIANCE



1. WEST ELEVATION



2. E-W SECTION

NOTE: B6 complies with the way in which height is measured under Section 261(c)(1) for RH-2 zoned parcels at the front facade.



3. ROOF PLAN



KEY PLAN

**LEGEND**

- RH-2 ZONING
- RH-2 40' HEIGHT LIMIT
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT\*

\*Actual height is measured from curb level at the highest elevation of the lot per Code Section 204(d)(6): as a minor deviation from height.

- CENTERLINE OF ENTRY FACADE
- LINE OF ALLOWABLE RH-2 MASS
- PORTION SEEKING EXCEPTION

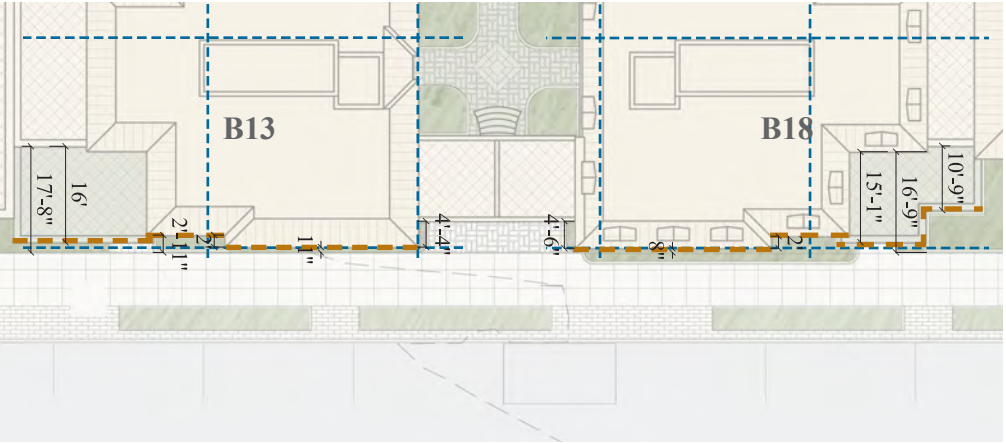
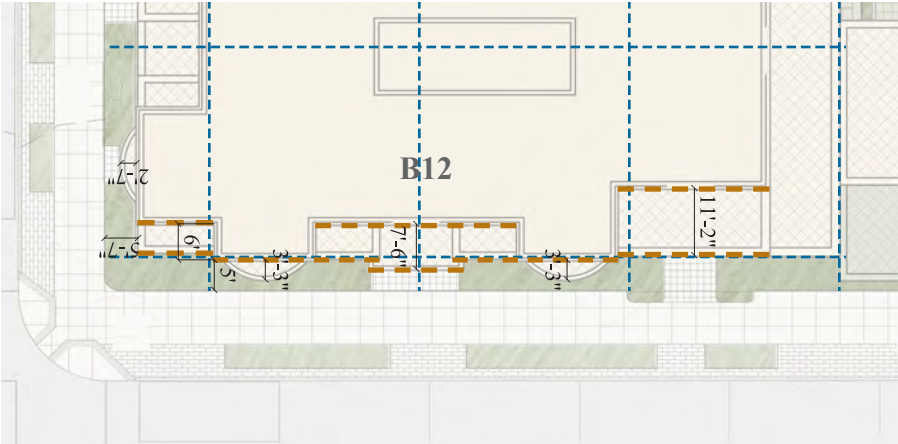
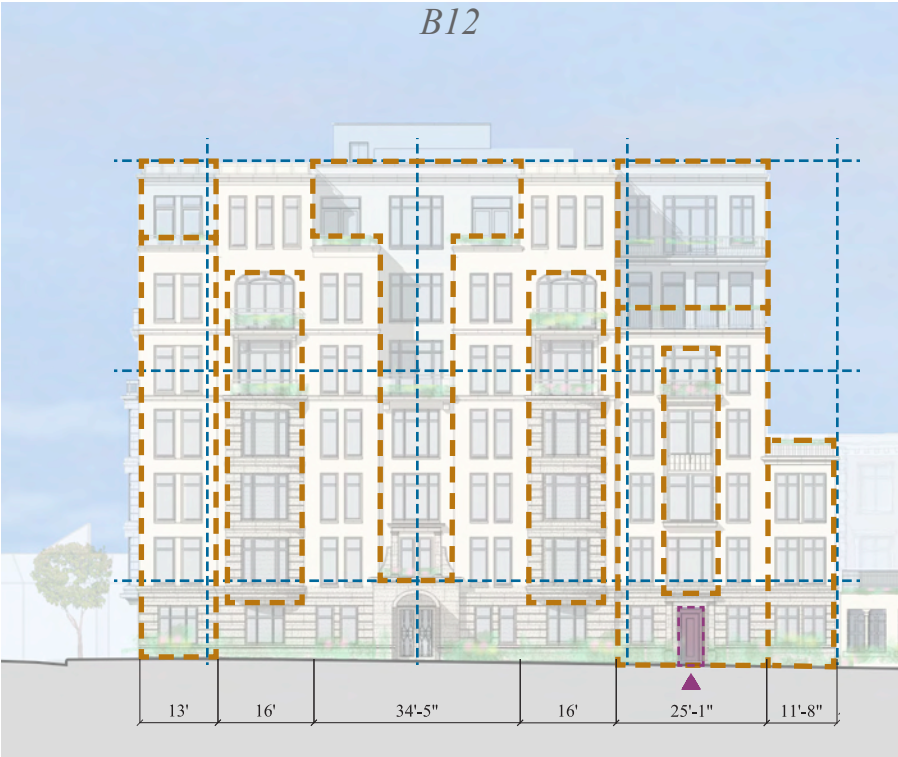
SCALE: 1" = 20'

0 5' 10' 20'

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B6

# BLOCK B: RH-2 HEIGHT COMPLIANCE



NOTE: B12, B13, and B18 facades vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)

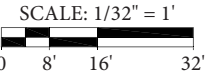


KEY PLAN

**LEGEND**

- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

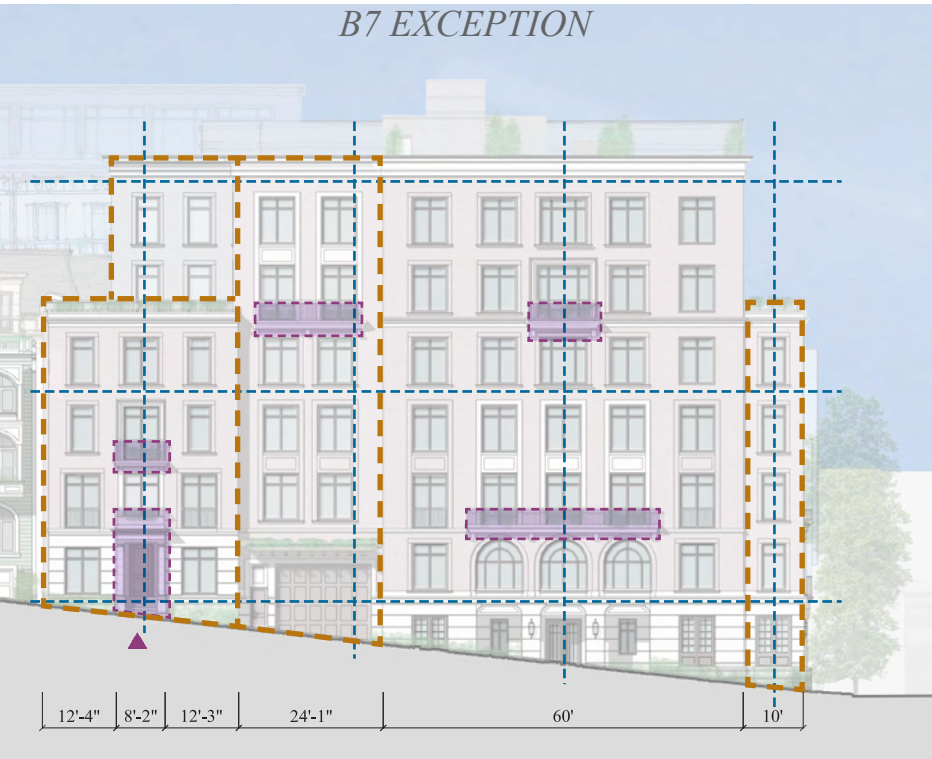
*\*CODE SECTION 144(1) "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25 FT"*



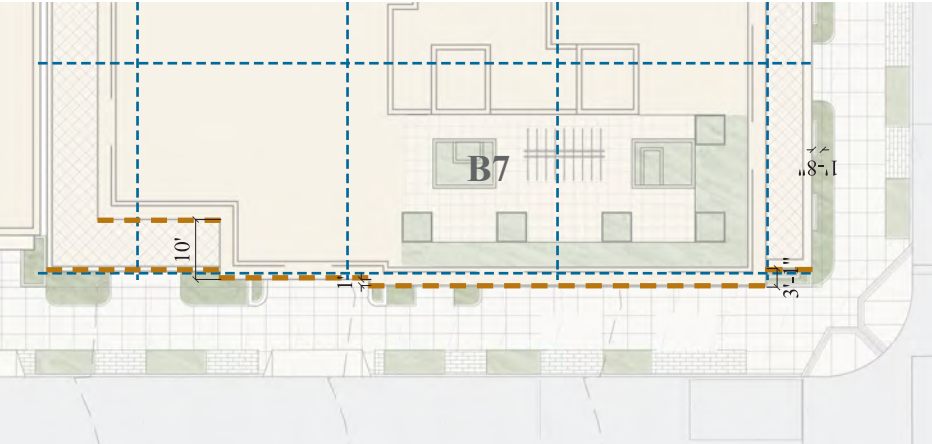
3700 CALIFORNIA STREET SAN FRANCISCO, CA

BLOCK B: RM-2 FACADE MODULATION





1. WEST ELEVATION *(Subject to PUD Exception)*



2. PLAN AT CHERRY STREET

*NOTE: B7 facade does not vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)  
Seeking exception; facade contains architectural features that contribute to overall variation (See Diagram 1)*

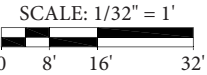


KEY PLAN

**LEGEND**

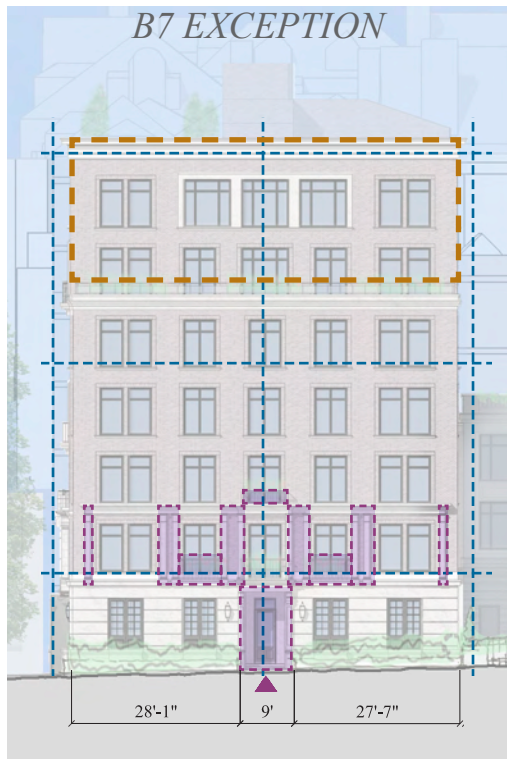
- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

*\*CODE SECTION 144(1) "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25 FT"*



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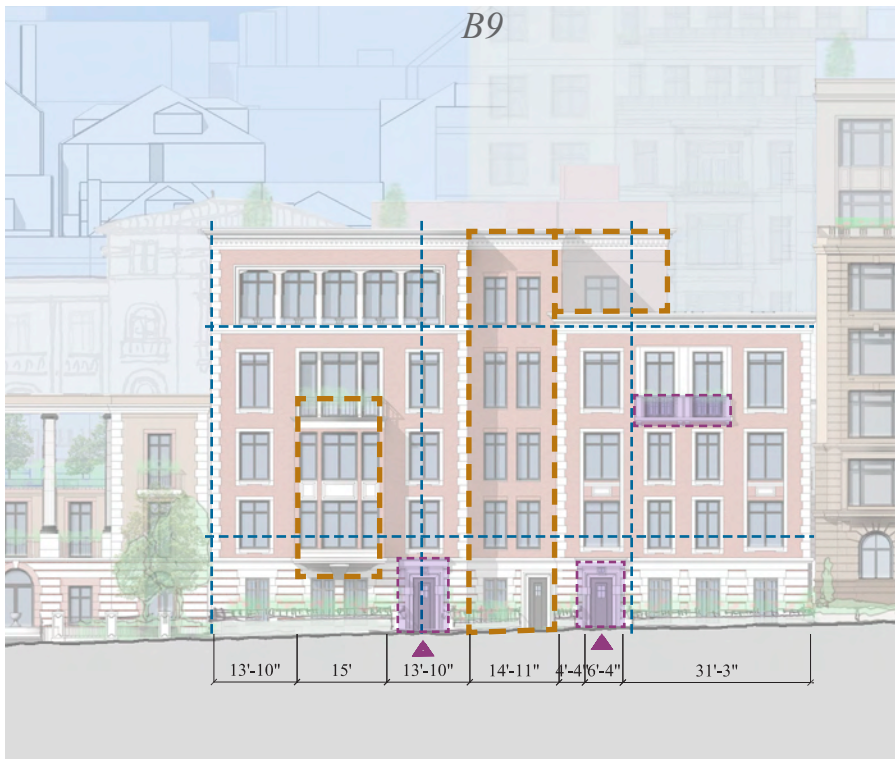




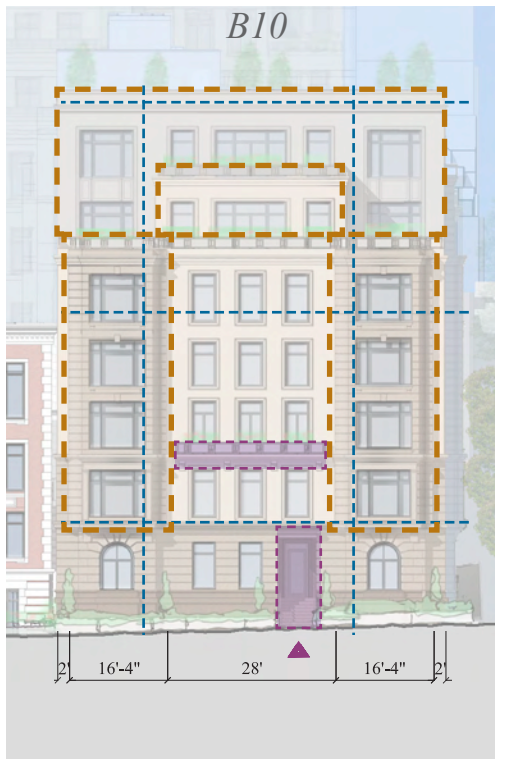
1. SOUTH ELEVATION  
(Subject to PUD Exception)



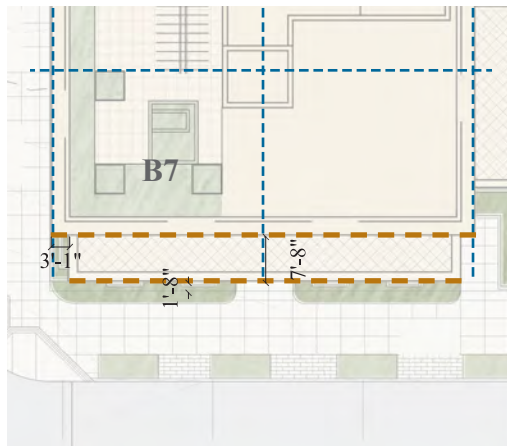
3. SOUTH ELEVATION



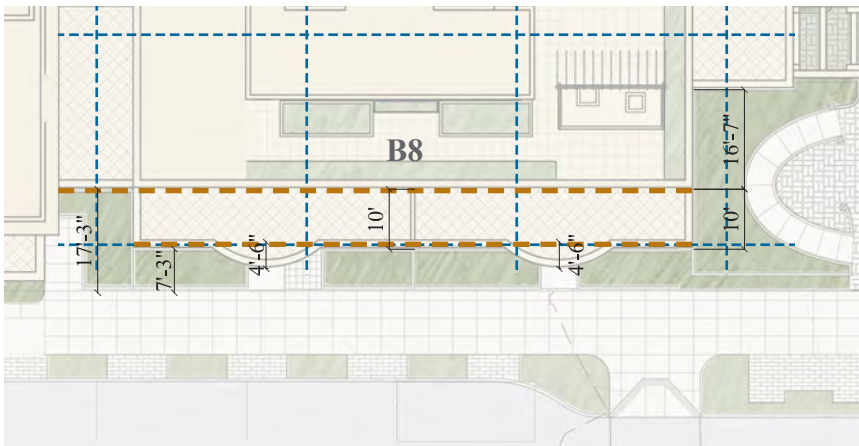
5. SOUTH ELEVATION



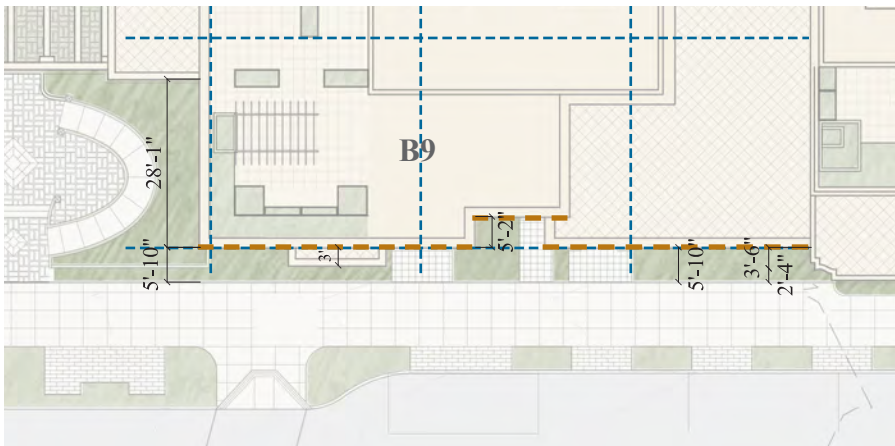
7. SOUTH ELEVATION



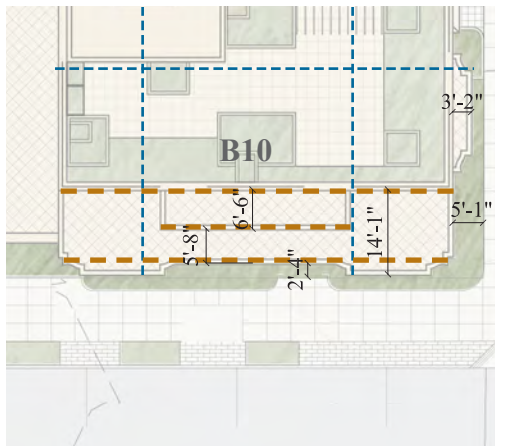
2. PLAN AT CALIFORNIA STREET



4. PLAN AT CALIFORNIA STREET



6. PLAN AT CALIFORNIA STREET



8. PLAN AT CALIFORNIA STREET

**NOTE: B8, B9, and B10 facades vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)**

**B7 facade does not vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)**  
Seeking exception; Facade contains architectural features that contribute to overall variation (See Diagram 1)

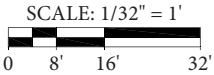


KEY PLAN

**LEGEND**

- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRANCES TO DWELLINGS\*

\*CODE SECTION 144(1) "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25 FT"

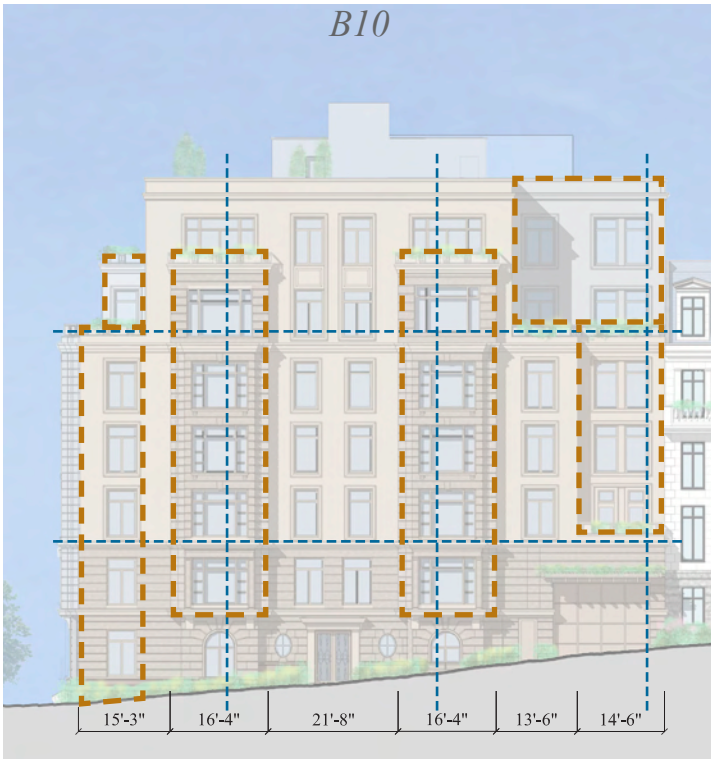


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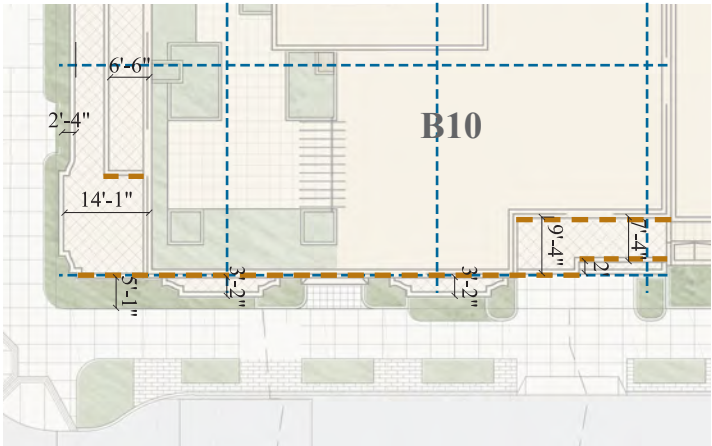


# BLOCK B: RM-2 FACADE MODULATION



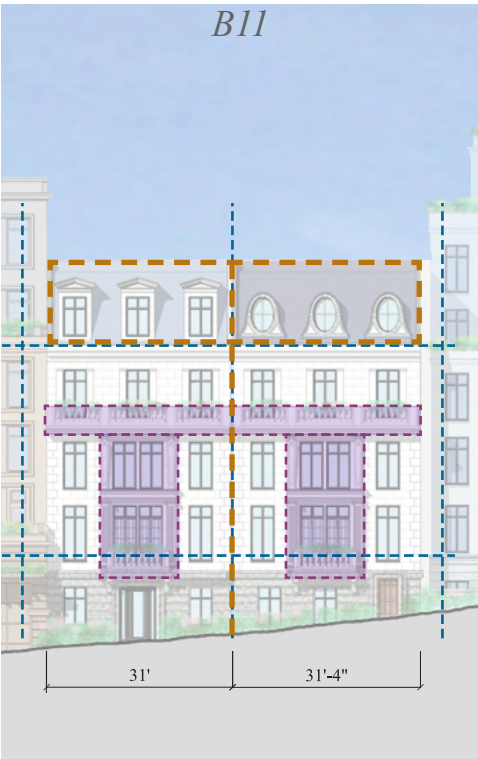


1. EAST ELEVATION

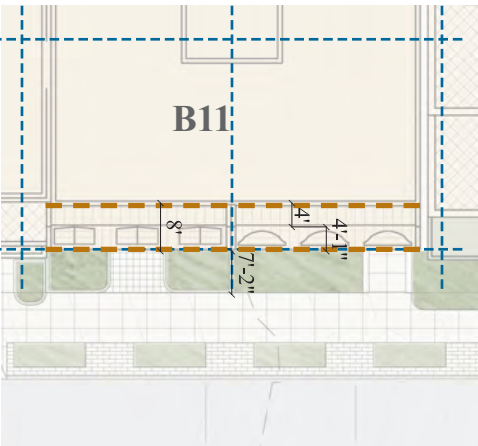


2. PLAN AT MAPLE STREET

**NOTE: B10, B11 and B12 facades vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)**



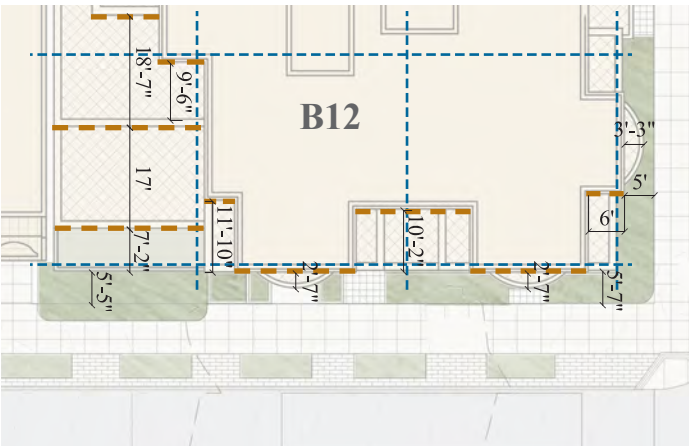
3. EAST ELEVATION



4. PLAN AT MAPLE STREET



5. EAST ELEVATION



6. PLAN AT MAPLE STREET

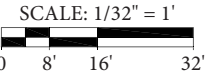


KEY PLAN

**LEGEND**

- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

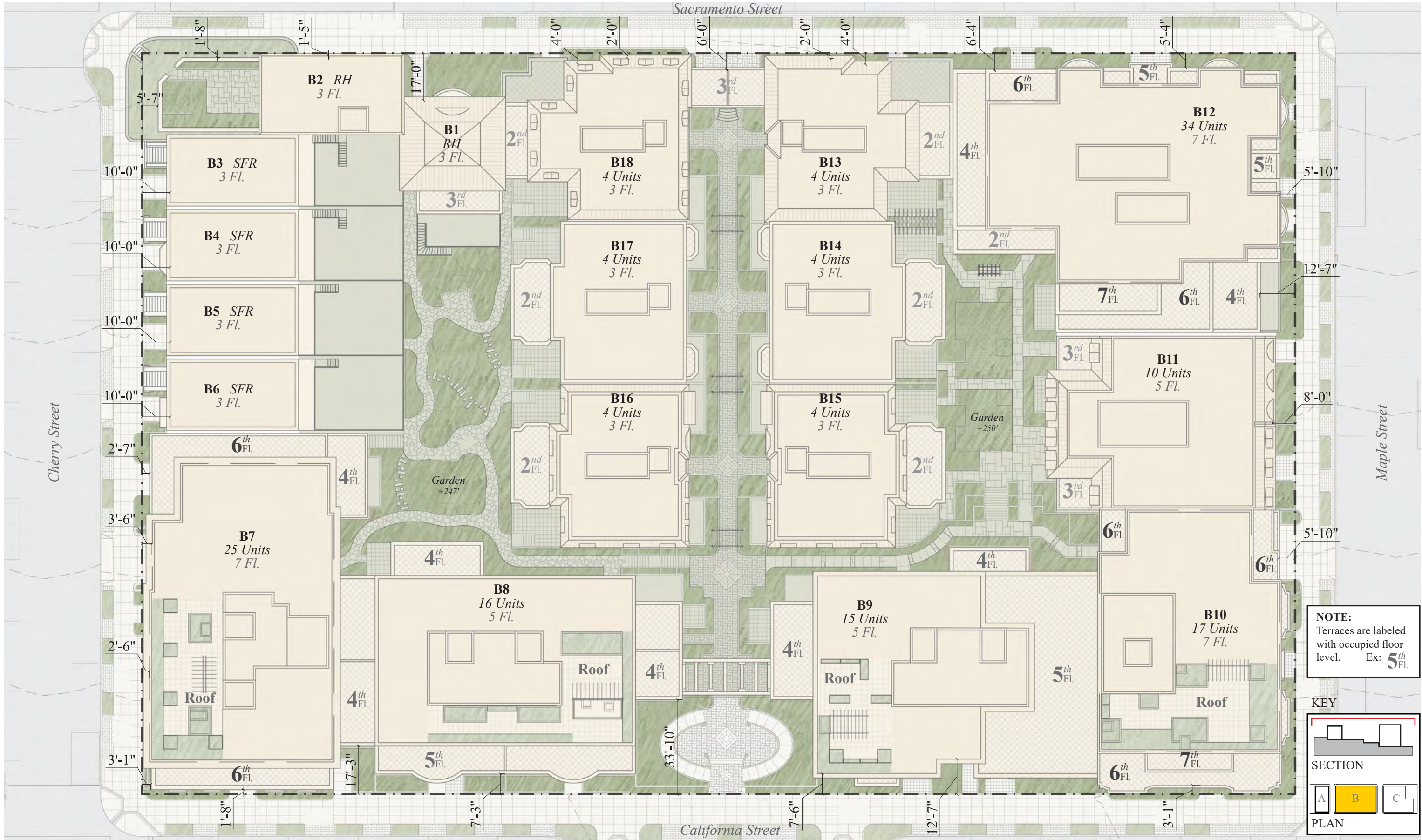
\*CODE SECTION 144(1) "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25 FT"



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# BLOCK B: RM-2 FACADE MODULATION





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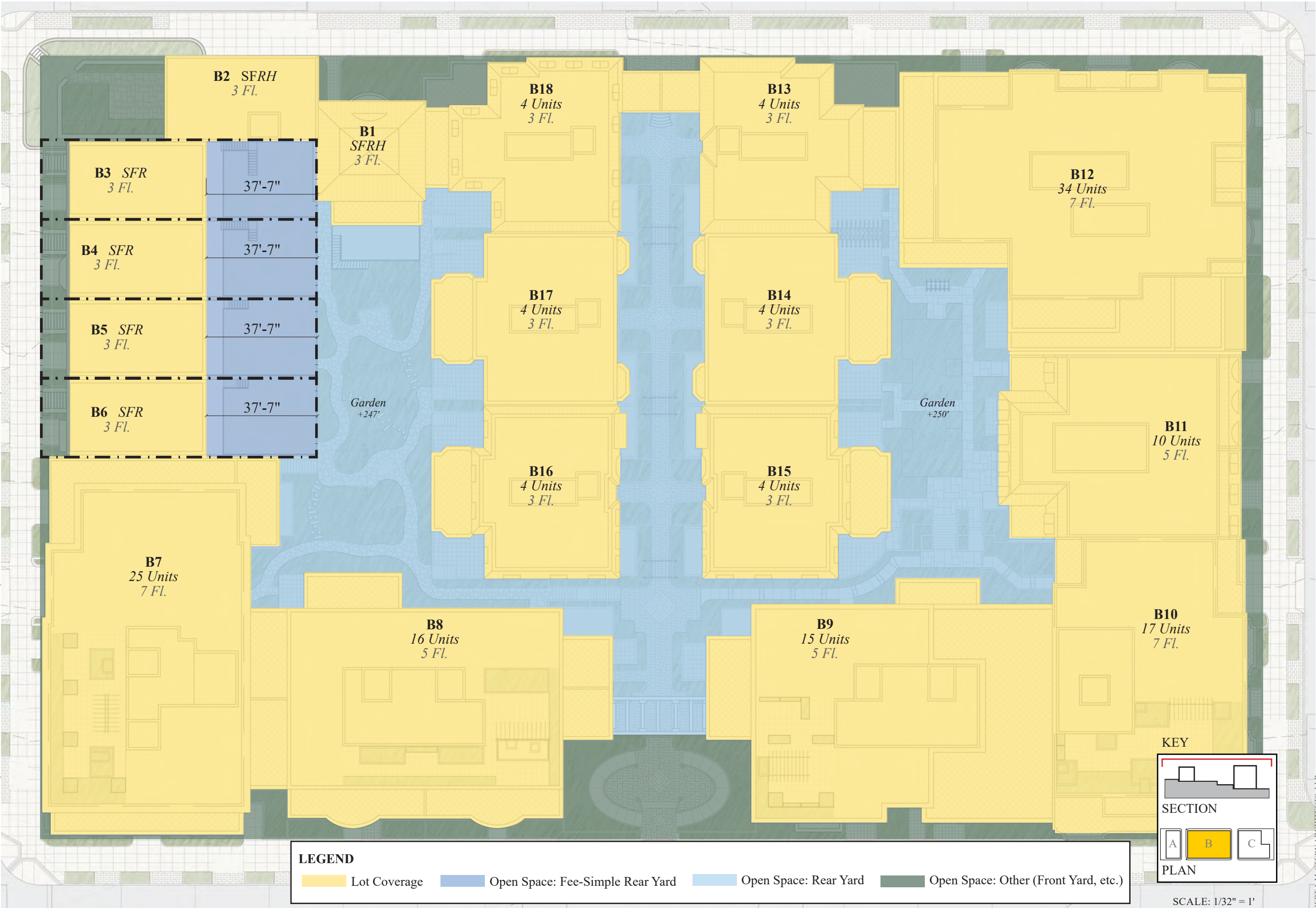
SAN FRANCISCO, CA

# FRONT SETBACKS

## BLOCK B: FRONT SETBACKS



B3	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	9%
Total Proposed Open Space:	49%
Delta Δ :	+4%
Required Rear Yard Depth: 45%	
Proposed Rear Yard Depth:	40%
Delta Δ :	(5%)
B4	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	9%
Total Proposed Open Space:	49%
Delta Δ :	+4%
Required Rear Yard Depth: 45%	
Proposed Rear Yard Depth:	40%
Delta Δ :	(5%)
B5	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	9%
Total Proposed Open Space:	49%
Delta Δ :	+4%
Required Rear Yard Depth: 45%	
Proposed Rear Yard Depth:	40%
Delta Δ :	(5%)
B6	
Lot Area:	2,500 sf
Proposed Open Space (Rear Yard):	40%
Proposed Open Space (Front Yard):	9%
Total Proposed Open Space:	49%
Delta Δ :	+4%
Required Rear Yard Depth: 45%	
Proposed Rear Yard Depth:	40%
Delta Δ :	(5%)
REST OF BLOCK B	
Lot Area:	99,390 sf
Proposed Open Space (Interior):	21%
Proposed Open Space (Green Edges):	11%
Total Proposed Open Space:	32%
Delta Δ :	(13%)



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## BLOCK B: REAR SETBACKS & SECTION 134



BLOCK B: PRIVATE OPEN SPACE

Bldg	Zon.	Total # of Units	# of Units w Priv. open space	Required	Provided
B1	RH-2	1	1	125.00	1,326
B2	RH-2	1	1	125.00	785
B3	RH-2	1	1	125.00	1,005
B4	RH-2	1	1	125.00	1,005
B5	RH-2	1	1	125.00	1,005
B6	RH-2	1	1	125.00	1,005
B7	RM-2	25	3	240.00	1,814
B8	RM-2	16	6	480.00	2,542
B9	RM-2	15	3	240.00	3,075
B10	RM-2	17	3	240.00	1,000
B11	RM-2	10	2	160.00	258
B12	RM-2	34	7	560.00	2,608
B13	RM-2	4	4	320.00	923
B14	RM-2	4	4	320.00	1,013
B15	RM-2	4	4	320.00	1,013
B16	RM-2	4	4	320.00	1,013
B17	RM-2	4	4	320.00	1,013
B18	RM-2	4	4	320.00	867
				4,590	23,270

BLOCK B: COMMON OPEN SPACE

Bldg	Zon.	Total # of Units	# of Units w.o Priv. open space	Required	Provided
B1	RH-2	1	0		
B2	RH-2	1	0		
B3	RH-2	1	0		
B4	RH-2	1	0		
B5	RH-2	1	0		
B6	RH-2	1	0		
B7	RM-2	25	22	2,340.80	3,077.40
B8	RM-2	16	10	1,064.00	1,398.82
B9	RM-2	15	12	1,276.80	1,678.58
B10	RM-2	17	14	1,489.60	1,958.34
B11	RM-2	10	8	851.20	1,119.05
B12	RM-2	34	27	2,872.80	3,776.81
B13	RM-2	4	0		
B14	RM-2	4	0		
B15	RM-2	4	0		
B16	RM-2	4	0		
B17	RM-2	4	0		
B18	RM-2	4	0		
				9,895	15,949

- NOTES:
1. Configuration of roof top areas not yet completed and to be provided later. Roof top areas may include any of the following: private or common residential open space (pursuant to Pl. Code Sec. 135), solar areas (pursuant to SF Better Roof Ordinance; Pl. Code Sec. 149), and living roof areas (pursuant to SF Green Building Code), or some combination of any/all of the above.
2. Roof top mechanical equipment and/or other similar feature will be enclosed and/or screened in compliance with Pl. Code Sec. 141 requirements.
3. Code-compliant common open spaces comply with all dimensional requirements.

LEGEND

Code-Compliant Common Open Space

Code-Compliant Private Open Space

Additional Common Open Space\*

Additional Private Open Space\*

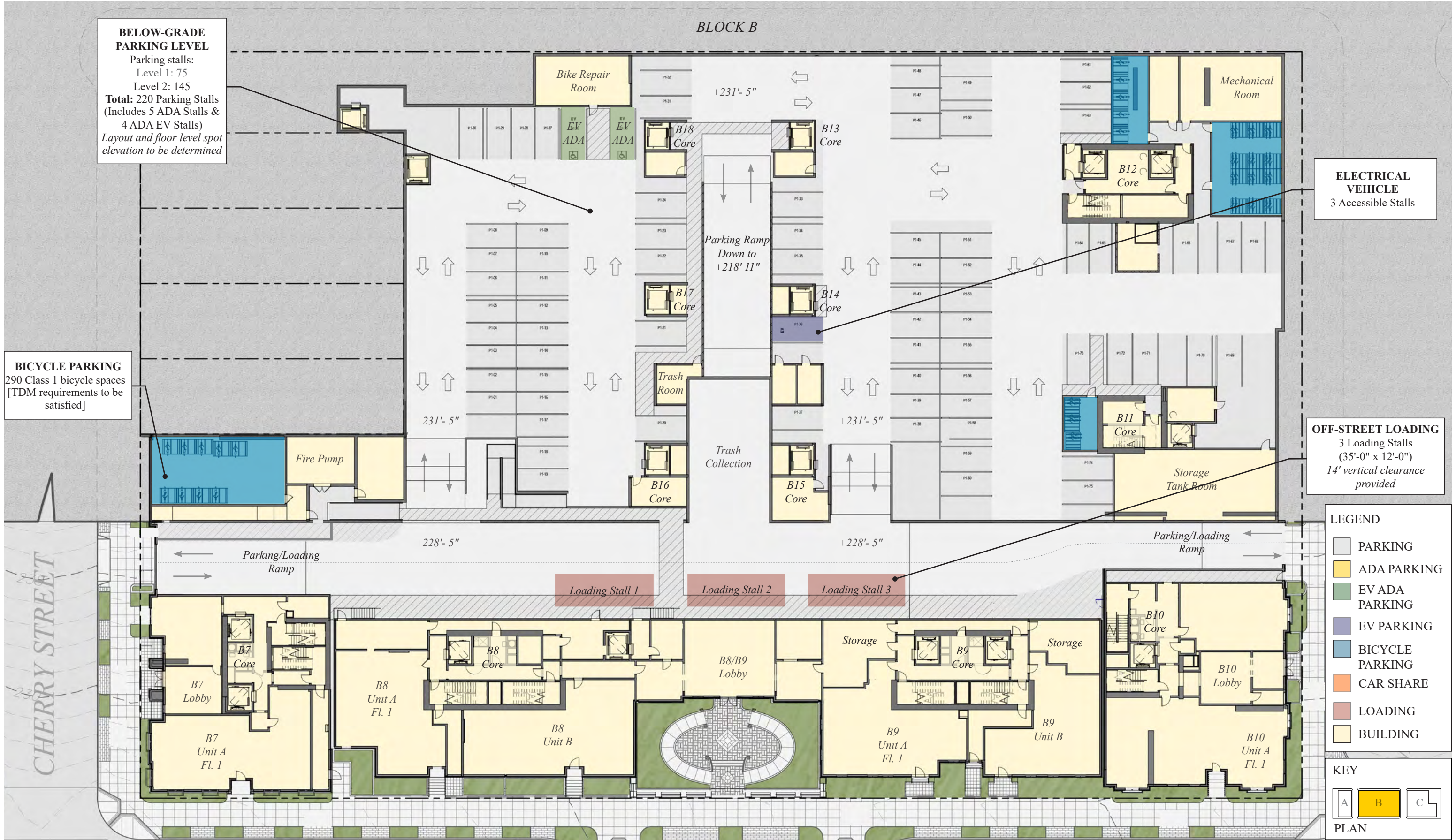
\*Open space that does not meet the dimensional requirements to be code-compliant and is not included in open space calculations. It represents additional common open space areas.

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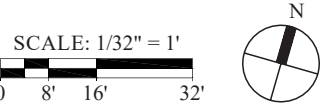




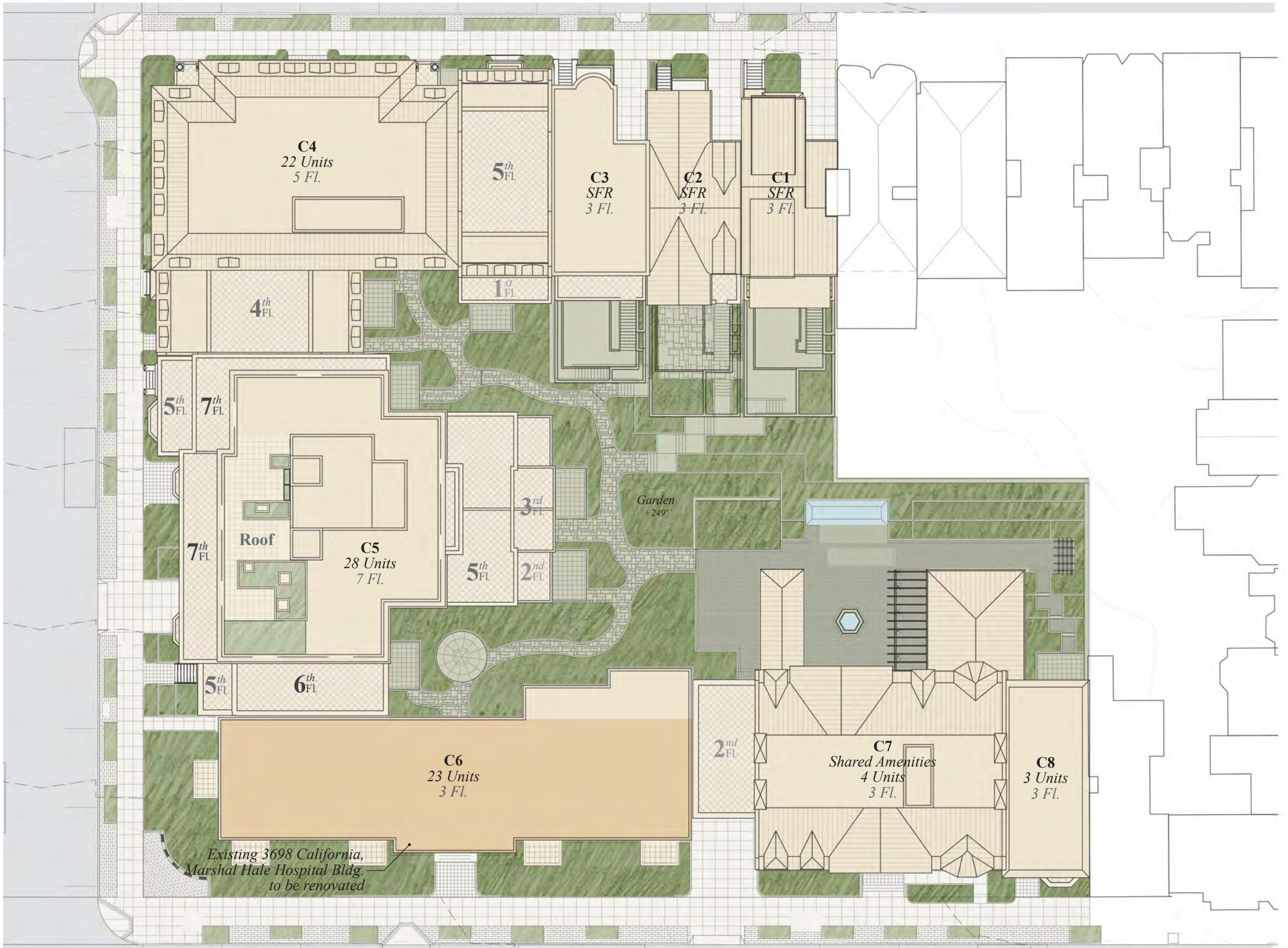
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LOWER LEVEL 1  
(BELOW-GRADE PARKING)

BLOCK B: PARKING DIAGRAM

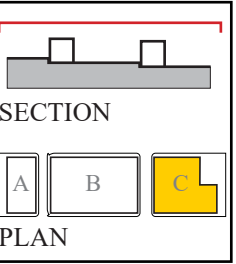






**NOTE:**  
Terraces are labeled  
with occupied floor  
level. Ex: **5<sup>th</sup> Fl.**

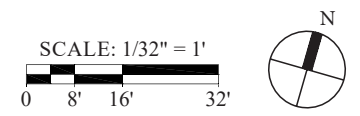
**KEY**



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# BLOCK C

## BLOCK C TITLE SHEET







**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



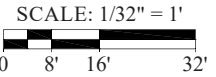
**LEGEND**

- RM-2 ZONING
- RH-2 ZONING
- 40' RH-2 HEIGHT LIMIT [SECTION 261]
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT

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SACRAMENTO STREET

BLOCK C: BUILDING HEIGHT DIAGRAM





**Applicable Code Sections include:**

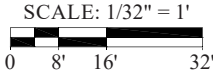
- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



KEY PLAN

**LEGEND**

- RM-2 ZONING
- RH-2 ZONING
- 40' RH-2 HEIGHT LIMIT [SECTION 261]
- 40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
- 80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
- ACTUAL HEIGHT

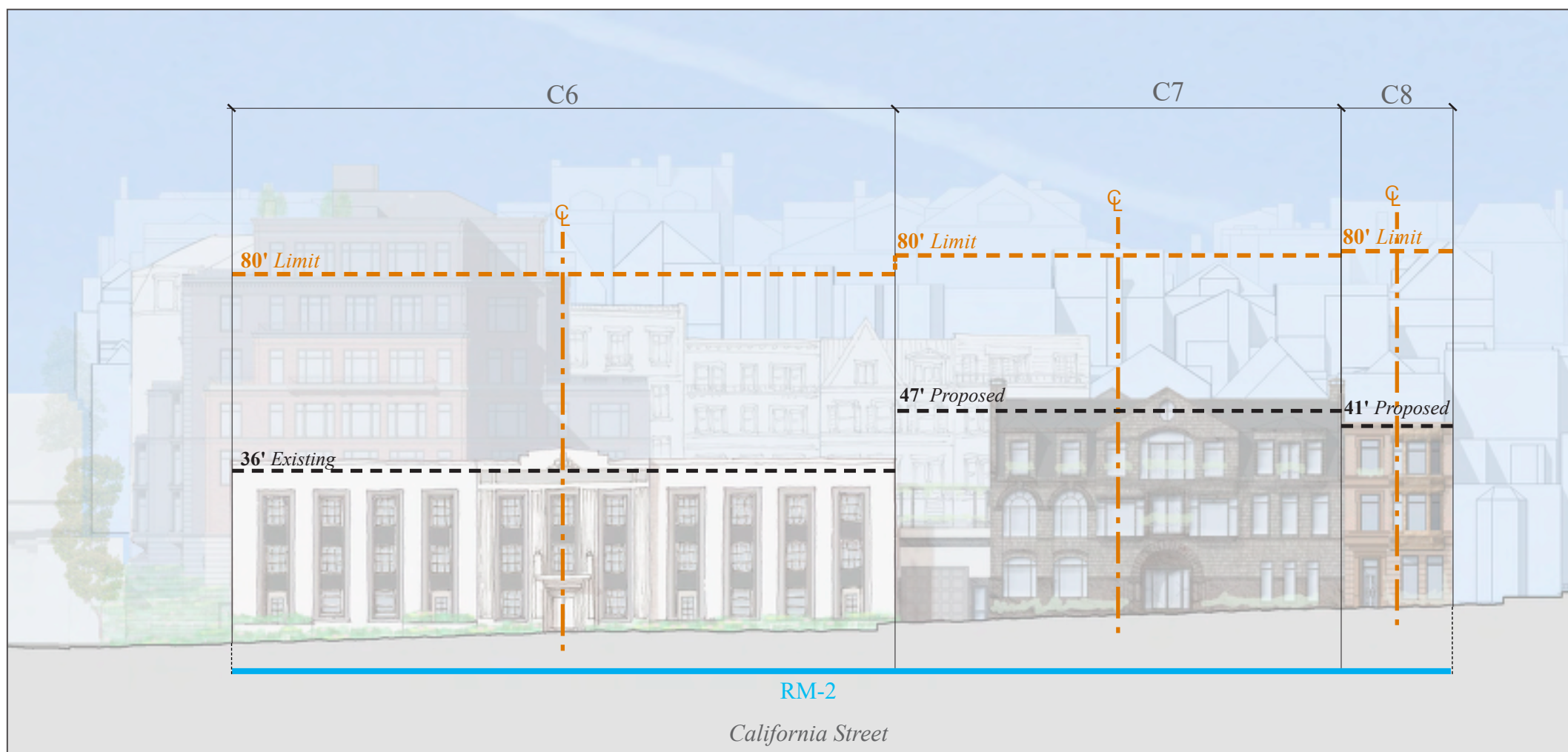


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MAPLE STREET

BLOCK C: BUILDING HEIGHT DIAGRAM





**Applicable Code Sections include:**

- Per **Section 260 (a)(2)**: Upper point on a sloped/pitched roof is measured per the average height of the rise in the case of a pitched, or any higher point of the feature not exempted under subsection (b).
- Per **Section 260(b)** certain building features are exempt and not subject to height limits, including parapets up to 4' in height under Section 260(b)(2)(A), as illustrated in the diagram as area above the height limit or actual height.
- Per **Section 260(b)(1)(B)** elevator and stair penthouses are exempt and not subject to the height limit, provided that such features shall not exceed 10' for buildings subject to height limit of 65' or less, and 16' for buildings subject to height limit of more than 65', except that elevator penthouse features can extend up to 16' regardless of the height limit so long as the height is limited to the footprint of the elevator shaft.



KEY PLAN

LEGEND	
<span style="color: blue;">—</span>	RM-2 ZONING
<span style="color: purple;">—</span>	RH-2 ZONING
<span style="color: purple;">- - -</span>	40' RH-2 HEIGHT LIMIT [SECTION 261]
<span style="color: green;">- - -</span>	40' HEIGHT LIMIT [40-X HEIGHT & BULK DISTRICT]
<span style="color: orange;">- - -</span>	80' HEIGHT LIMIT [80-E HEIGHT & BULK DISTRICT]
<span style="color: black;">- - -</span>	ACTUAL HEIGHT

SCALE: 1/32" = 1'  
0 8' 16' 32'

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CALIFORNIA STREET

## BLOCK C: BUILDING HEIGHT DIAGRAM

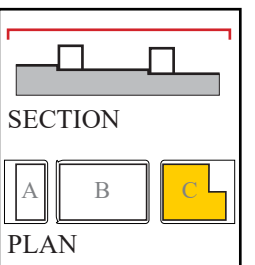


**Applicable Code Sections:**

- Per **Section 270 -2.3.1:** "Bulk limits apply above 65-ft height, so that max. length is 110-ft and max. diagonal dimension is 140-ft."
- **NOTE:** C5 complies with the way in which bulk is measured under Section 270-2.3.1.



**KEY**



BUILDING MASS OVER 65' IN HEIGHT

SCALE: 1/32" = 1'  
0 8' 16' 32'



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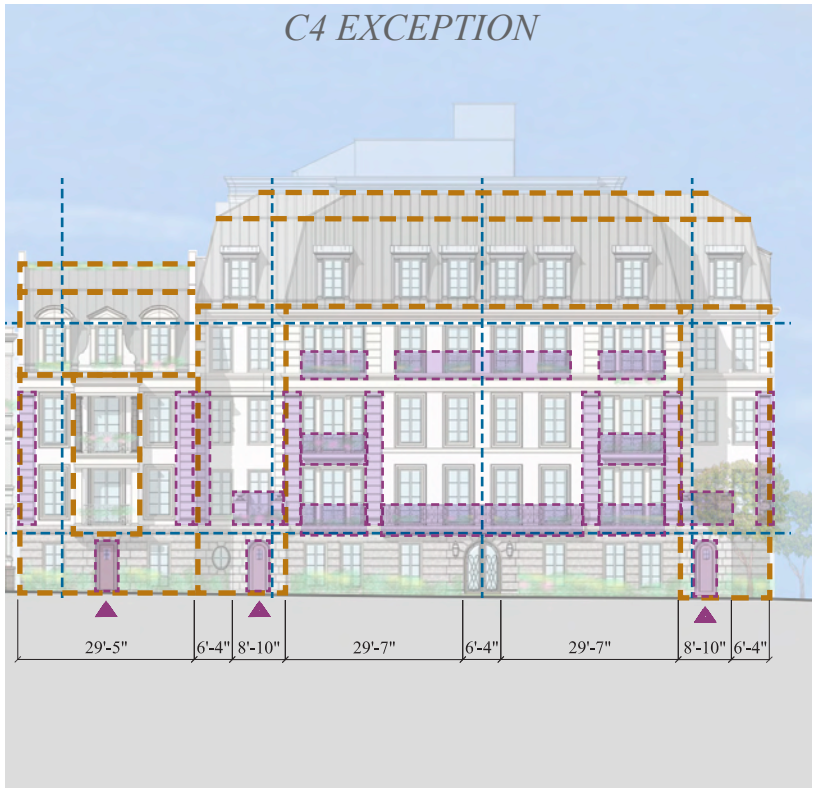
## BULK LIMIT COMPLIANCE DIAGRAM

### BLOCK C: BULK COMPLIANCE DIAGRAM

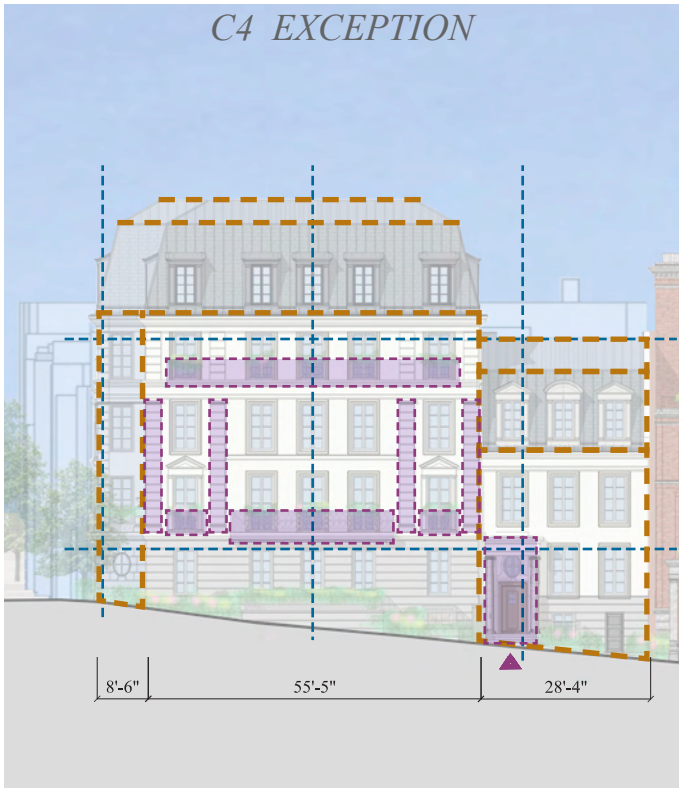
PUD/CU SUBMITTAL  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

A-C.13





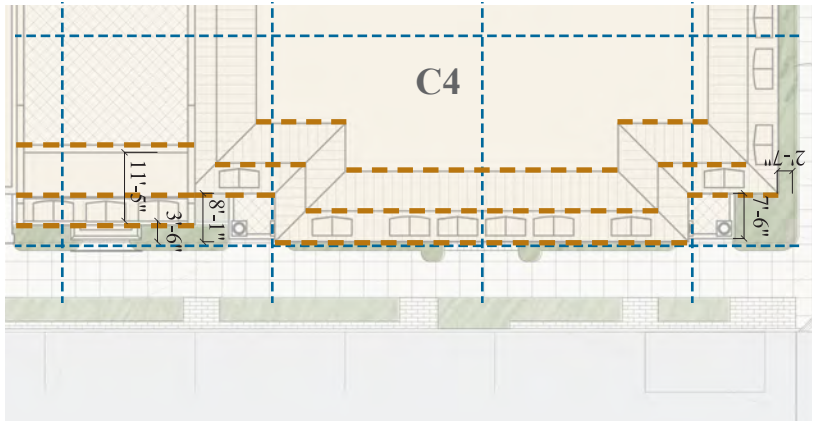
1. NORTH ELEVATION *(Subject to PUD Exception)*



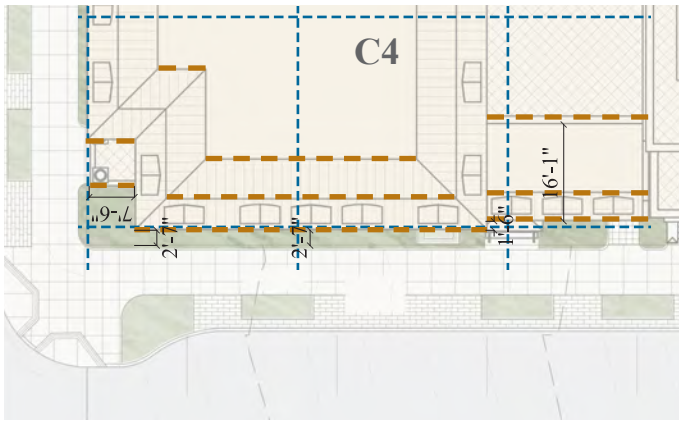
3. WEST ELEVATION *(Subject to PUD Exception)*



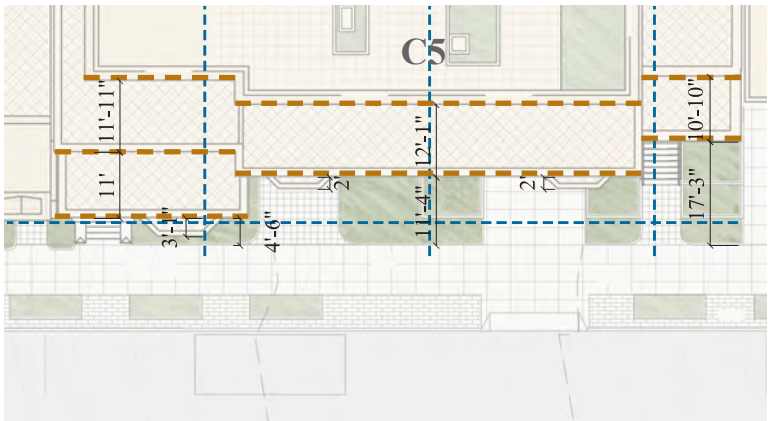
5. WEST ELEVATION



2. PLAN SACRAMENTO STREET



4. PLAN AT MAPLE STREET



6. PLAN AT MAPLE STREET

**NOTE:** C5 facade varies by a minimum of 2' at intervals that comply with **Code Section 144.1**. (35' horizontal or vertical)

**C4 facade does not vary by a minimum of 2' at intervals that comply with Code Section 144.1. (35' horizontal or vertical)**  
*Seeking exception; Facade contains architectural features that contribute to overall variation (See Diagrams 1 and 3)*

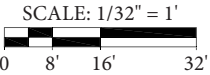


KEY PLAN

**LEGEND**

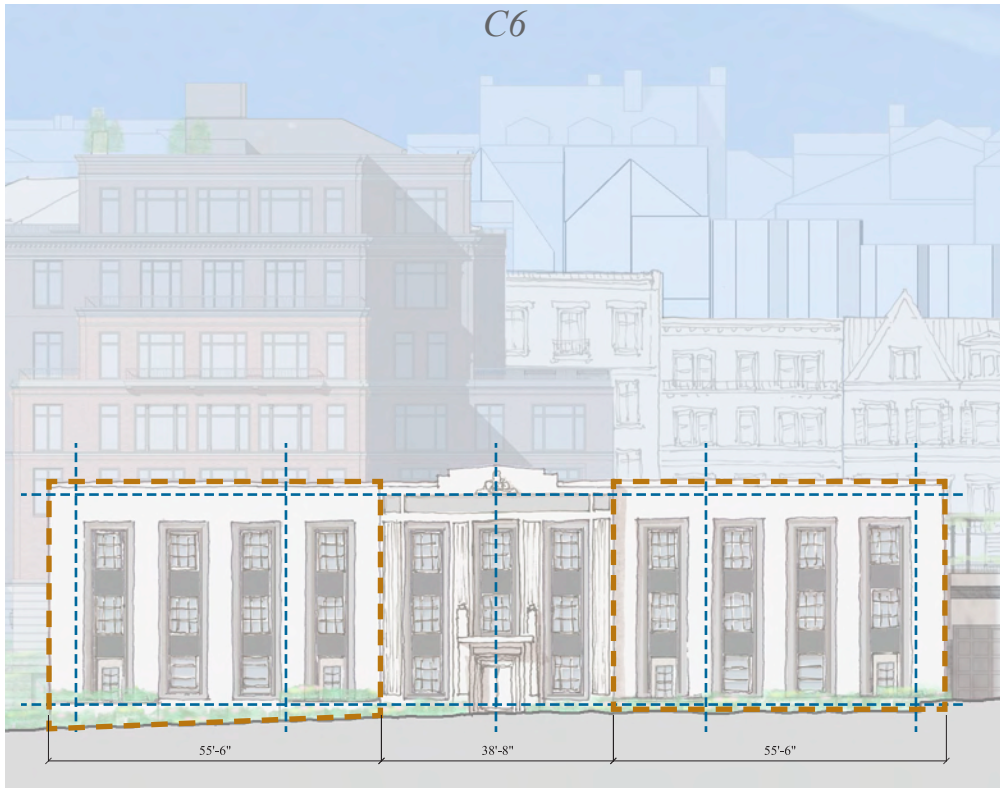
- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

**\*CODE SECTION 144(1)** "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25FT"

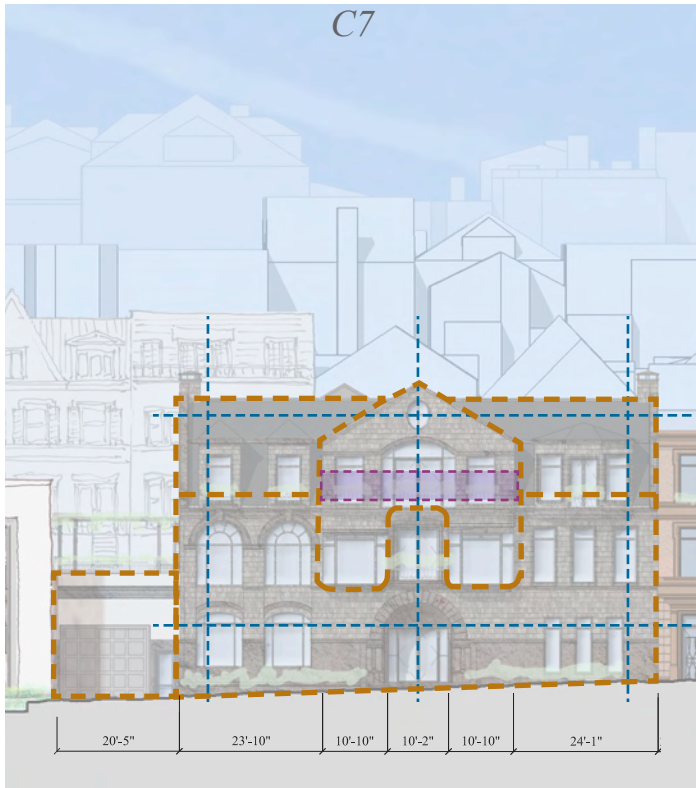


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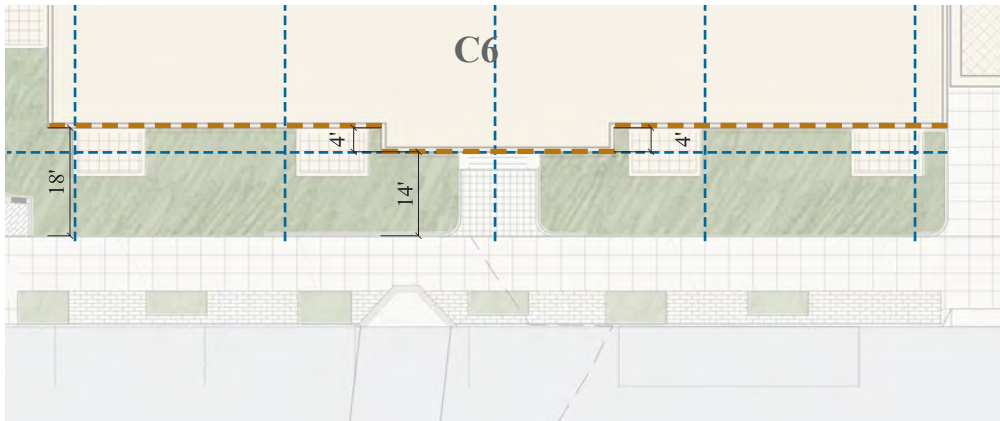




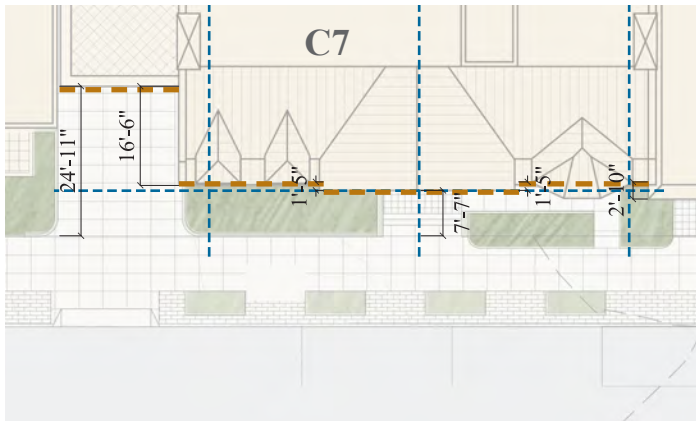
1. SOUTH ELEVATION (EXISTING BUILDING)\*\*



3. SOUTH ELEVATION



2. PLAN AT CALIFORNIA STREET



4. PLAN AT CALIFORNIA STREET

**NOTE:** C7 facade varies by a minimum of 2' at intervals that comply with **Code Section 144.1**. (35' horizontal or vertical)

C6 is an existing, non-conforming structure.



KEY PLAN

**LEGEND**

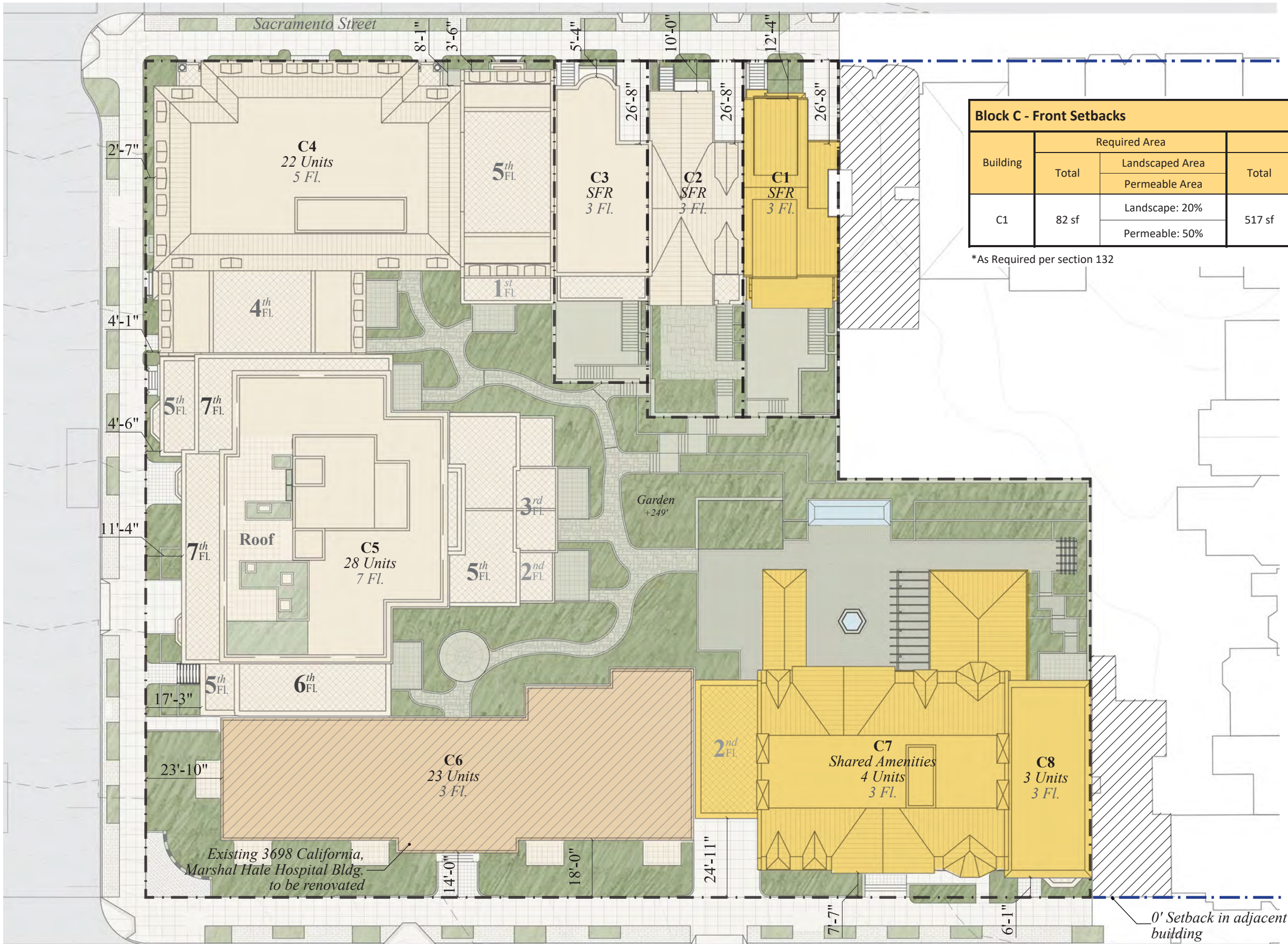
- BUILDING SETBACKS
- 35' FACADE MODULATION GRID (HORIZONTAL & VERTICAL)
- ARCHITECTURAL FEATURES
  - JULIETTE BALCONIES
  - PILASTERS
  - PEDESTRIAN ENTRIES TO DWELLINGS\*

**\*CODE SECTION 144(1)** "AS AN ALTERNATIVE [...] A MINIMUM OF 1 PEDESTRIAN ENTRANCE SERVING A UNIT OR UNITS WITHIN EACH PORTION OF THE FRONT OF THE BUILDING THAT HAS A FULL WIDTH OF 25 FT"

SCALE: 1/32" = 1'  
0 8' 16' 32'

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Block C - Front Setbacks				
Building	Required Area		Provided Area	
	Total	Landscaped Area	Total	Landscaped Area
		Permeable Area		Permeable Area
C1	82 sf	Landscape: 20%	517 sf	Landscape: 66 sf (80%)
		Permeable: 50%		Permeable: 66 sf (80%)

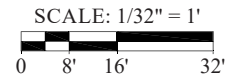
\*As Required per section 132

**NOTE:**  
Terraces are labeled  
with occupied floor  
level. Ex: 5<sup>th</sup> Fl.

KEY

SECTION

PLAN



3700 CALIFORNIA STREET SAN FRANCISCO, CA

FRONT SETBACKS

BLOCK C: FRONT SETBACKS



C1

Lot Area: 3,380 sf

Proposed Open Space (Rear Yard): 40%

Proposed Open Space (Front Yard): 15%

Total Proposed Open Space: 55%

Delta Δ: +10%

Sect. 134(c)(1) Averaged Required Rear Yard Depth: 34.7%

Proposed Rear Yard Depth: 40%

Delta Δ: +5.3%

C2

Lot Area: 3,380 sf

Proposed Open Space (Rear Yard): 40%

Proposed Open Space (Front Yard): 14%

Total Proposed Open Space: 54%

Delta Δ: +9%

Required Rear Yard Depth: 45%

Proposed Rear Yard Depth: 40%

Delta Δ: (5%)

C3

Lot Area: 3,080 sf

Proposed Open Space (Rear Yard): 34%

Proposed Open Space (Front Yard): 14%

Total Proposed Open Space: 48%

Delta Δ: +3%

Required Rear Yard Depth: 45%

Proposed Rear Yard Depth: 34%

Delta Δ: (11%)

REST OF BLOCK C

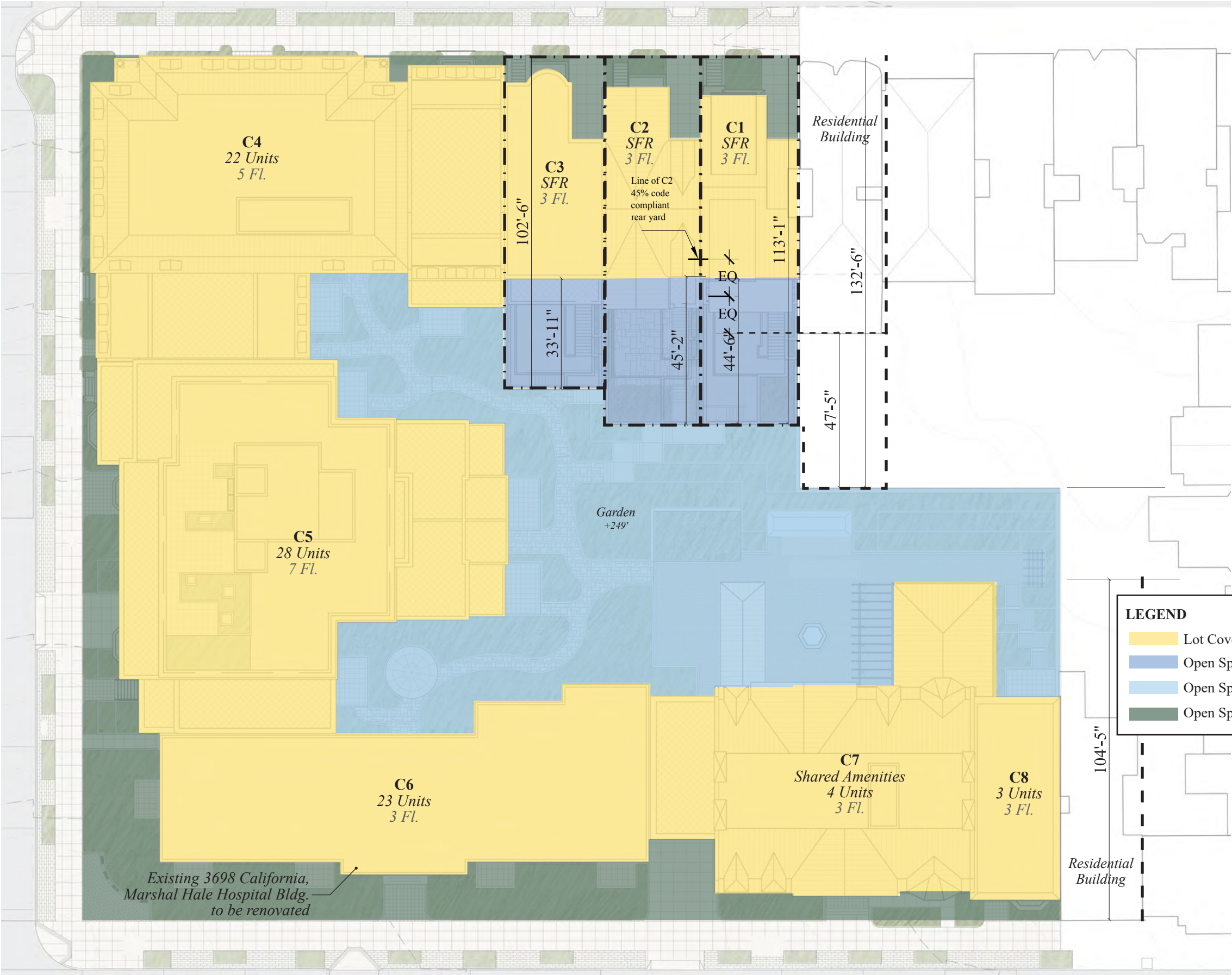
Lot Area: 59,090 sf

Proposed Open Space (Interior): 27%

Proposed Open Space (Green Edges): 12%

Total Proposed Open Space: 39%

Delta Δ: (6%)



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- NOTES:**
1. Configuration of roof top areas not yet completed and to be provided later. Roof top areas may include any of the following: private or common residential open space (pursuant to Pl. Code Sec. 135), solar areas (pursuant to SF Better Roof Ordinance; Pl. Code Sec. 149), and living roof areas (pursuant to SF Green Building Code), or some combination of any/all of the above.
  2. Roof top mechanical equipment and/or other similar feature will be enclosed and/or screened in compliance with Pl. Code Sec. 141 requirements.
  3. Code-compliant common open spaces comply with all dimensional requirements.

**LEGEND**

- Code-Compliant Common Open Space
- Code-Compliant Private Open Space
- Additional Common Open Space\*
- Additional Private Open Space\*

\*Open space that does not meet the dimensional requirements to be code-compliant and is not included in open space calculations. It represents additional common open space areas.

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BLOCK C: PRIVATE OPEN SPACE

Building	Zoning	Total # of Units	# of Units w Priv. Open Space	Required if Private	Provided Total Private per building
C1	RM-2	1	1	80.00	1,544
C2	RM-2	1	1	80.00	1,469
C3	RM-2	1	1	80.00	1,048
C4	RM-2	22	6	480.00	2,612
C5	RM-2	28	13	1,040.00	5,076
C6	RM-2	23	5	400.00	866
C7	RM-2	4	0		0
C8	RM-2	3	1	80.00	149
				2,240	12,764

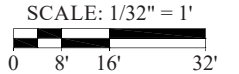
BLOCK C: COMMON OPEN SPACE

Building	Zoning	Total # of Units	# of Units w.o Priv. Open Space	Required if Common (x1.33)	Provided Total Common per building
C1	RM-2	1	0		
C2	RM-2	1	0		
C3	RM-2	1	0		
C4	RM-2	22	16	1,702.40	4,654.55
C5	RM-2	28	15	1,596.00	5,098.64
C6	RM-2	23	18	1,915.20	8,217.36
C7	RM-2	4	4	425.60	2,089.64
C8	RM-2	3	2	212.80	581.82
				5,852	20,642

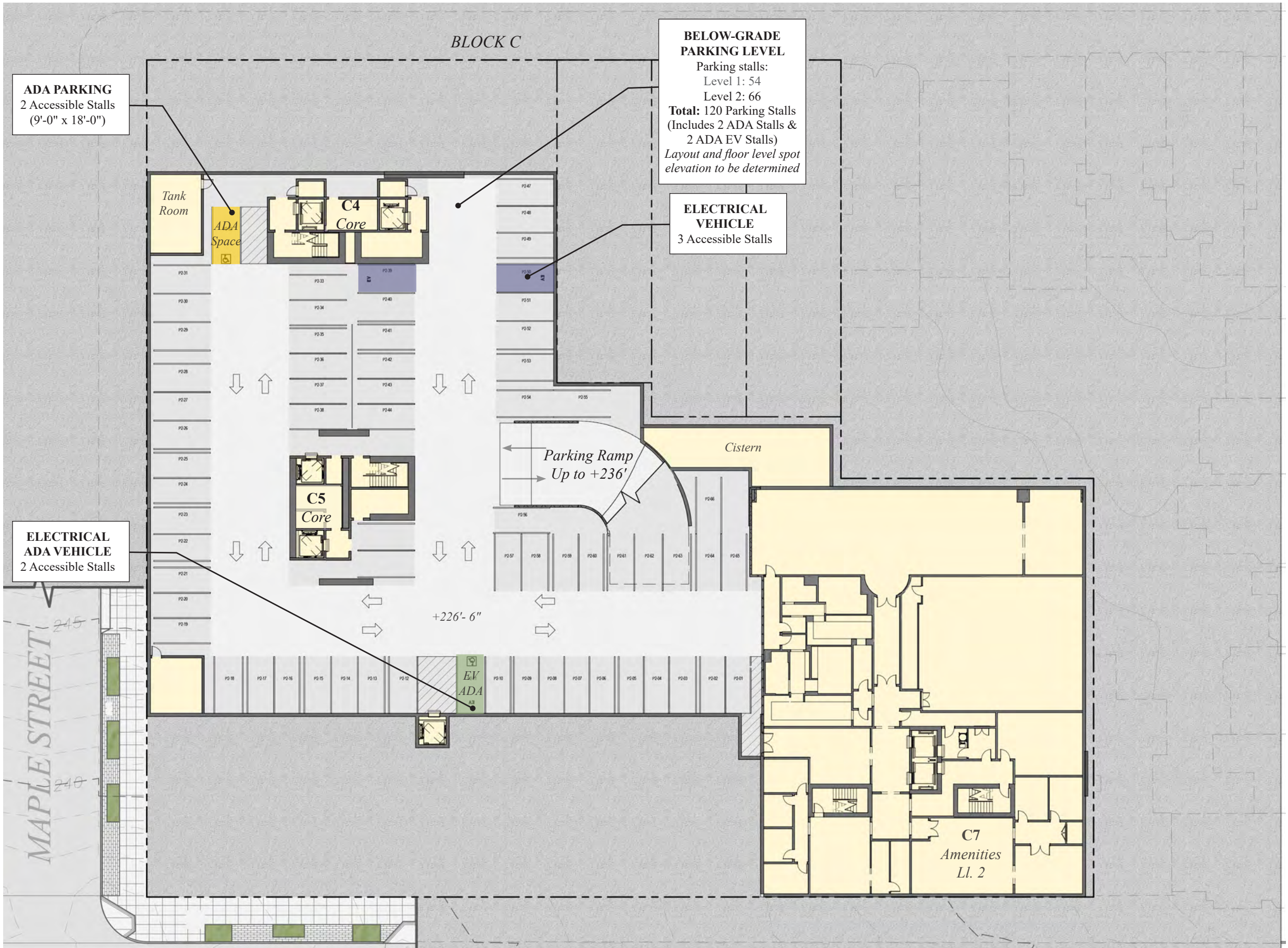
**KEY**

SECTION

PLAN



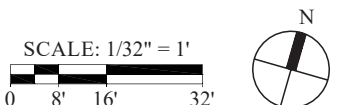




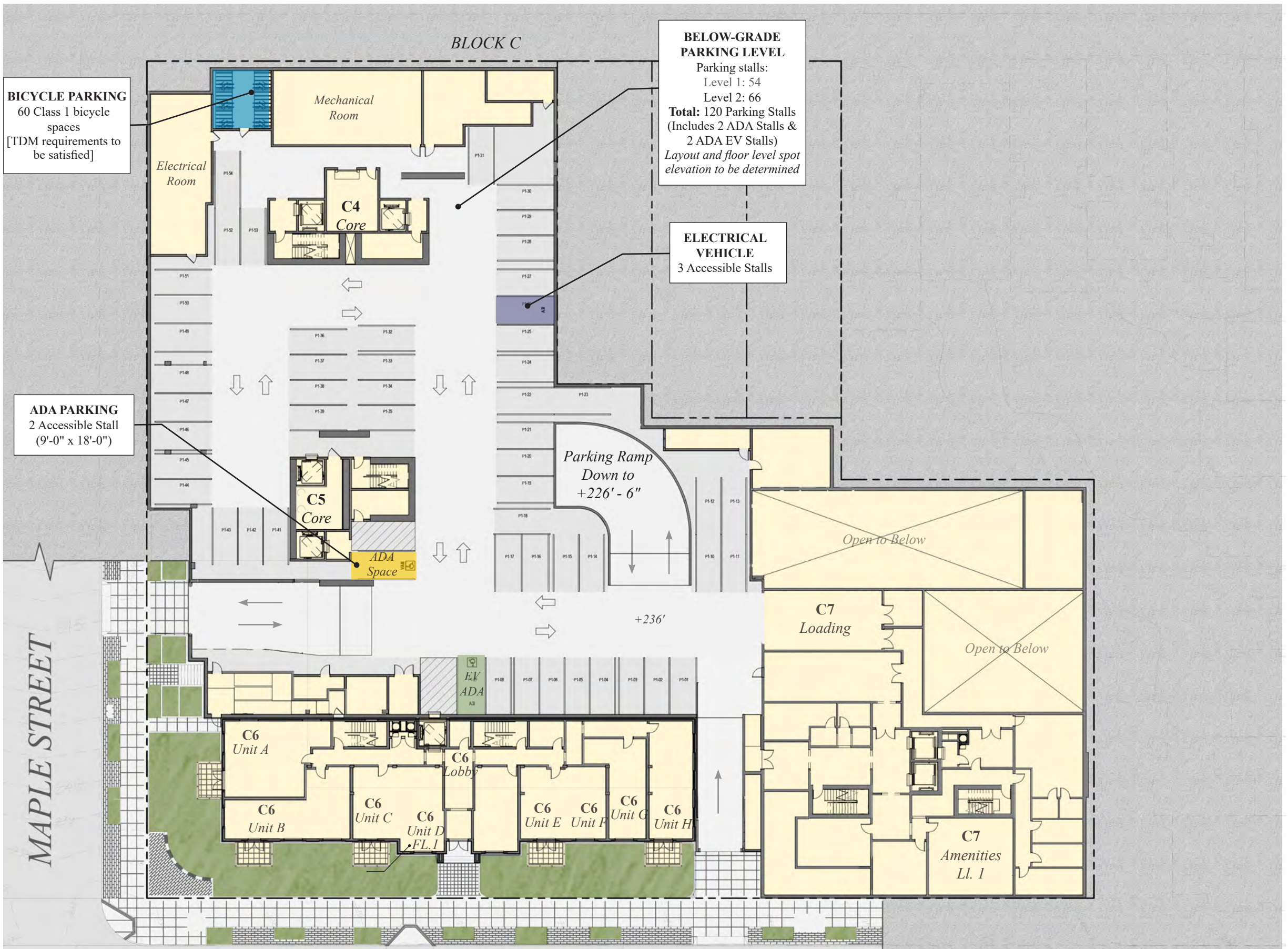
3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

LOWER LEVEL 2  
(BELOW-GRADE PARKING & AMENITIES)

BLOCK C: PARKING DIAGRAM





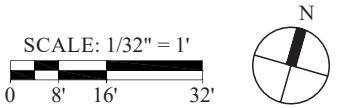


3700 CALIFORNIA STREET

SAN FRANCISCO, CA

LOWER LEVEL 1  
(GROUND FLOOR AT CALIFORNIA STREET)

# BLOCK C: PARKING DIAGRAM



# SITE SECTIONS

3700 CALIFORNIA STREET SAN FRANCISCO, CA

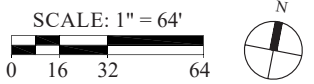


## SITE SECTIONS TITLE SHEET





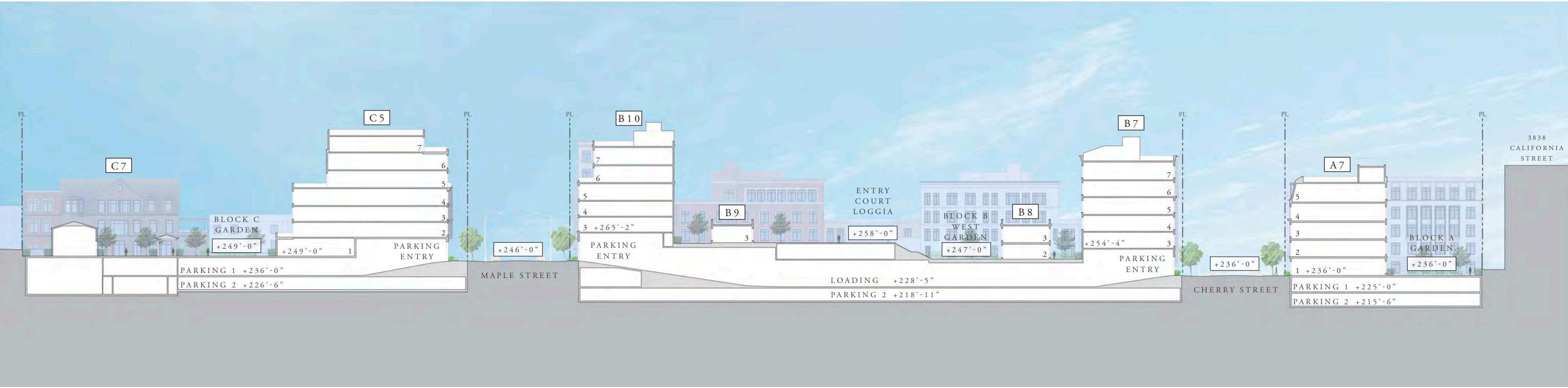
PL ..... Property Line



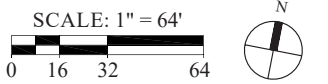
3700 CALIFORNIA STREET SAN FRANCISCO, CA

W-E SECTION A

PROPOSED SITE SECTION



PL ..... Property Line



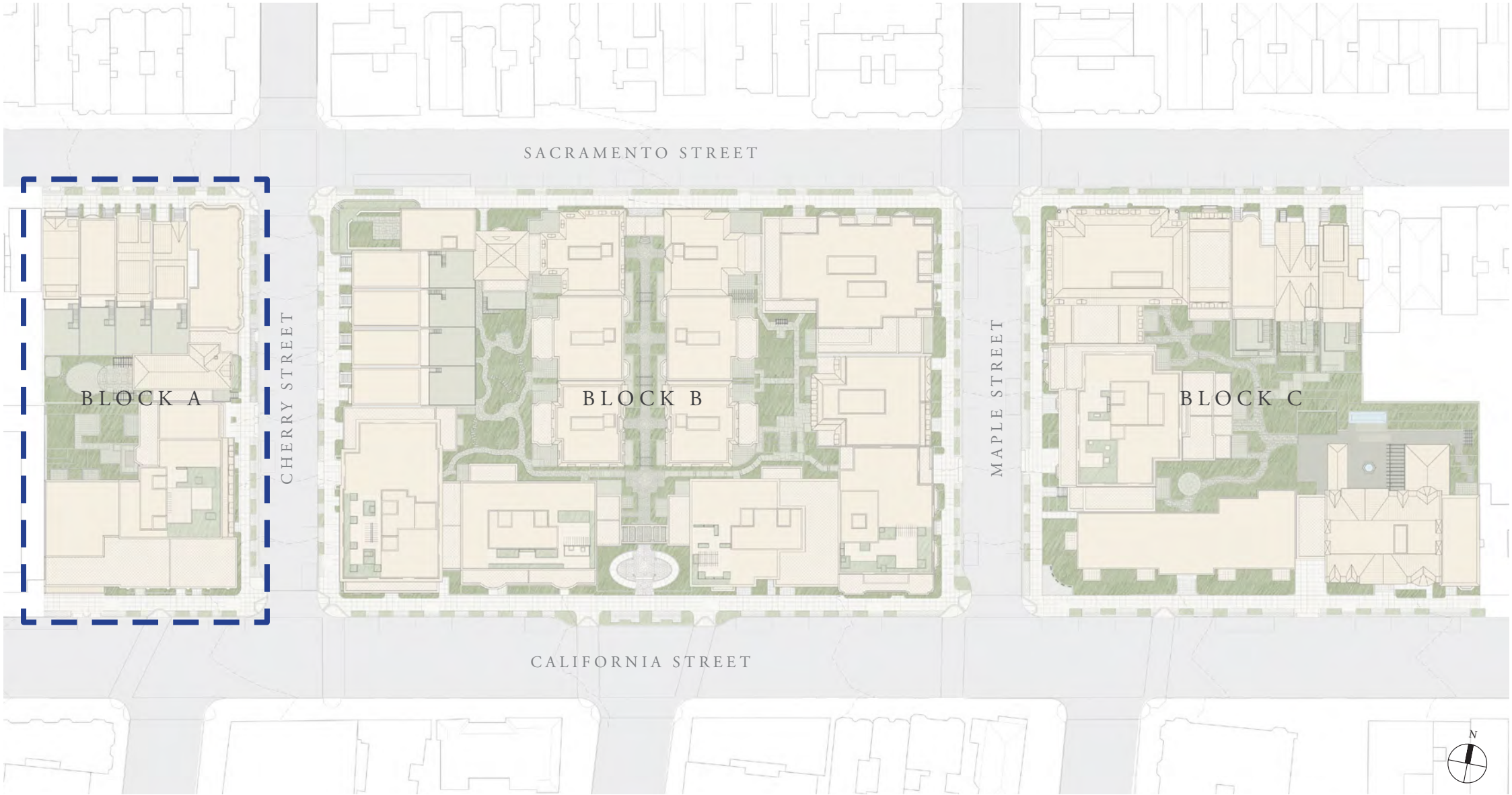
3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

E-W SECTION B

PROPOSED SITE SECTION



# BLOCK A



KEY PLAN

3700 CALIFORNIA STREET  
SAN FRANCISCO, CA



## BLOCK A TITLE SHEET



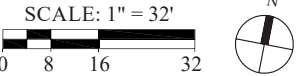


P.L. - - - - - Property Line



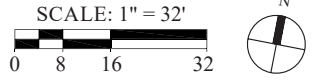
3700 CALIFORNIA STREET SAN FRANCISCO, CA

# N-S SECTION 1 BLOCK A





PL ..... Property Line



3700 CALIFORNIA STREET SAN FRANCISCO, CA

# N-S SECTION 2 BLOCK A





PL ..... Property Line



SCALE: 1" = 32'  
0 8 16 32

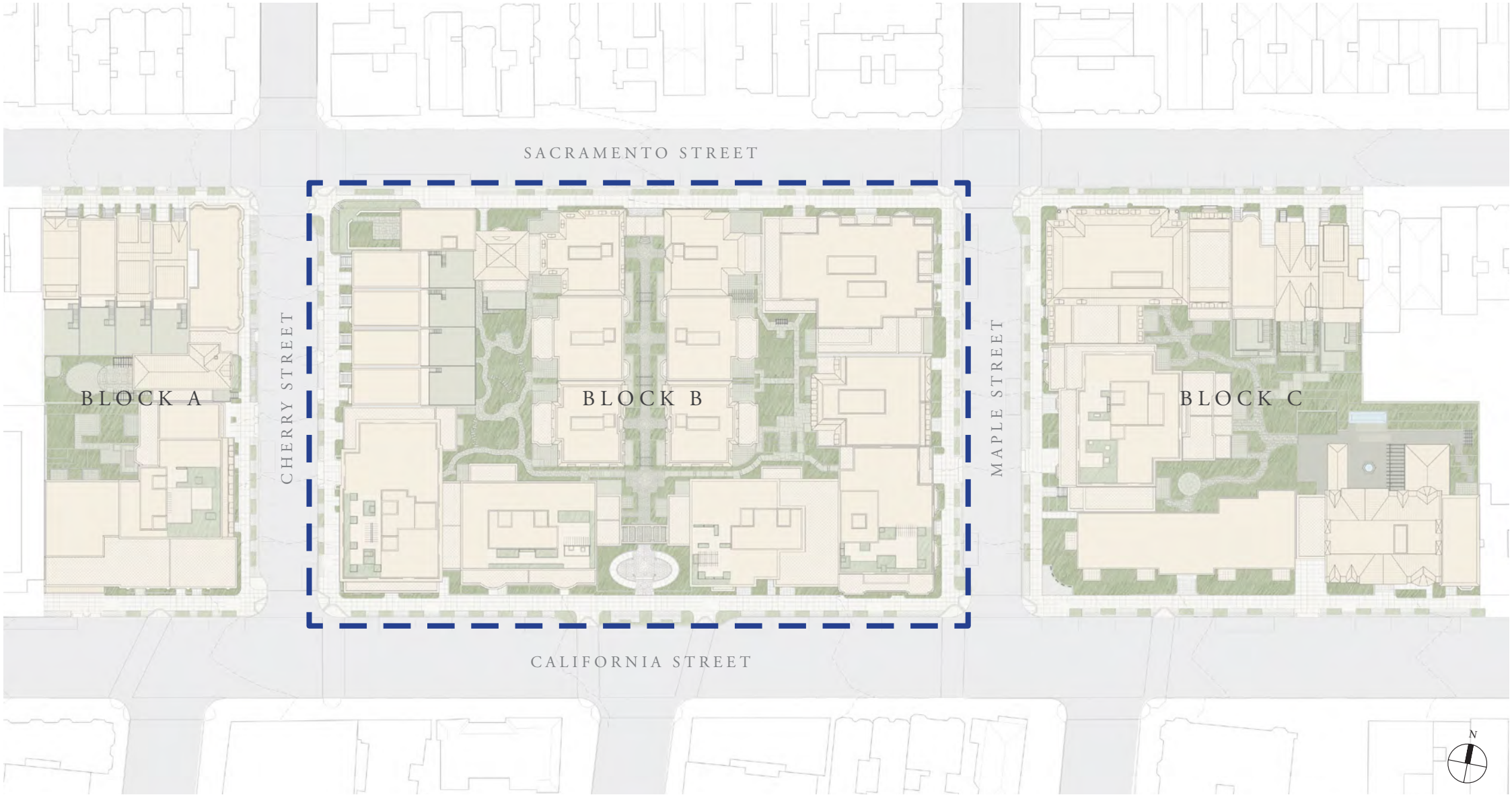
3700 CALIFORNIA STREET SAN FRANCISCO, CA

# W-E SECTION A

## BLOCK B



# BLOCK B

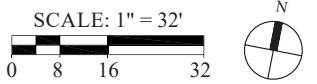


KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA



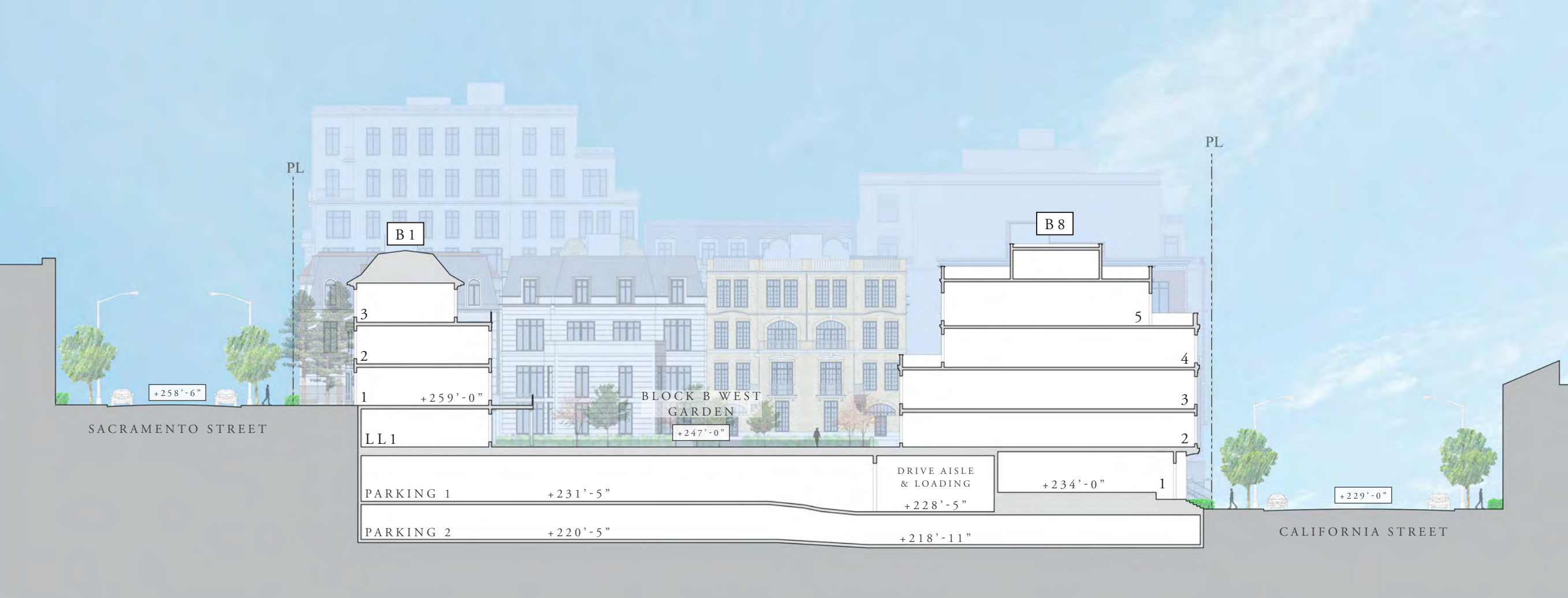
## BLOCK B TITLE SHEET



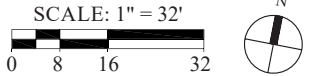
3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

# N-S SECTION 3 BLOCK B





PL ..... Property Line



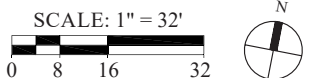
3700 CALIFORNIA STREET SAN FRANCISCO, CA

# N-S SECTION 4 BLOCK B





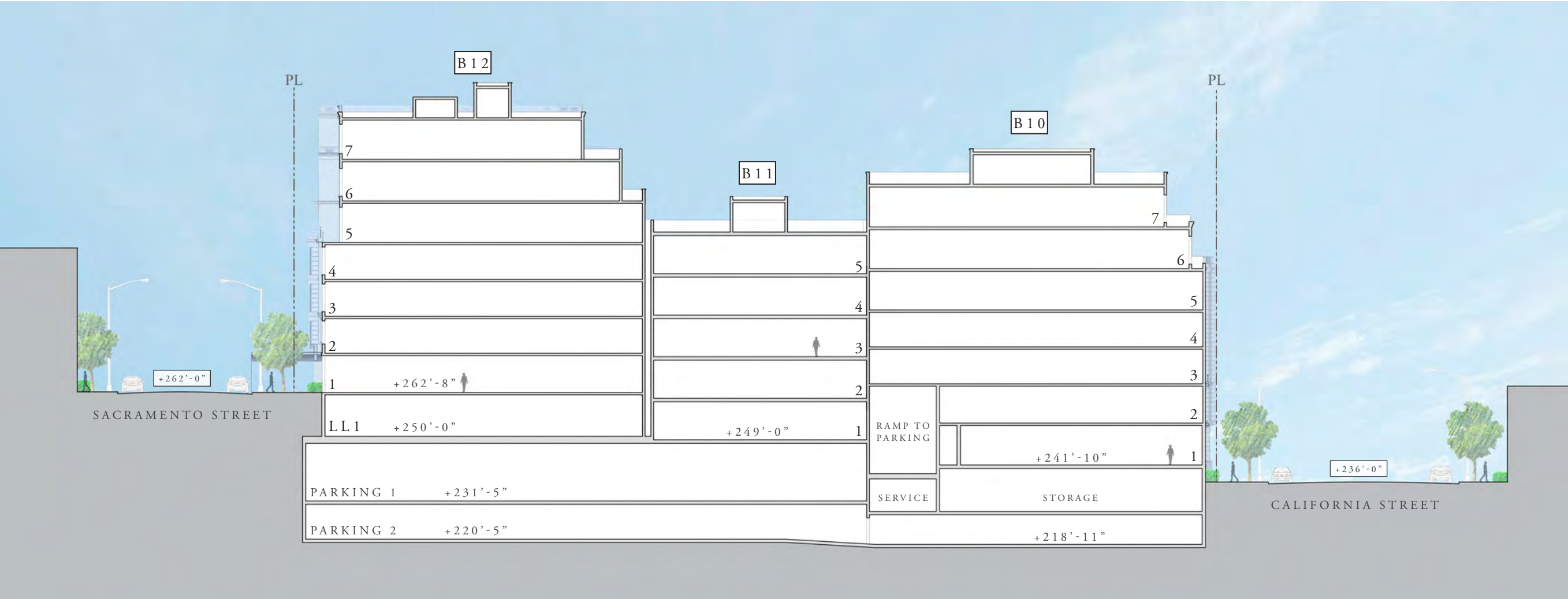
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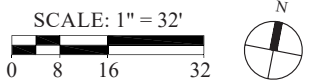
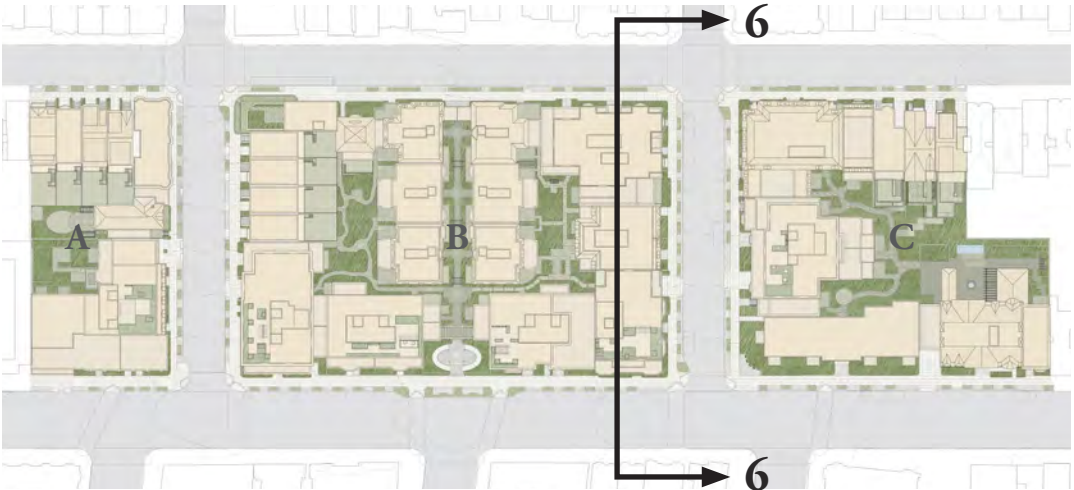
3700 CALIFORNIA STREET SAN FRANCISCO, CA

# N-S SECTION 5 BLOCK B

PUD/CU SUBMITTAL A-04.23  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



PL ..... Property Line



3700 CALIFORNIA STREET

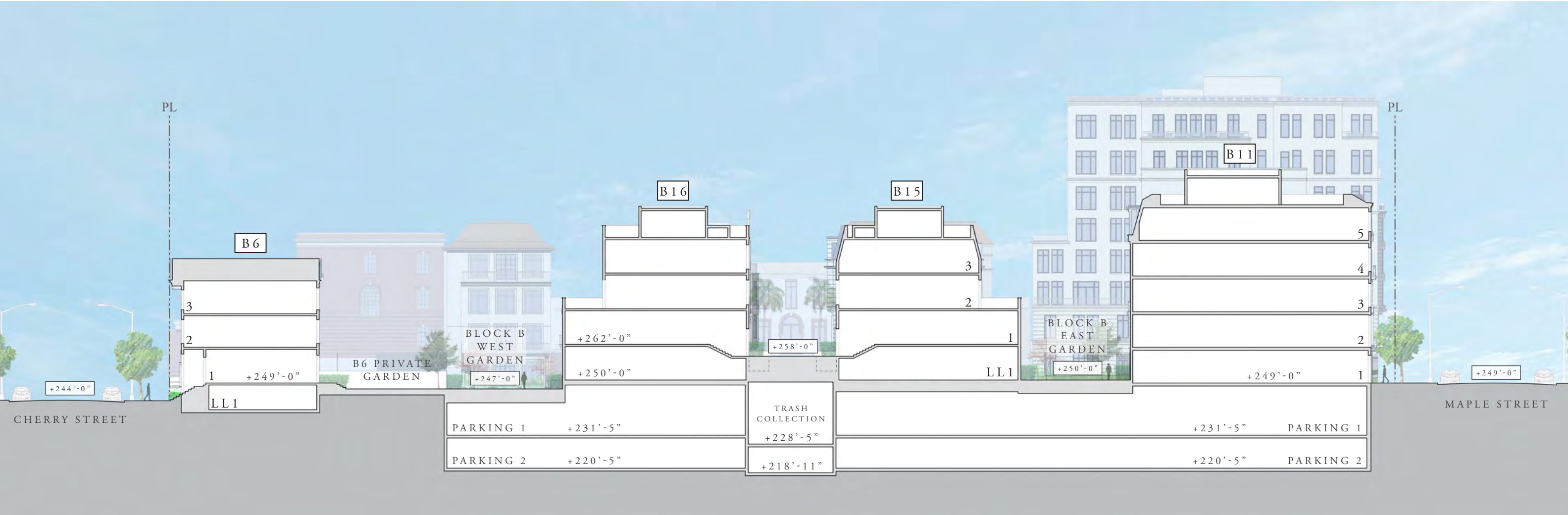
SAN FRANCISCO, CA

N-S SECTION 6

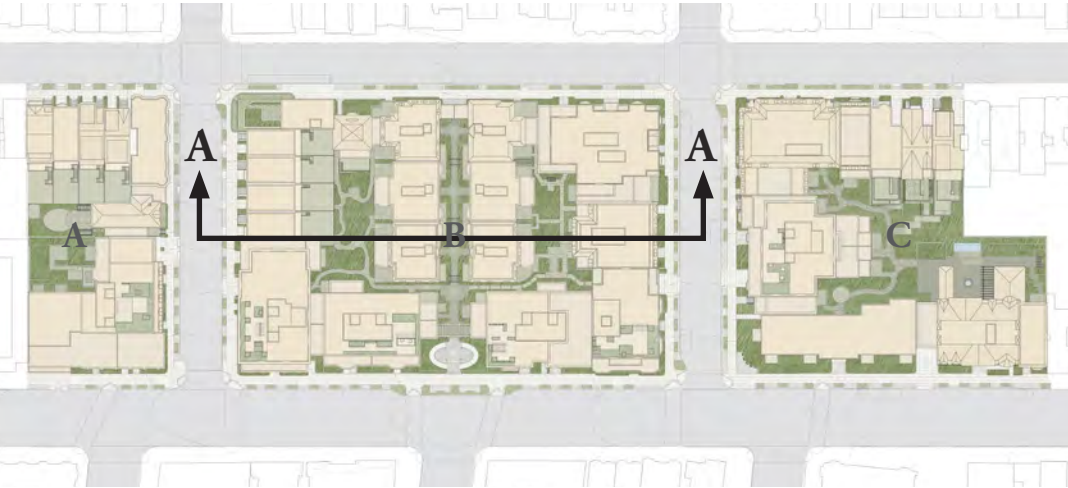
BLOCK B

PUD/CU SUBMITTAL A-04.24  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



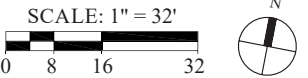


PL ..... Property Line



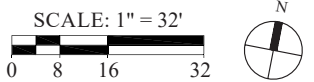
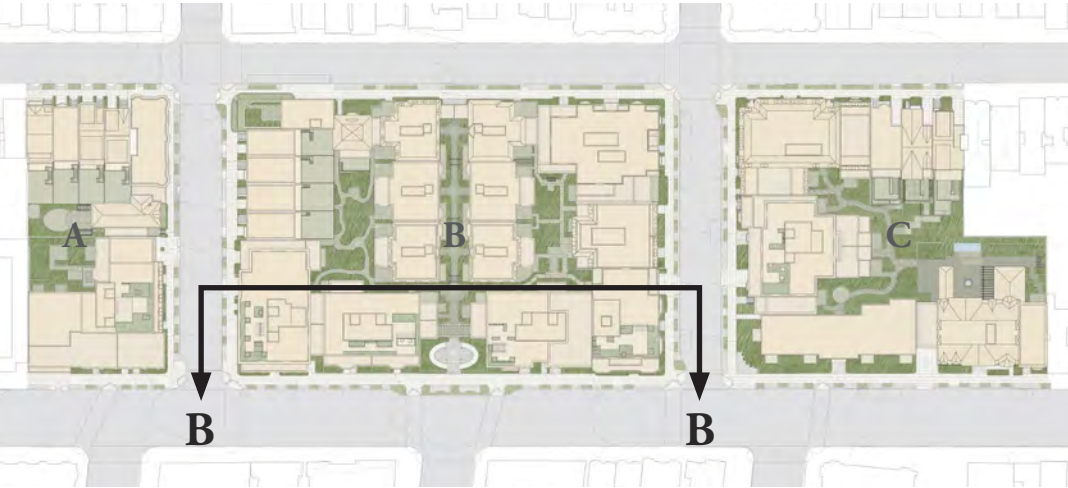
3700 CALIFORNIA STREET SAN FRANCISCO, CA

# W-E SECTION A BLOCK B





PL ..... Property Line

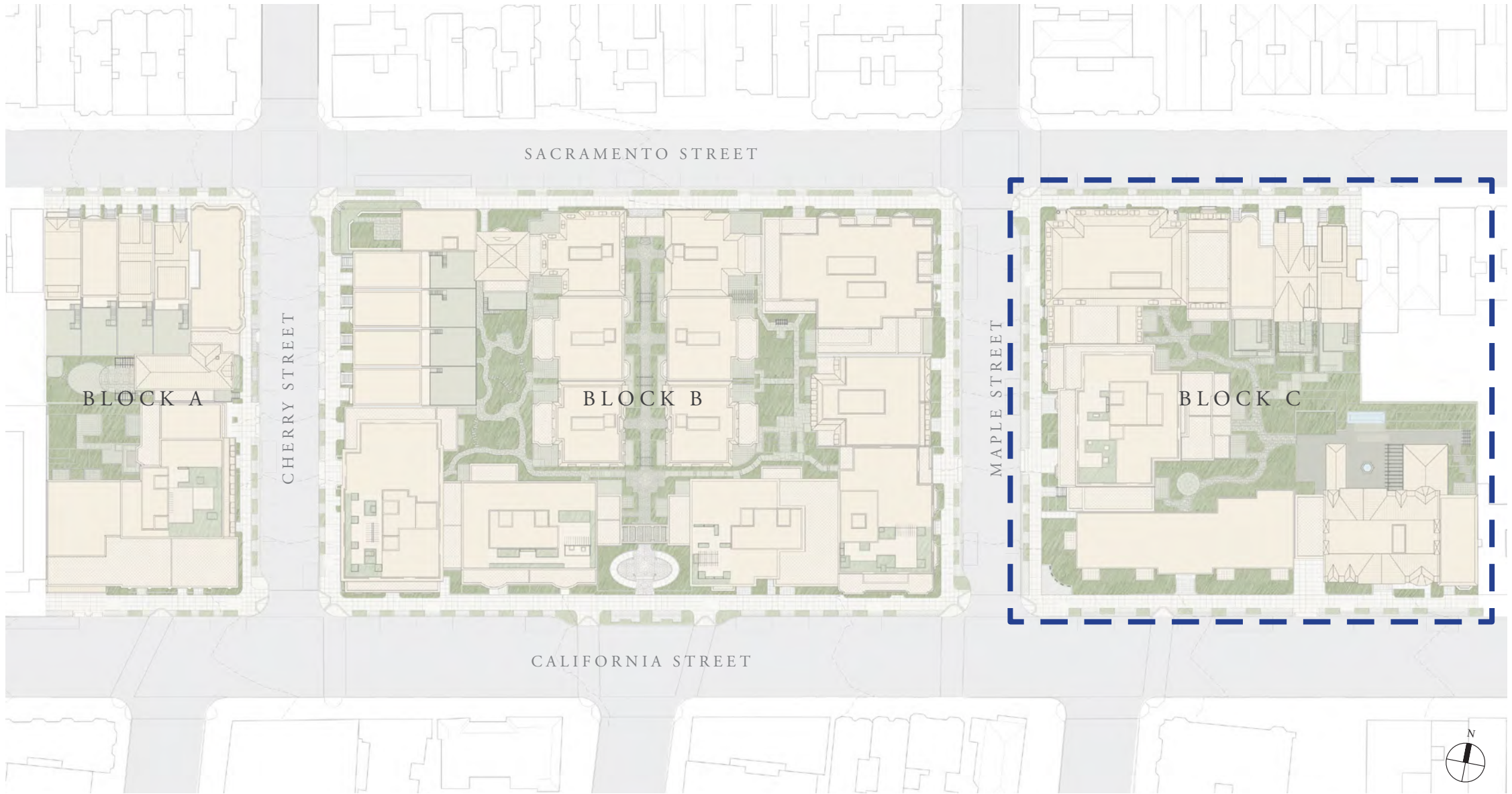


3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

E-W SECTION B  
BLOCK B



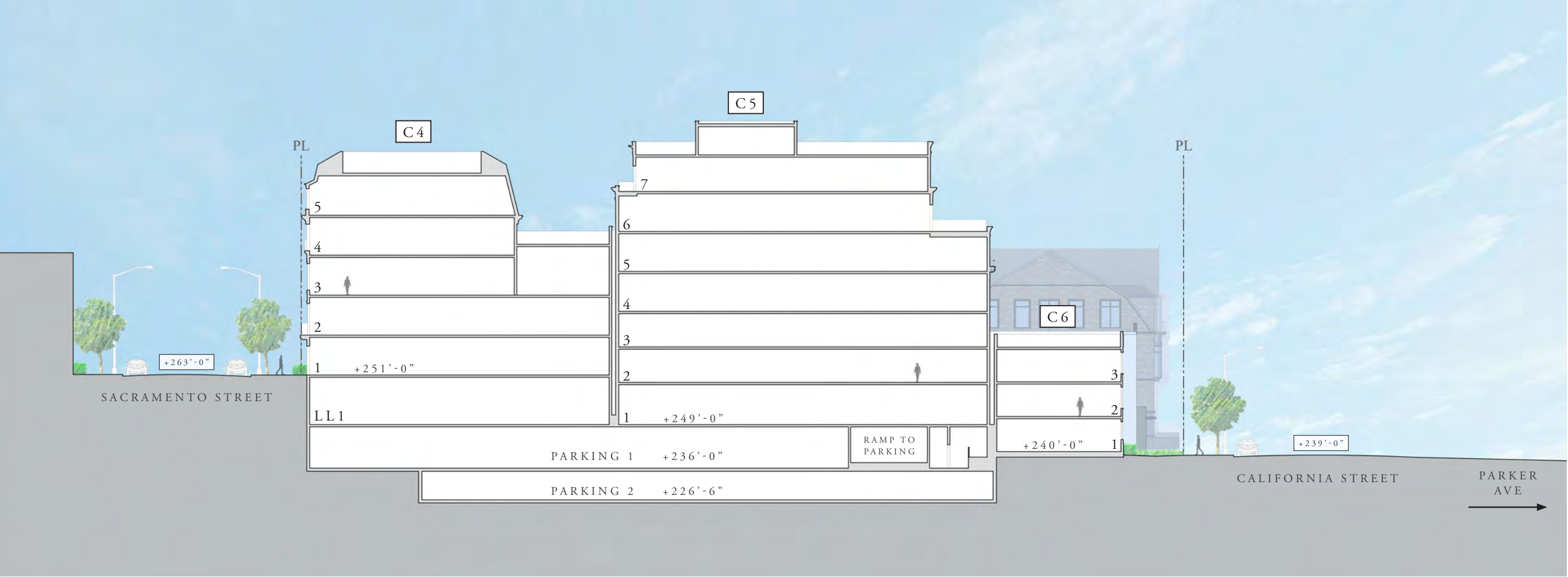
# BLOCK C



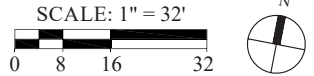
KEY PLAN

3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

## BLOCK C TITLE SHEET



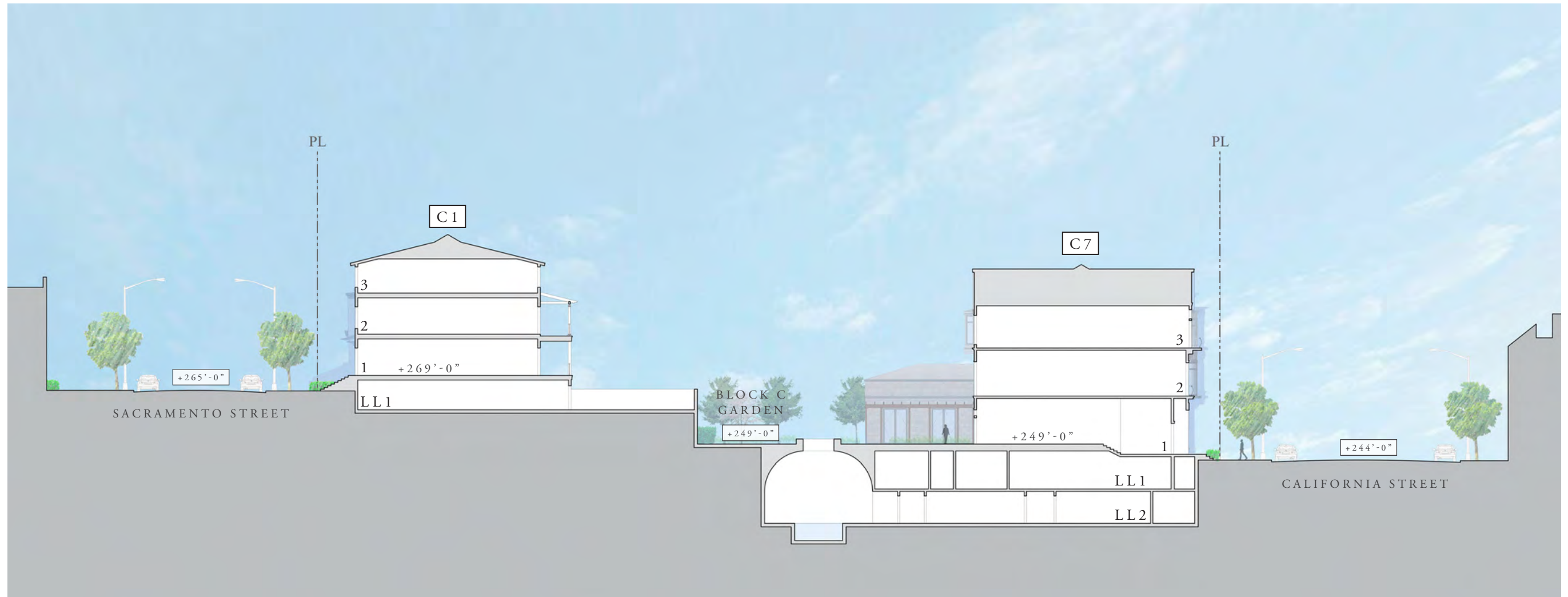
PL ..... Property Line



3700 CALIFORNIA STREET SAN FRANCISCO, CA

# N-S SECTION 7 BLOCK C





PL ..... Property Line



SCALE: 1" = 32'  
0 8 16 32



3700 CALIFORNIA STREET

SAN FRANCISCO, CA

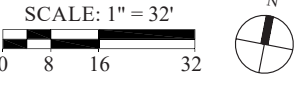
N-S SECTION 8

BLOCK C

PUD/CU SUBMITTAL A-04.32  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



PL ..... Property Line



3700 CALIFORNIA STREET SAN FRANCISCO, CA

W-E SECTION A  
BLOCK C



# MATERIALS

3700 CALIFORNIA STREET      SAN FRANCISCO, CA



## MATERIALS TITLE SHEET



SACRAMENTO STREET

A1

- SC-01 STUCCO
- BR-02 BRICK BASE
- SC-09 STUCCO TRIM
- SH-01 ASPHALT SHINGLE ROOF

A2

- SC-05 STUCCO
- ST-07 STONE BASE
- GFRC-03 GFRC TRIM

A3

- WD-01 CEDAR SHINGLES
- BR-01 BRICK BASE
- WD-09 PAINTED WOOD OR ENGINEERED WOOD TRIM
- SH-02 ASPHALT SHINGLE ROOF

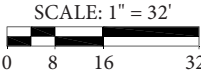
A4

- WD-02 CEDAR SHINGLES
- BR-03 BRICK BASE
- WD-12 PAINTED WOOD OR ENGINEERED WOOD TRIM
- SH-03 ASPHALT SHINGLE ROOF

ELEVATION KEY



BUILDING TERMS



3700 CALIFORNIA STREET SAN FRANCISCO, CA





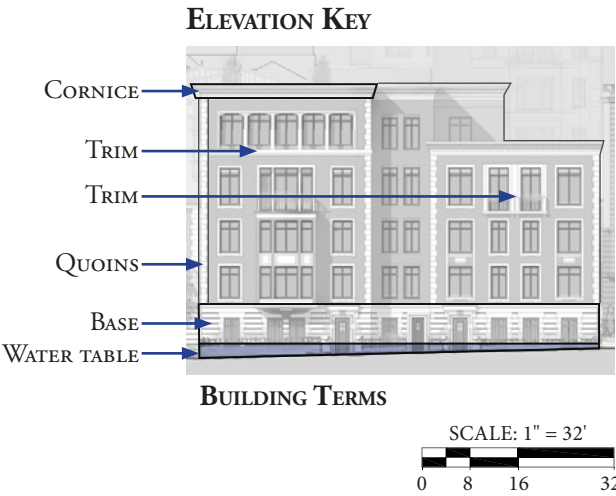
CHERRY STREET

A6

- WD-01 CEDAR SHINGLES
- BR-01 BRICK BASE
- WD-I 3 PAINTED WOOD OR ENGINEERED WOOD TRIM
- SH-03 ASPHALT SHINGLE ROOF

A7

- SC-07 STUCCO
- SC-08 STUCCO BASE
- ST-08 STONE WATER TABLE
- SC-07 STUCCO TRIM
- MT-02 METAL ROOF



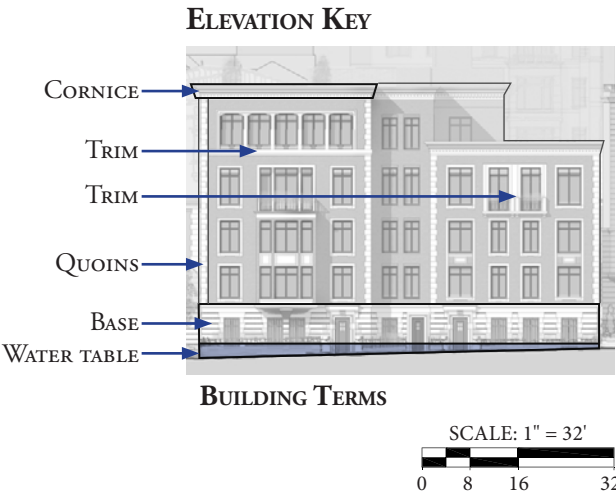
3700 CALIFORNIA STREET SAN FRANCISCO, CA



CALIFORNIA STREET

A7

- SC-07 STUCCO
- SC-08 STUCCO BASE
- ST-08 STONE WATER TABLE
- SC-07 STUCCO TRIM
- MT-02 METAL ROOF







SACRAMENTO STREET

**B12**

- SC-05** STUCCO
- ST-03** STONE OR CAST STONE BASE
- CS-03**
- ST-07** STONE WATER TABLE
- SC-05** STUCCO AND GFRC TRIM
- GFRC-03**

**B13**

- SC-02** STUCCO
- ST-07** STONE WATER TABLE
- ST-03** STONE OR CAST STONE
- CS-03**
- RF-02** CLAY TILE ROOF

**LOGGIA**

- SC-05** STUCCO
- ST-01** STONE OR CAST STONE
- CS-01** BASE AND TRIM
- ST-06** STONE WATER TABLE

**B18**

- SC-06** STUCCO
- SC-06** STUCCO AND CAST STONE TRIM
- CS-06**
- ST-07** STONE WATER TABLE
- RF-01** SLATE ROOF

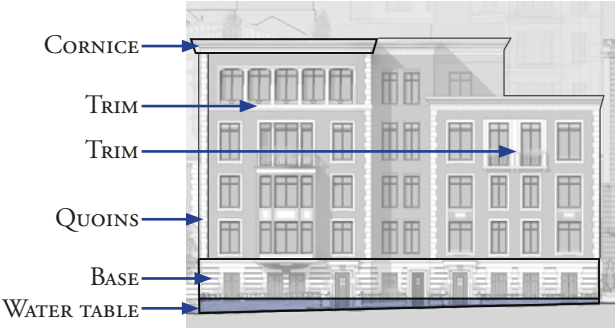
**B1**

- SC-05** STUCCO
- ST-07** STONE WATER TABLE
- SC-06** STUCCO AND CAST STONE TRIM
- CS-03**
- SH-05** ASPHALT SHINGLE ROOF

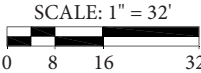
**B2**

- BR-01** BRICK
- CS-03** CAST STONE TRIM
- GFRC-03** GFRC CORNICE
- ST-08** STONE WATER TABLE
- WD-09** PAINTED WOOD OR ENGINEERED WOOD SHUTTERS

**ELEVATION KEY**



**BUILDING TERMS**



3700 CALIFORNIA STREET

SAN FRANCISCO, CA

BLOCK B - SACRAMENTO STREET



CHERRY STREET

**B2**

- BR-01** BRICK
- CS-03** CAST STONE TRIM
- GFRC-03** GFRC CORNICE
- ST-08** STONE WATER TABLE
- WD-09** PAINTED WOOD OR ENGINEERED WOOD SHUTTERS

**B7**

- BR-03** BRICK
- ST-02** STONE OR CAST STONE BASE
- CS-02** CAST STONE TRIM
- ST-06** STONE WATERTABLE
- GFRC-02** GFRC CORNICE

**B3**

- WD-04** PAINTED WOOD OR ENGINEERED WOOD CLAPBOARD
- BR-01** BRICK BASE
- WD-I6** PAINTED WOOD OR ENGINEERED WOOD TRIM

**B4**

- WD-05** PAINTED WOOD OR ENGINEERED WOOD CLAPBOARD
- BR-04** BRICK BASE
- WD-I6** PAINTED WOOD OR ENGINEERED WOOD TRIM

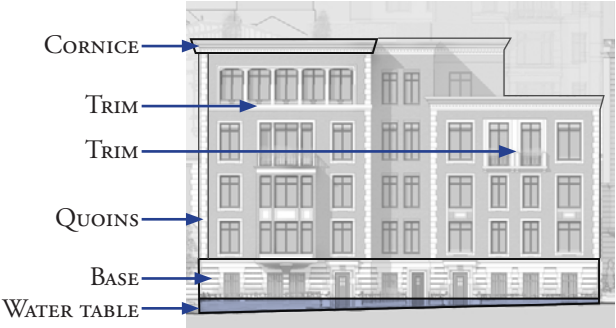
**B5**

- WD-06** PAINTED WOOD OR ENGINEERED WOOD CLAPBOARD
- BR-02** BRICK BASE
- WD-I6** PAINTED WOOD OR ENGINEERED WOOD TRIM

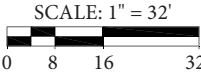
**B6**

- WD-07** PAINTED WOOD OR ENGINEERED WOOD CLAPBOARD
- BR-04** BRICK BASE
- WD-I6** PAINTED WOOD OR ENGINEERED WOOD TRIM

ELEVATION KEY



BUILDING TERMS



3700 CALIFORNIA STREET SAN FRANCISCO, CA

BLOCK B - CHERRY STREET





- B10**
- SC-04 STUCCO
  - SC-03 STUCCO BASE
  - ST-06 STONE WATER TABLE
  - SC-03 STUCCO TRIM
  - SC-04

CALIFORNIA STREET

**B7**

- BR-03 BRICK
- ST-02 STONE OR CAST
- CS-02 STONE BASE
- ST-06 STONE WATERTABLE
- CS-02 CAST STONE TRIM
- GFRC-02 GFRC CORNICE

**B8**

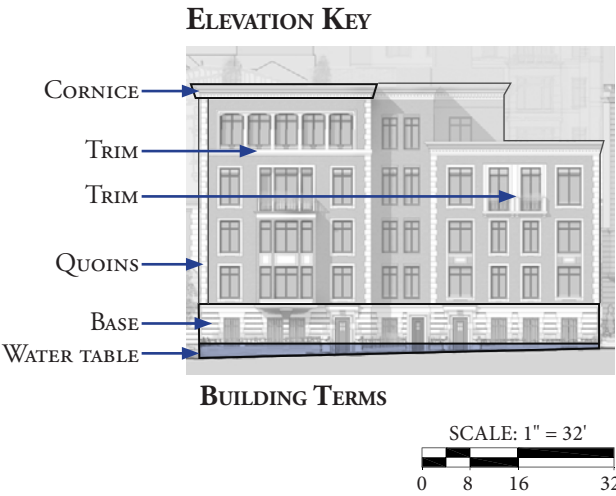
- SC-07 STUCCO
- SC-08 STUCCO BASE
- ST-08 STONE WATER TABLE
- SC-07 STUCCO TRIM
- GFRC-06 GFRC CORNICE

**LOGGIA**

- SC-04 STUCCO
- ST-02 STONE OR CAST STONE BASE, QUOINS AND TRIM
- CS-02
- BR-01 BRICK TRIM
- ST-07 STONE WATERTABLE
- GFRC-02 GFRC OR CAST STONE
- CS-02 COLUMNS

**B9**

- BR-01 BRICK
- ST-02 STONE AND BRICK BASE
- BR-01
- ST-02 STONE OR CAST STONE QUOINS AND TRIM
- CS-02
- GFRC-02 GFRC CORNICE
- ST-07 STONE WATERTABLE



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BLOCK B - CALIFORNIA STREET





MAPLE STREET

**B10**

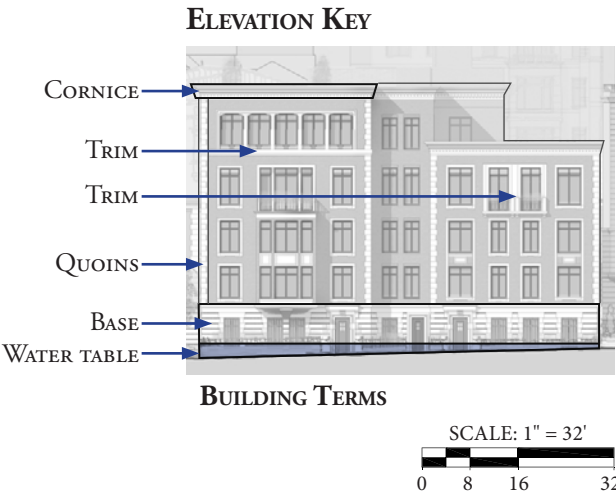
- SC-04** STUCCO
- SC-03** STUCCO BASE
- ST-06** STONE WATER TABLE
- SC-03** STUCCO TRIM
- SC-04**

**B11**

- SC-06** STUCCO
- ST-05** STONE OR CAST STONE BASE
- CS-05**
- ST-07** STONE WATER TABLE
- GFRC-06** GFRC AND STUCCO TRIM
- SC-06**
- GFRC-06** GFRC CORNICE
- RF-01** SLATE ROOF

**B12**

- SC-05** STUCCO
- ST-03** STONE OR CAST STONE BASE
- CS-03**
- ST-07** STONE WATER TABLE
- SC-05** STUCCO AND GFRC TRIM
- GFRC-03**



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BLOCK B - MAPLE STREET





MEWS

**B13**

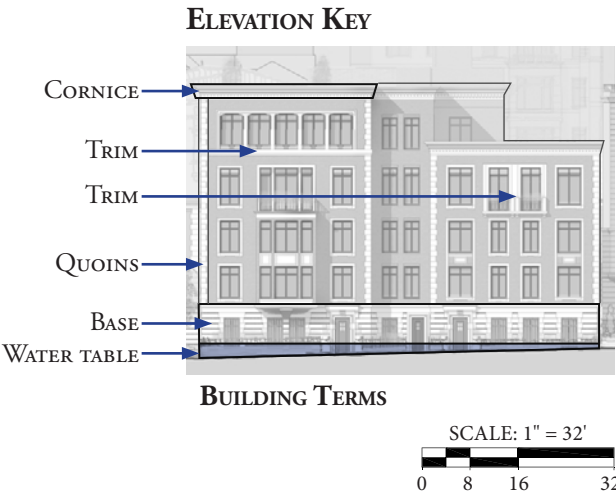
- SC-02 STUCCO
- ST-07 STONE WATER TABLE
- ST-03 STONE OR CAST STONE
- CS-03
- RF-02 CLAY TILE ROOF

**B14**

- BR-02 BRICK
- CS-02 CAST STONE TRIM
- ST-07 STONE WATER TABLE

**B15**

- SC-06 STUCCO
- SC-06 STUCCO AND CAST STONE TRIM
- CS-06
- ST-08 STONE WATER TABLE
- RF-01 SLATE ROOF



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SACRAMENTO STREET

3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

BLOCK C - SACRAMENTO STREET

C1

- SC-07STUCCO
- ST-08STONE WATER TABLE
- WD-10PAINTED WOOD OR ENGINEERED WOOD TRIM
- SH-01ASPHALT SHINGLE ROOF

C2

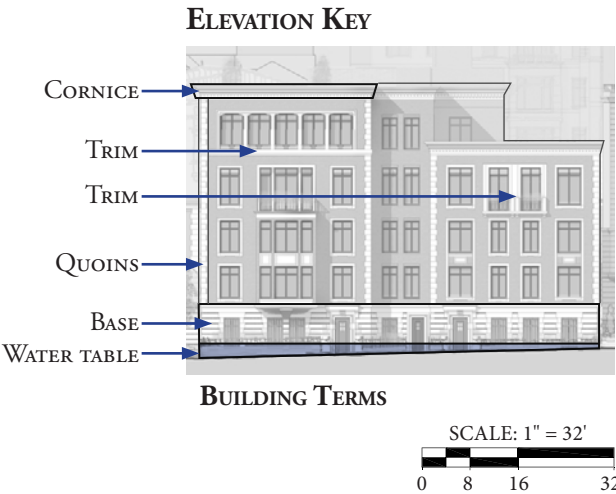
- WD-01CEDAR SHINGLE
- BR-01BRICK BASE
- WD-08PAINTED WOOD OR ENGINEERED WOOD TRIM
- SH-05ASPHALT SHINGLE ROOF

C3

- BR-04BRICK (PAINTED)
- ST-08STONE WATER TABLE
- CS-06CAST STONE TRIM
- GFRC-06GRFC CORNICE

C4

- SC-06STUCCO
- ST-04STONE OR CAST STONE BASE
- CS-04
- ST-07STONE WATER TABLE
- SC-06STUCCO AND GFRC TRIM
- GFRC-06
- CS-06STONE OR CAST STONE QUOINS
- RF-01SLATE ROOF







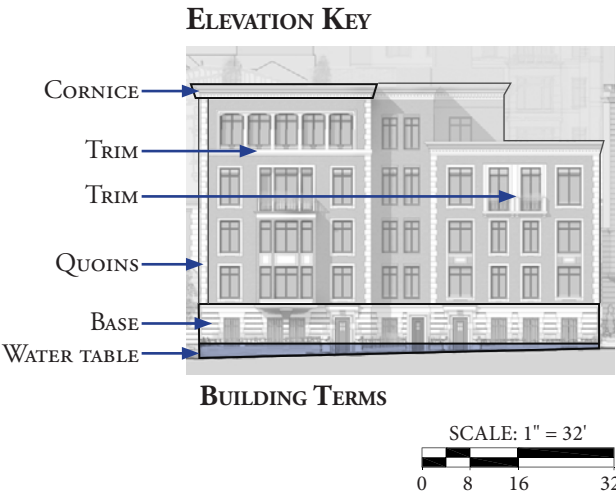
MAPLE STREET

C4

- SC-06 STUCCO
- ST-04 STONE OR CAST STONE BASE
- CS-04
- ST-07 STONE WATER TABLE
- SC-06 STUCCO AND GFRC TRIM
- GFRC-06
- CS-06 STONE OR CAST STONE QUOINS
- RF-01 SLATE ROOF

C5

- BR-01 BRICK
- ST-03 STONE OR CAST STONE BASE
- CS-03
- ST-08 STONE WATER TABLE
- CS-03 CAST STONE OR GFRC TRIM
- GFRC-03
- ST-03 STONE OR CAST STONE QUOINS
- CS-03



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BLOCK C - MAPLE STREET



CALIFORNIA STREET

**C6**

- SC-06** STUCCO
- SC-08** STUCCO TRIM
- SC-09**

**C8**

- BR-02** BRICK
- ST-09** STONE TRIM
- ST-07** STONE WATER TABLE

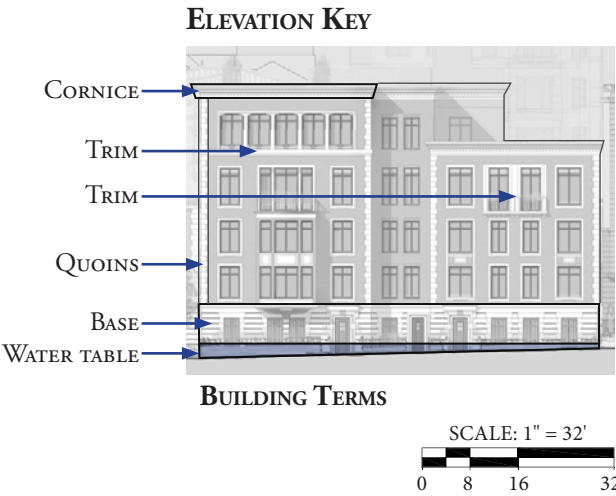
**C7**

- WD-02** CEDAR SHINGLE
- ST-08** STONE BASE
- WD-12** PAINTED WOOD OR ENGINEERED WOOD TRIM
- WD-03** CEDAR SHINGLE ROOF OR
- SH-01** ASPHALT SHINGLE ROOF

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BLOCK C - CALIFORNIA STREET





# MATERIAL BOARDS

3700 CALIFORNIA STREET SAN FRANCISCO, CA





ST-01 PALE WARM . HEAVILY FIGURED



ST-02 GOLDEN, HEAVILY FIGURED



ST-03 WARM GRAY, NO VEIN



ST-04 LIGHT GRAY, NO VEIN



ST-05 DARK GRAY, FIGURED

3700 CALIFORNIA STREET SAN FRANCISCO, CA





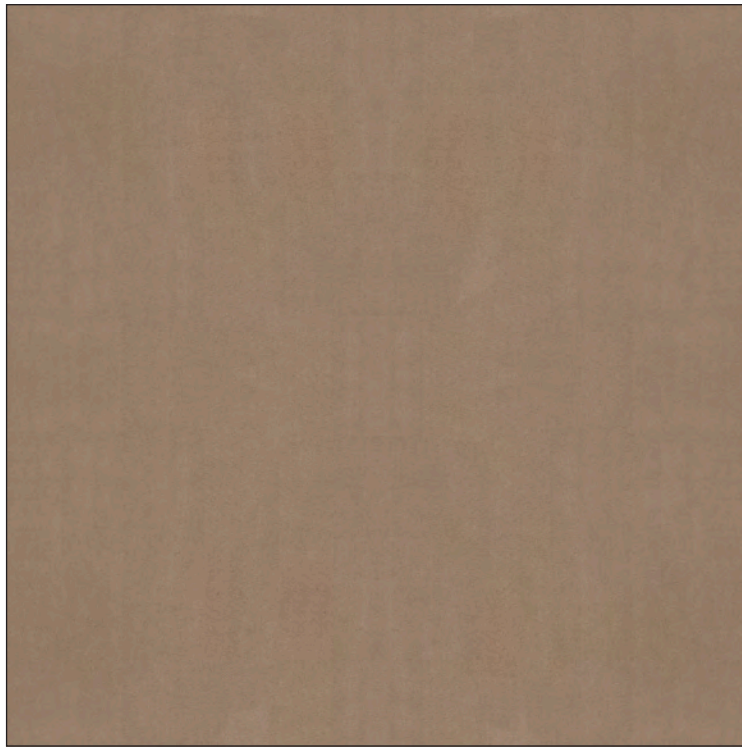
ST-06 GOLDEN, HIGHLY FIGURED



ST-07 LIGHT GRAY, COARSE FINISH



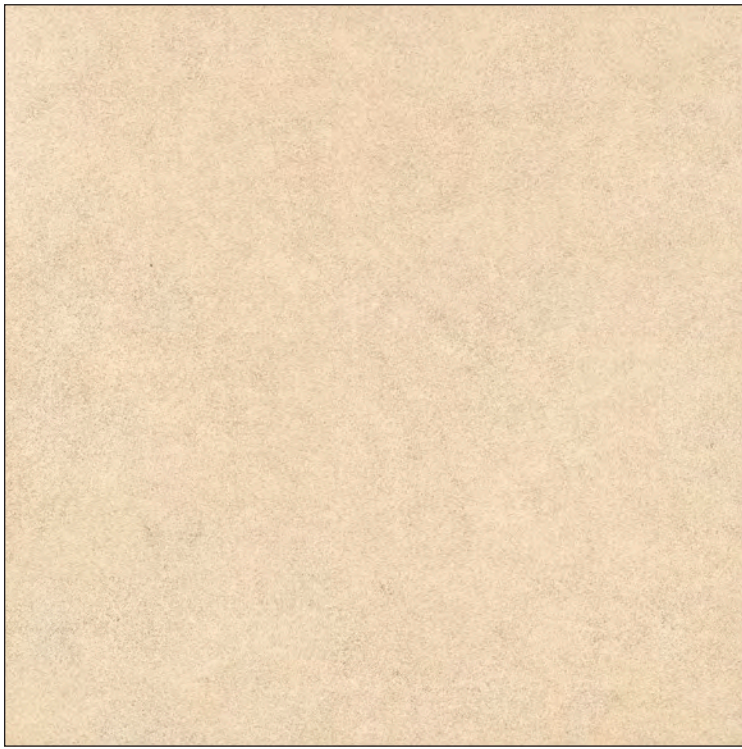
ST-08 MEDIUM GRAY, HONED



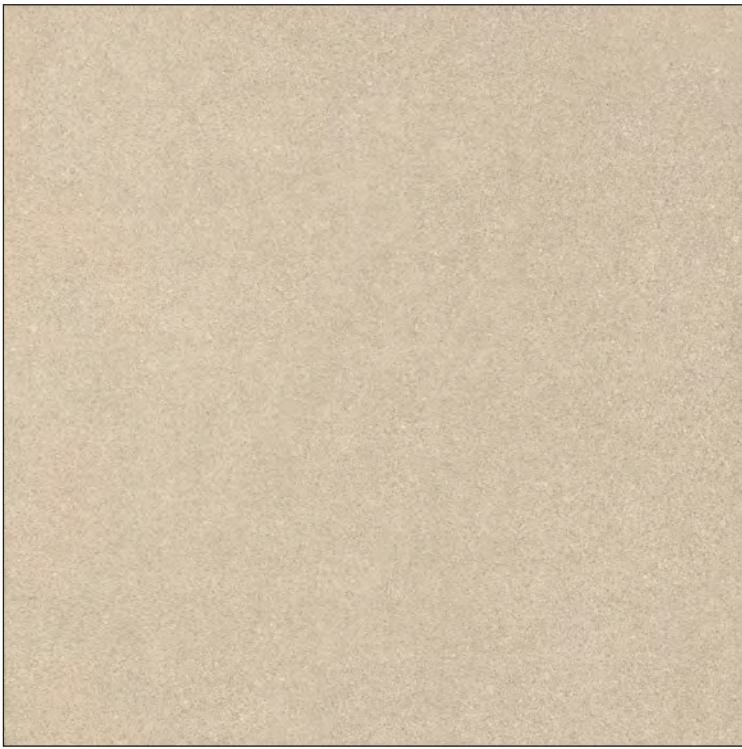
ST-09 BROWN SANDSTONE

3700 CALIFORNIA STREET SAN FRANCISCO, CA





CS-01 PALE WARM  
GFRC-01 PALE WARM



CS-02 GOLDEN  
GFRC-02 GOLDEN



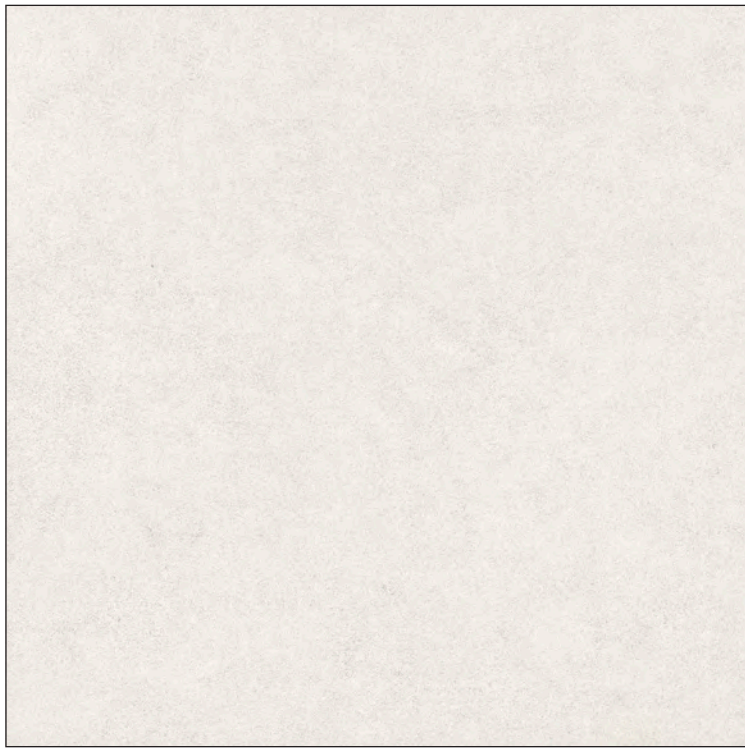
CS-03 WARM GRAY  
GFRC-03 WARM GRAY



CS-04 LIGHT GRAY  
GFRC-04 LIGHT GRAY



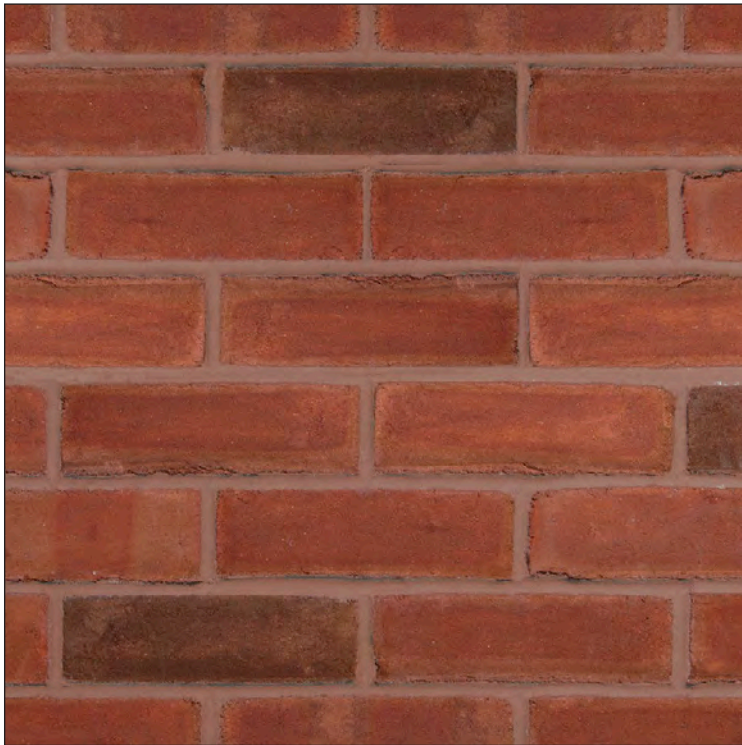
CS-05 DARK GRAY  
GFRC-05 DARK GRAY



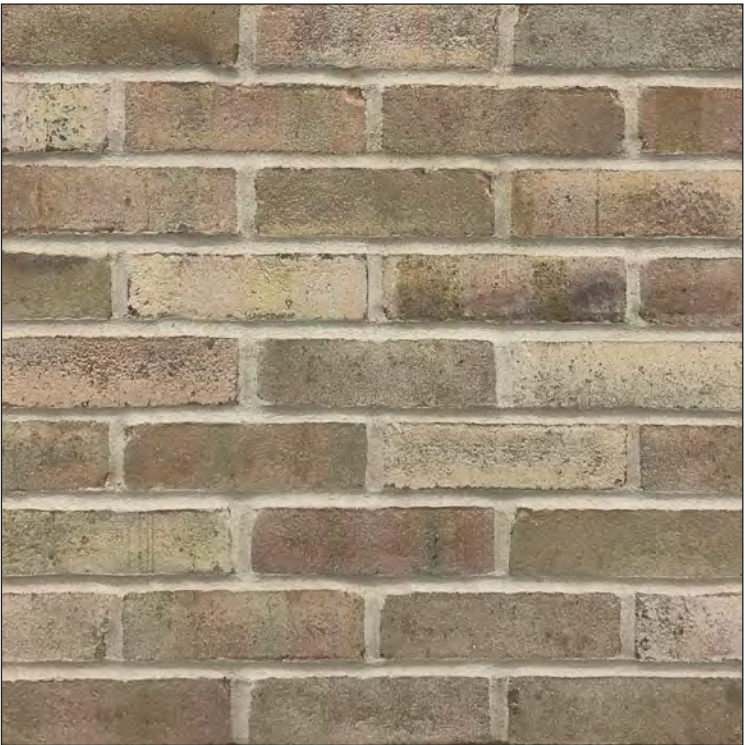
CS-06 WHITE  
GFRC-06 WHITE

3700 CALIFORNIA STREET SAN FRANCISCO, CA





BR-O1    RED BLEND



BR-O2    TAN BLEND



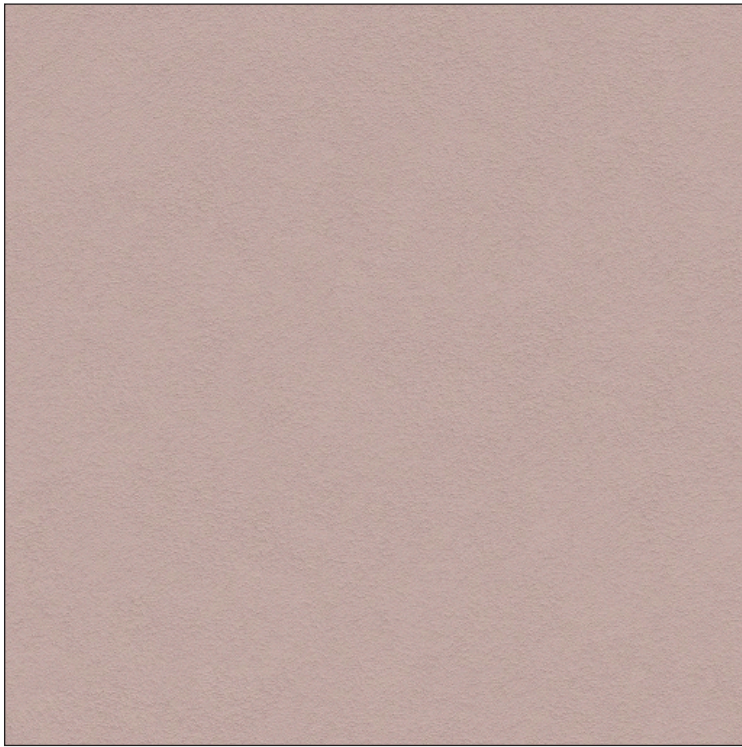
BR-O3    TAN/GRAY BLEND



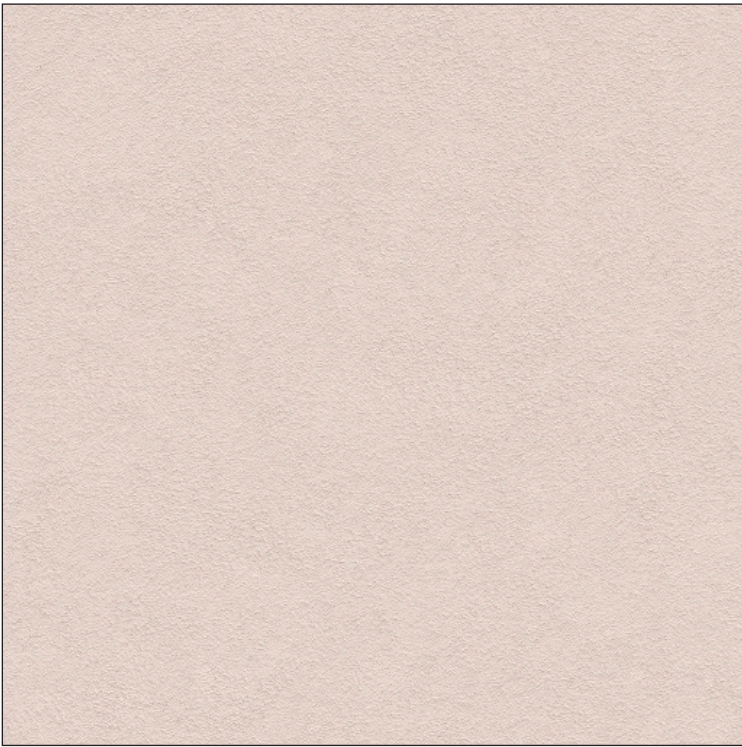
BR-O4    PAINTED WHITE

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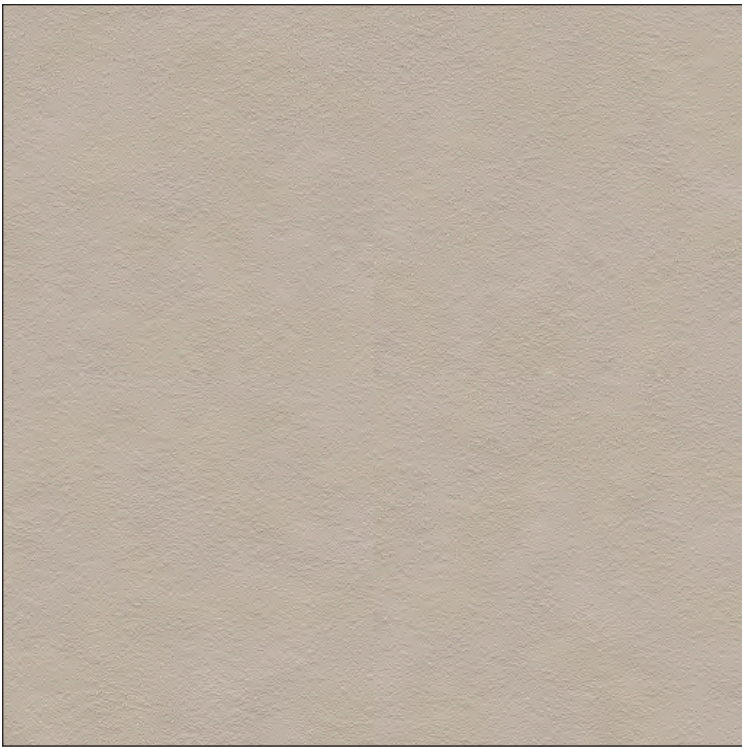




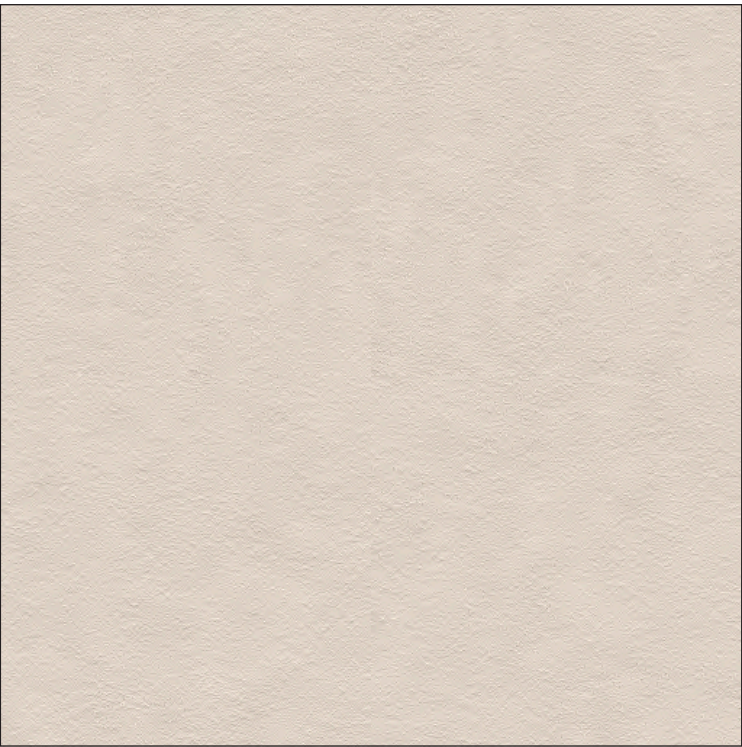
SC-01 MEDIUM ROSE



SC-02 LIGHT ROSE



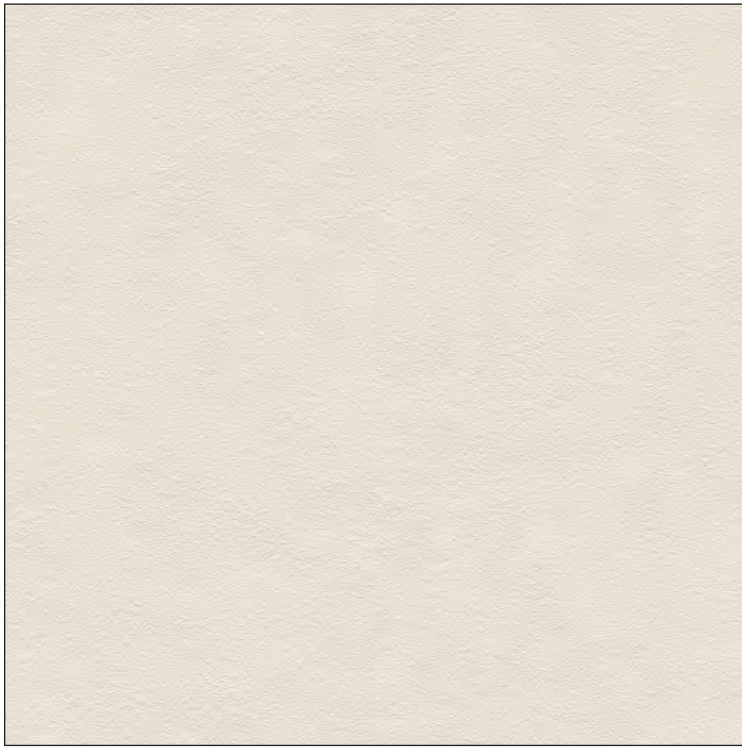
SC-03 BEIGE / BROWN



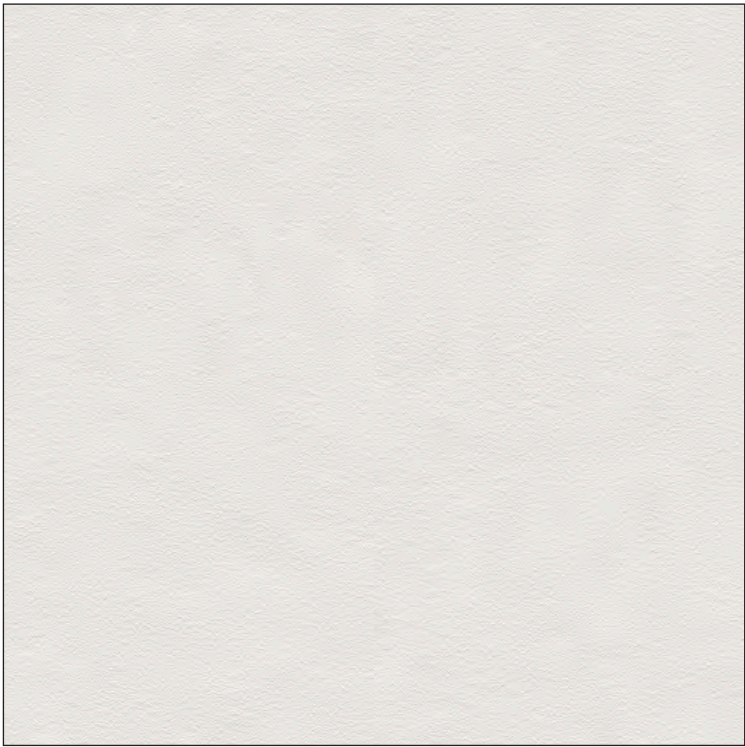
SC-04 LIGHT BEIGE / BROWN

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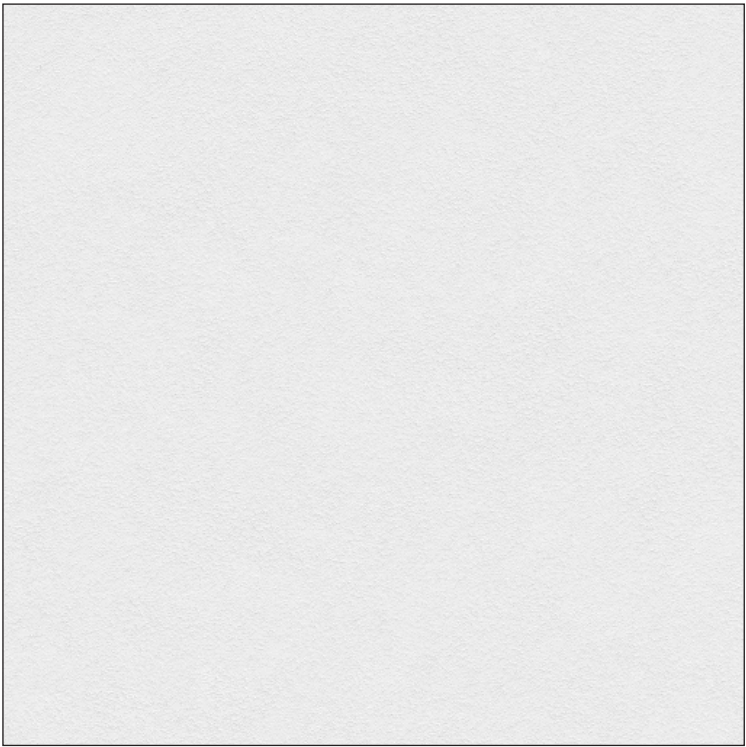




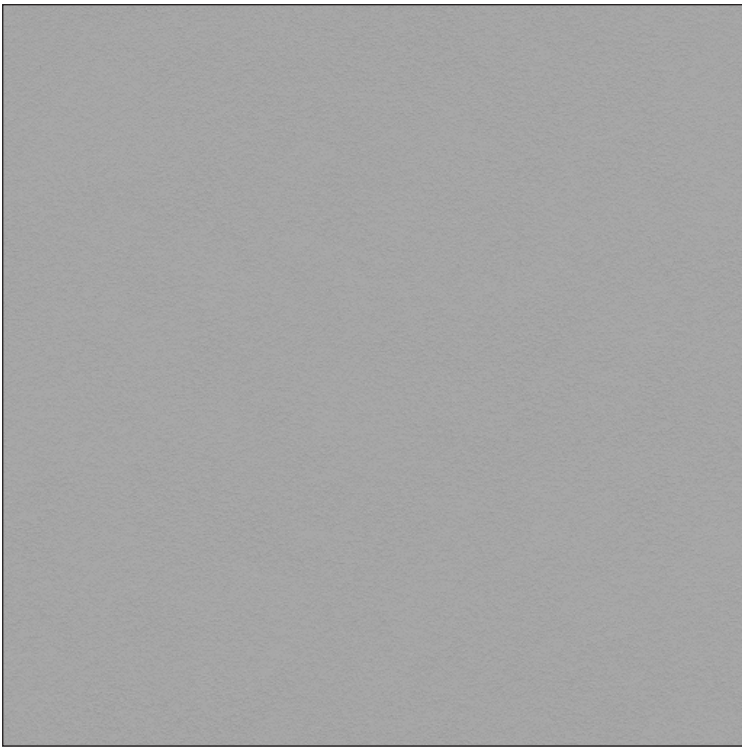
SC-05 IVORY



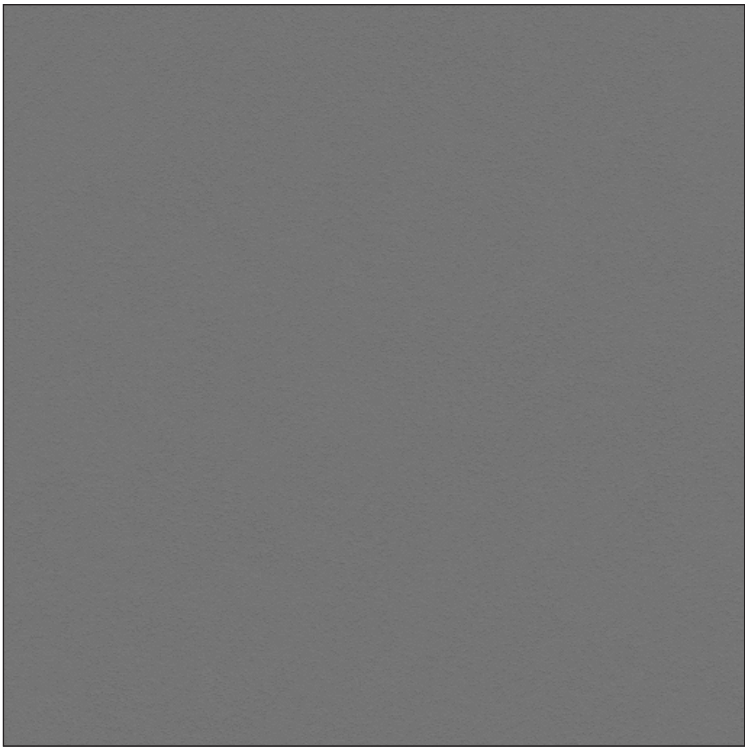
SC-06 OFF-WHITE



SC-07 BRIGHT WHITE



SC-08 LIGHT GRAY



SC-09 DARK GRAY

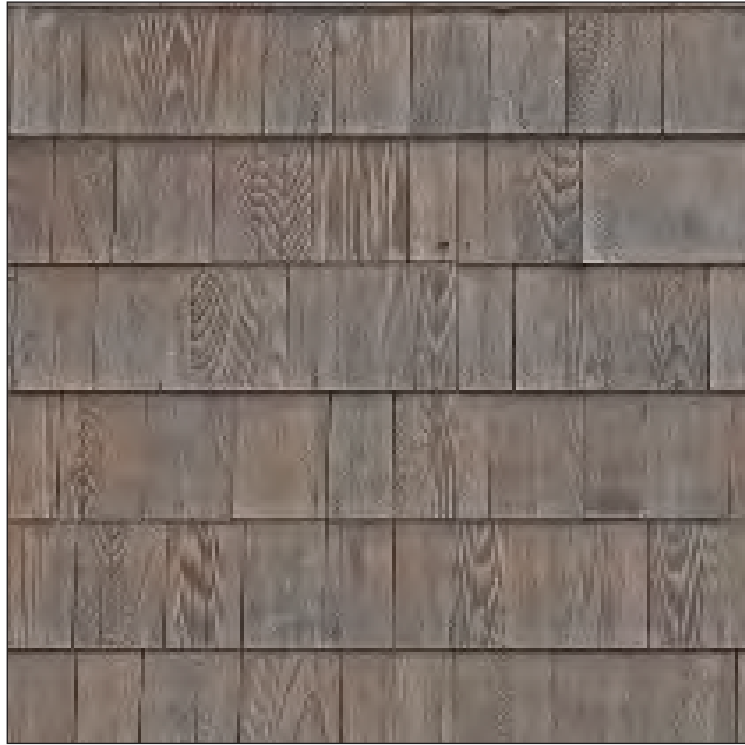
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STUCCO



WD-01 LIGHT BROWN



WD-02 BROWN / GRAY

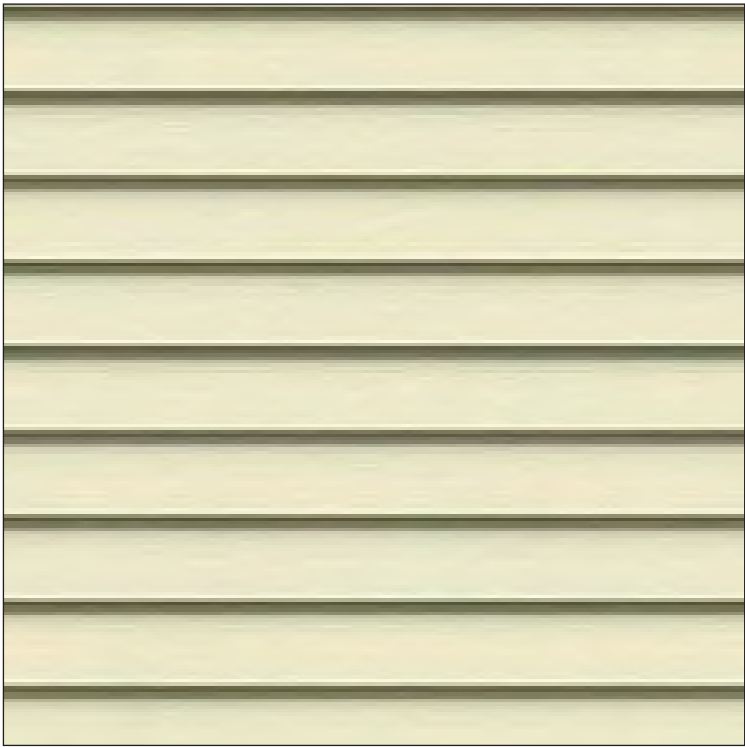


WD-03 DARK BROWN / GRAY

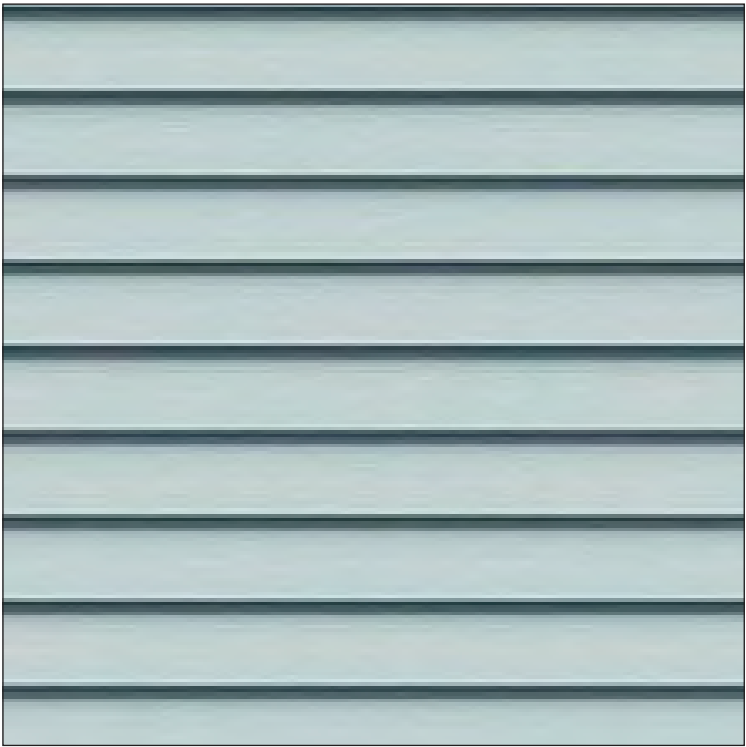




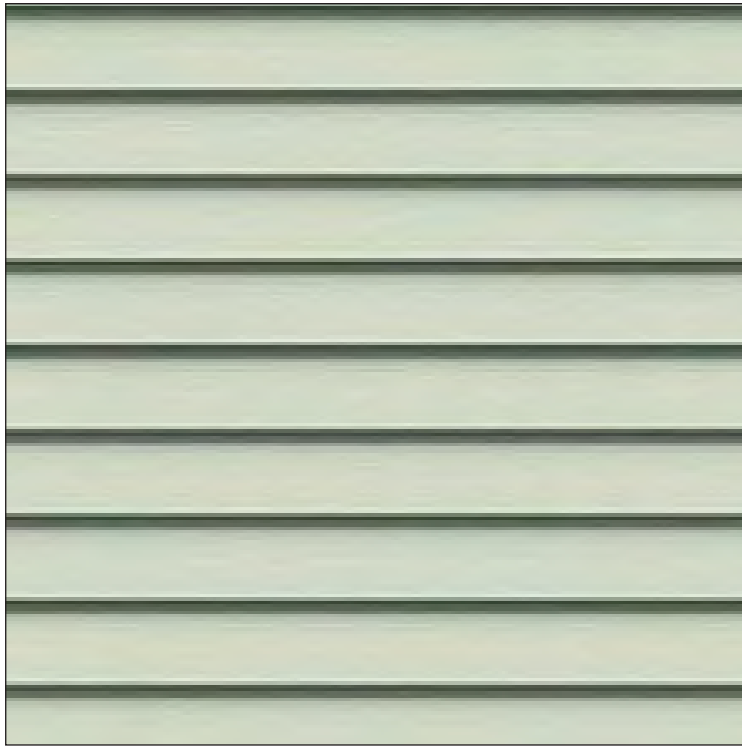
WD-04 WHITE



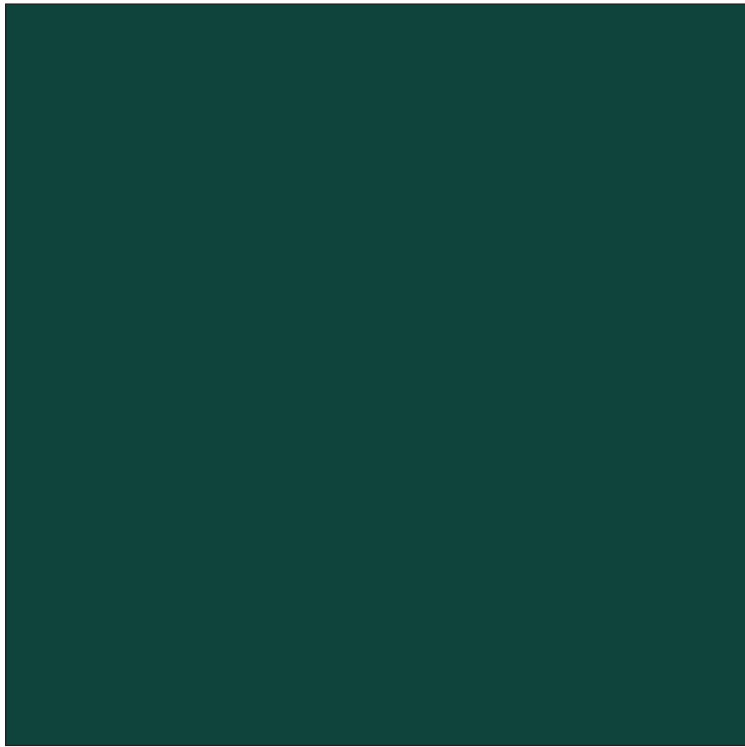
WD-05 LIGHT YELLOW



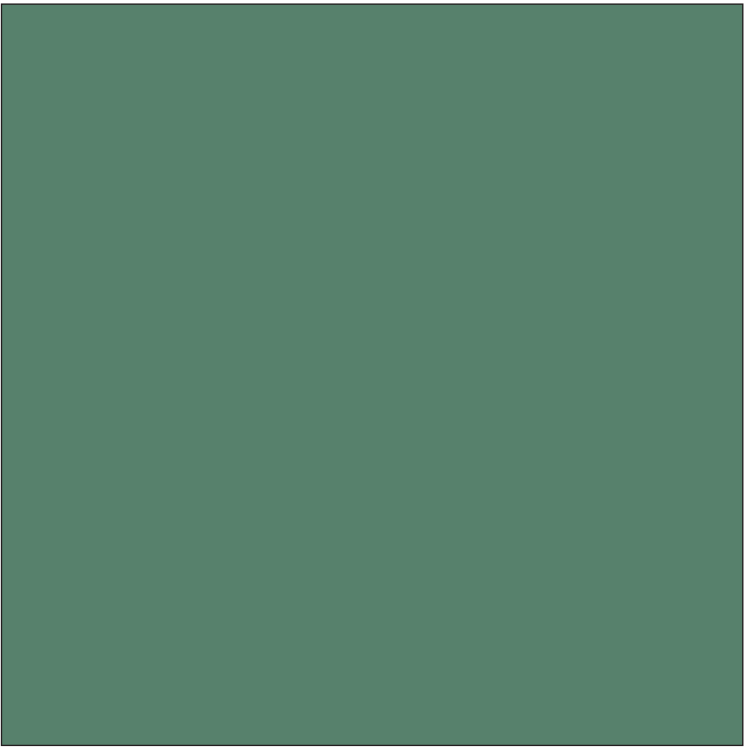
WD-06 LIGHT BLUE



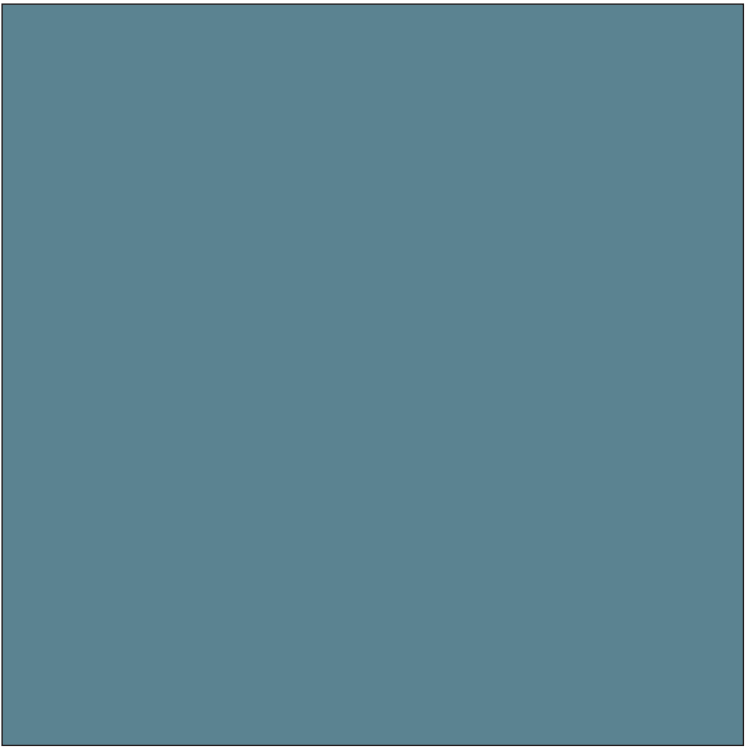
WD-07 LIGHT GREEN



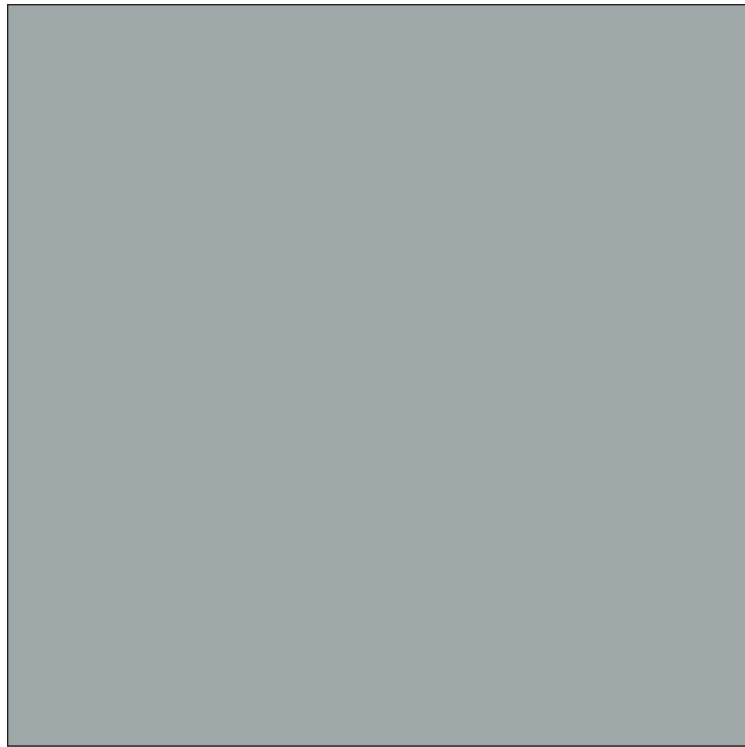
WD-08    DARK GREEN



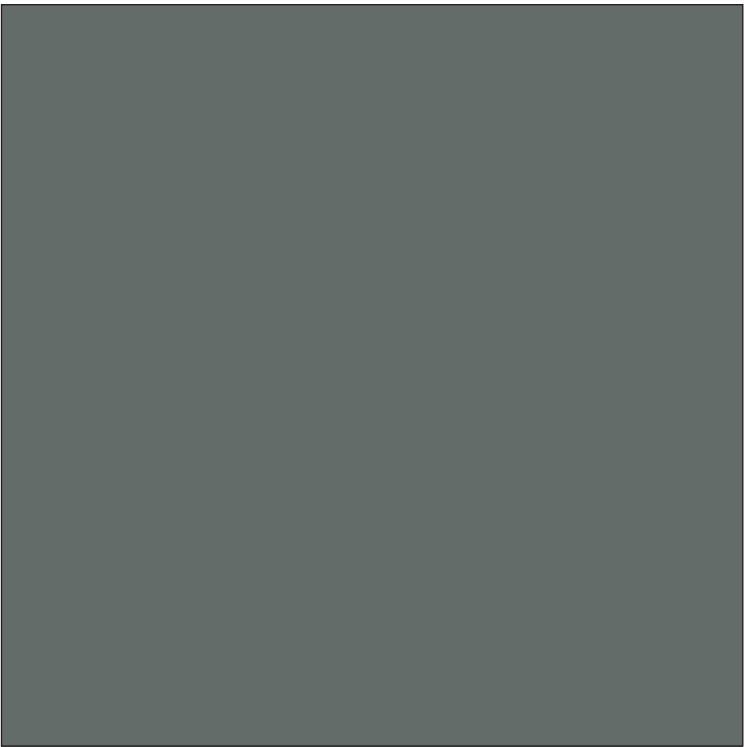
WD-09    MEDIUM GREEN



WD-10    BLUE / GRAY



WD-11    LIGHT GRAY



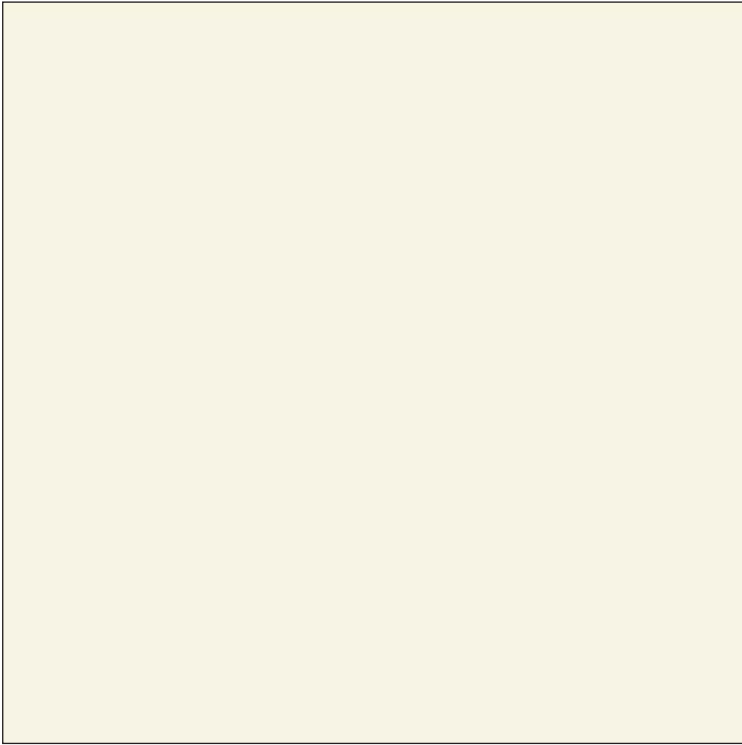
WD-12    MEDIUM GRAY



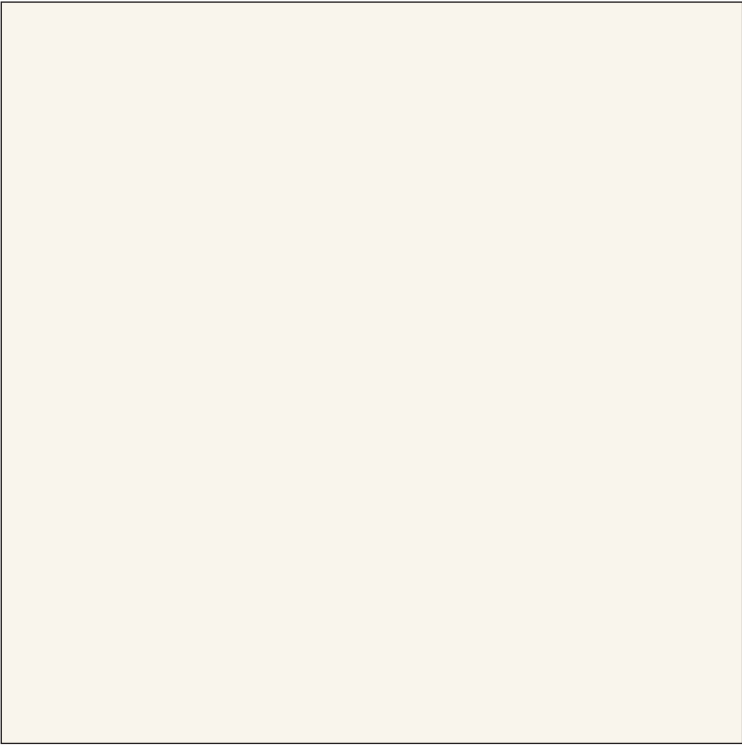
WD-13    CHARCOAL GRAY

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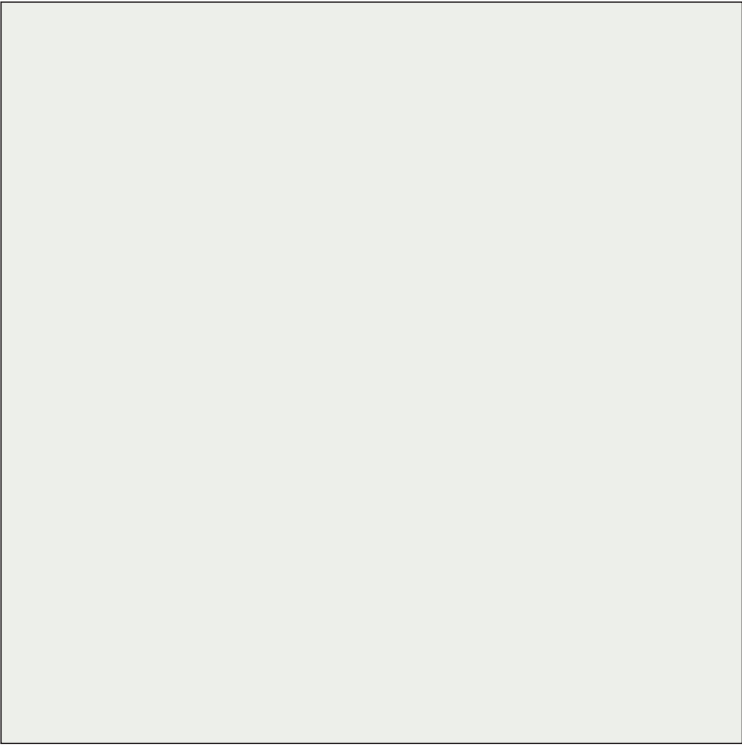




WD-14 CREAM



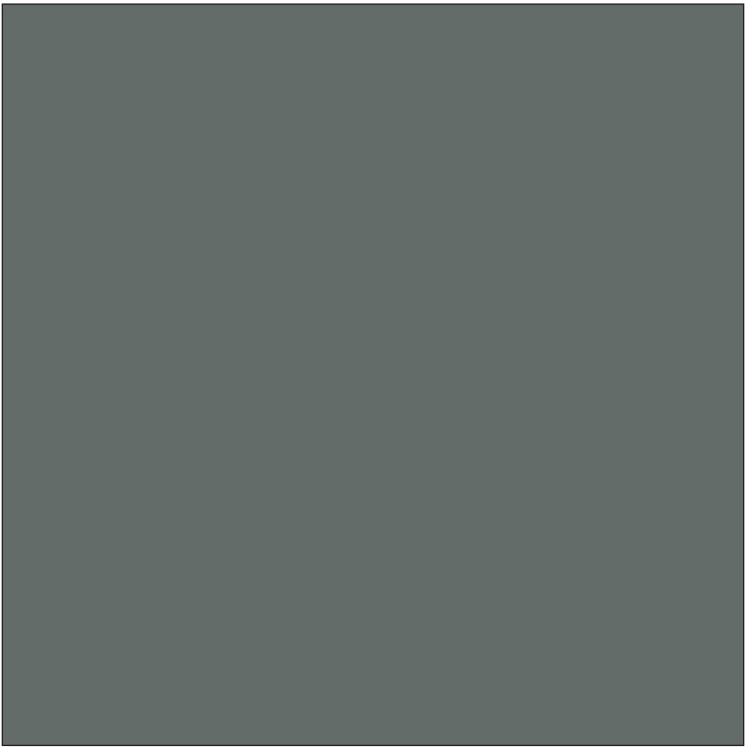
WD-15 OFF-WHITE



WD-16 BRIGHT WHITE



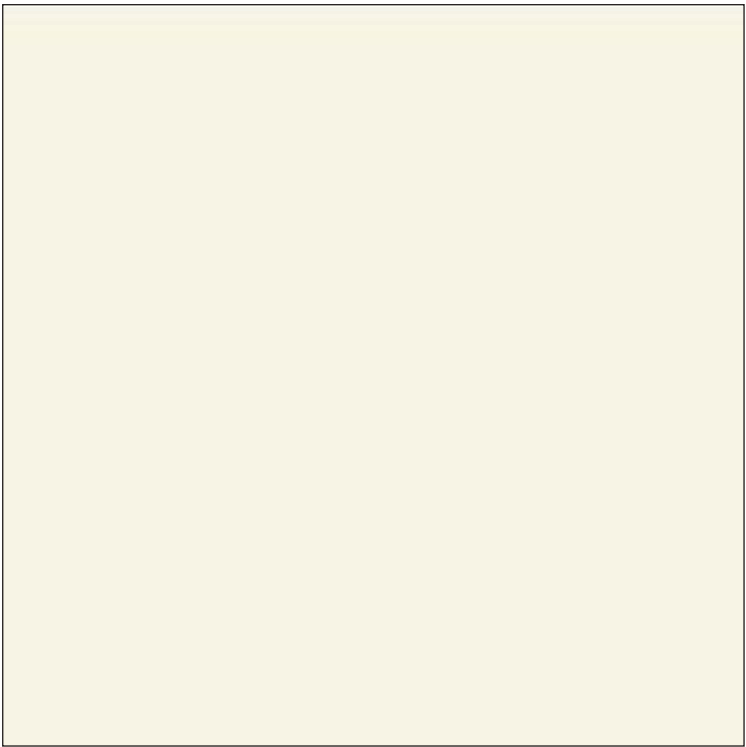
MT-01 MEDIUM BRONZE



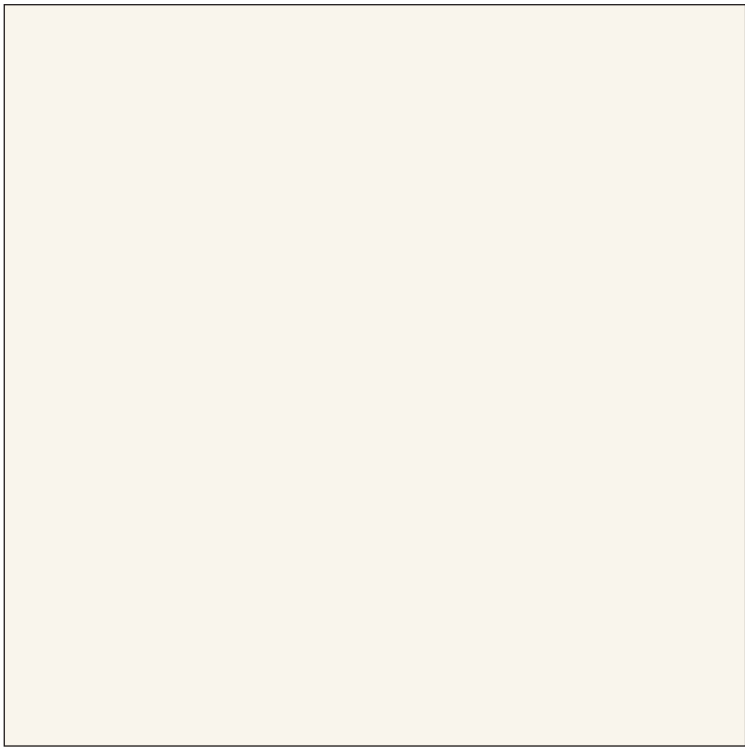
MT-02 MEDIUM GRAY



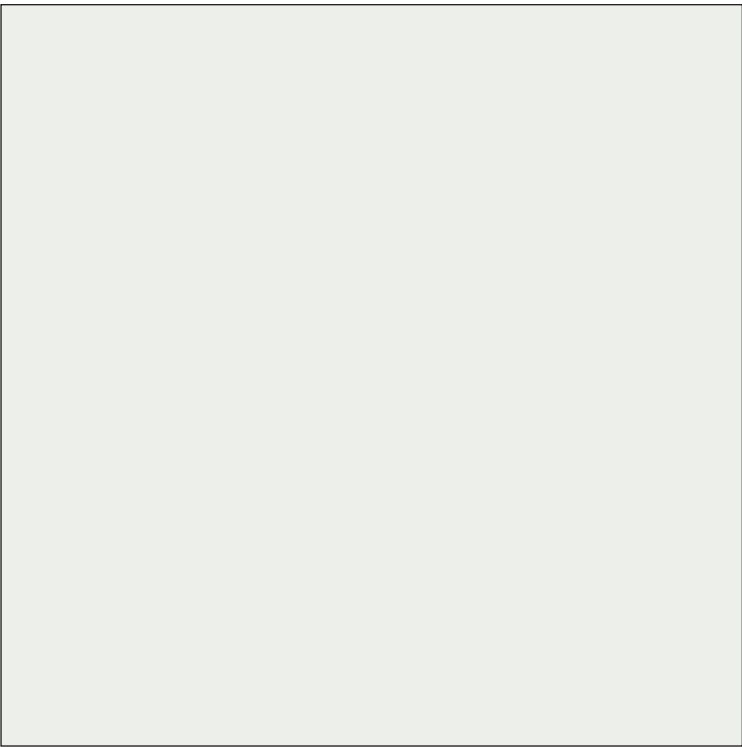
MT-03 CHARCOAL GRAY



MT-04 CREAM



MT-05 OFF-WHITE



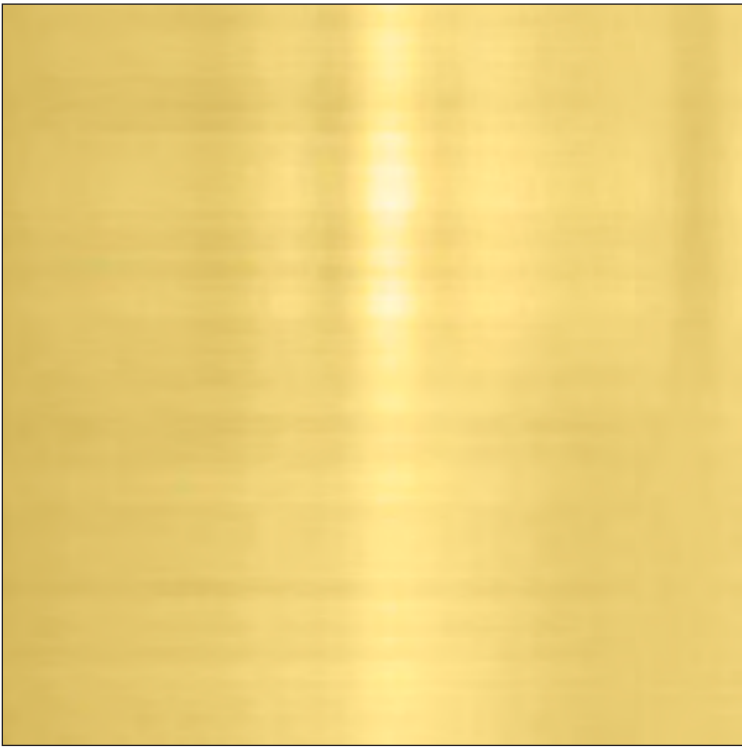
MT-06 BRIGHT WHITE

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MT-07 BRONZE, 613/US10B  
DARK OXIDIZED, SATIN BRONZE,  
OIL RUBBED



MT-08 BRASS, 606/US4  
SATIN BRASS, CLEAR COATED



MT-09 COPPER





SH-O1    DARK GRAY



SH-O2    LIGHT GRAY



SH-O3    GRAY / BROWN



SH-O4    BROWN



SH-O5    WARM BROWN

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ASPHALT SHINGLES





RF-01 SLATE



RF-02 CLAY TILES

# RENDERINGS

3700 CALIFORNIA STREET      SAN FRANCISCO, CA



## RENDERINGS TITLE SHEET



# EIR VIEWS

3700 CALIFORNIA STREET      SAN FRANCISCO, CA







3700 CALIFORNIA STREET

SAN FRANCISCO, CA



JORDAN AVENUE - EXISTING







3700 CALIFORNIA STREET

SAN FRANCISCO, CA



JORDAN AVENUE - PROPOSED







3700 CALIFORNIA STREET

SAN FRANCISCO, CA



COMMONWEALTH AVENUE - EXISTING







3700 CALIFORNIA STREET

SAN FRANCISCO, CA



COMMONWEALTH AVENUE - PROPOSED



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A-06.14





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PARKER AVENUE - EXISTING







3700 CALIFORNIA STREET

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# PARKER AVENUE - PROPOSED







3700 CALIFORNIA STREET  
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CALIFORNIA STREET - EXISTING







3700 CALIFORNIA STREET

SAN FRANCISCO, CA



CALIFORNIA STREET - PROPOSED







3700 CALIFORNIA STREET  
SAN FRANCISCO, CA

CHERRY STREET - EXISTING





3700 CALIFORNIA STREET SAN FRANCISCO, CA

# CHERRY STREET - PROPOSED





3700 CALIFORNIA STREET

SAN FRANCISCO, CA



SACRAMENTO STREET - EXISTING







3700 CALIFORNIA STREET SAN FRANCISCO, CA

# SACRAMENTO STREET - PROPOSED



# ADDITIONAL VIEWS

3700 CALIFORNIA STREET SAN FRANCISCO, CA





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# CALIFORNIA STREET







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# CALIFORNIA STREET



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MAPLE STREET





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# SACRAMENTO STREET





AERIAL VIEW

3700 CALIFORNIA STREET SAN FRANCISCO, CA



SHEET TITLE





3700 CALIFORNIA STREET SAN FRANCISCO, CA

## AERIAL VIEW - EXISTING





3700 CALIFORNIA STREET SAN FRANCISCO, CA

## AERIAL VIEW - PROPOSED



# PROJECT SUMMARY

3700 CALIFORNIA STREET      SAN FRANCISCO, CA



## PROJECT SUMMARY TITLE SHEET



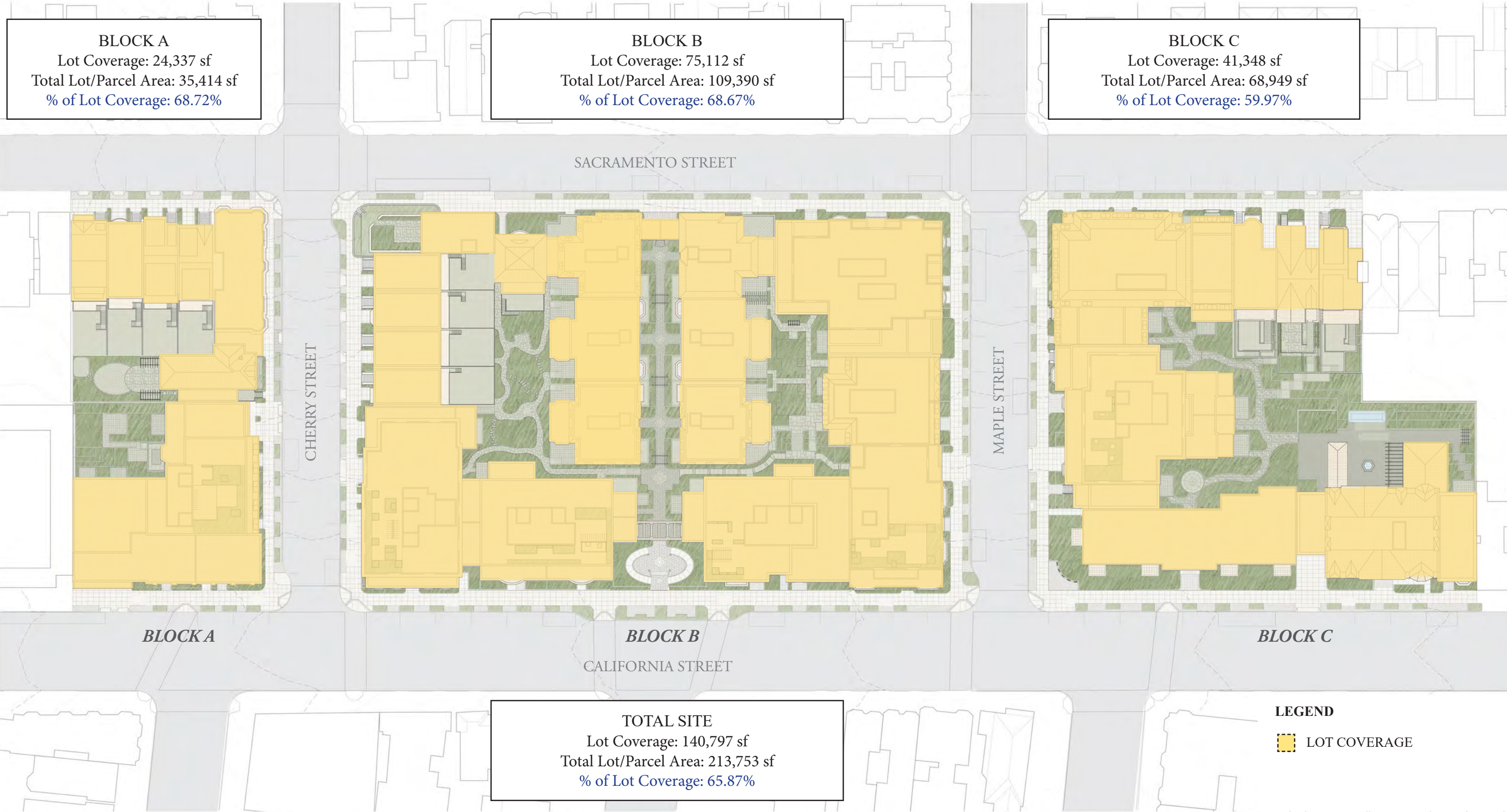
Building	Type	Zoning District	Lot Area	Occupied Floors above Sidewalk Grade	Roof Height above Sidewalk Grade	Gross Interior Area (sf)	Net Interior Area (sf)		Unit Mix							Total	Number of Bedrooms*	Parking Spaces**	Loading Spaces	# Units with Code-Compliant		Common Open Space				
									Single Family on Fee Lot	Single Family on Podium	Units in Multifamily Buildings															
											Studio	1 BR	2 BR	3 BR	4 BR											
							Units	Amenities																		
A1	Single Family on Fee Lot	RH-2	2,500	3	40.0	5,236	4,846		1	--	--	--	--	--	1	4	2.0	n/a	1	1,105	n/a					
A2	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,766	4,376		1	--	--	--	--	--	1	4	2.0	n/a	1	1,006	n/a					
A3	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,792	4,402		1	--	--	--	--	--	1	4	2.0	n/a	1	1,006	n/a					
A4	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,628	4,238		1	--	--	--	--	--	1	4	2.0	n/a	1	959	n/a					
A5	Multifamily (existing)	RH-2	2,818	4	40.0	7,041	6,261		--	--	--	9	--	--	9	9	in podium	n/a	n/a	--	0					
A6	Single Family on Fee Lot	RH-2	4,994	3	40.0	5,936	5,446		1	--	--	--	--	--	1	4	2.0	n/a	1	2,749	n/a					
A7	Multifamily	RM-2	17,602	5	65.0	62,375	47,799		--	--	--	6	8	14	1	29	68	57.0	n/a	4	4,396	3,851 (2,660 required for 34 units)				
B3	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,501	4,111		1	--	--	--	--	--	1	4	2.0	n/a	1	1,005	n/a					
B4	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,501	4,111		1	--	--	--	--	--	1	4	2.0	n/a	1	1,005	n/a					
B5	Single Family on Fee Lot	RH-2	2,500	3	40.0	4,501	4,111		1	--	--	--	--	--	1	4	2.0	n/a	1	1,005	n/a					
B6	Single Family on Fee Lot	RH-2/RM-2	2,500	3	40.0	4,501	4,111		1	--	--	--	--	--	1	4	2.0	n/a	1	1,005	n/a					
B1	Single Family on Podium	RH-2	99,390	3	40.0	4,860	4,860		--	1	--	--	--	--	1	4	220.0	3 stalls 35'x12'		1	1,326	15,949 (9,895.2 required for 93 units)				
B2	Single Family on Podium	RH-2		3	40.0	5,785	5,785		--	1	--	--	--	--	1	4				1	1,038					
B7	Multifamily	RM-2		7	80.0	49,806	32,437		--	--	2	8	10	2	3	25				48	3		1,814			
B8	Multifamily	RM-2		5	66.0	35,632	24,507		--	--	1	5	5	5	--	16				31	6		2,542			
B9	Multifamily	RM-2		5	66.0	33,009	22,875		--	--	--	2	12	--	1	15				30	3		3,075			
B10	Multifamily	RM-2		7	80.0	43,420	27,727		--	--	1	--	4	12	--	17				45	3		1,000			
B11	Multifamily	RM-2		5	58.0	23,023	14,571		--	--	1	1	6	2	--	10				20	2		258			
B12	Multifamily	RM-2		7	80.0	65,935	46,002		--	--	3	9	13	8	1	34				66	7		2,608			
B13	Multifamily	RM-2		3	40.0	11,616	9,015		--	--	--	--	--	4	--	4				12	4		923			
B14	Multifamily	RM-2		3	40.0	11,832	9,314		--	--	--	--	--	4	--	4				12	4		1,013			
B15	Multifamily	RM-2		3	40.0	12,146	9,144		--	--	--	--	--	4	--	4				12	4		1,013			
B16	Multifamily	RM-2		3	40.0	11,015	8,528		--	--	--	--	--	4	--	4				12	4		1,013			
B17	Multifamily	RM-2		3	40.0	11,188	8,616		--	--	--	--	--	4	--	4				12	4		1,013			
B18	Multifamily	RM-2		3	40.0	11,344	8,804		--	--	--	--	2	2	--	4				10	4		867			
C1	Single Family on Fee Lot	RM-2	3,392	3	38.0	5,490	5,100		1	--	--	--	--	--	1	4	2.0	n/a	1	1,544	n/a					
C2	Single Family on Fee Lot	RM-2	3,392	3	36.0	5,736	5,346		1	--	--	--	--	--	1	4	2.0	n/a	1	1,469	n/a					
C3	Single Family on Fee Lot	RM-2	3,077	3	42.0	5,736	5,346		1	--	--	--	--	--	1	4	2.0	n/a	1	1,048	n/a					
C4	Multifamily	RM-2	59,088	5	58.0	54,643	33,098		--	--	--	7	10	5	--	22	42	120.0	1 stall 35'x12'		6	2,612	20,642 (5,852 required for 55 units)			
C5	Multifamily	RM-2		7	80.0	59,104	44,715		--	--	1	--	18	9	--	28	64				13	5,076				
C6	Multifamily	RM-2		3	36.0	18,568	13,696		--	--	7	16	--	--	--	23	23				5	866				
C7	Amenity Building / Multi-Fam	RM-2		3	50.0	35,947	3,278	19,279	--	--	--	4	--	--	--	4	4				--	na				
C8	Multifamily	RM-2		3	38.0	3,940	3,841		--	--	--	--	3	--	--	3	6			1	149					
Total							213,753		632,553	440,417	19,279	12	2	16	67	91	79	6	273	582	421.0	4 stalls	91	47,508	40,442	
*Note: Single family homes on fee lots and on podium are anticipated to have four bedrooms. Studios counted here as one bedroom each.												Mix	4%	1%	6%	25%	33%	29%	2%	100%						
												Avg Unit Size (net sq ft)							1,613							

Sidewalk widths	Existing* (ft)	Proposed* (ft)
Block A: California Street	15'-0"	15'-0"
Block A: Cherry Street	15'-0"	15'-0"
Block A: Sacramento Street	15'-0"	15'-0"
Block B: California Street	15'-0"	15'-0"
Block B: Maple Street	7'-10"	15'-0"
Block B: Sacramento Street	15'-0"	15'-0"
Block B: Cherry Street	15'-0"	15'-0"
Block C: California Street	15'-0"	15'-0"
Block C: Maple Street	7'-10"	15'-0"
Block C: Sacramento Street	15'-0"	15'-0"

\*NOTE: Overall sidewalk width from property line to curb, not including occasional encroachments.

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



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SAN FRANCISCO, CA

LOT COVERAGE

PROPOSED SITE PLAN: DIAGRAMS



CODE-COMPLIANT PRIVATE OPEN SPACE

**91 UNITS** satisfy open space requirements via private open space, as follows:

- 11 Units** in RH-2 x (125 SF *minimum requirement*) = 1,375 SF *required*  
vs. actual area of **12,956 SF provided.**
- 80 Units** in RM-2 x (80 SF *minimum requirement*) = 6,400 SF *required*  
vs. actual area of **34,299 SF provided.**

*An exceedance of 6x the required area.*

CODE-COMPLIANT COMMON OPEN SPACE

**173\* UNITS** satisfy open space requirements via common open space, as follows:

- 173 Units** in RM-2 x (106.4 SF *minimum requirement*) = 18,407 SF *required*  
vs. actual area of **40,442 SF provided.**

*An exceedance of more than 2x the required area.*

*\*Units in Building A5 (Existing 401 Cherry) are excluded from these calculations because it is an existing non-conforming structure; the exterior envelope will not be altered.*

ADDITIONAL PRIVATE OPEN SPACE\*

ADDITIONAL COMMON OPEN SPACE\*

*\*Open space that does not meet the dimensional requirements to be code-compliant and is not included in open space calculations. It represents additional common open space areas.*



3700 CALIFORNIA STREET  
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OPEN SPACE

PROPOSED SITE PLAN: DIAGRAMS

# UNIT LAYOUTS



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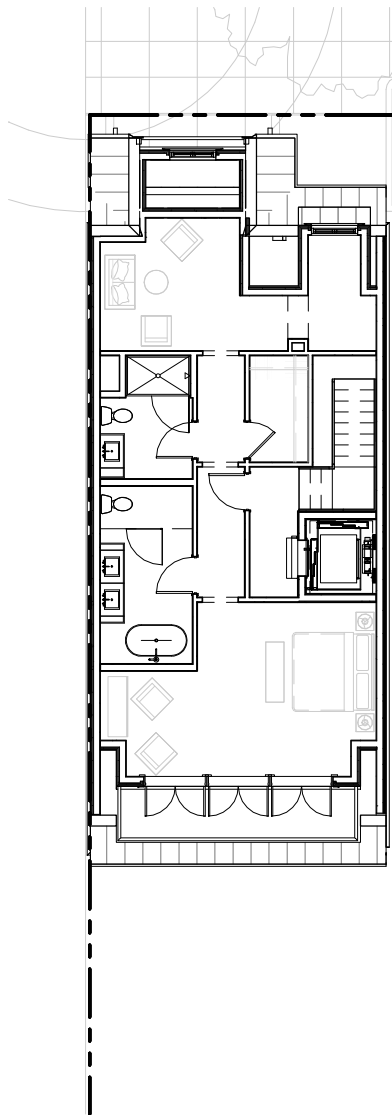


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FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

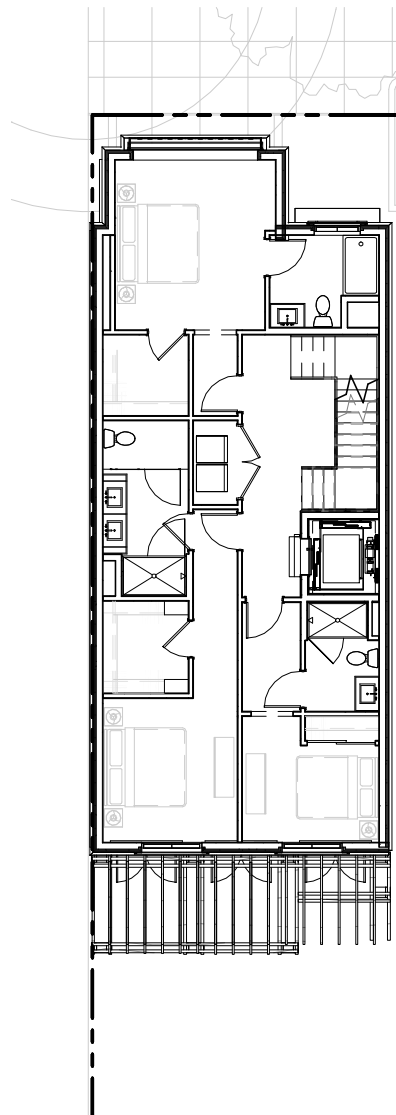


BLOCK A

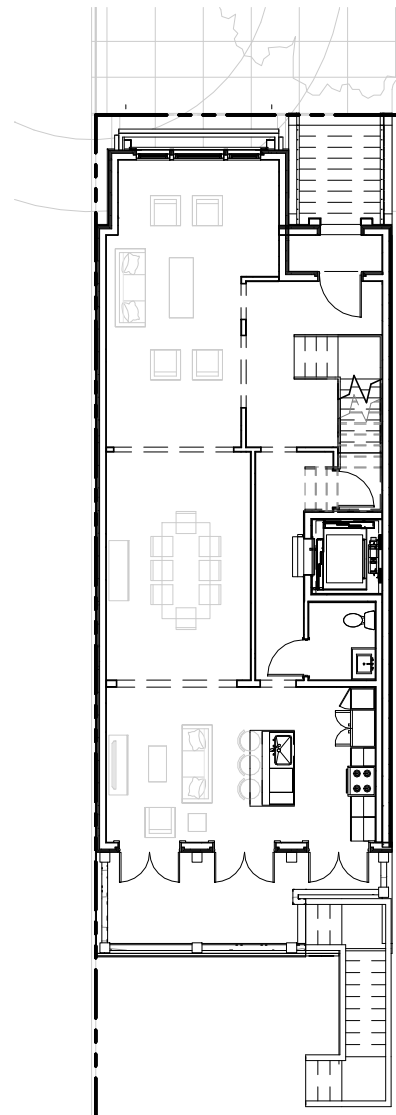
<u>Building</u>	<u>Building Type</u>	<u># Units</u>	<u>SFR</u>	<u>Studio</u>	<u>1 BR</u>	<u>2 BR</u>	<u>3 BR</u>	<u>4 BR</u>
A1	SFR	1	1	-	-	-	-	-
A2	SFR	1	1	-	-	-	-	-
A3	SFR	1	1	-	-	-	-	-
A4	SFR	1	1	-	-	-	-	-
A5	Multi	9	-	-	9	-	-	-
A6	SFR	1	1	-	-	-	-	-
A7	Multi	29	-	-	6	8	14	1
Total:		43	5	-	15	8	14	1
%		100%	12%	0%	35%	19%	33%	2%



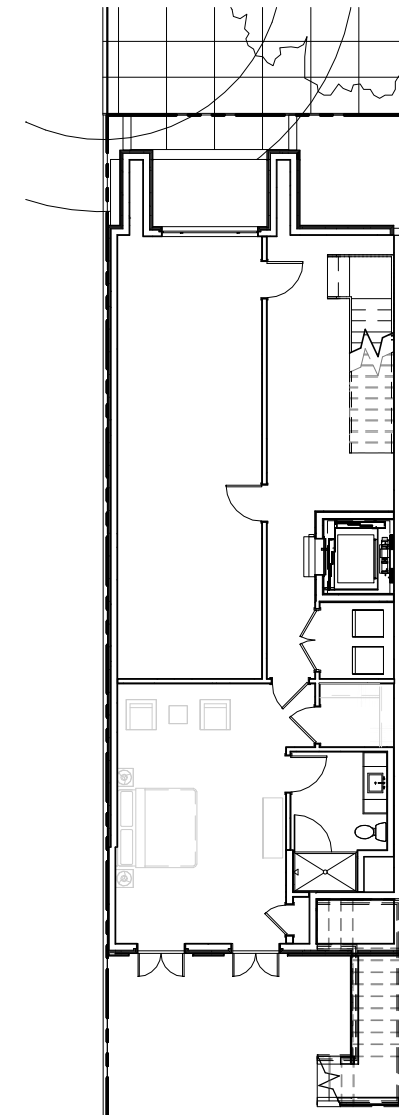
BUILDING PLAN  
FLOOR 3



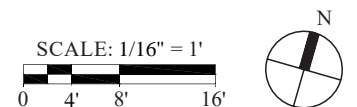
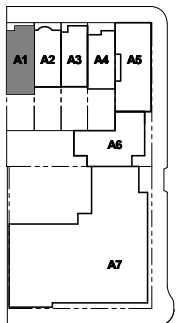
BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
BASEMENT



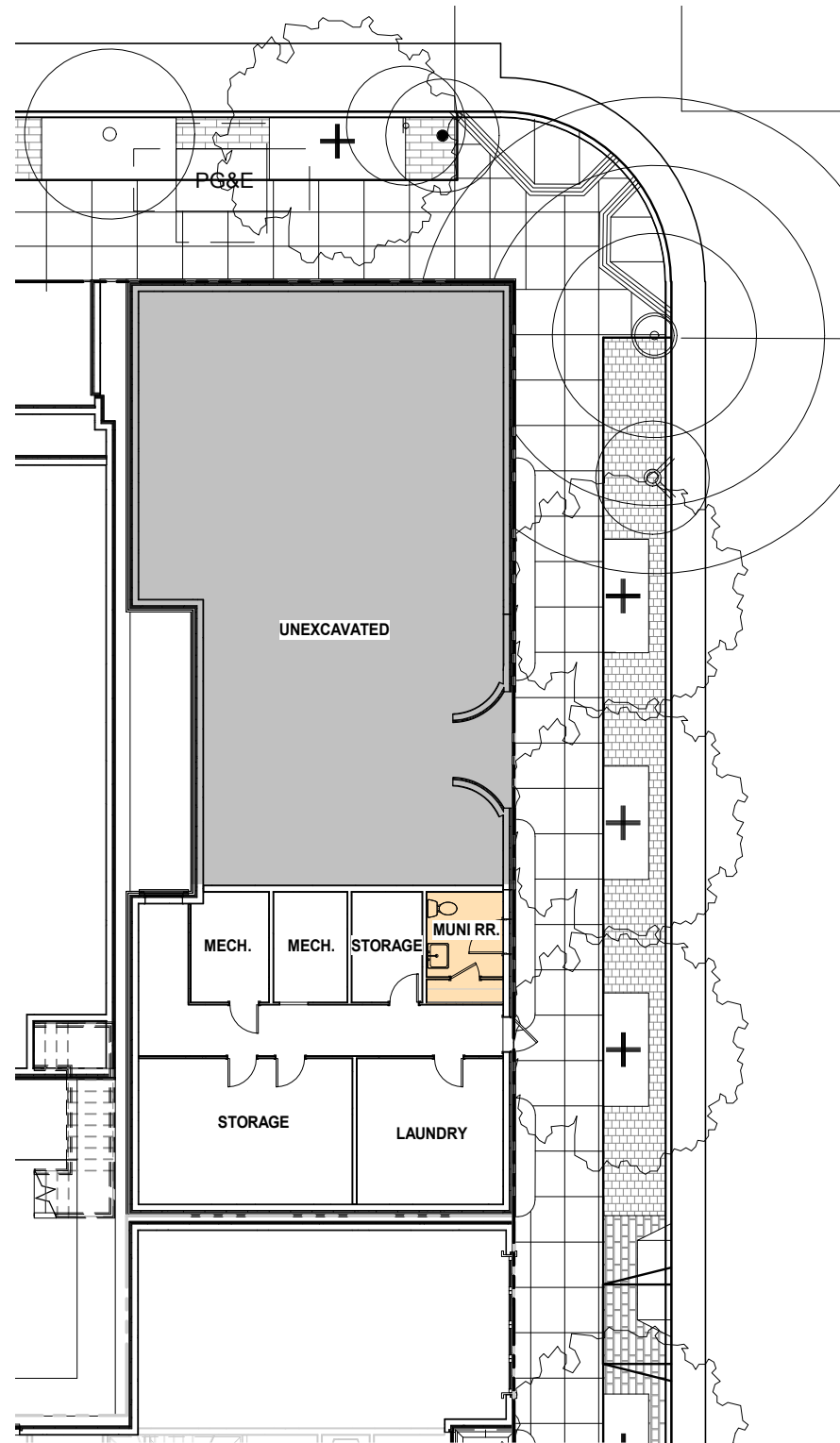
3700 CALIFORNIA STREET SAN FRANCISCO, CA



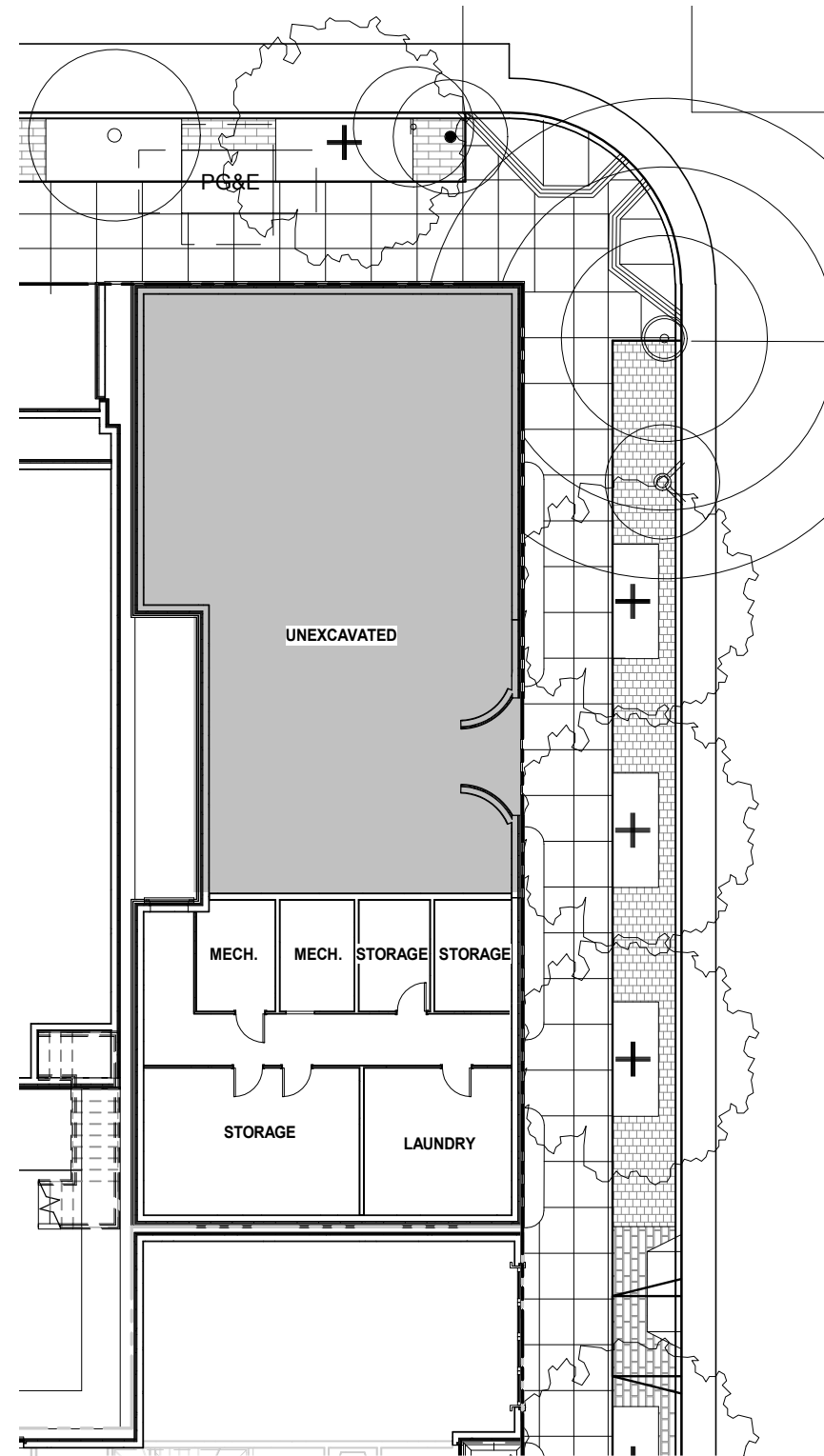
## BUILDING PLANS - A1 (A2, A3, A4 SIM.)

PUD/CU SUBMITTAL A2.01-A1  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

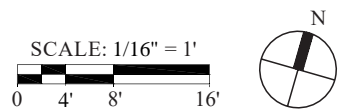
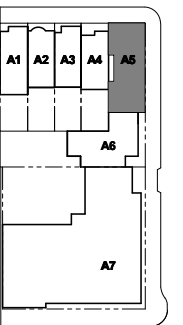




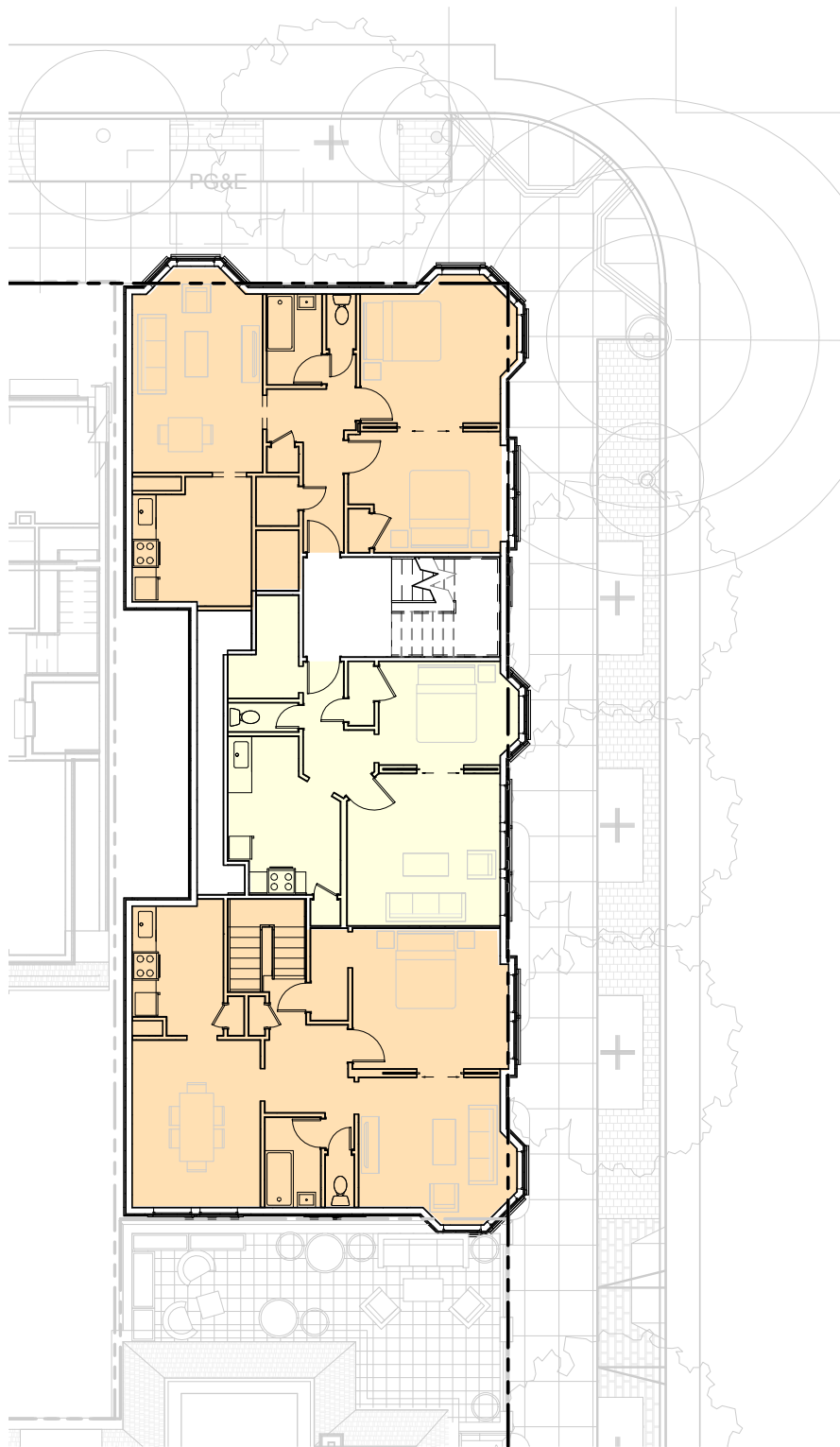
BUILDING PLAN  
BASEMENT - FLOOR 2 - PROPOSED MUNI RESTROOMS



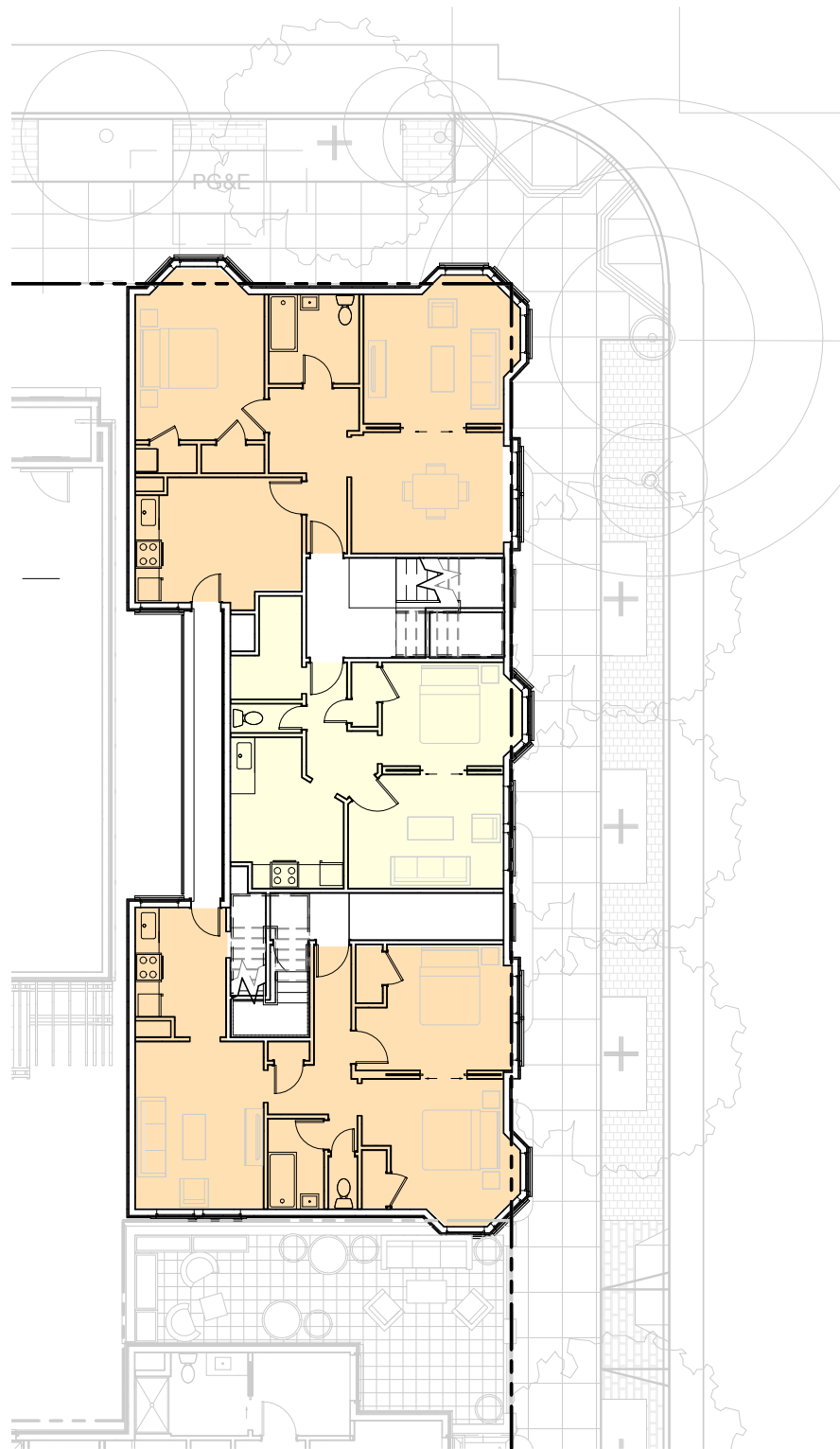
BUILDING PLAN  
BASEMENT - EXISTING



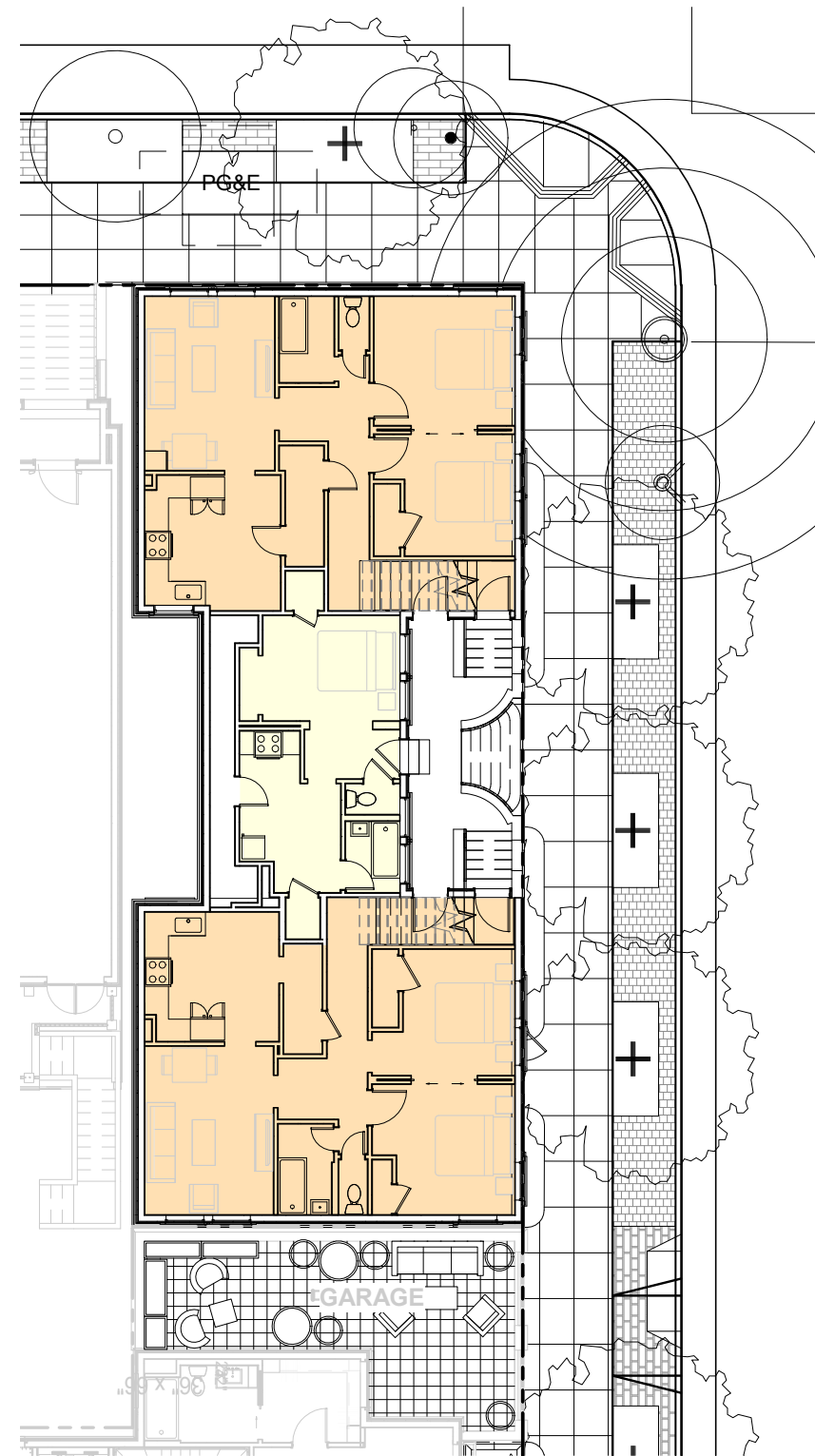
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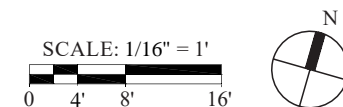
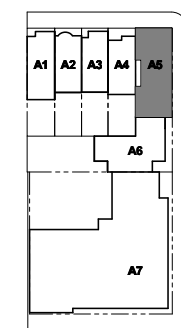
BUILDING PLAN  
EXISTING TO REMAIN - FLOOR 3



BUILDING PLAN  
EXISTING TO REMAIN - FLOOR 2



BUILDING PLAN  
EXISTING TO REMAIN - FLOOR 1



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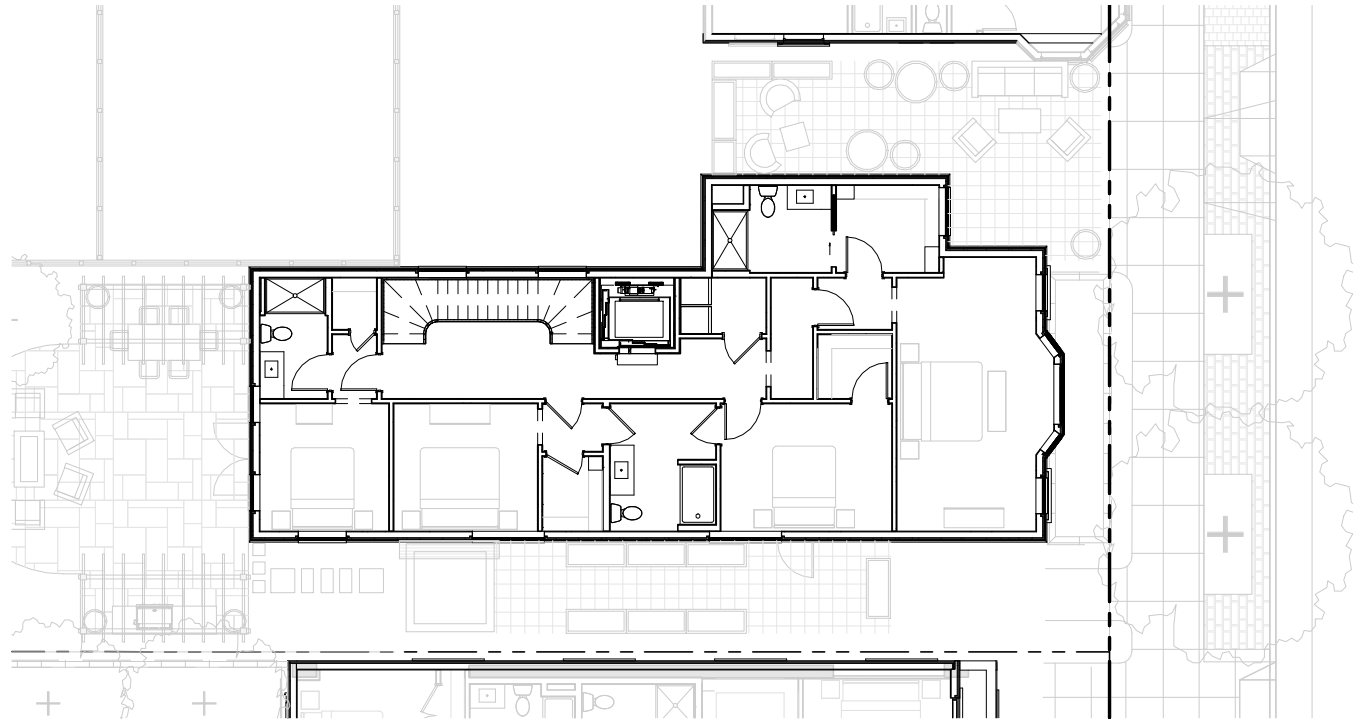
3700 CALIFORNIA STREET SAN FRANCISCO, CA



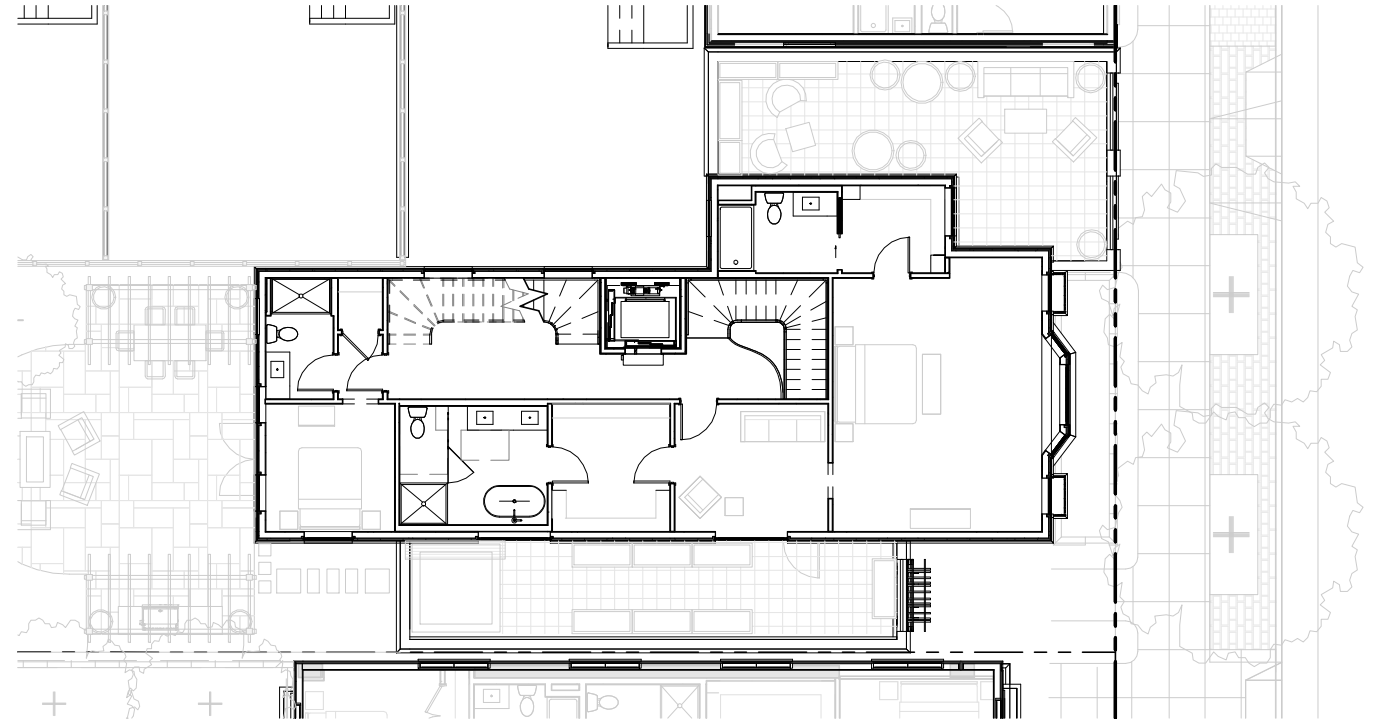
## BUILDING PLANS - FLOORS 1,2,3 - A5

PUD/CU SUBMITTAL A2.01-A5  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

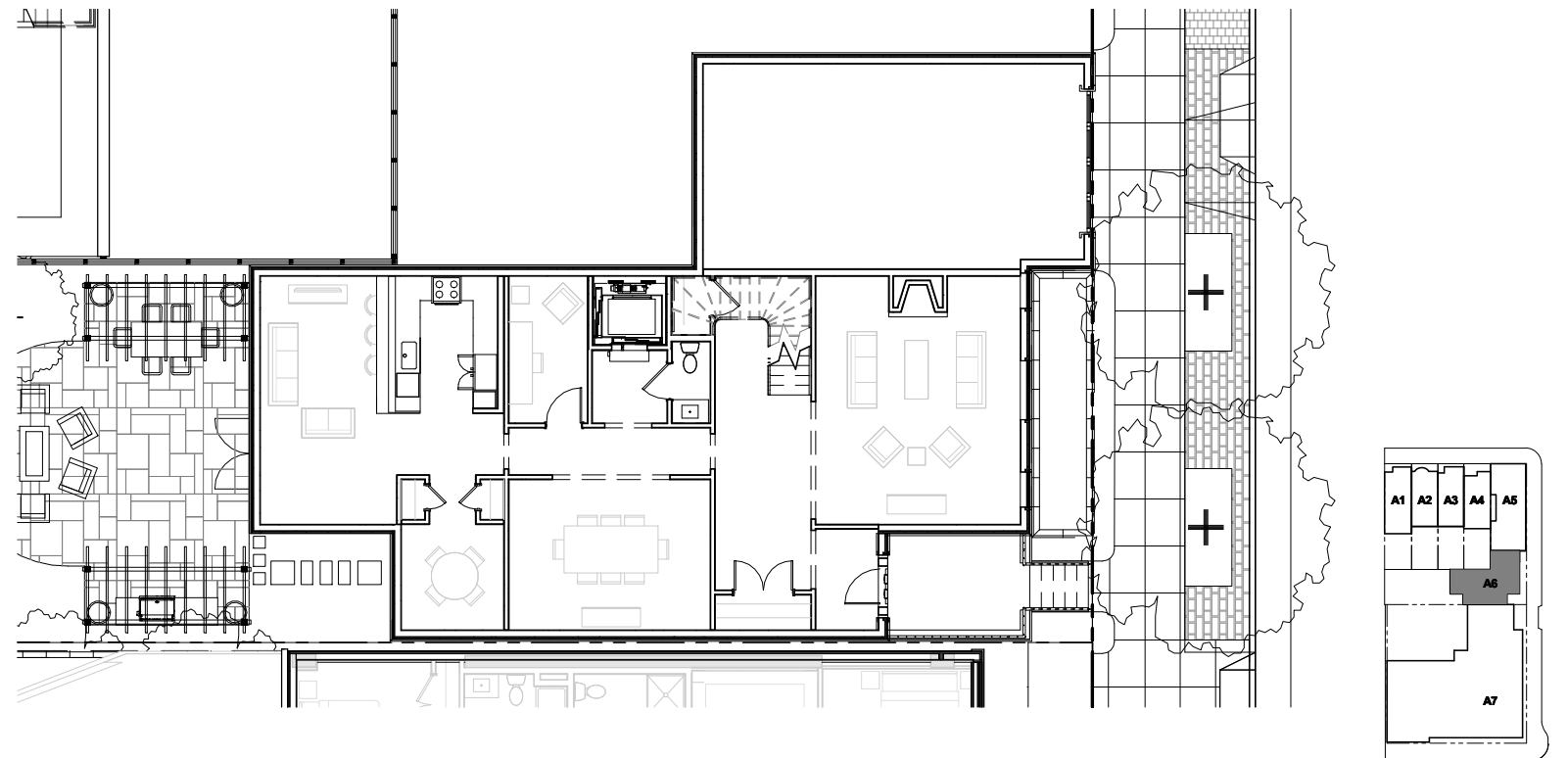




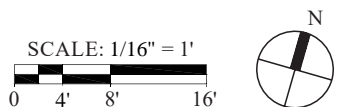
BUILDING PLAN - FLOOR 3



BUILDING PLAN - FLOOR 2



BUILDING PLAN - FLOOR 1



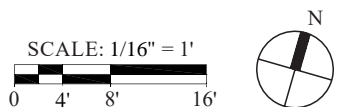
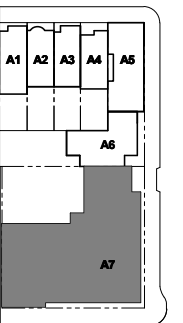
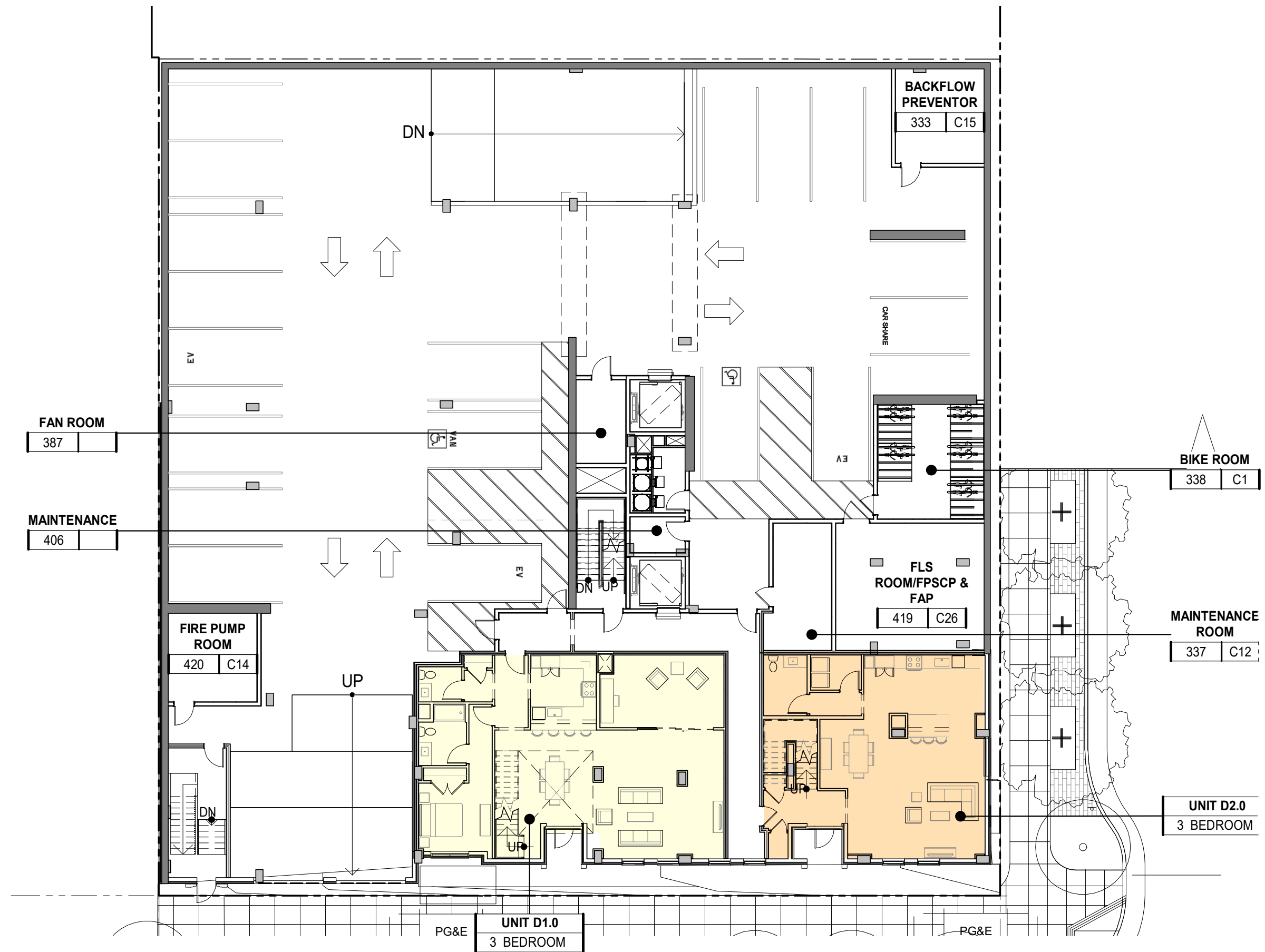
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BUILDING PLAN - FLOORS 1-3 - A6

PUD/CU SUBMITTAL A2.01-A6  
NOVEMBER 2019  
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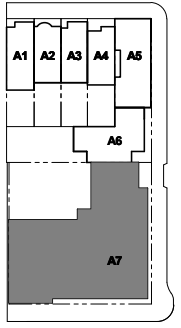
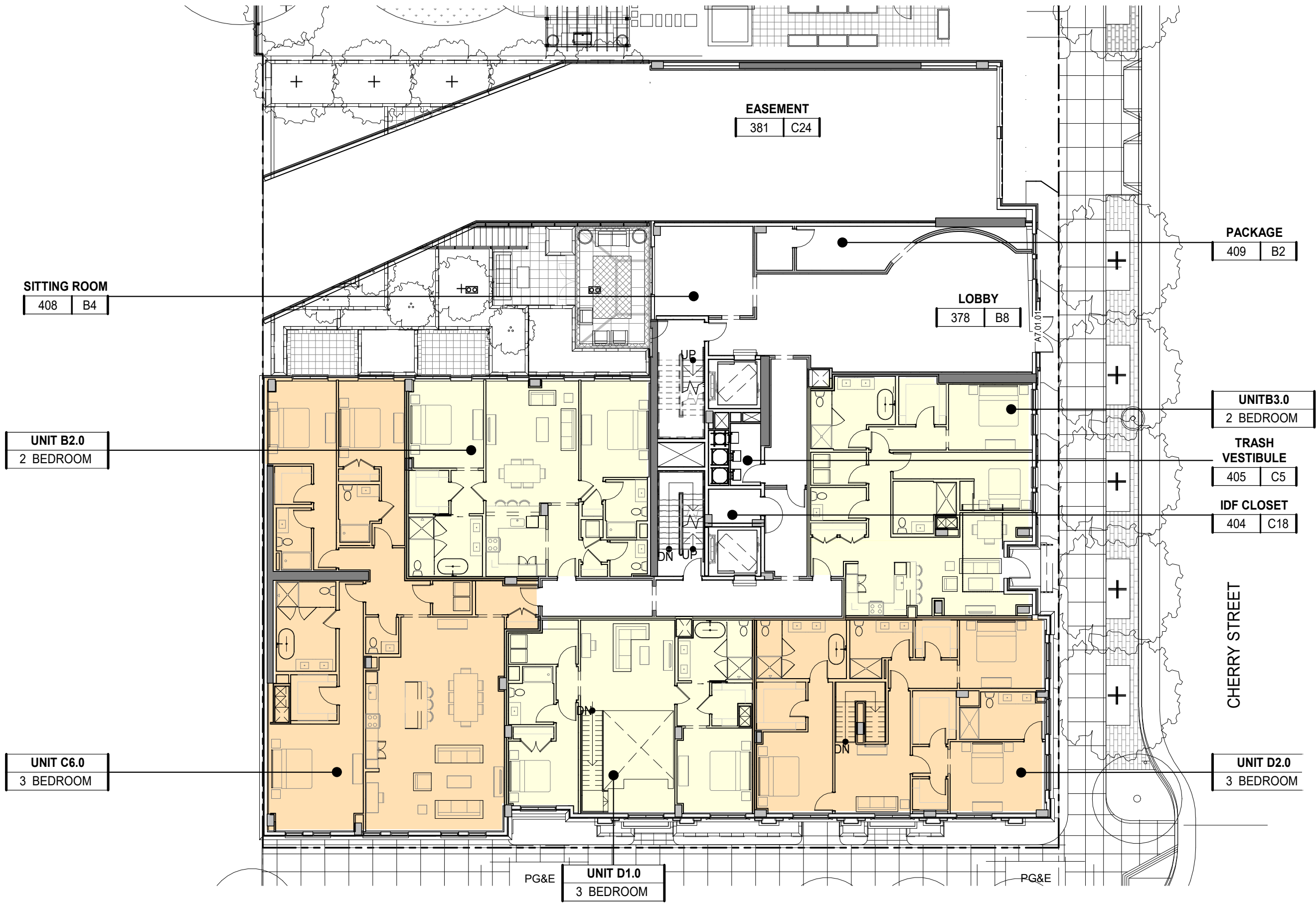
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## BUILDING PLAN - BASEMENT - A7

PUD/CU SUBMITTAL A2.G1-A7  
 NOVEMBER 2019  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



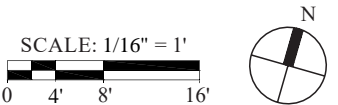
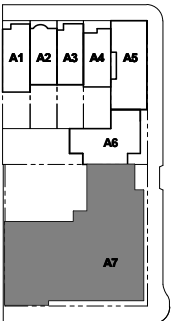
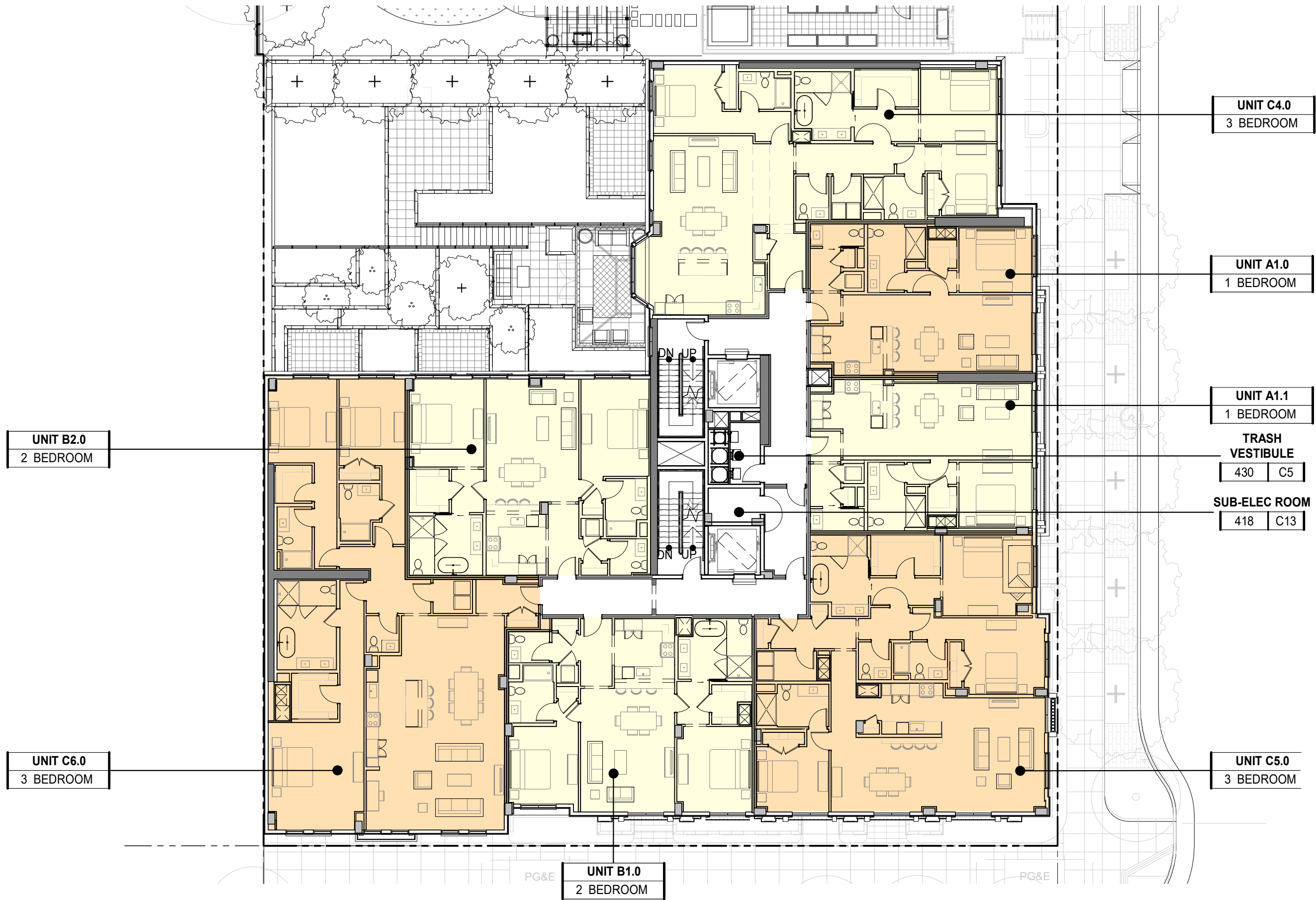


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# BUILDING PLAN - FLOOR 1 - A7

PUD/CU SUBMITTAL A2.01-A7  
NOVEMBER 2019  
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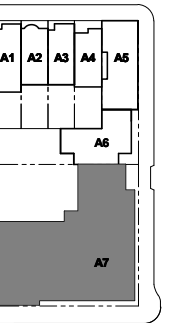
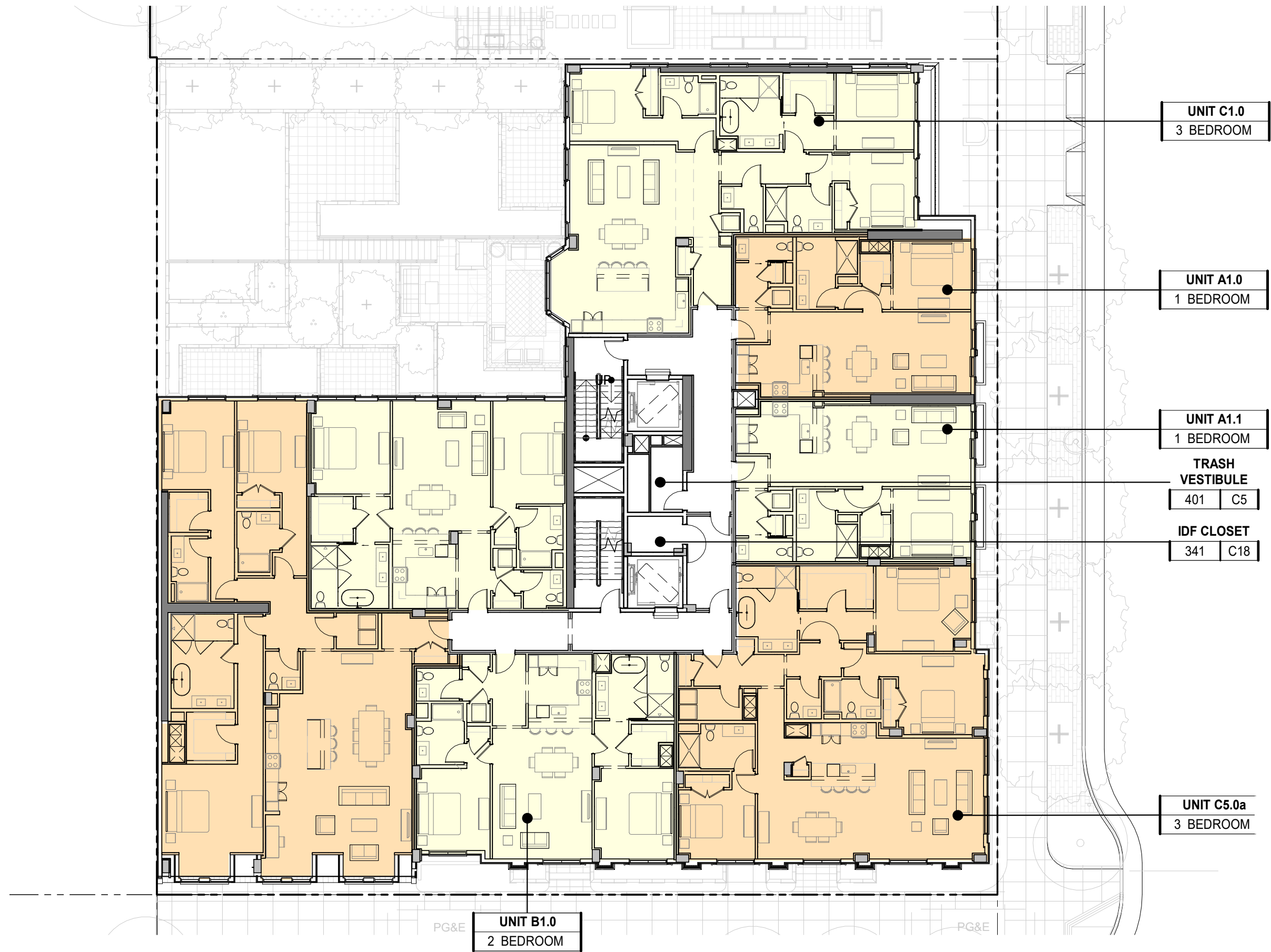
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# BUILDING PLAN - FLOOR 2 (FLOOR 3 SIM.) - A7

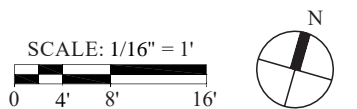
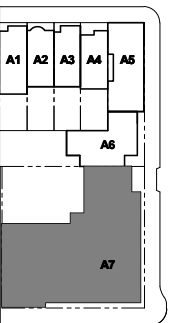
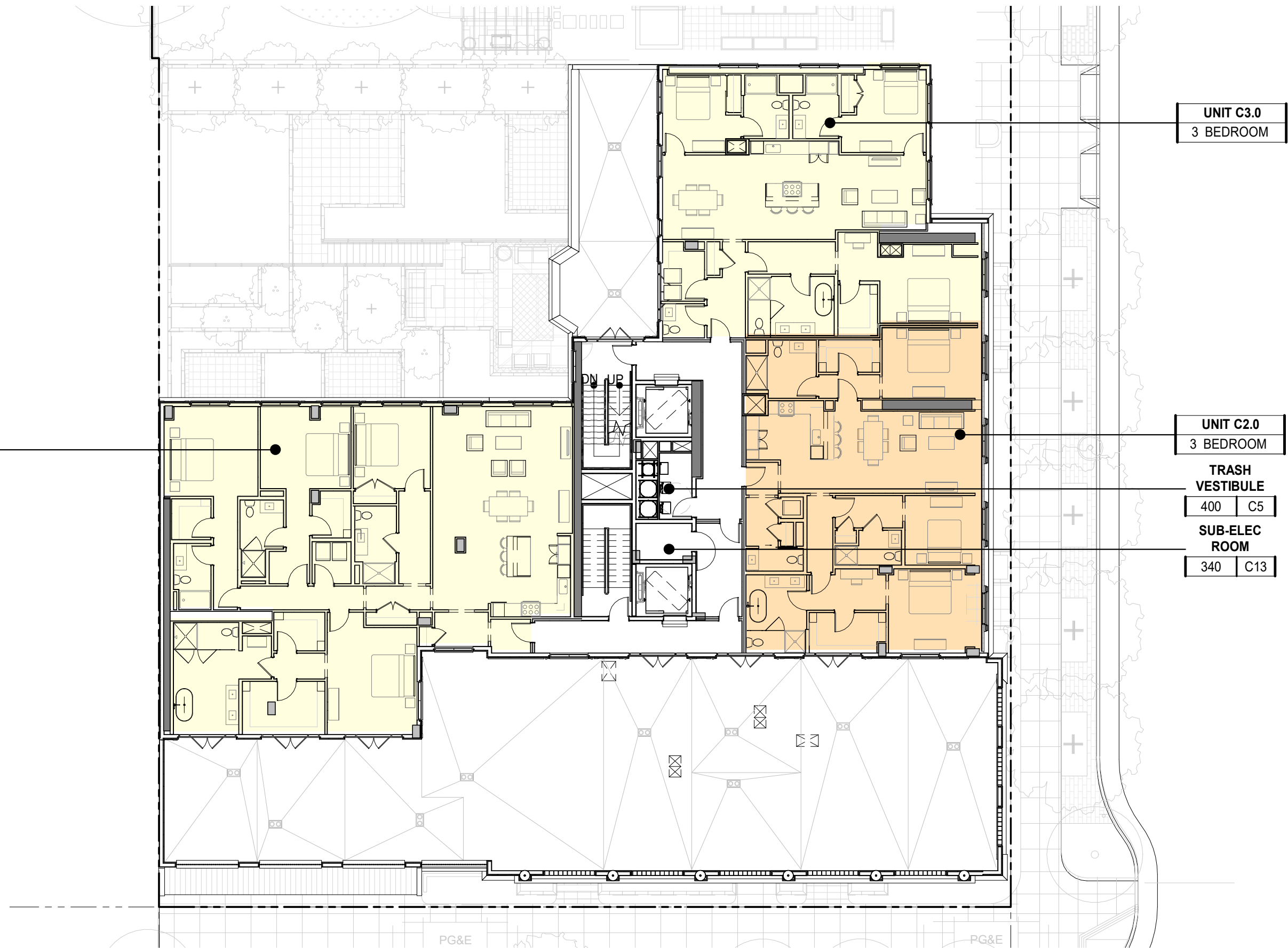
PUD/CU SUBMITTAL A2.02-A7  
 NOVEMBER 2019  
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## BUILDING PLAN - FLOOR 4 - A7



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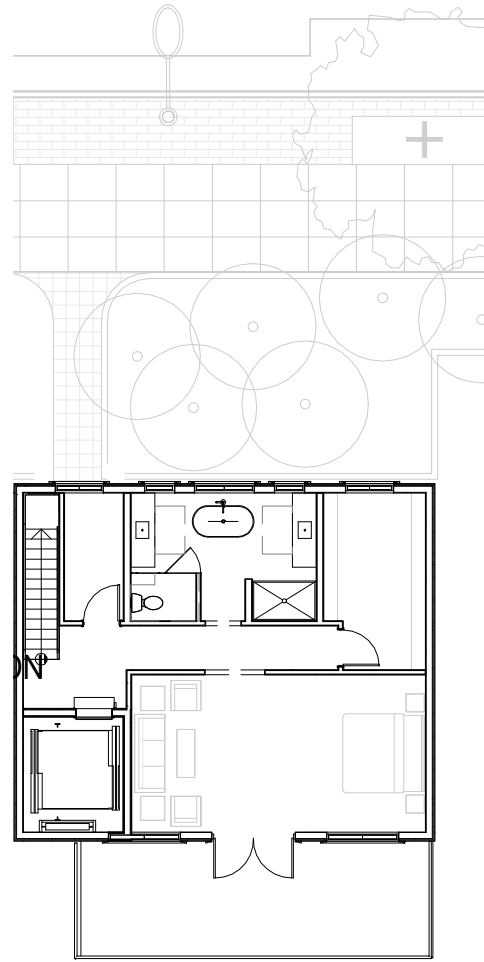
## BUILDING PLAN - FLOOR 5 - A7

PUD/CU SUBMITTAL A2.05-A7  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

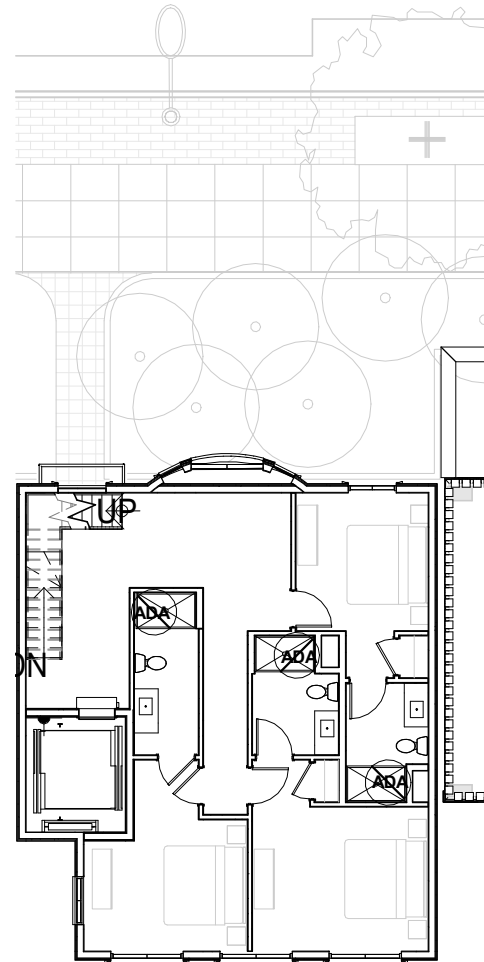


BLOCK B

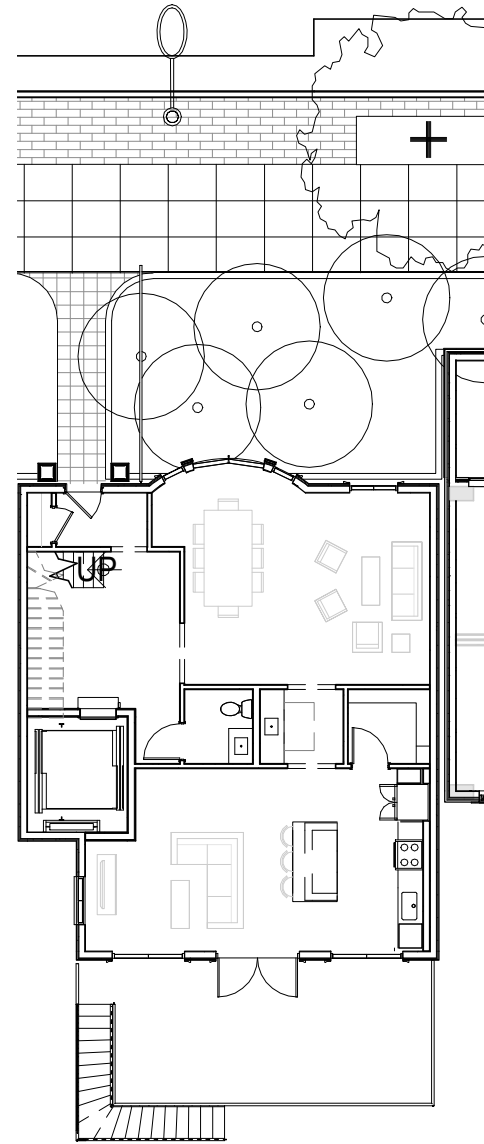
<u>Building</u>	<u>Building Type</u>	<u># Units</u>	<u>SFR</u>	<u>Studio</u>	<u>1 BR</u>	<u>2 BR</u>	<u>3 BR</u>	<u>4 BR</u>
B1	SFRH	1	1	-	-	-	-	-
B2	SFRH	1	1	-	-	-	-	-
B3	SFR	1	1	-	-	-	-	-
B4	SFR	1	1	-	-	-	-	-
B5	SFR	1	1	-	-	-	-	-
B6	SFR	1	1	-	-	-	-	-
B7	Multi	25	-	2	8	10	2	3
B8	Multi	16	-	1	5	5	5	-
B9	Multi	15	-	-	2	12	-	1
B10	Multi	17	-	1	-	4	12	-
B11	Multi	10	-	1	1	6	2	-
B12	Multi	34	-	3	9	13	8	1
B13	Multi Mews	4	-	-	-	-	4	-
B14	Multi Mews	4	-	-	-	-	4	-
B15	Multi Mews	4	-	-	-	-	4	-
B16	Multi Mews	4	-	-	-	-	4	-
B17	Multi Mews	4	-	-	-	-	4	-
B18	Multi Mews	4	-	-	-	2	2	-
Total:		147	6	8	25	52	51	5
%		100%	4%	5%	17%	35%	35%	3%



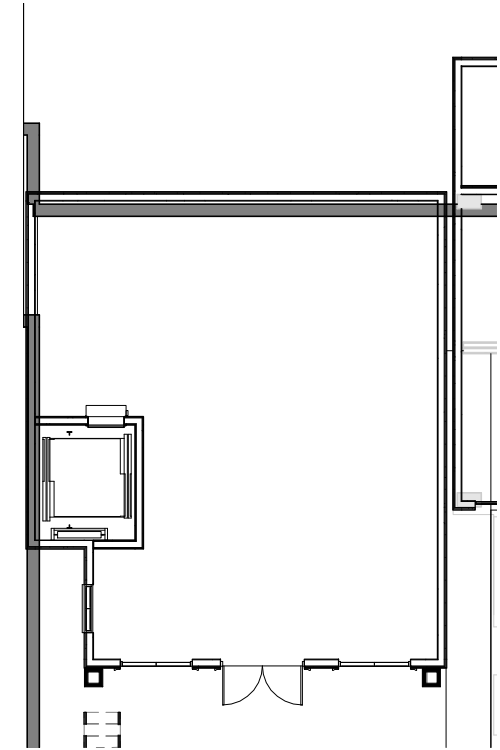
BUILDING PLAN  
FLOOR 3



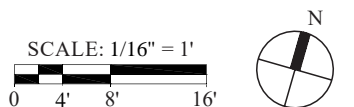
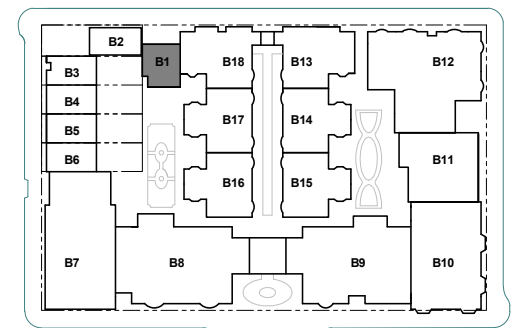
BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
BASEMENT



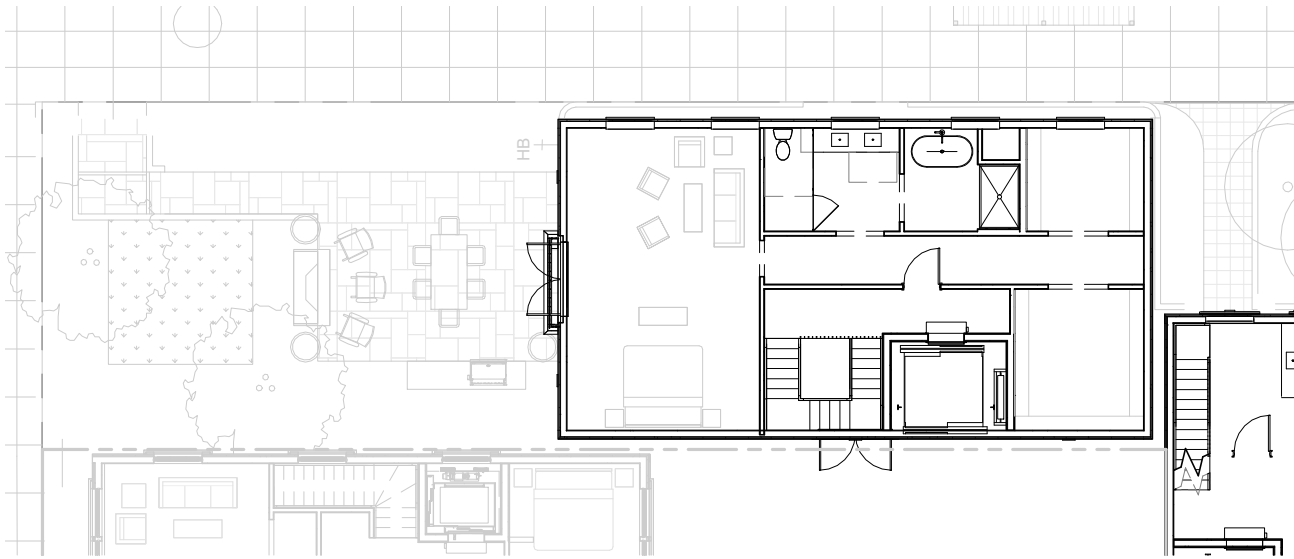
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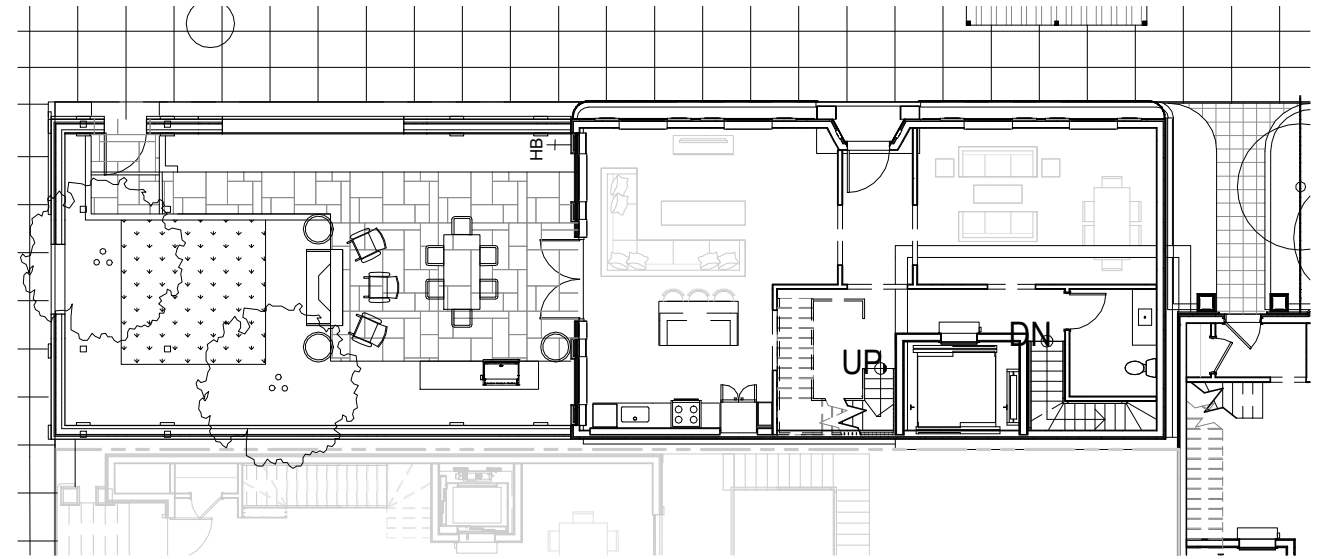
## BUILDING PLAN - B1

PUD/CU SUBMITTAL A2.01-B1  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

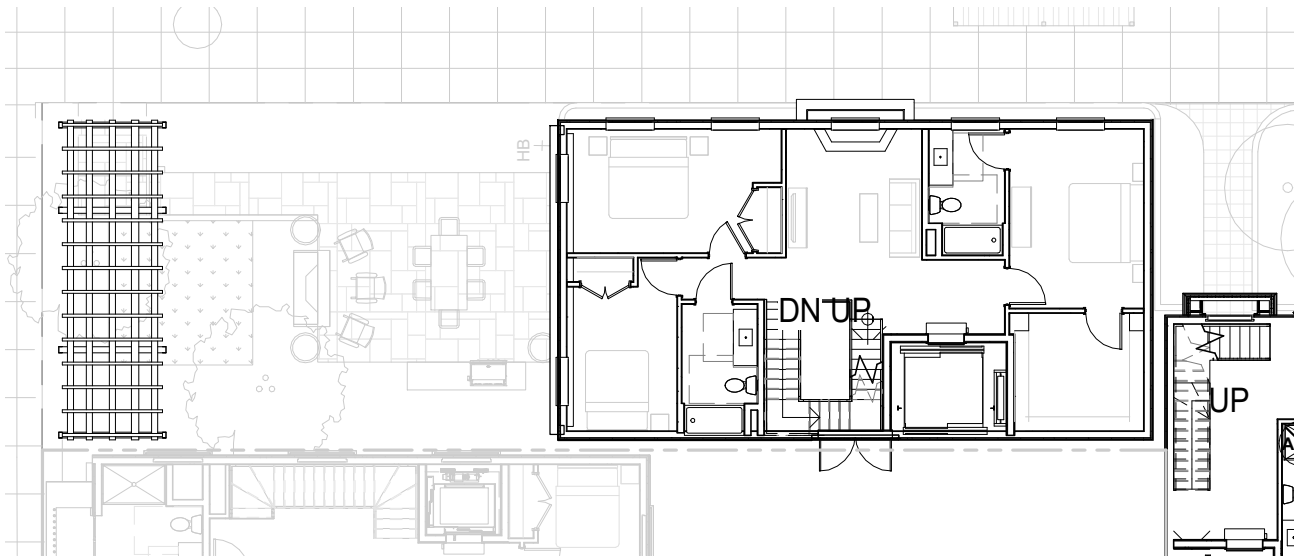




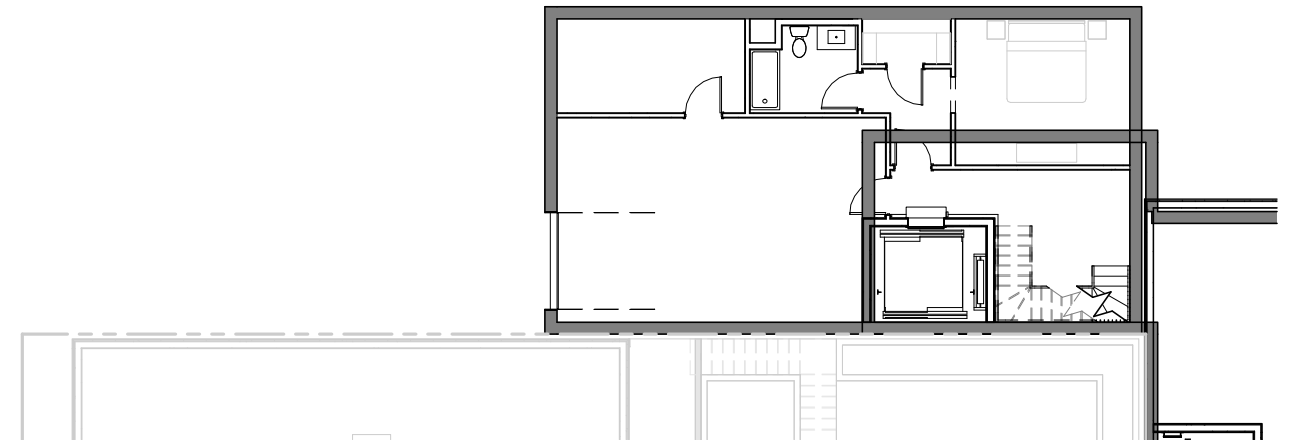
BUILDING PLAN  
FLOOR 3



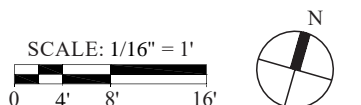
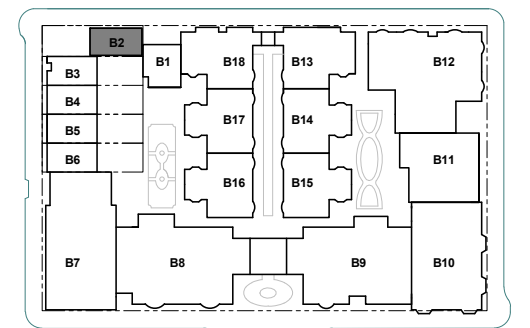
BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
BASEMENT

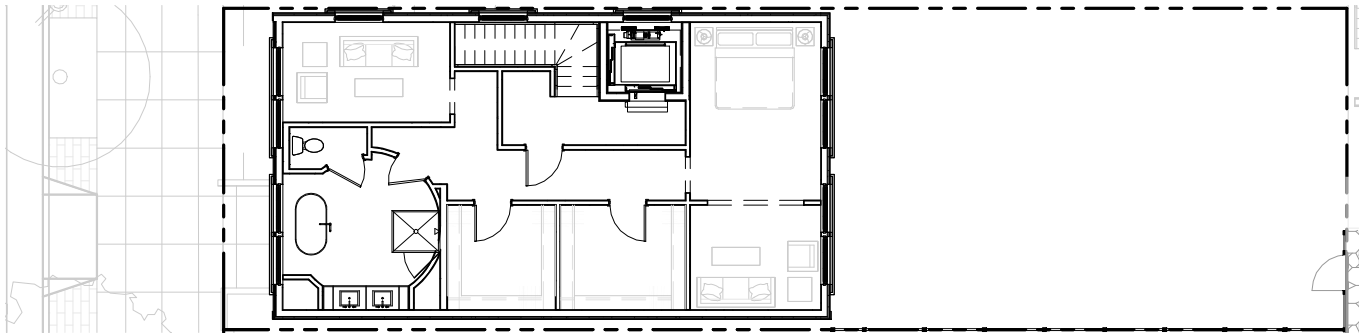


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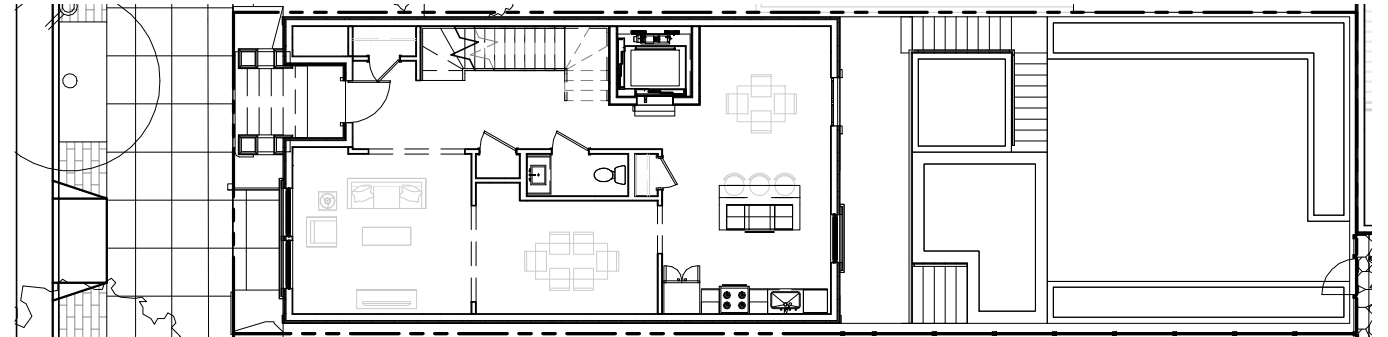


## BUILDING PLANS - B2

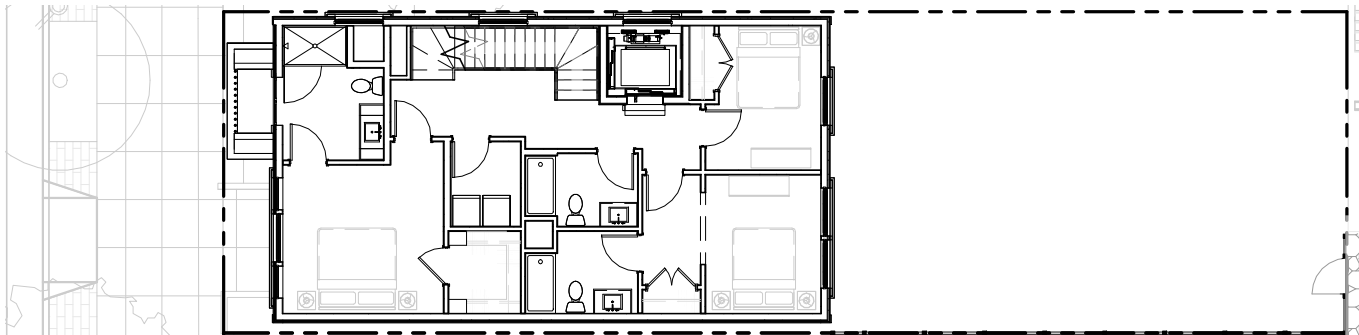
PUD/CU SUBMITTAL A2.01-B2  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



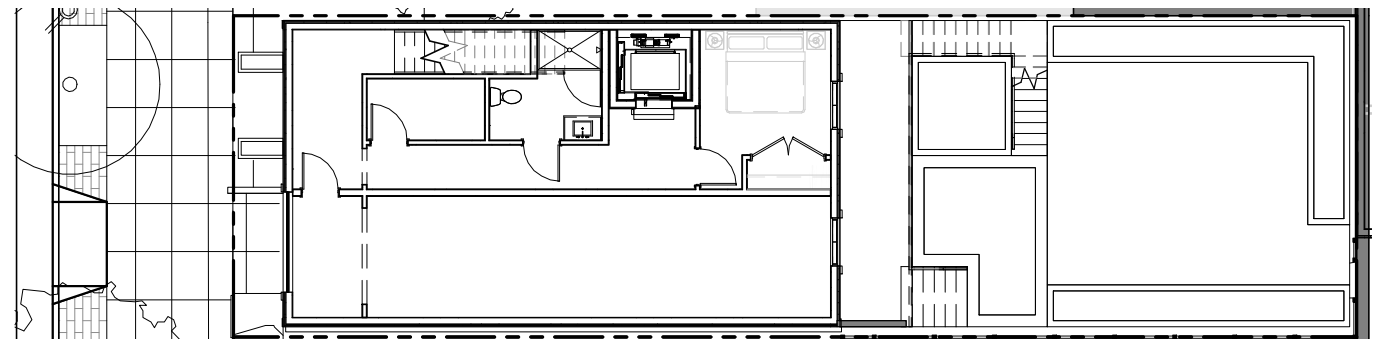
BUILDING PLAN  
FLOOR 3



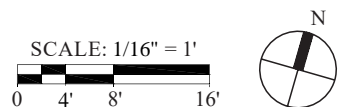
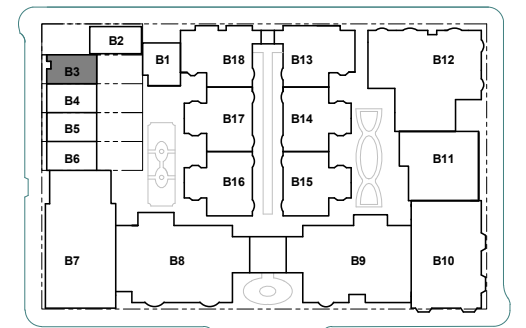
BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
BASEMENT



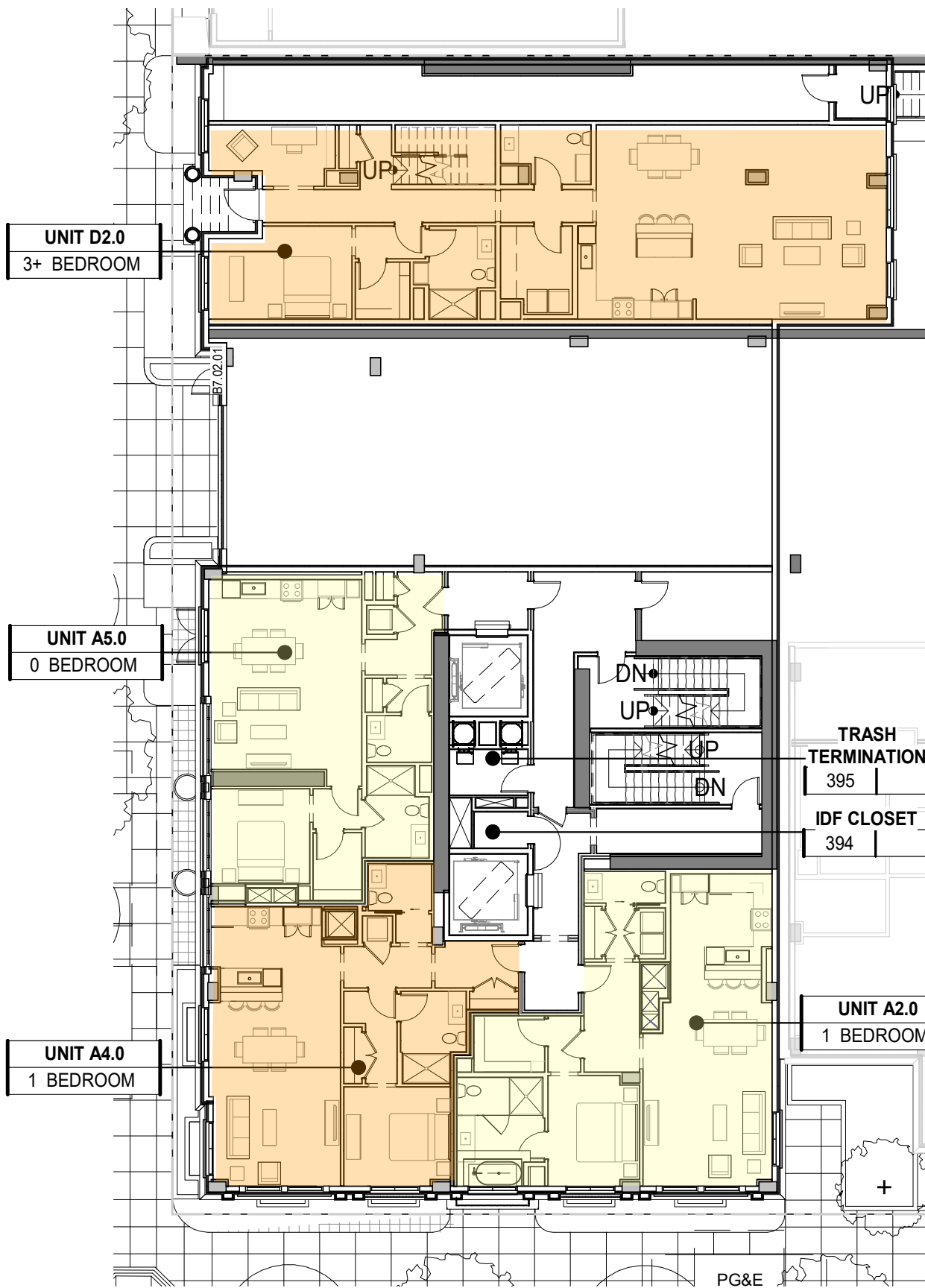
3700 CALIFORNIA STREET SAN FRANCISCO, CA



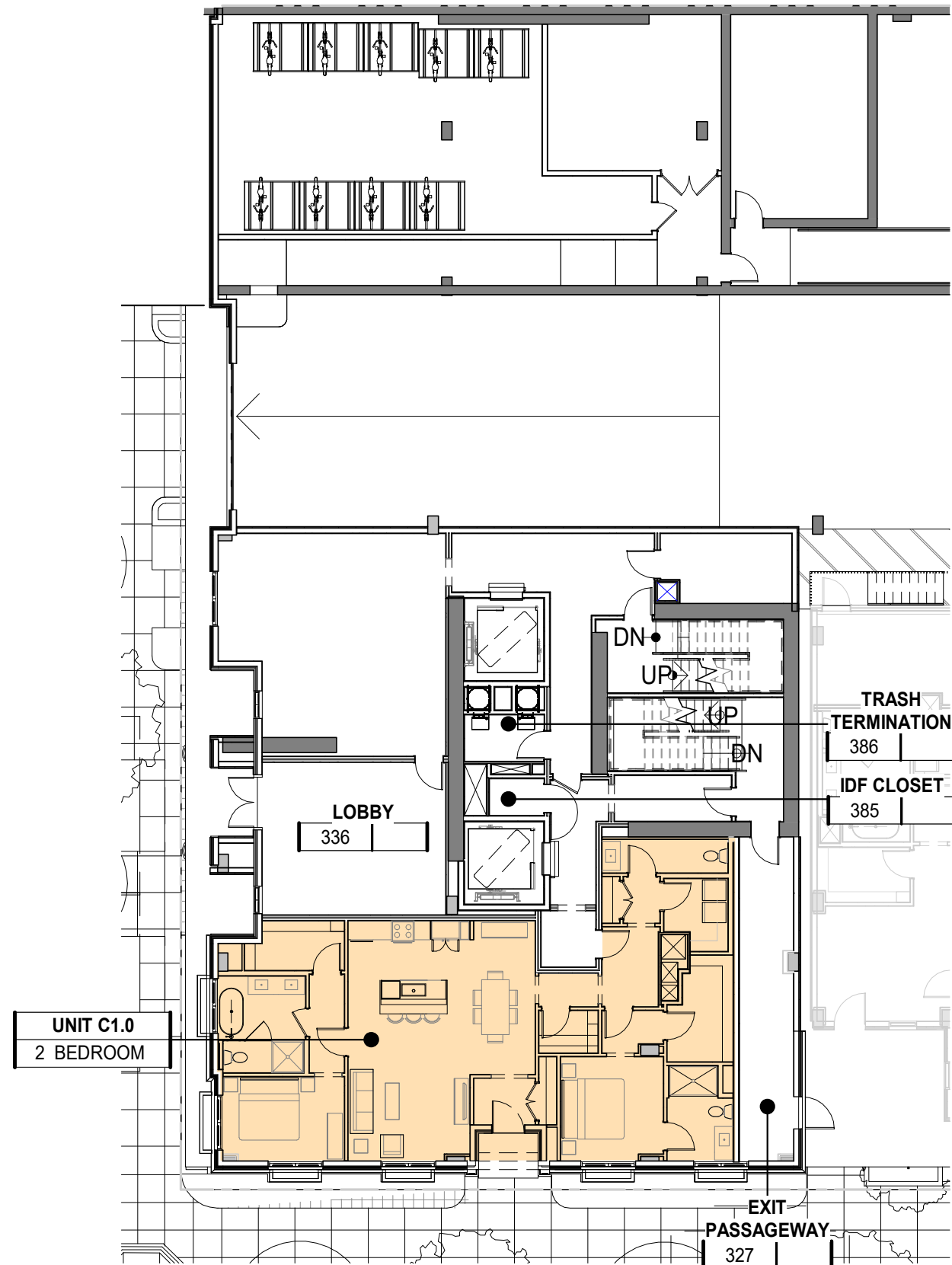
BUILDING PLANS - B3 (B4, B5, B6 SIM.)

PUD/CU SUBMITTAL A2.01-B3  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

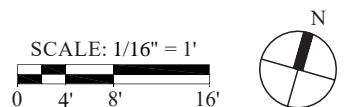
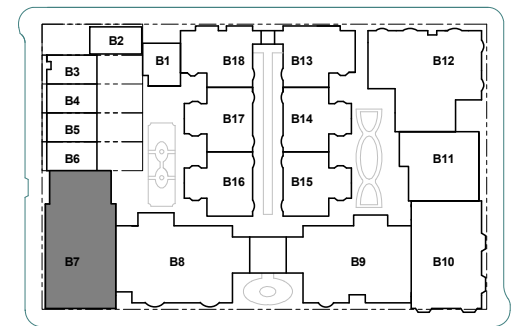




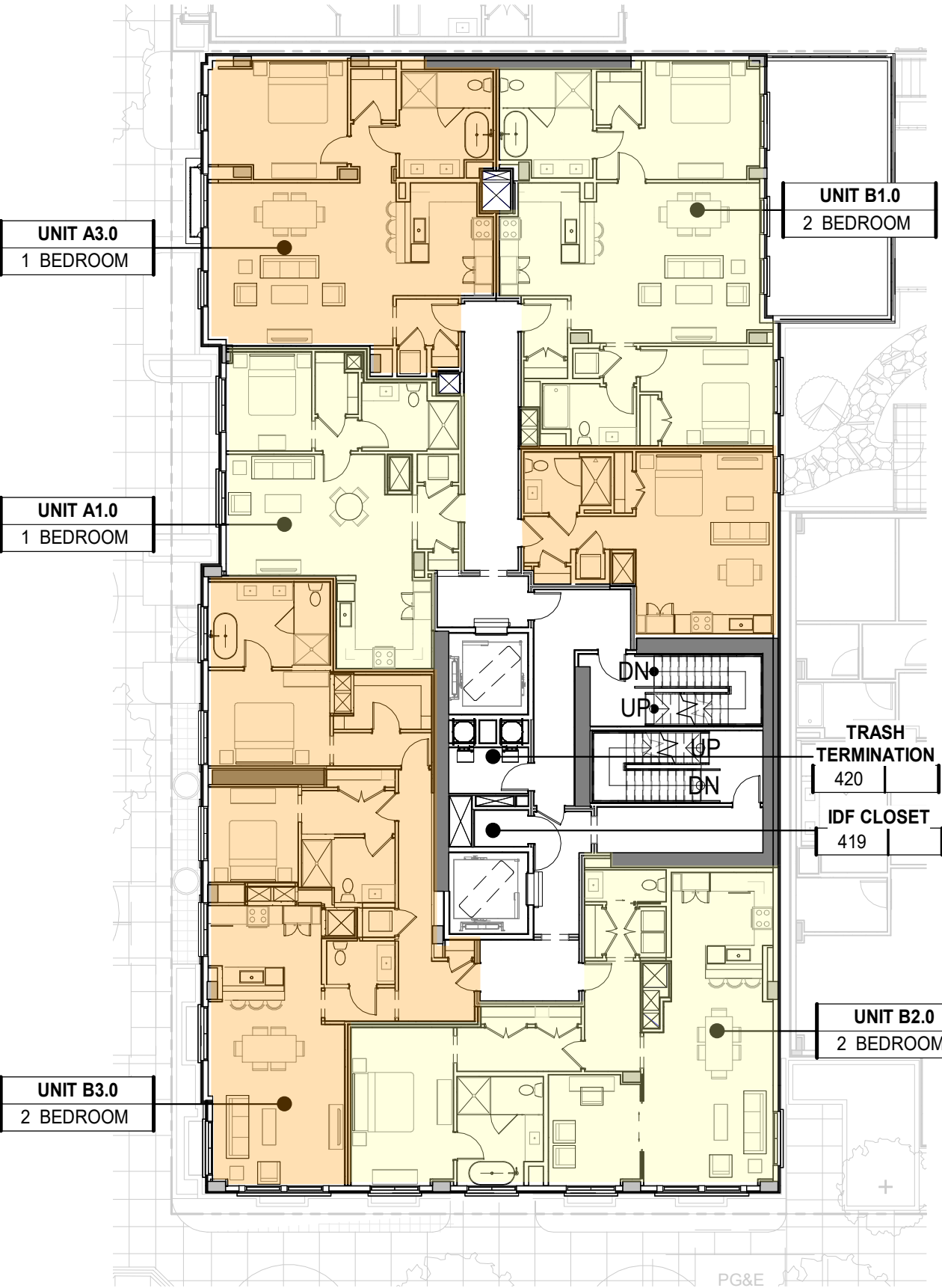
BUILDING PLAN  
FLOOR 2



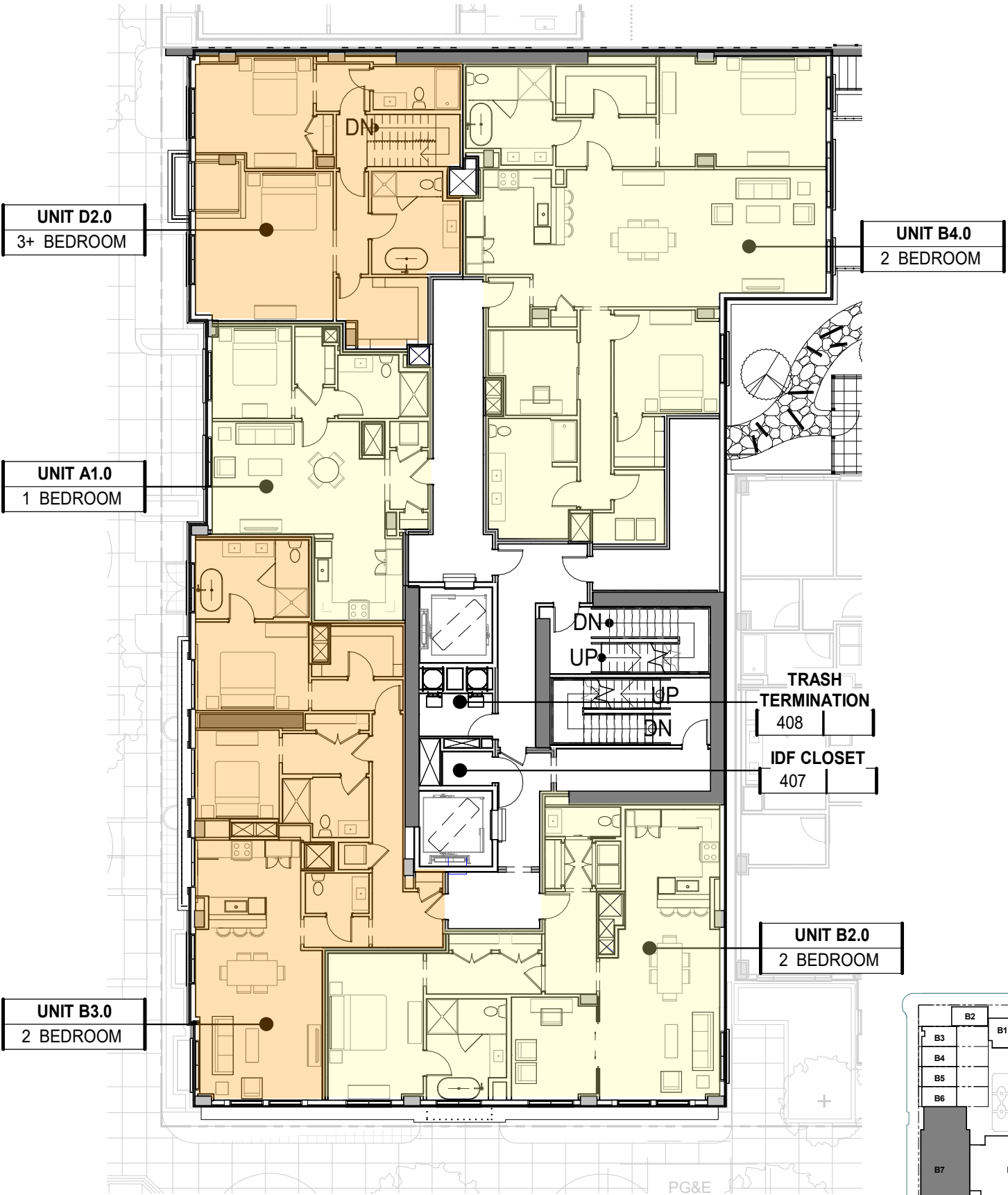
BUILDING PLAN  
FLOOR 1



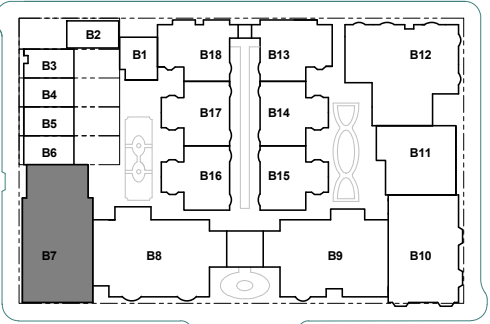
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BUILDING PLAN  
FLOOR 4



BUILDING PLAN  
FLOOR 3



SCALE: 1/16" = 1'  
0 4' 8' 16'

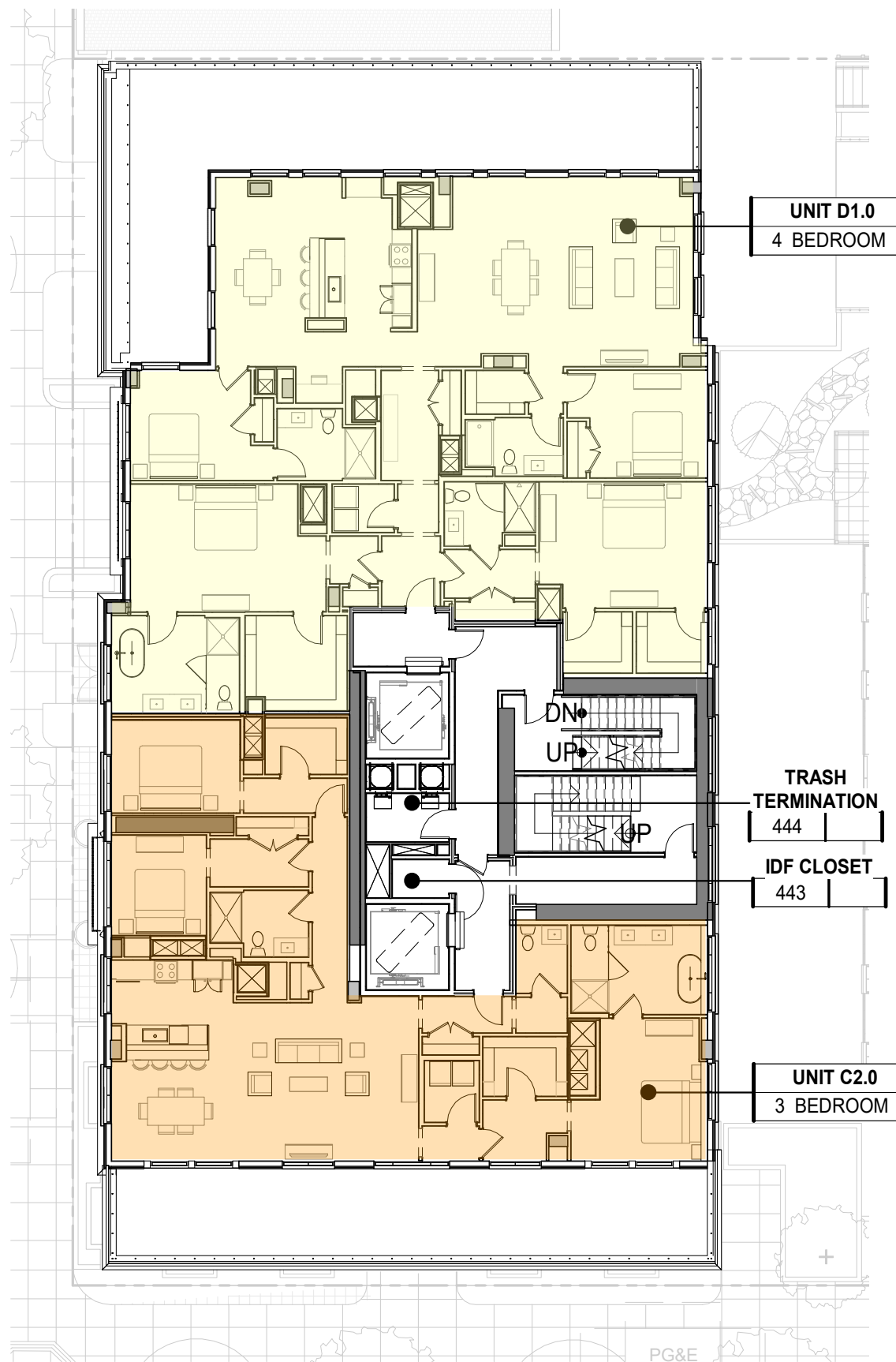


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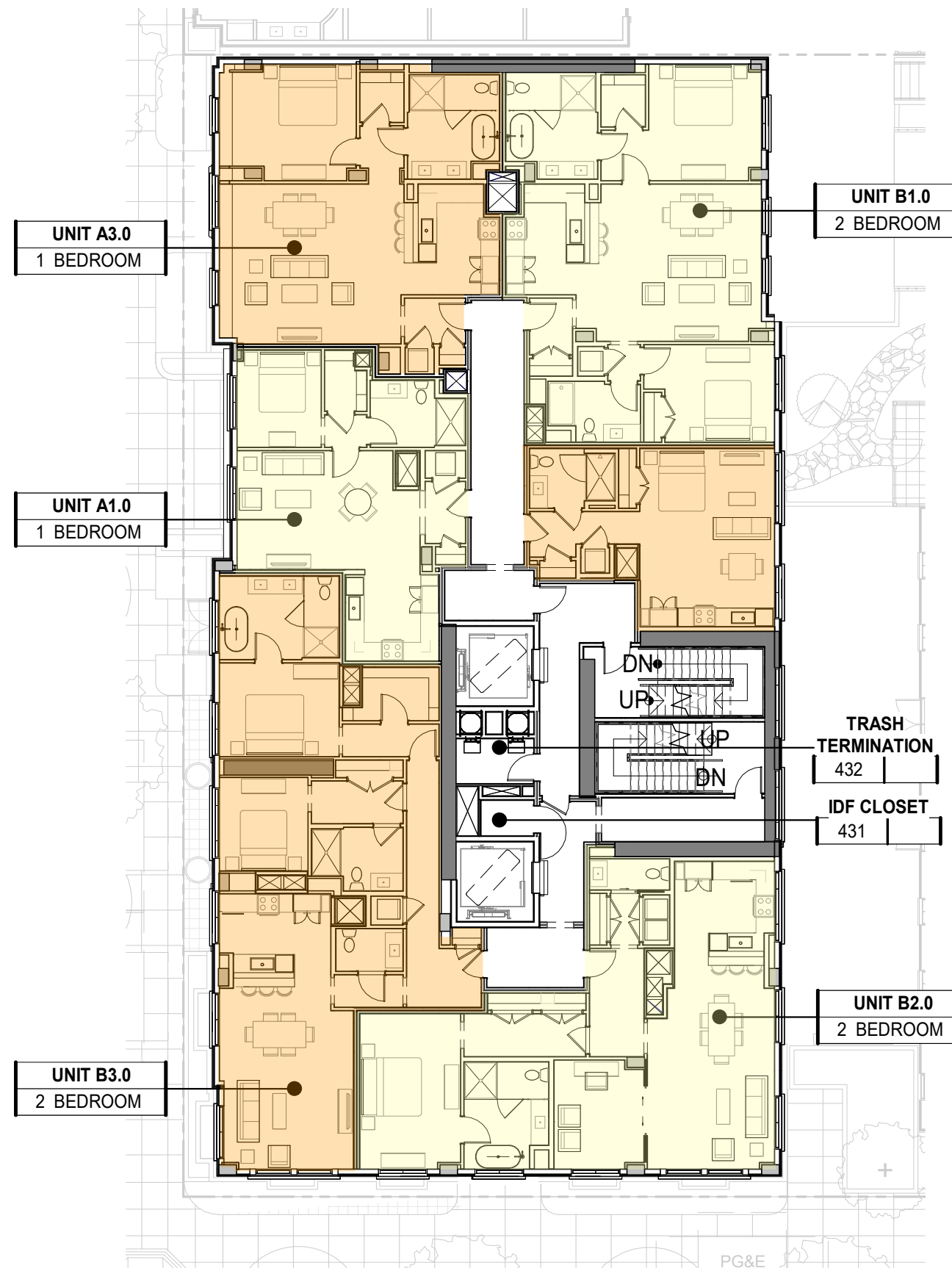


# BUILDING PLAN - FLOORS 3 AND 4 - B7

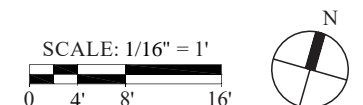
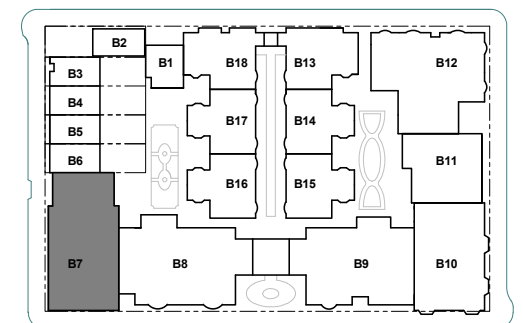




BUILDING PLAN  
FLOOR 6



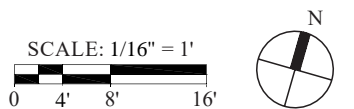
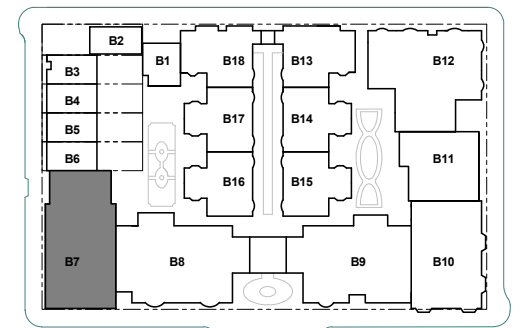
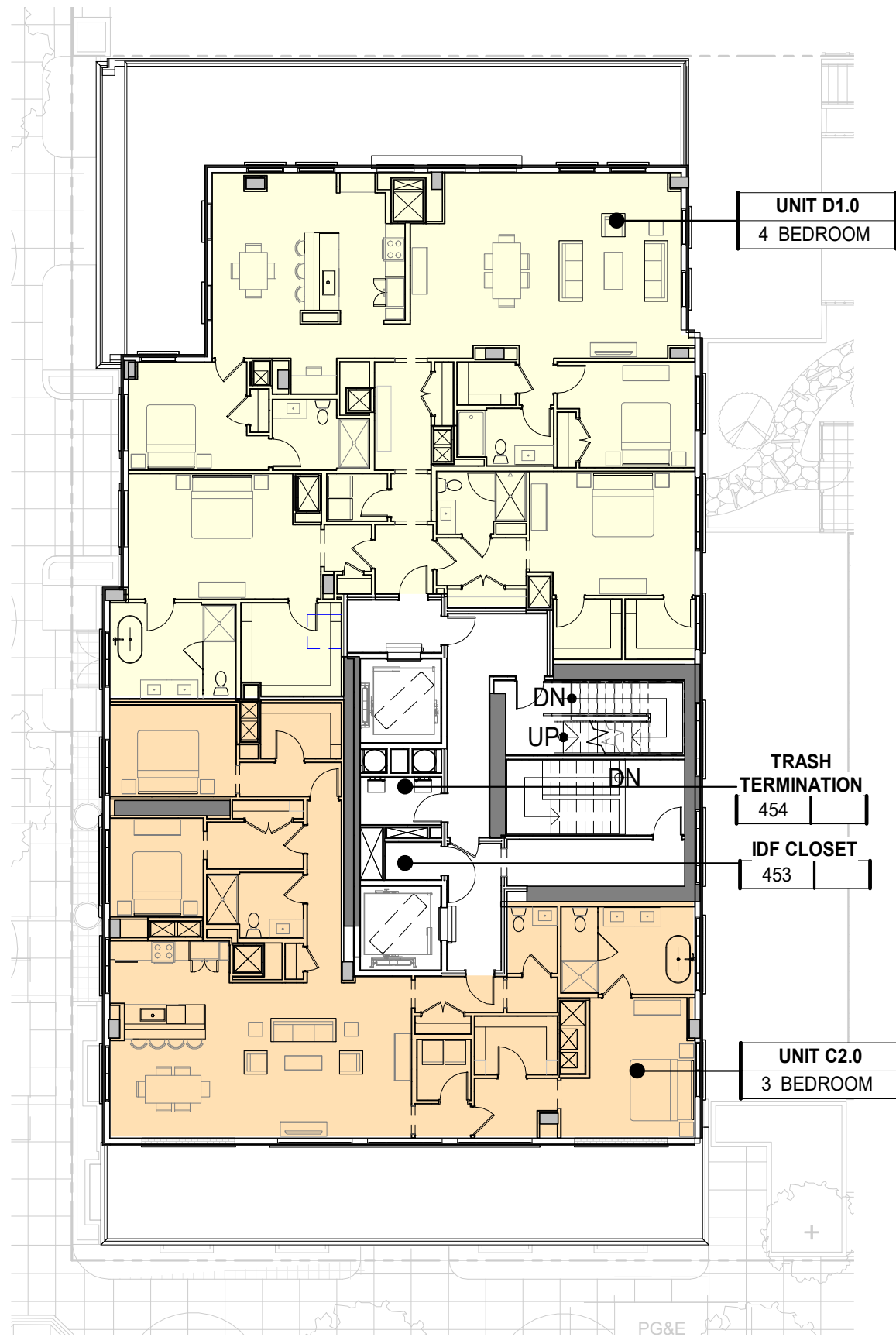
BUILDING PLAN  
FLOOR 5



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## BUILDING PLAN - FLOORS 5 AND 6 - B7

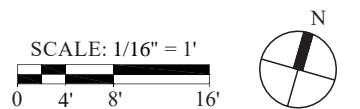
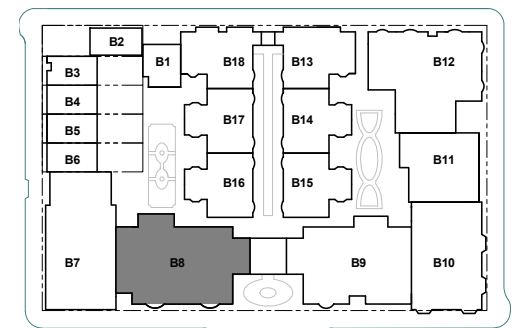
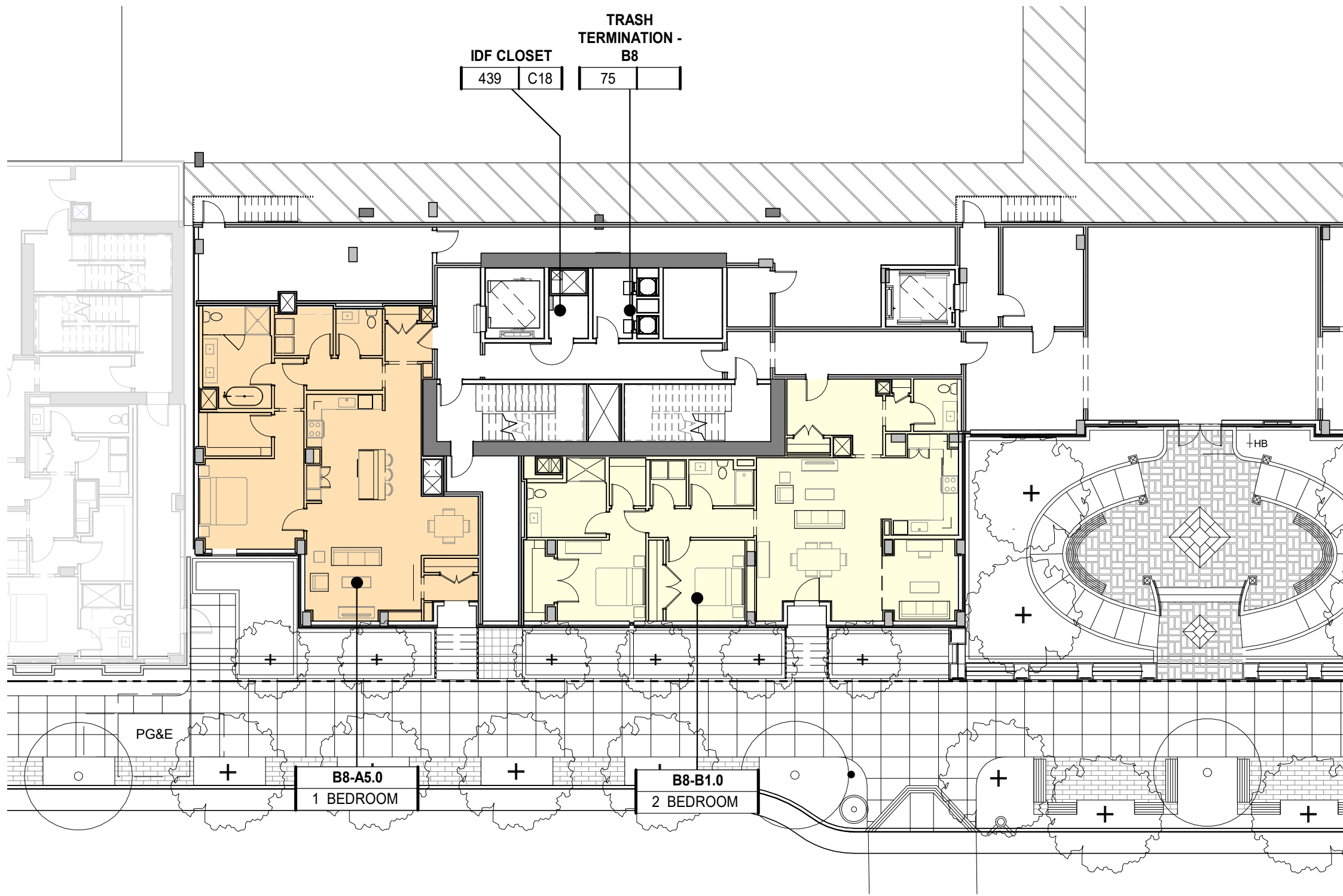
PUD/CU SUBMITTAL A2.03-B7  
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## BUILDING PLAN - FLOOR 7 - B7





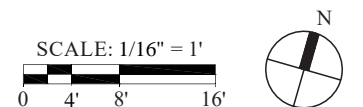
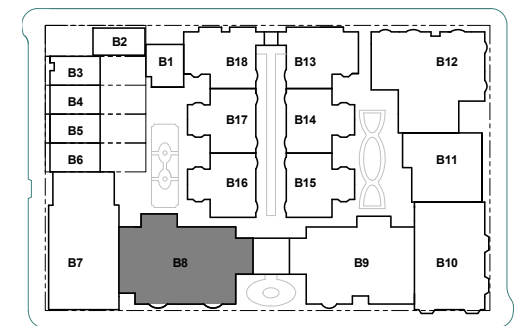
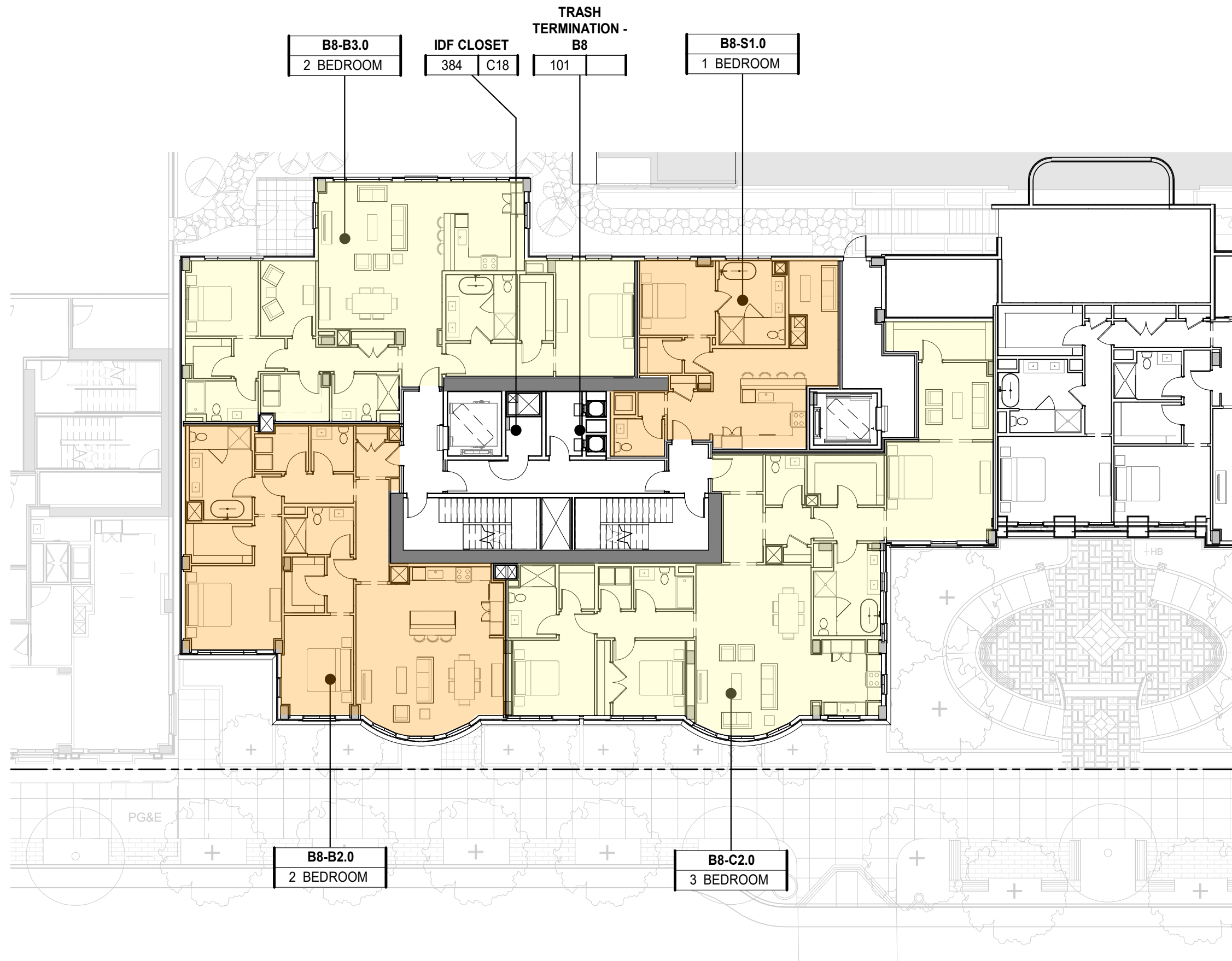
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## BUILDING PLAN - FLOOR 1 - B8

PUD/CU SUBMITTAL A2.01-B8  
NOVEMBER 2019  
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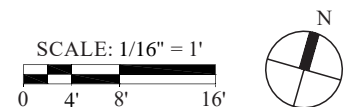
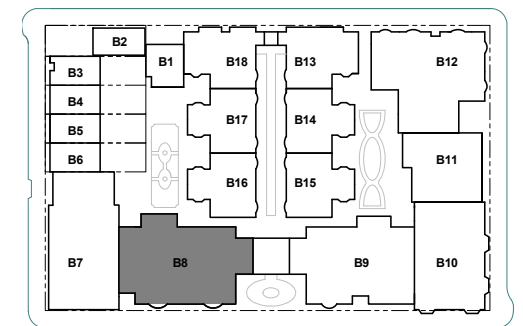
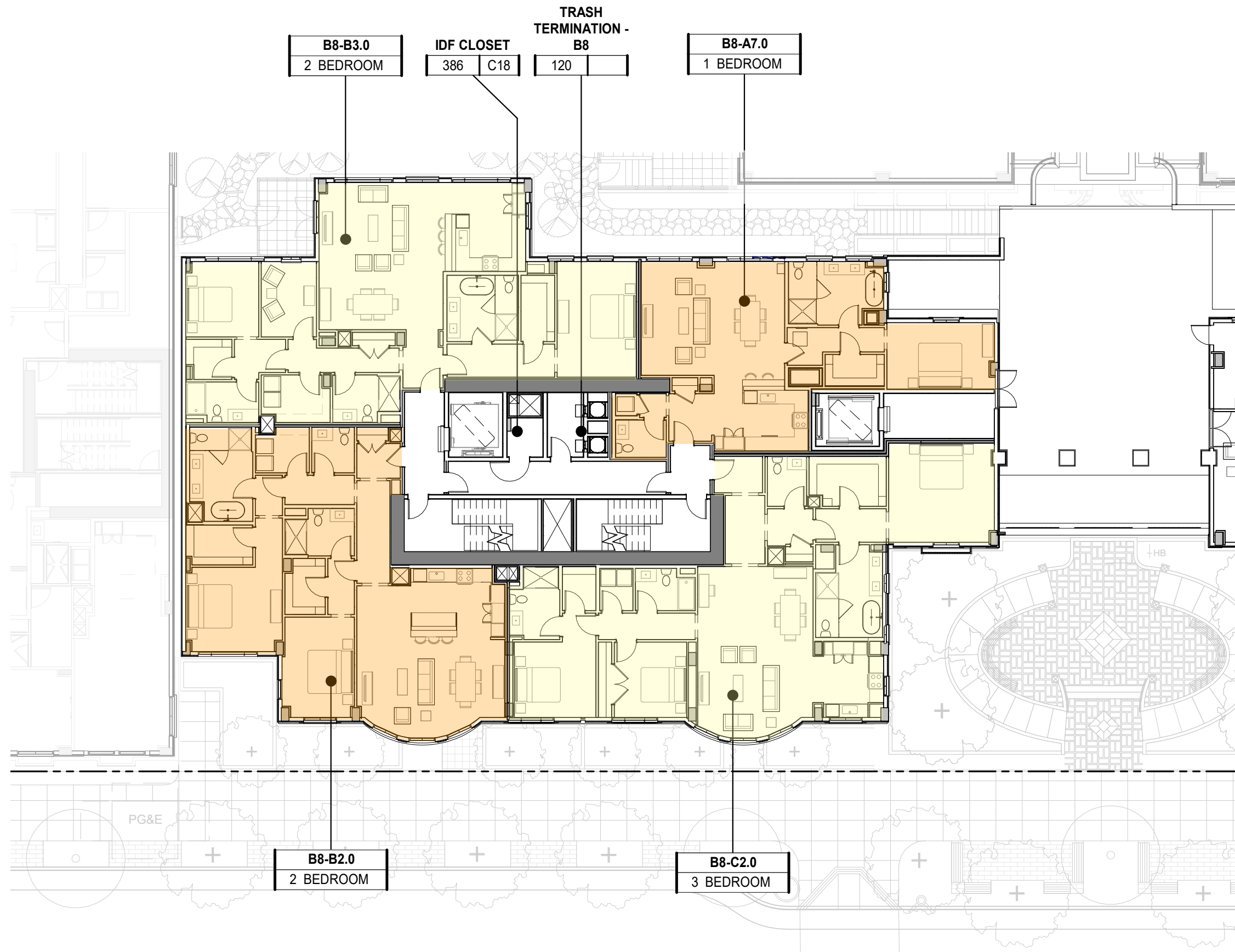
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## BUILDING PLAN - FLOOR 2 - B8

PUD/CU SUBMITTAL A2.02-B8  
NOVEMBER 2019  
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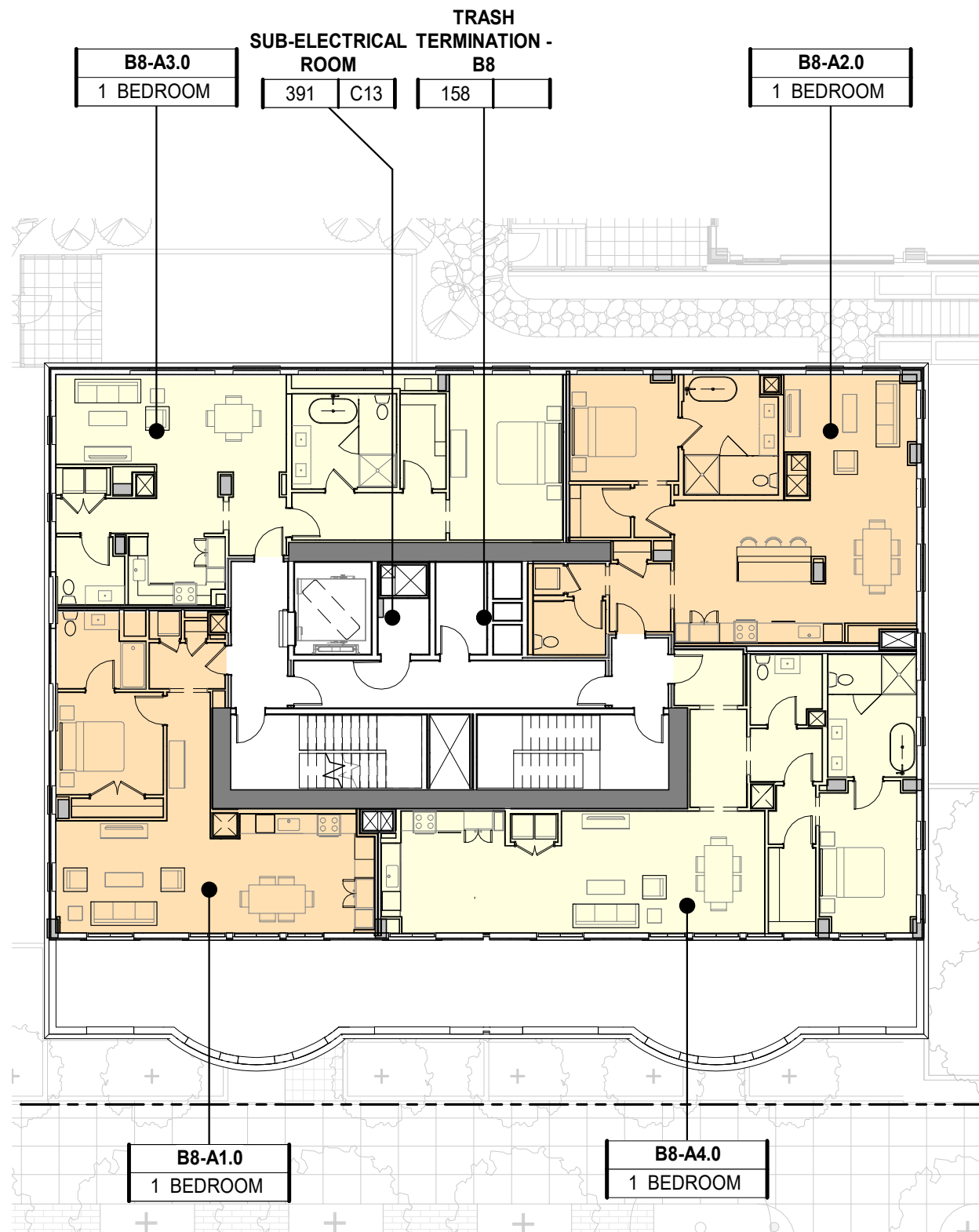
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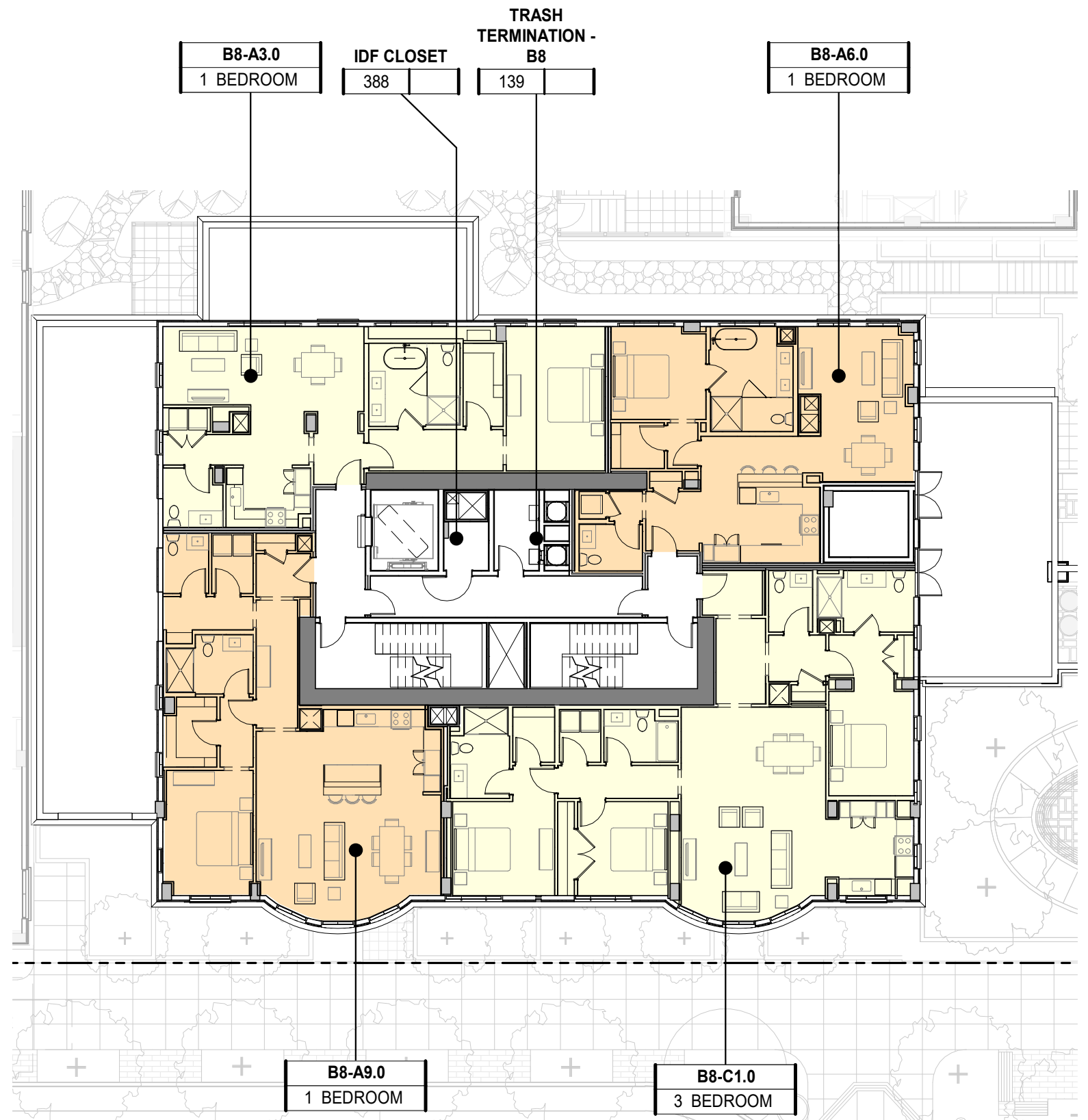


## BUILDING PLAN - FLOOR 3 - B8

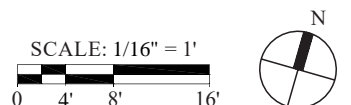
PUD/CU SUBMITTAL A2.03-B8  
NOVEMBER 2019  
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BUILDING PLAN  
FLOOR 5



BUILDING PLAN  
FLOOR 4



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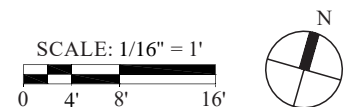
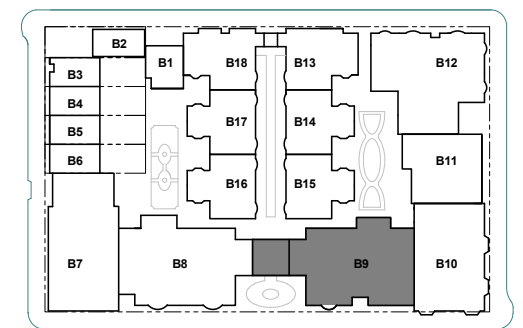
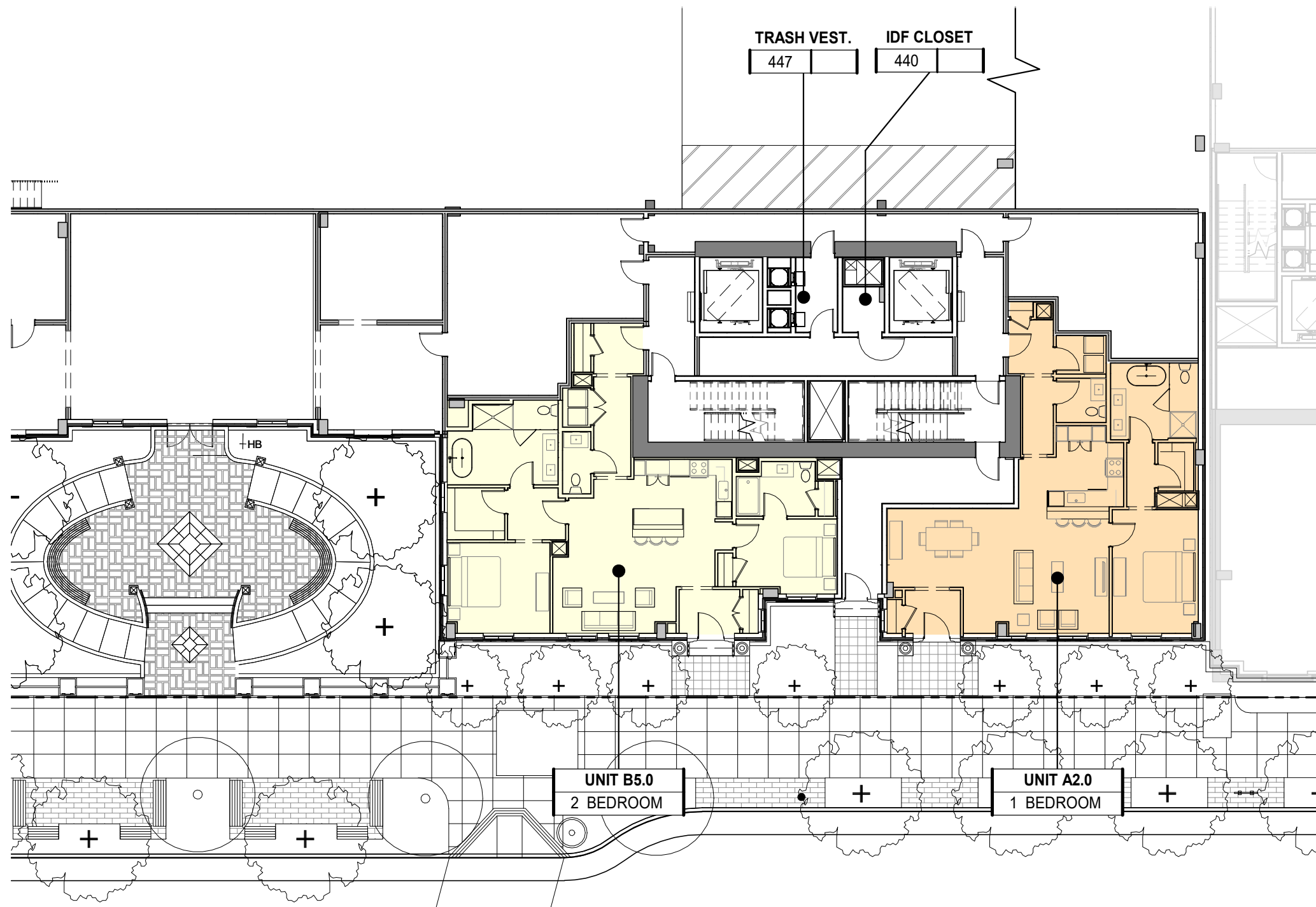
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## BUILDING PLAN - FLOORS 4 AND 5 - B8

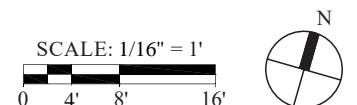
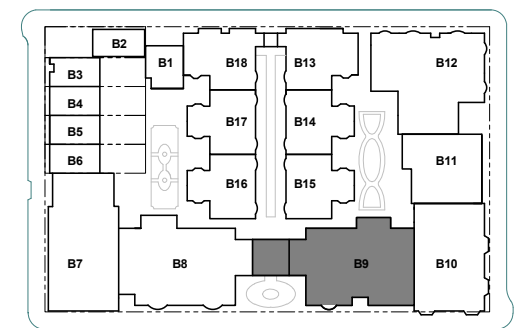
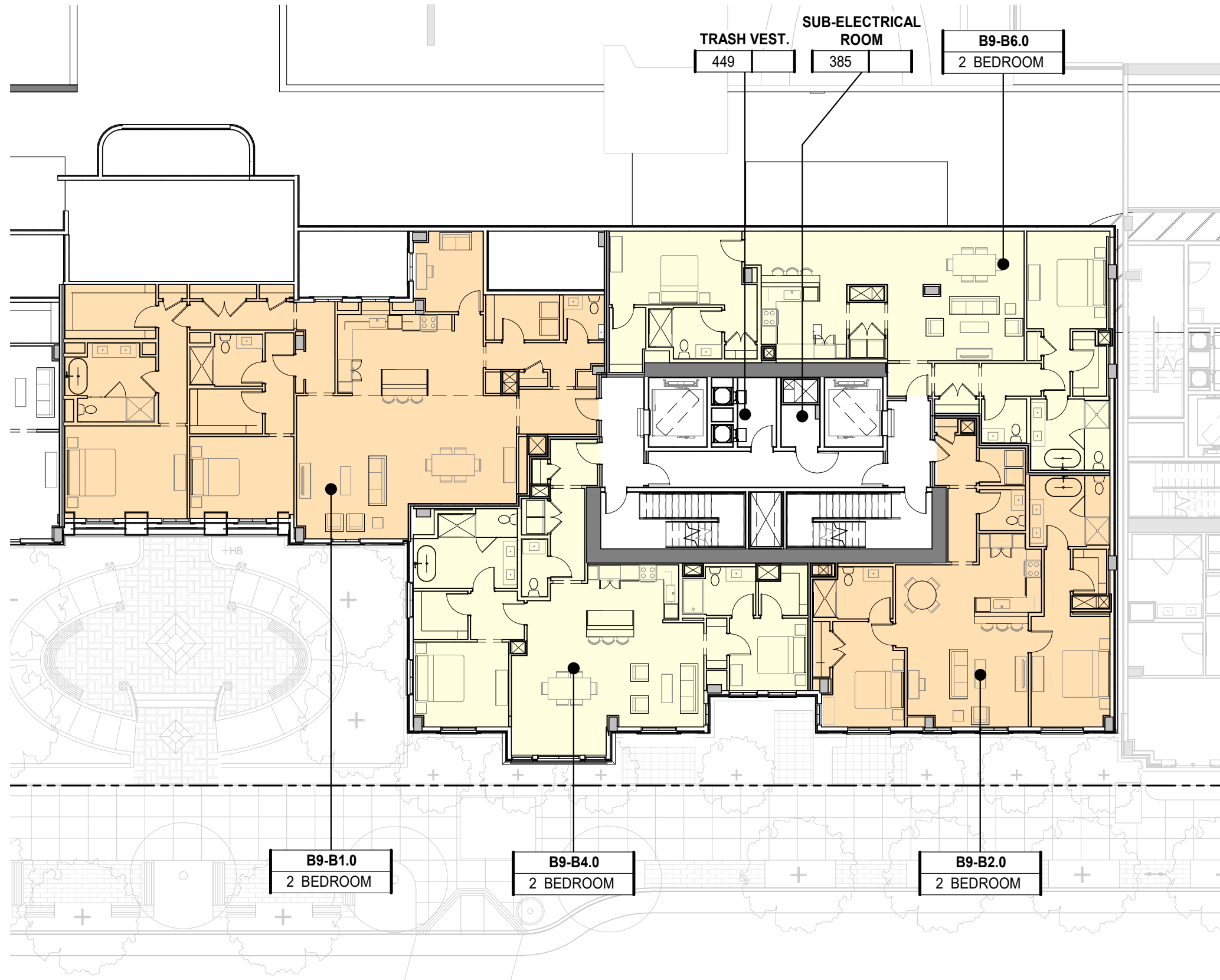
PUD/CU SUBMITTAL A2.04-B8  
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## BUILDING PLAN - FLOOR 1 - B9



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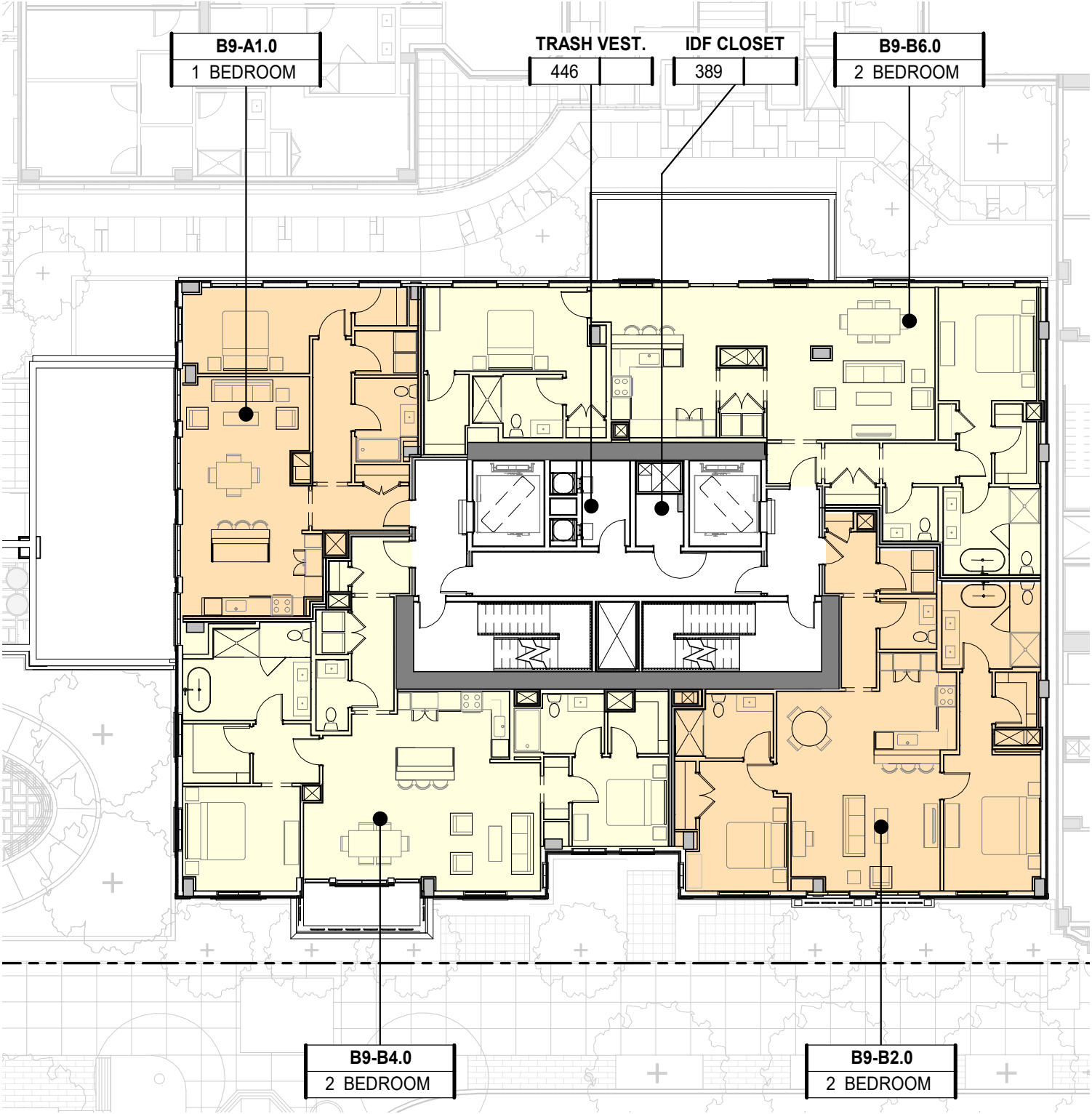
3700 CALIFORNIA STREET SAN FRANCISCO, CA



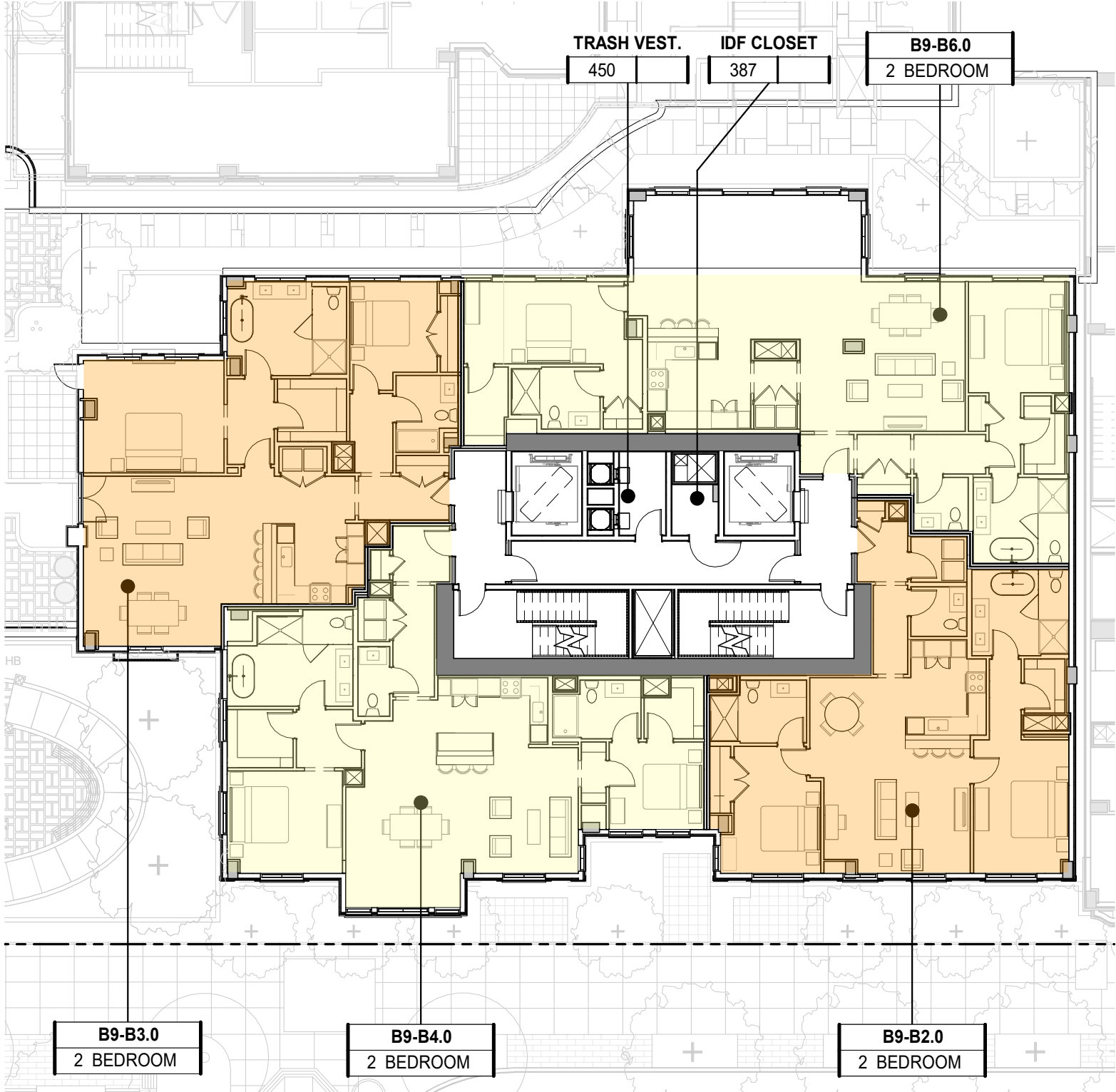
## BUILDING PLAN - FLOOR 2 - B9

PUD/CU SUBMITTAL A2.02-B9  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



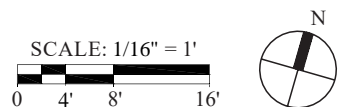
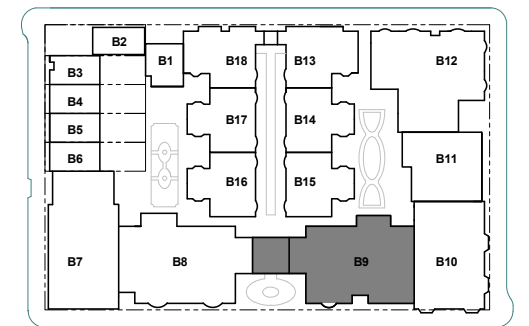
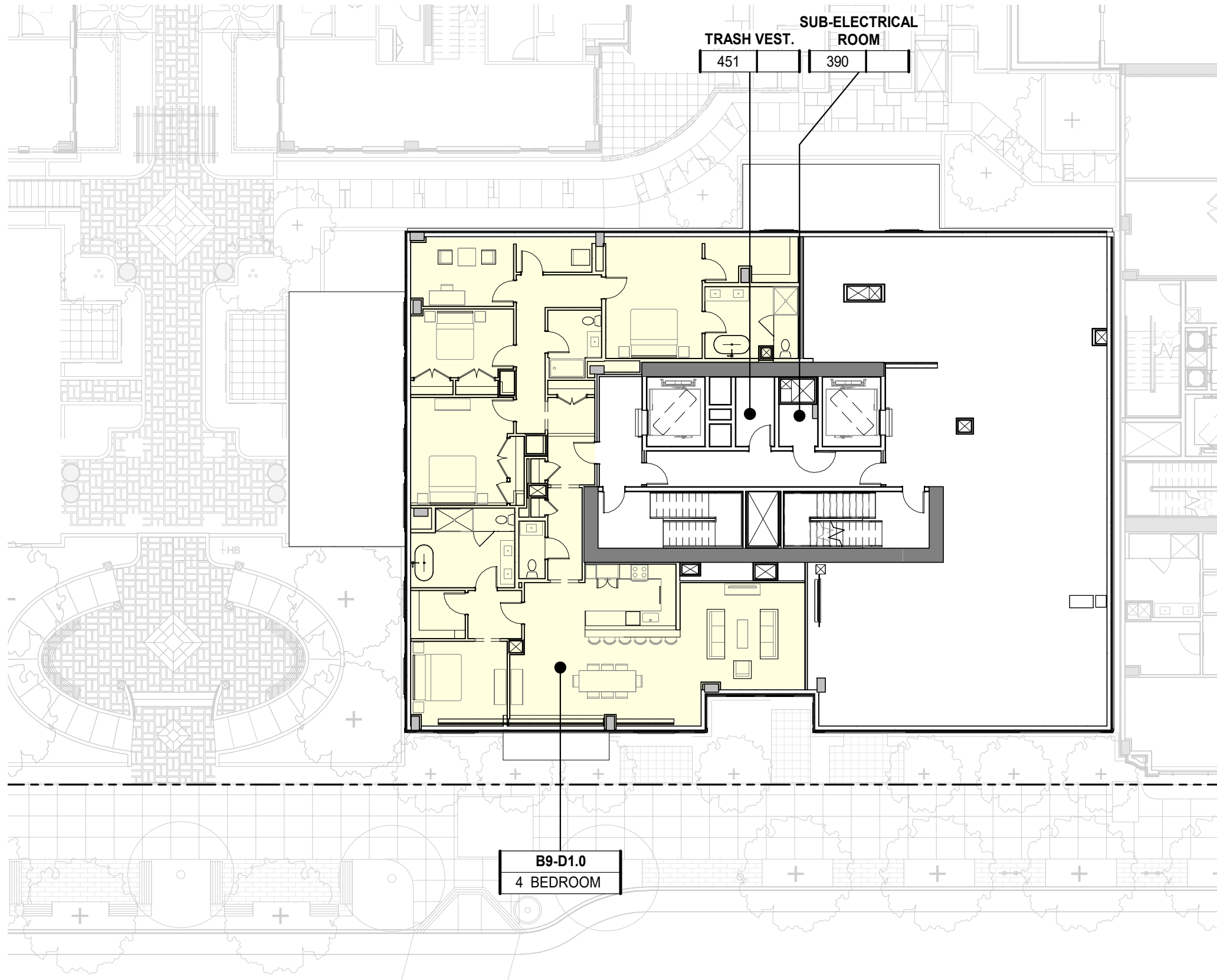


BUILDING PLAN  
FLOOR 4



BUILDING PLAN  
FLOOR 3

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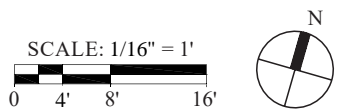
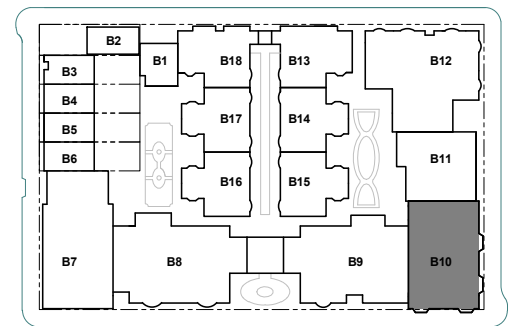
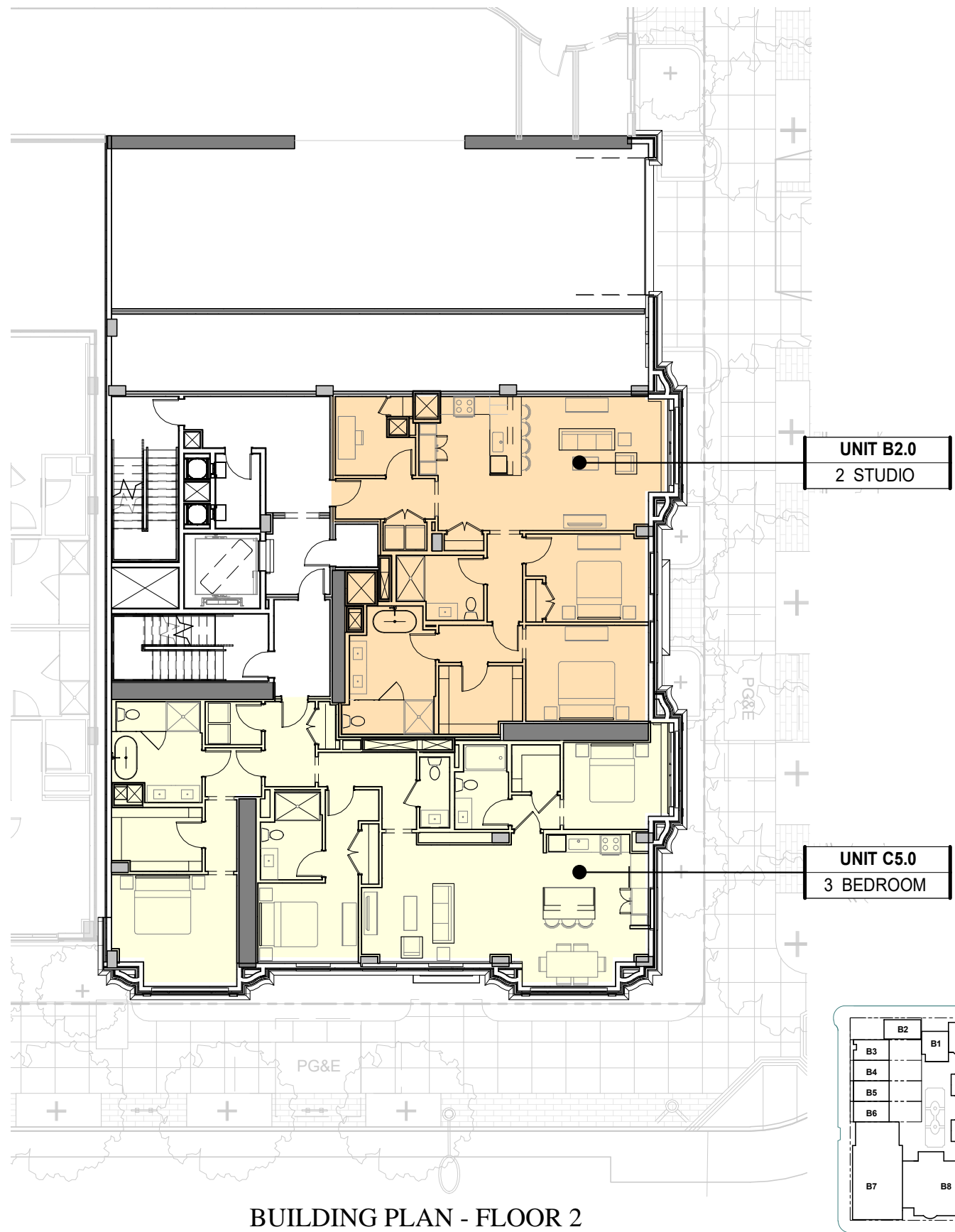
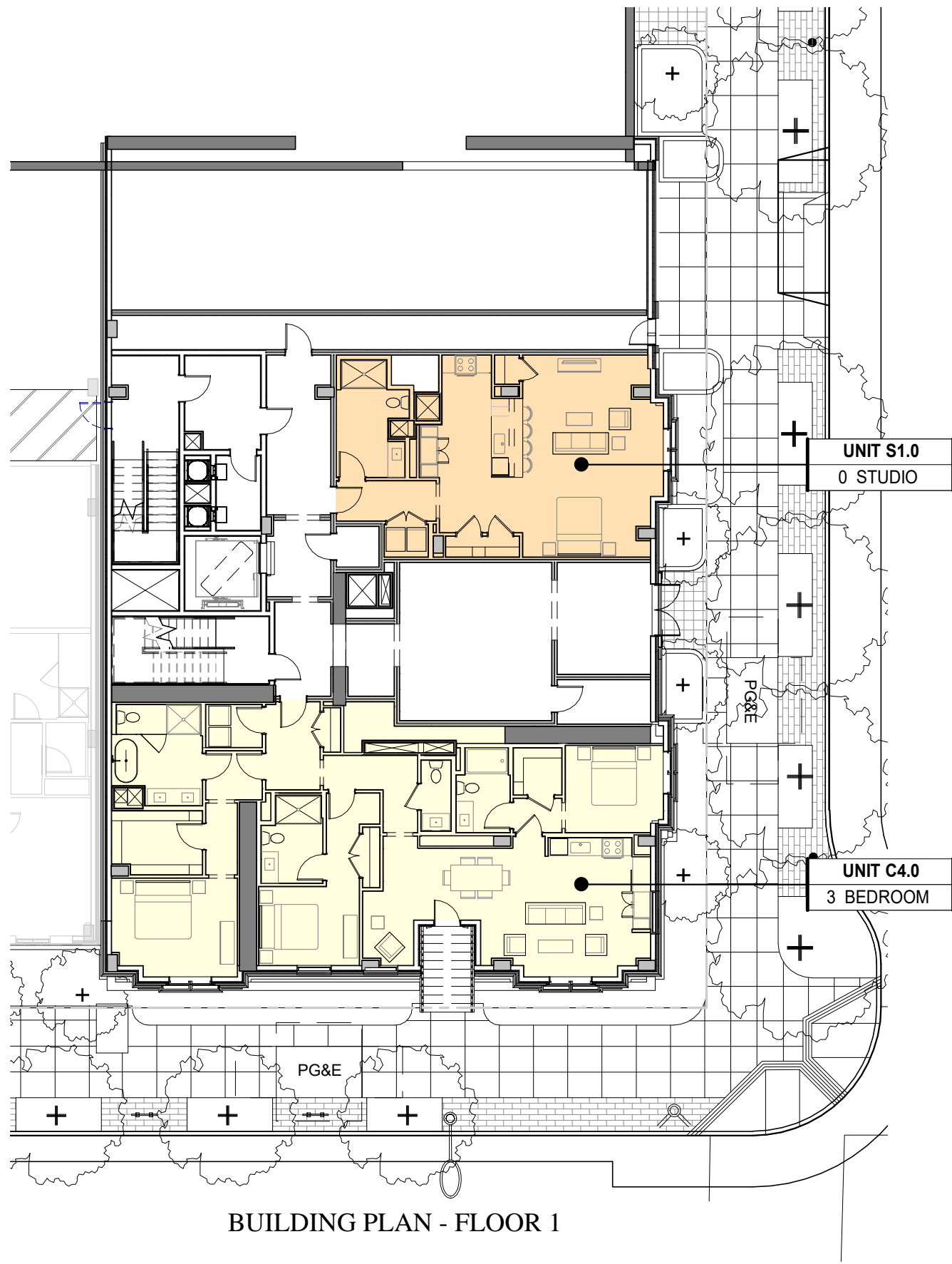
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## BUILDING PLAN - FLOOR 5 - B9

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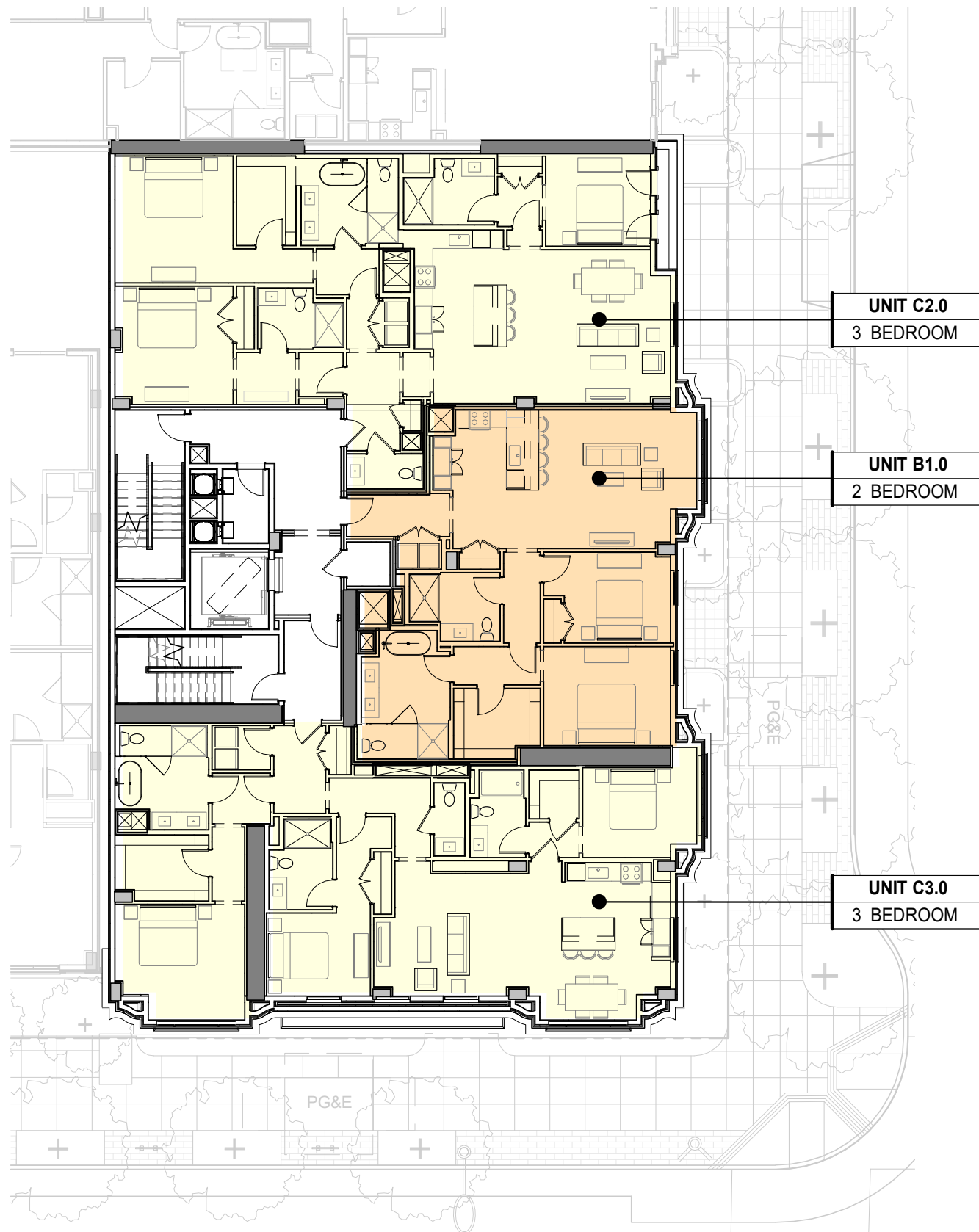
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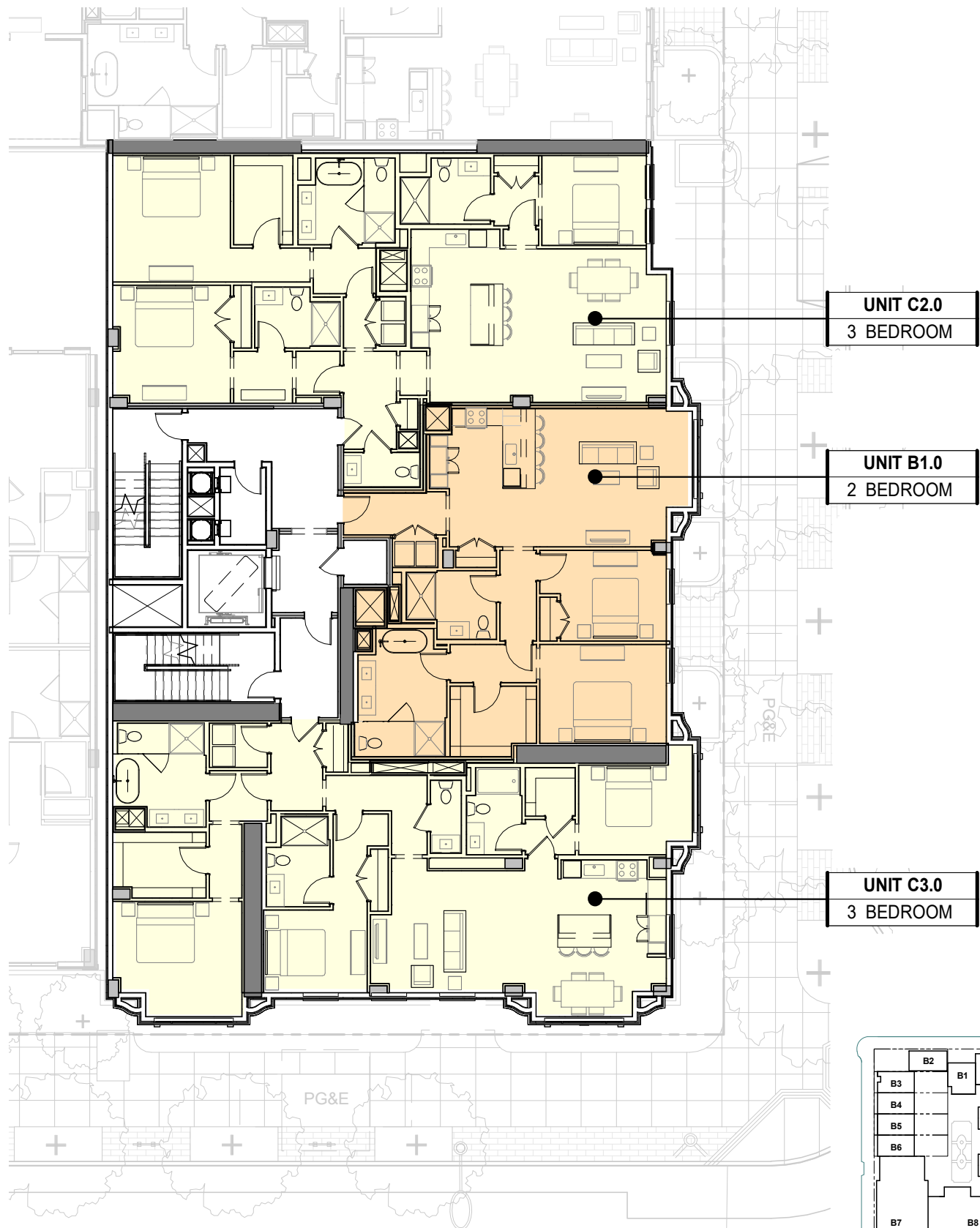


## BUILDING PLAN - FLOORS 1 & 2 - B10

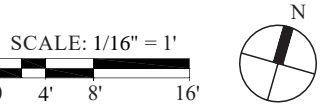
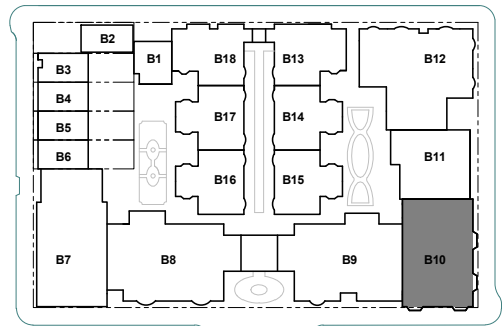
PUD/CU SUBMITTAL A2.01-B10  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



BUILDING PLAN - FLOOR 3



BUILDING PLAN - FLOOR 4

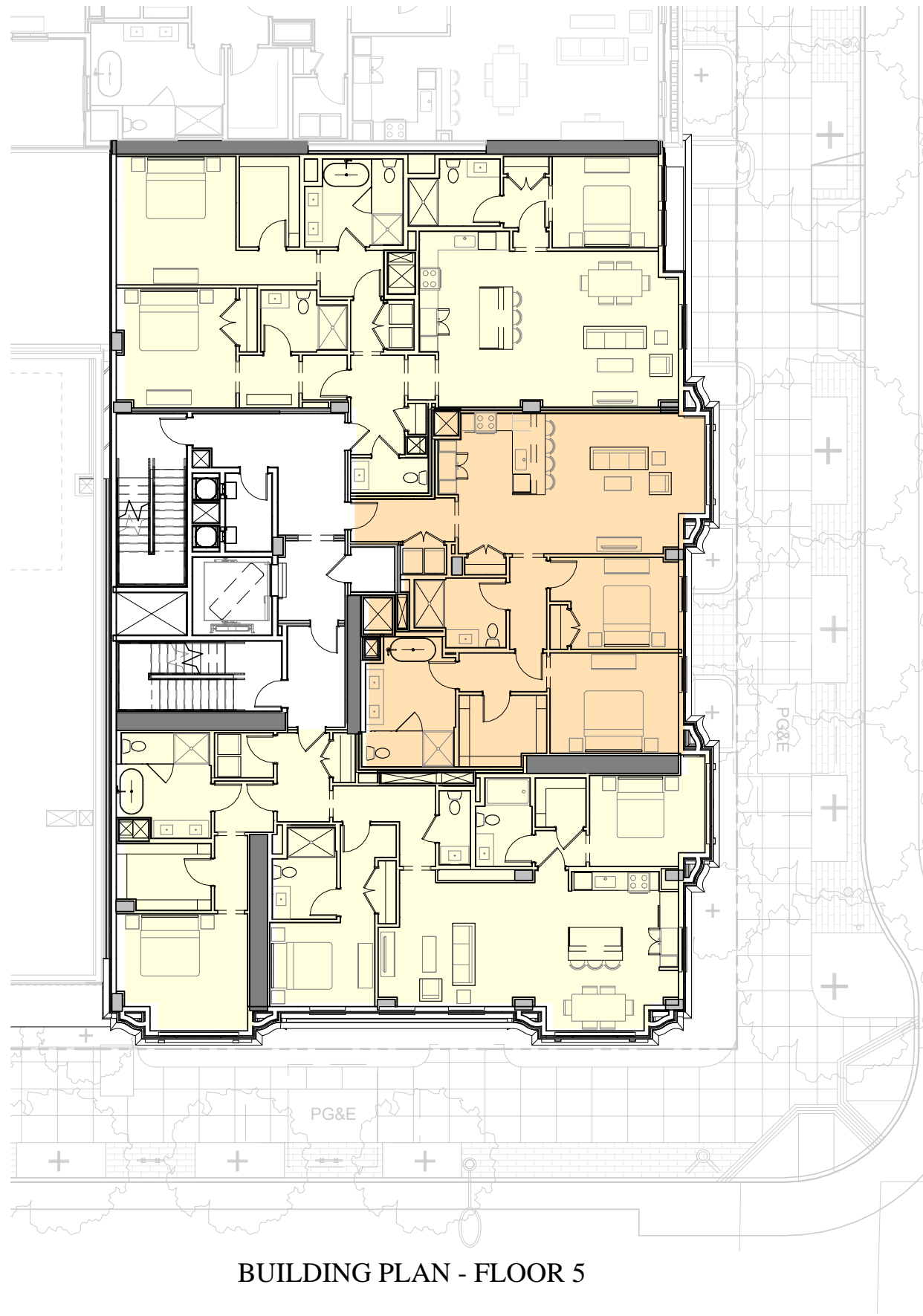


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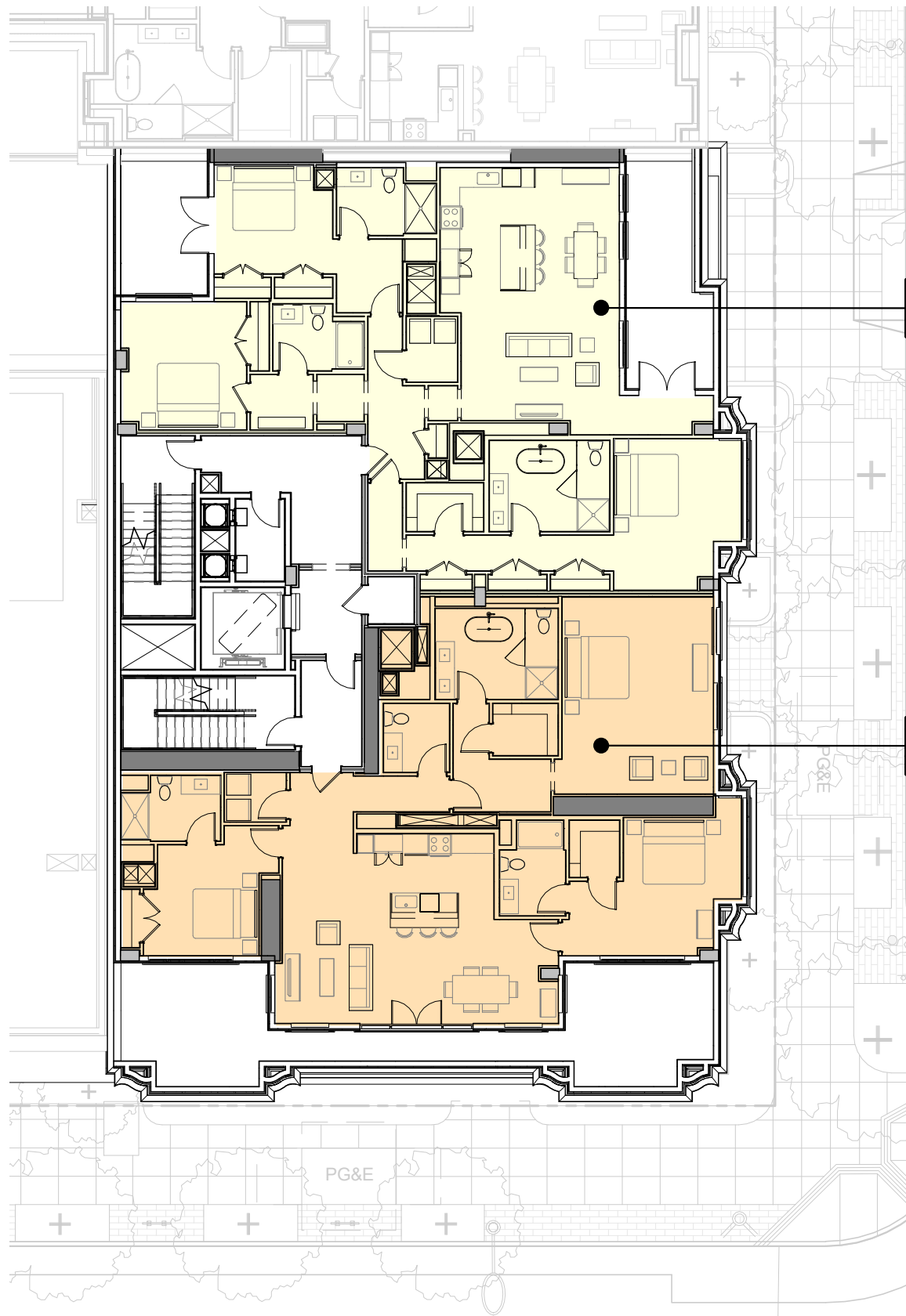


# BUILDING PLAN - FLOORS 2 & 3 - B10





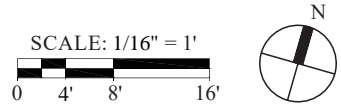
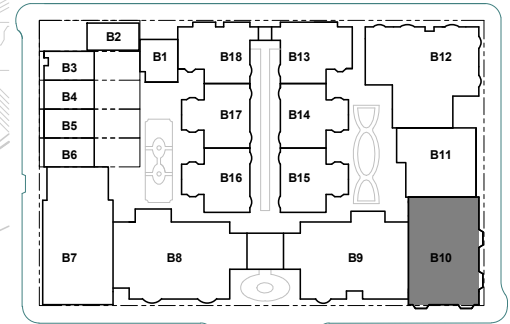
BUILDING PLAN - FLOOR 5



BUILDING PLAN - FLOOR 6

UNIT C6.0  
3 BEDROOM

UNIT C1.0  
3 BEDROOM

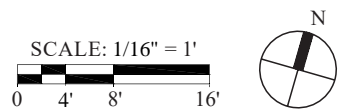
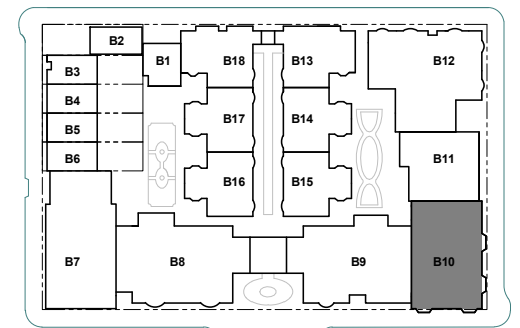
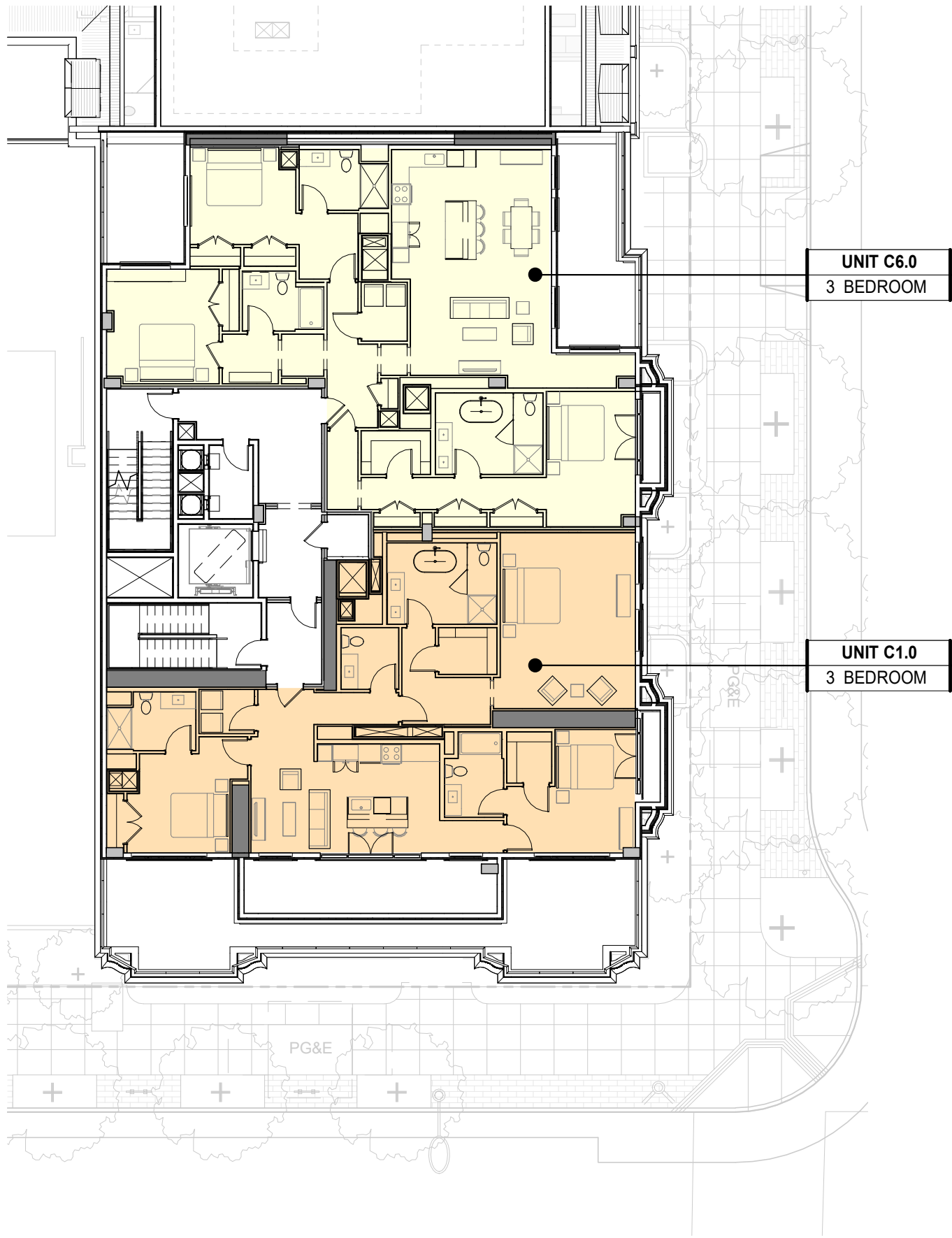


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BUILDING PLAN - FLOORS 5 & 6 - B10

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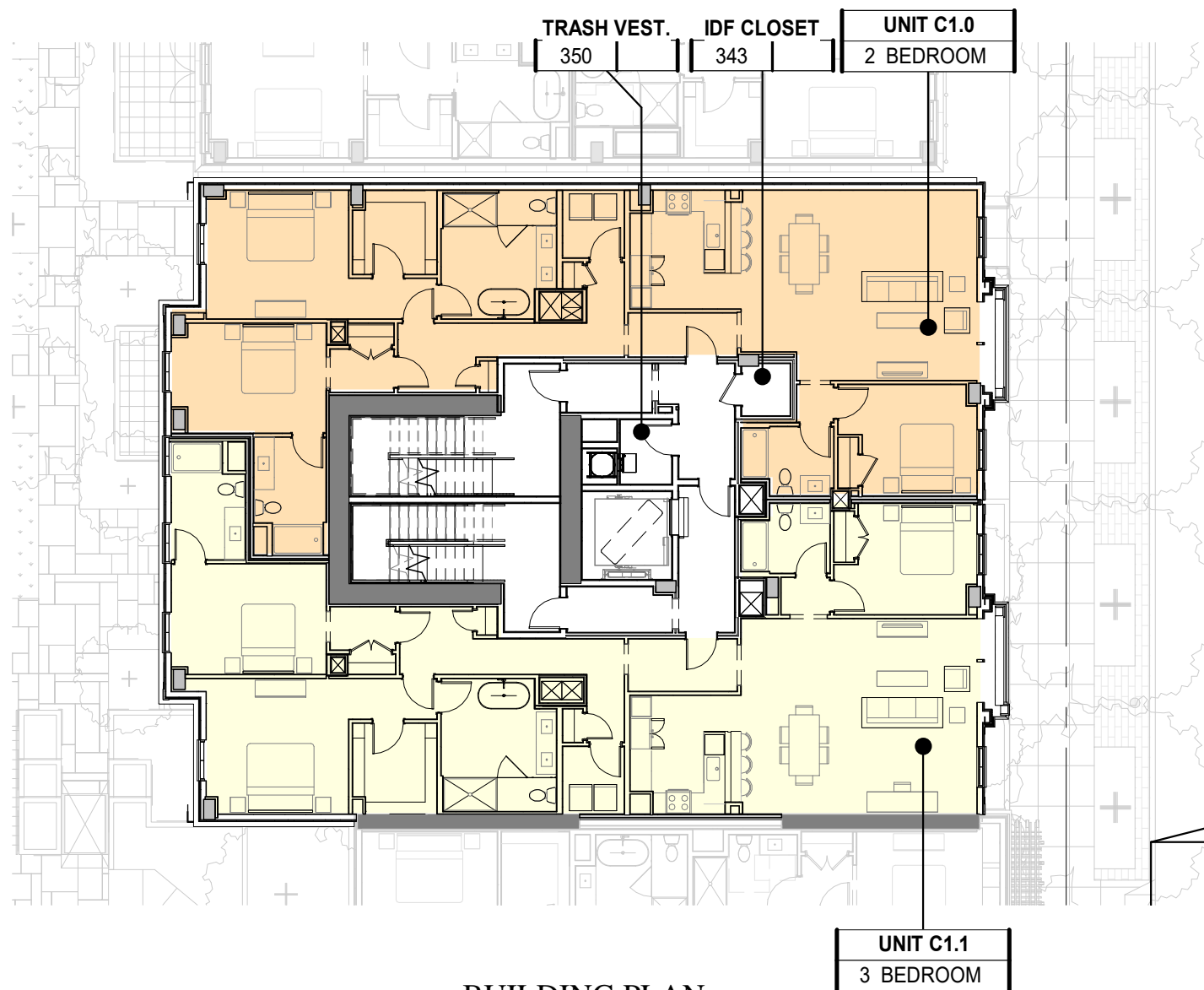
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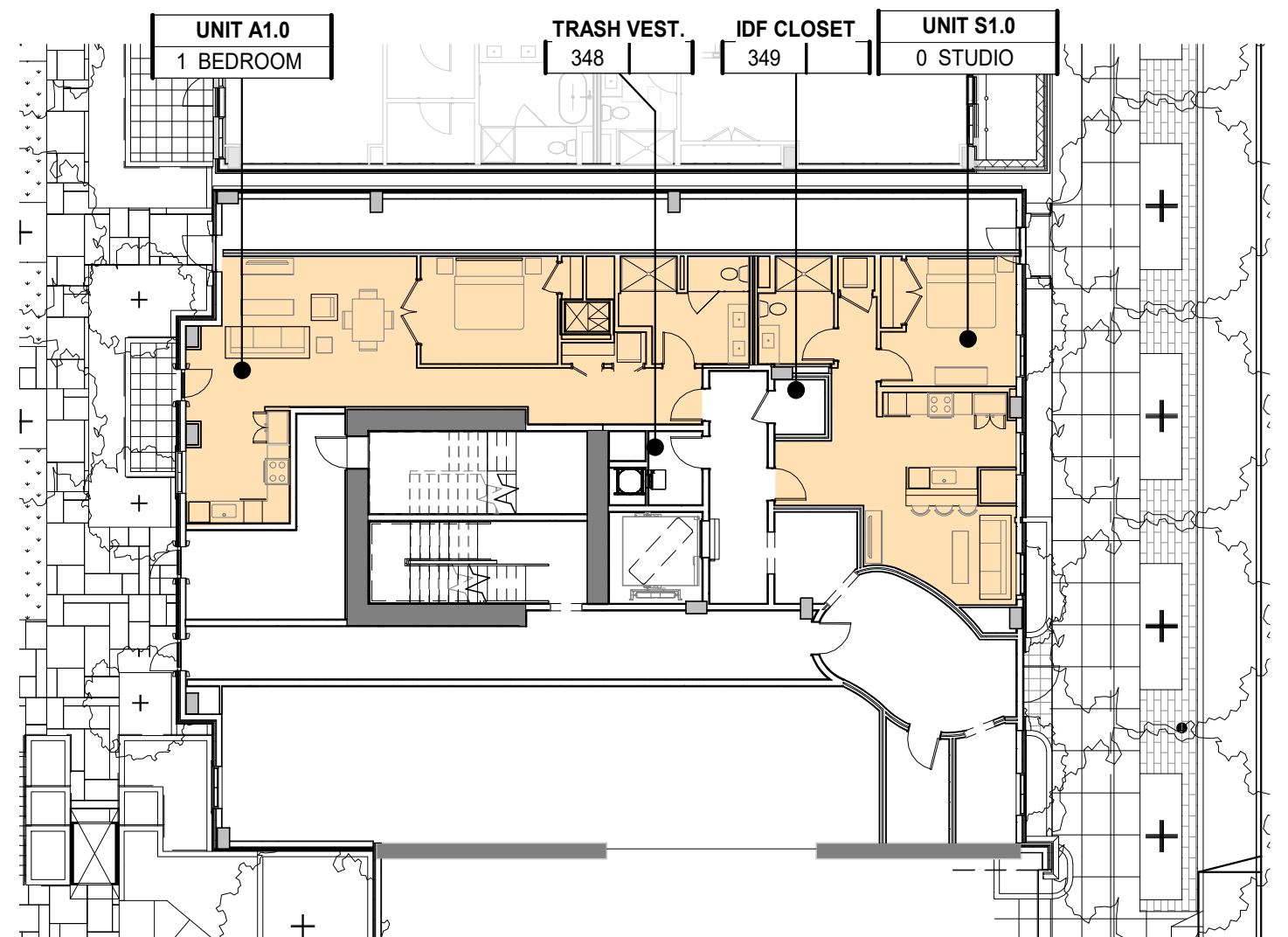
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PUD/CU SUBMITTAL A2.04-B10  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

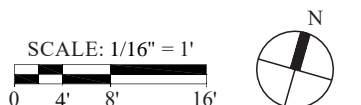
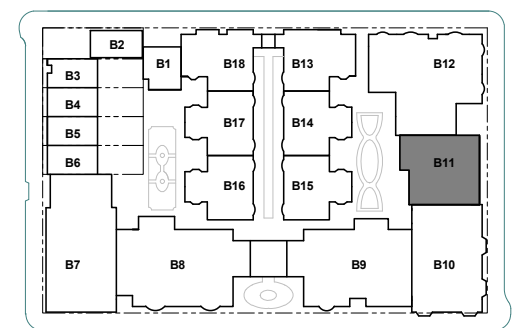




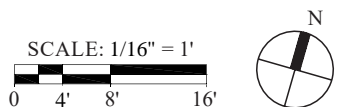
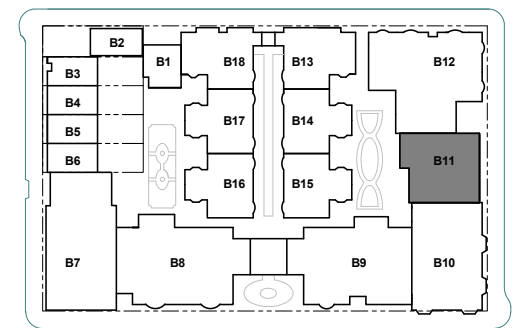
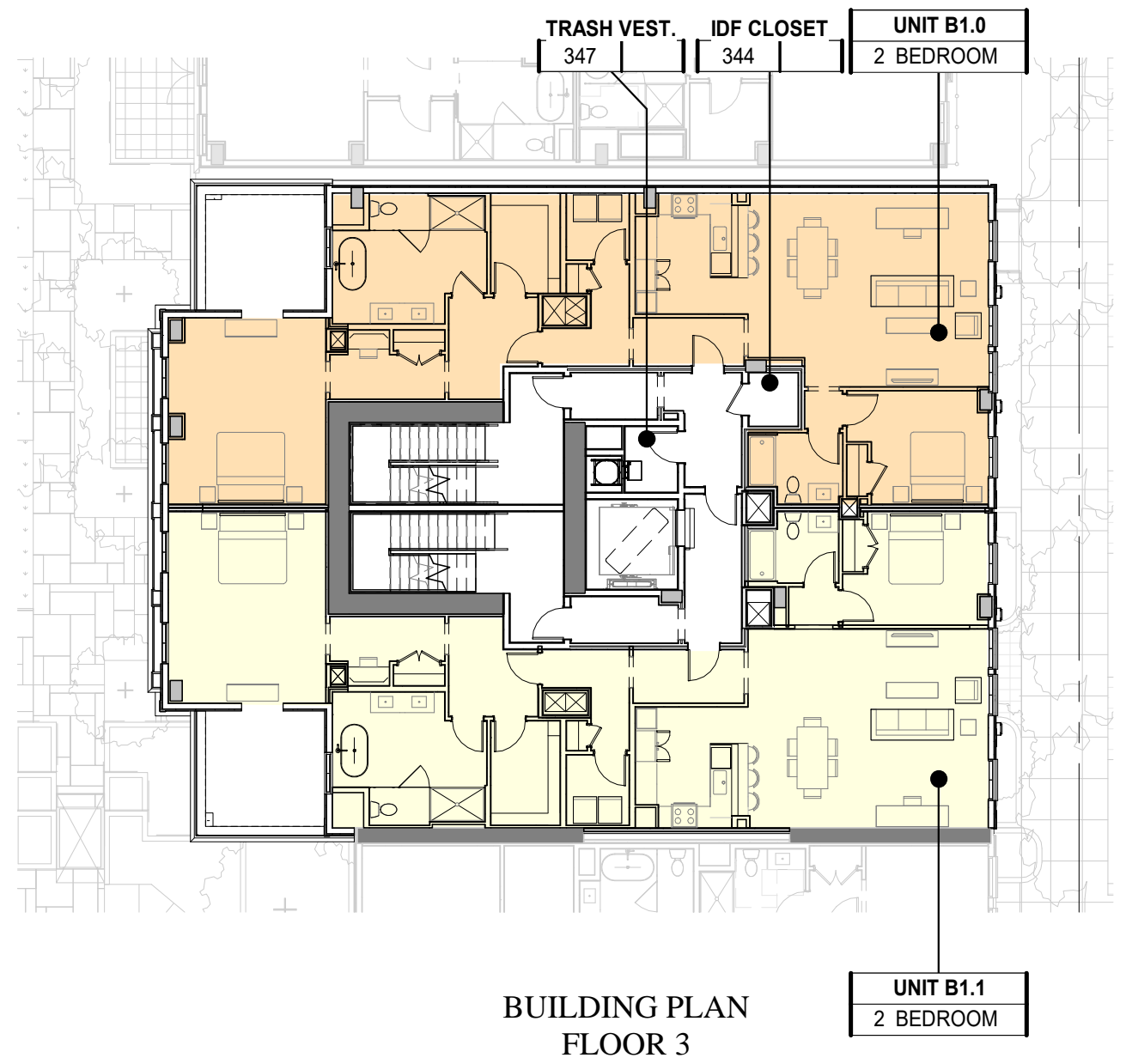
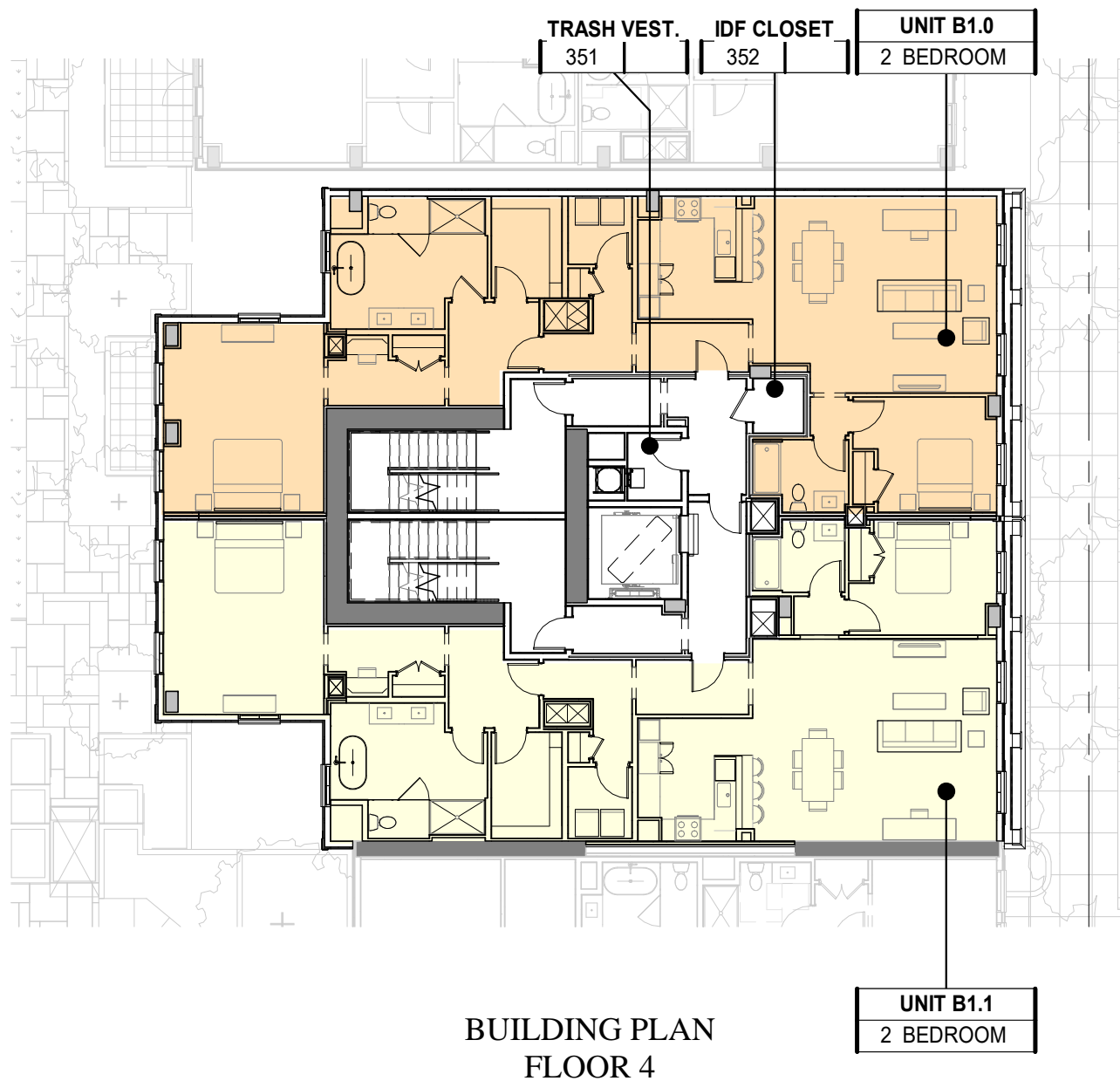
BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



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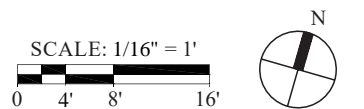
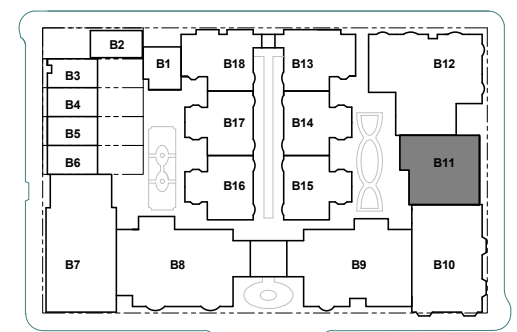
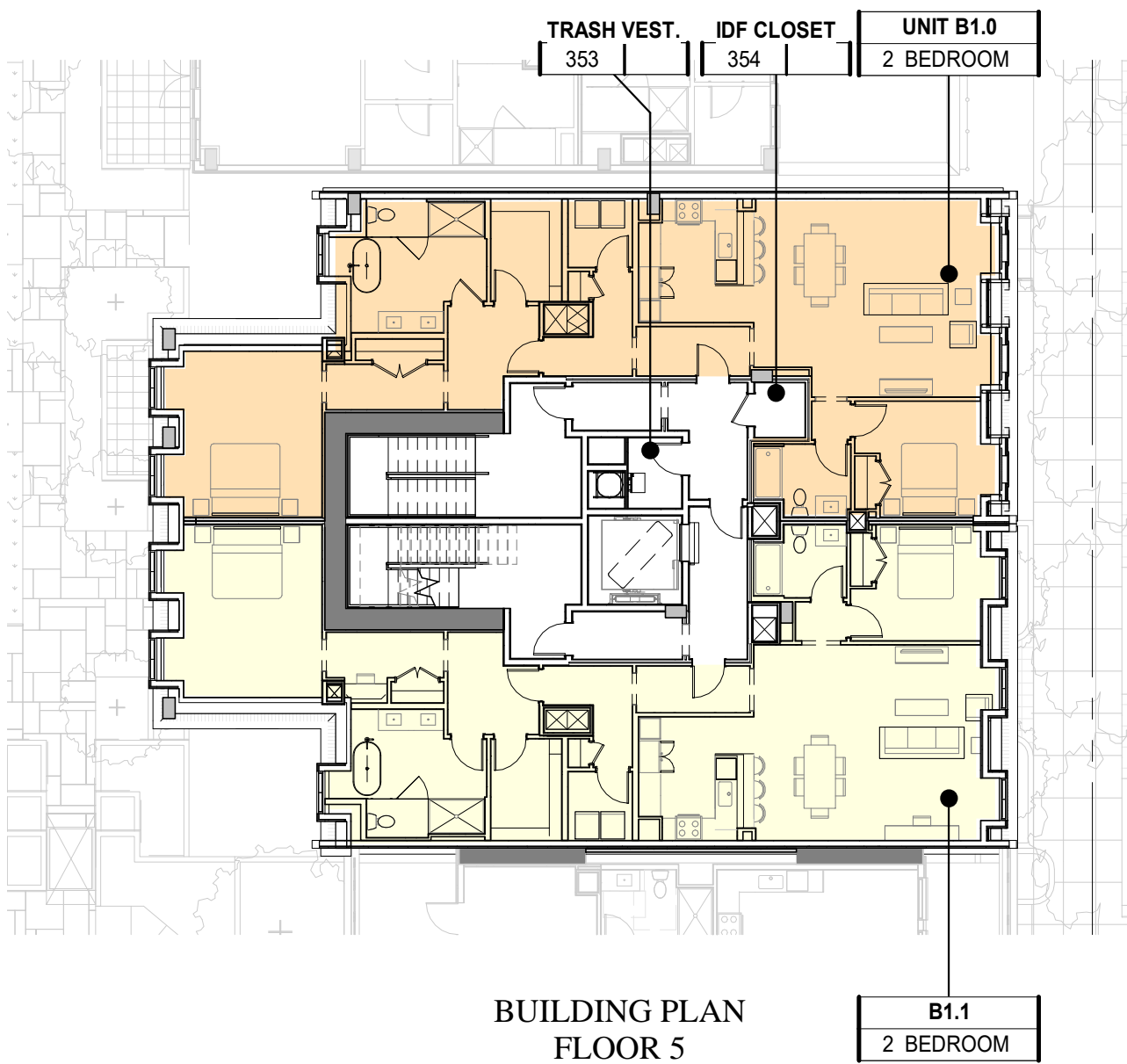
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## BUILDING PLAN - FLOORS 3 & 4 - B11

PUD/CU SUBMITTAL A2.02-B11  
NOVEMBER 2019  
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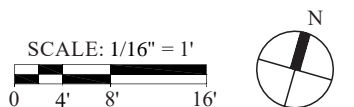
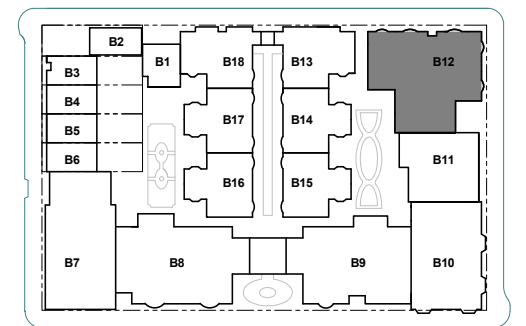
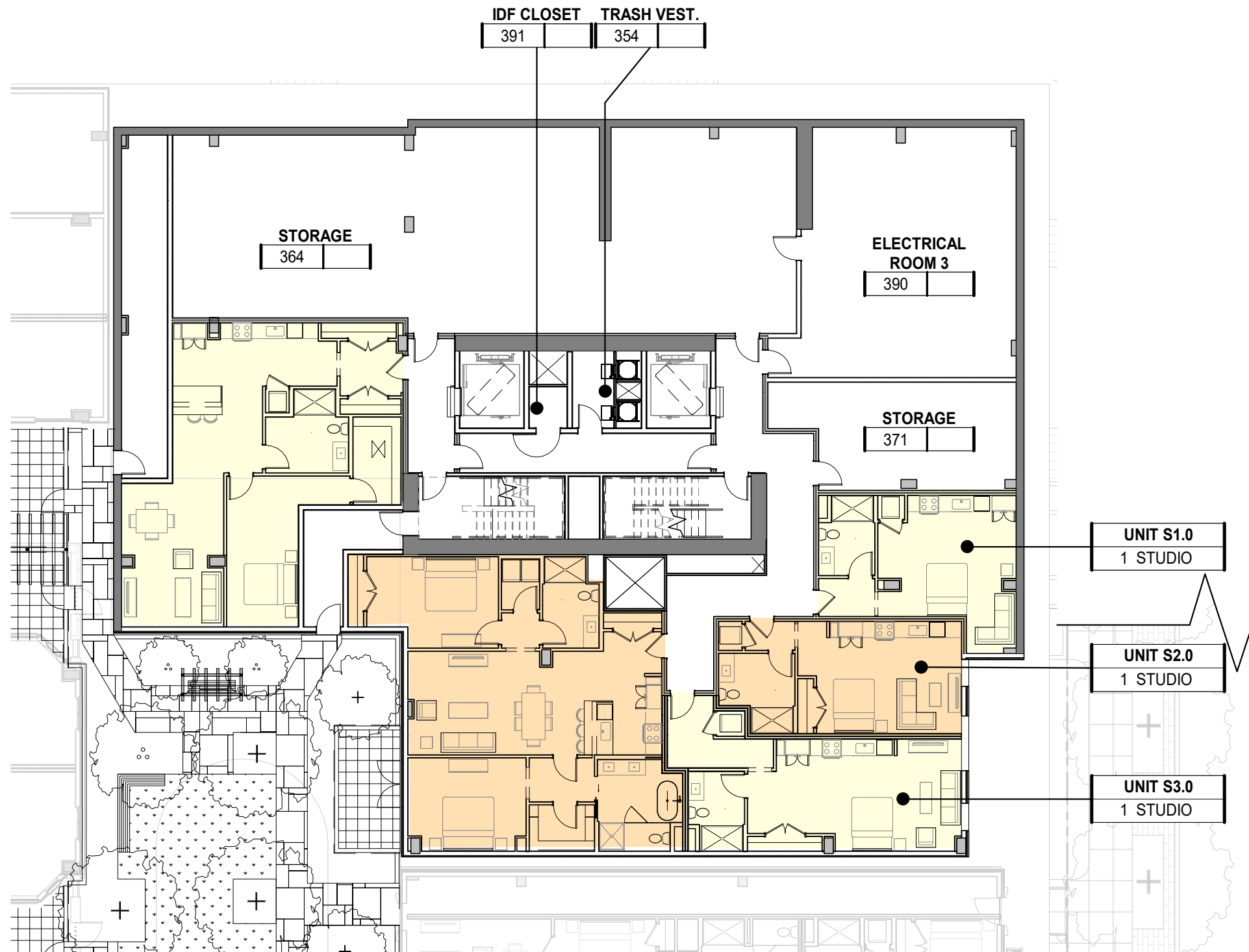
TMG  
PARTNERS  
MILLER COMPANY  
landscape architects

GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF100+  
YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 5 - B11

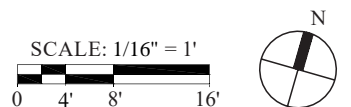
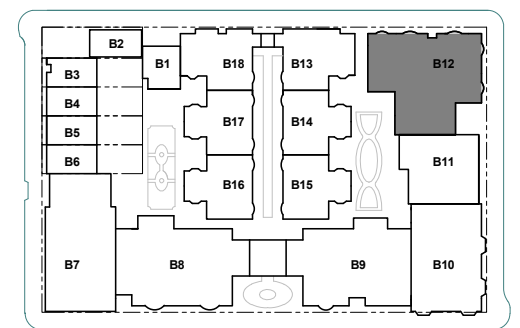
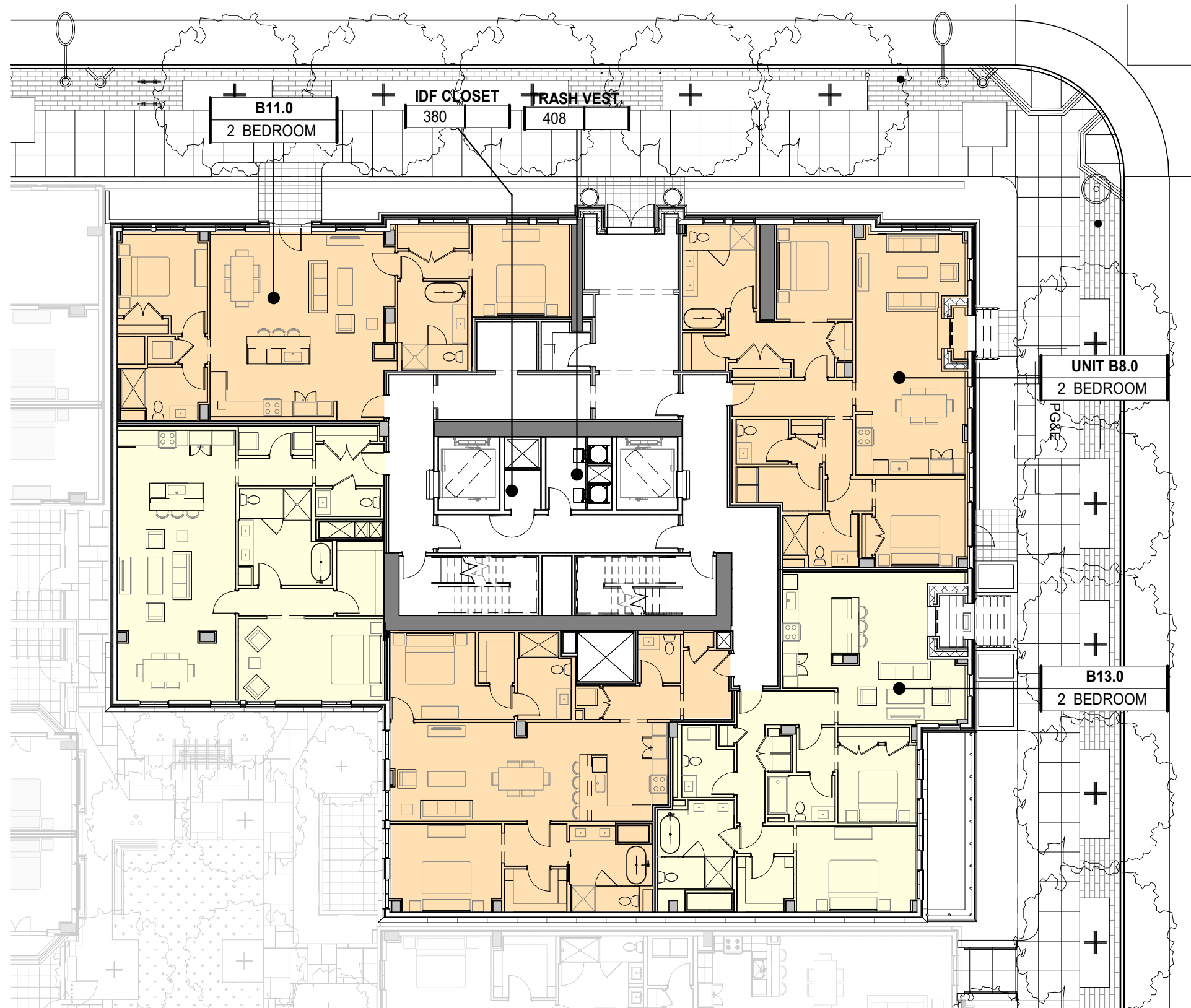
PUD/CU SUBMITTAL A2.03-B11  
NOVEMBER 2019  
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## BUILDING PLAN - BASEMENT - B12





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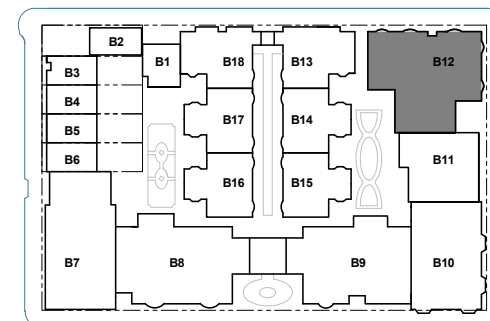
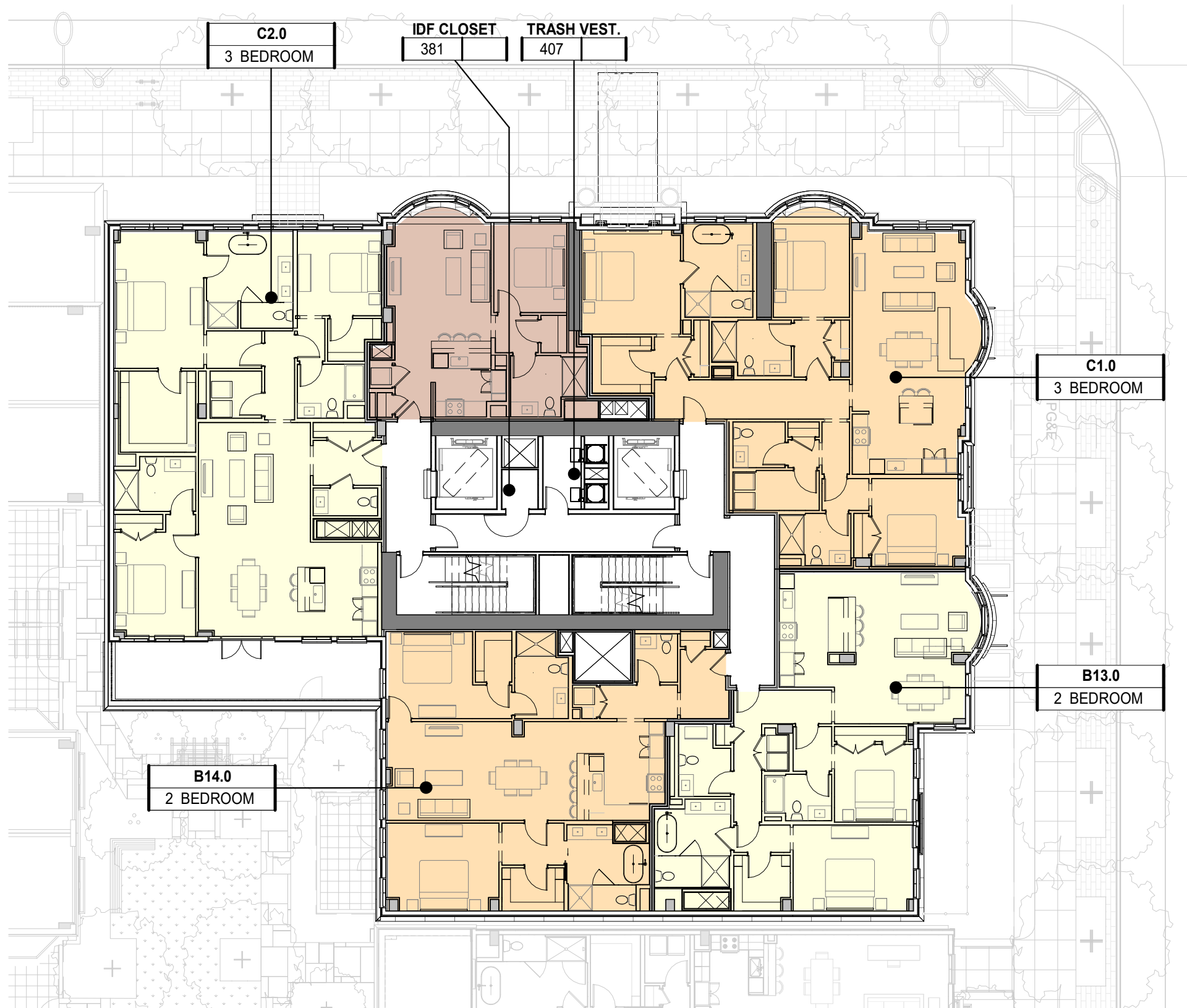
TMG  
PARTNERS  
MILLER COMPANY  
landscape architects

GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF100+  
YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 1 - B12

PUD/CU SUBMITTAL A2.01-B12  
NOVEMBER 2019  
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SCALE: 1/16" = 1'

0 4' 8' 16'



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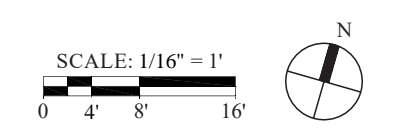
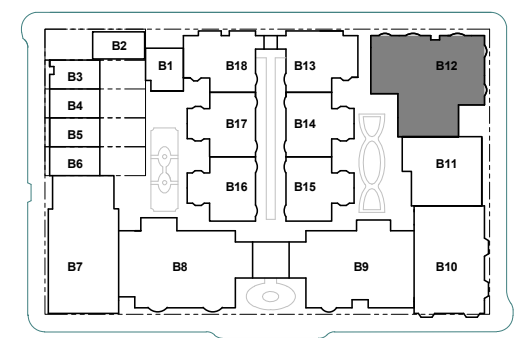
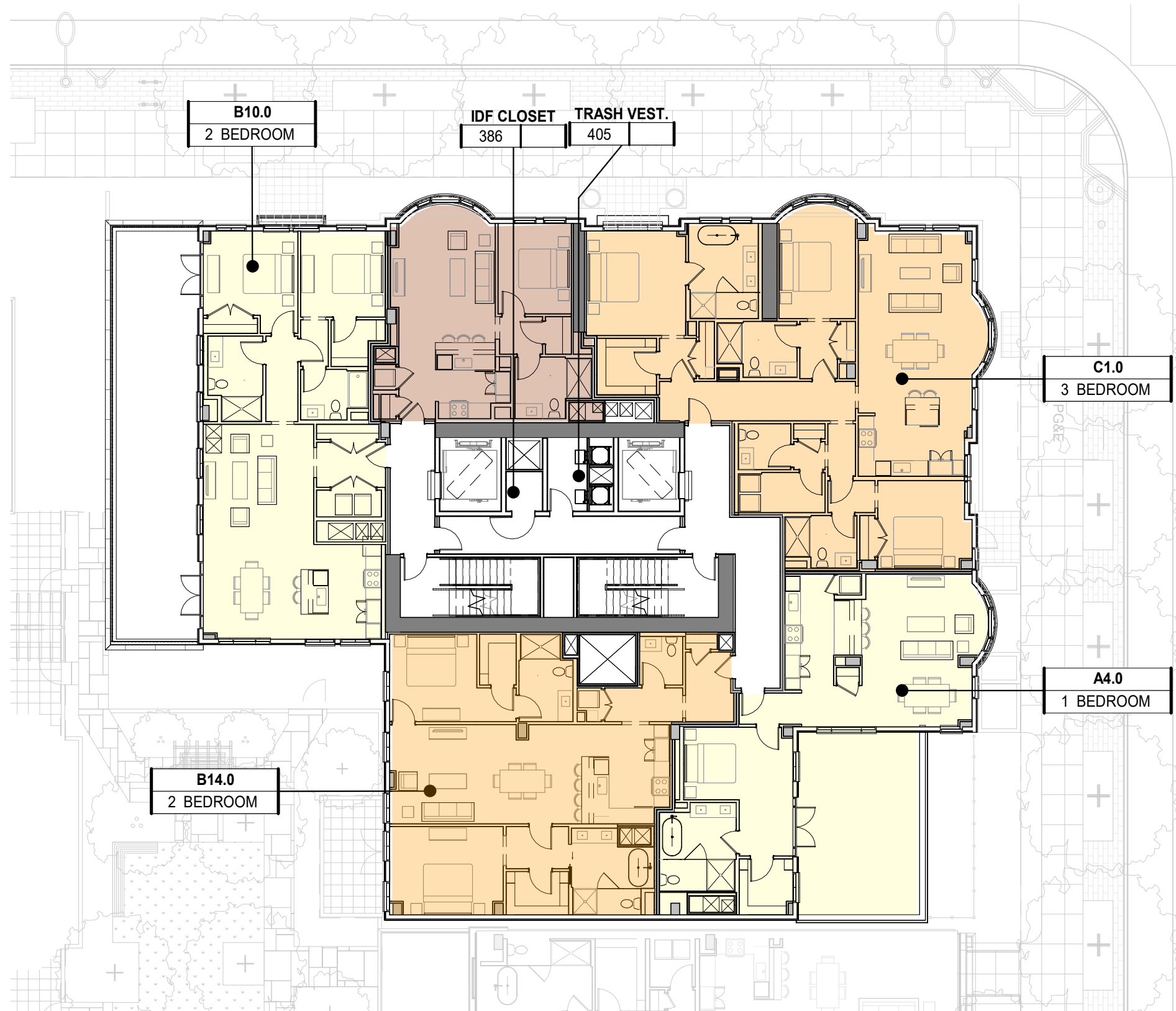
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## BUILDING PLAN - FLOOR 2 (FLOOR 3 SIM.) - B12

PUD/CU SUBMITTAL A2.02-B12  
NOVEMBER 2019  
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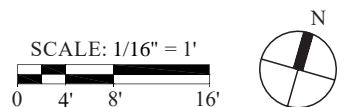
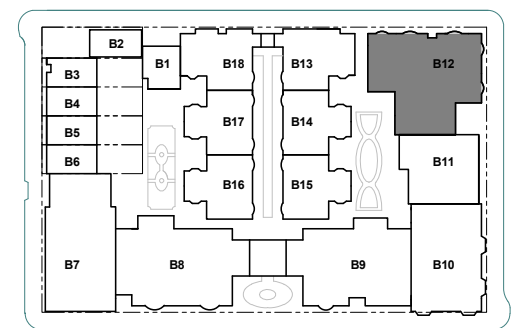
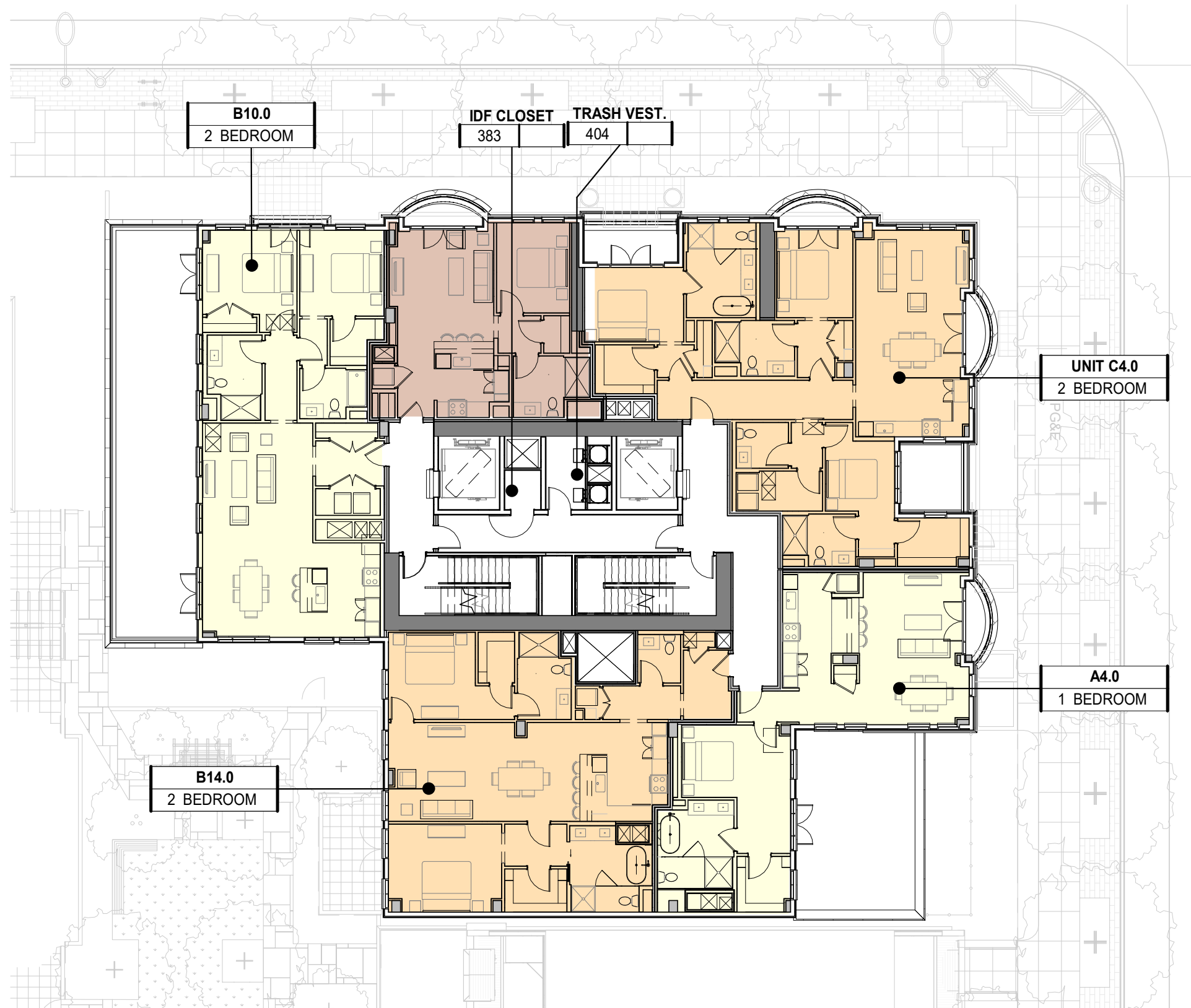




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# BUILDING PLAN - FLOOR 4 - B12



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TMG PARTNERS  
MILLER COMPANY  
landscape architects

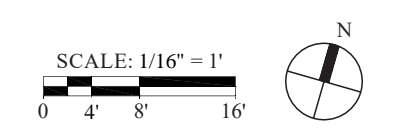
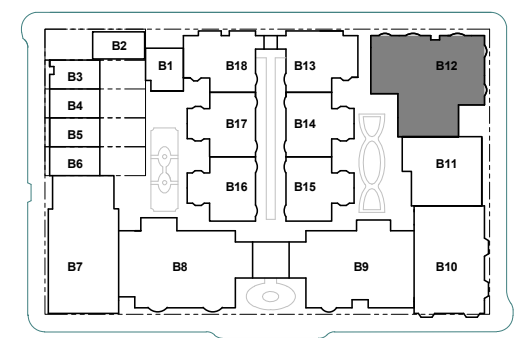
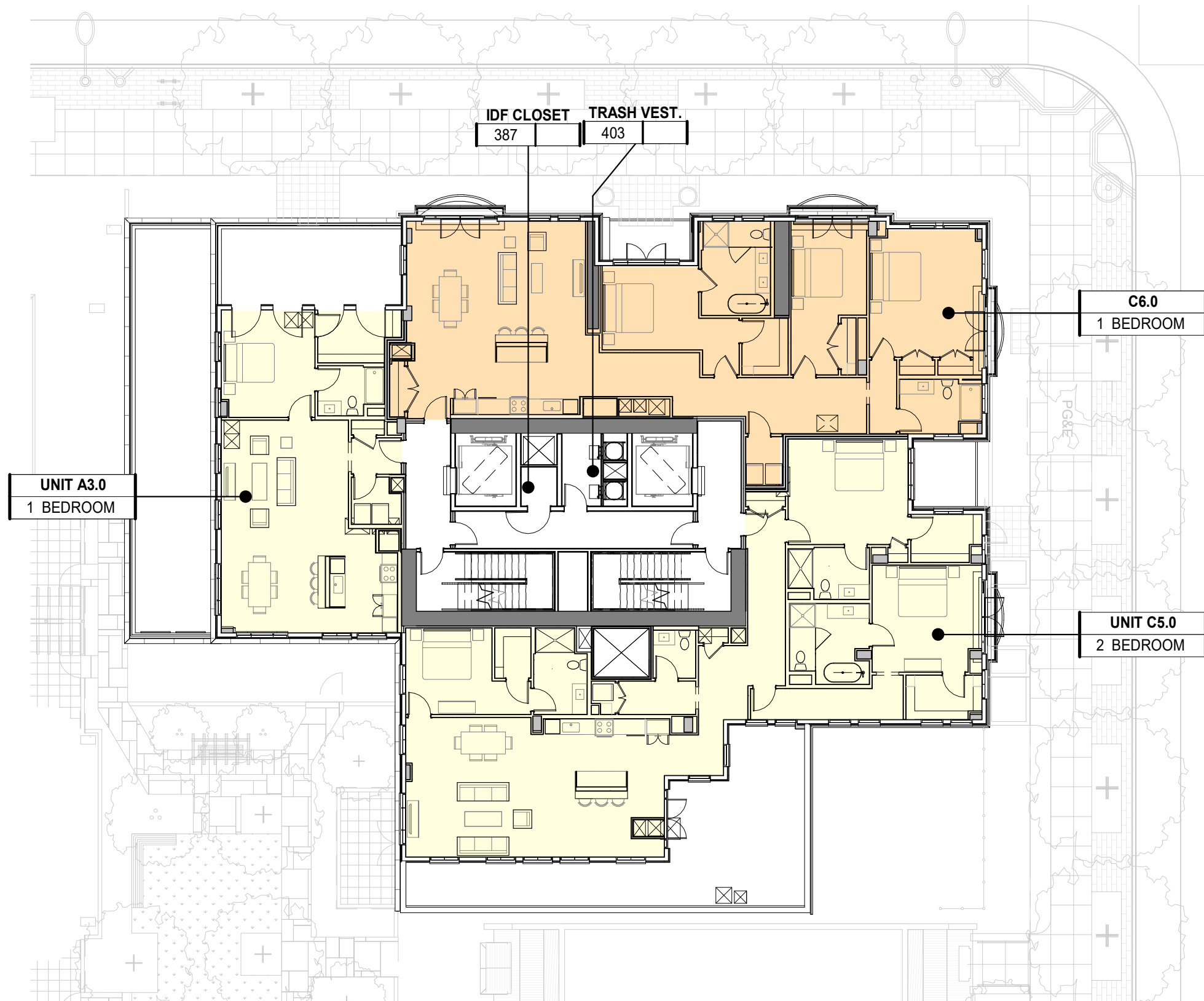
GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF 100+ YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 5 - B12

PUD/CU SUBMITTAL A2.05-B12  
NOVEMBER 2019  
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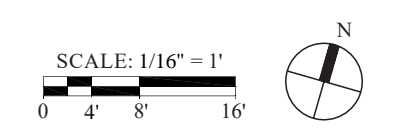
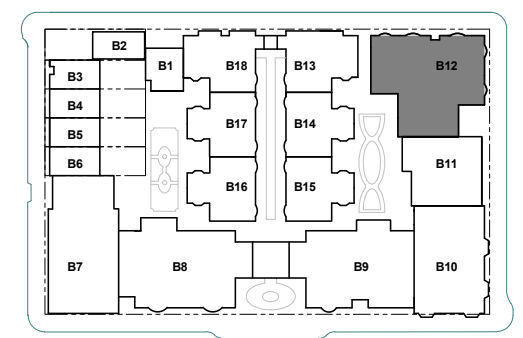
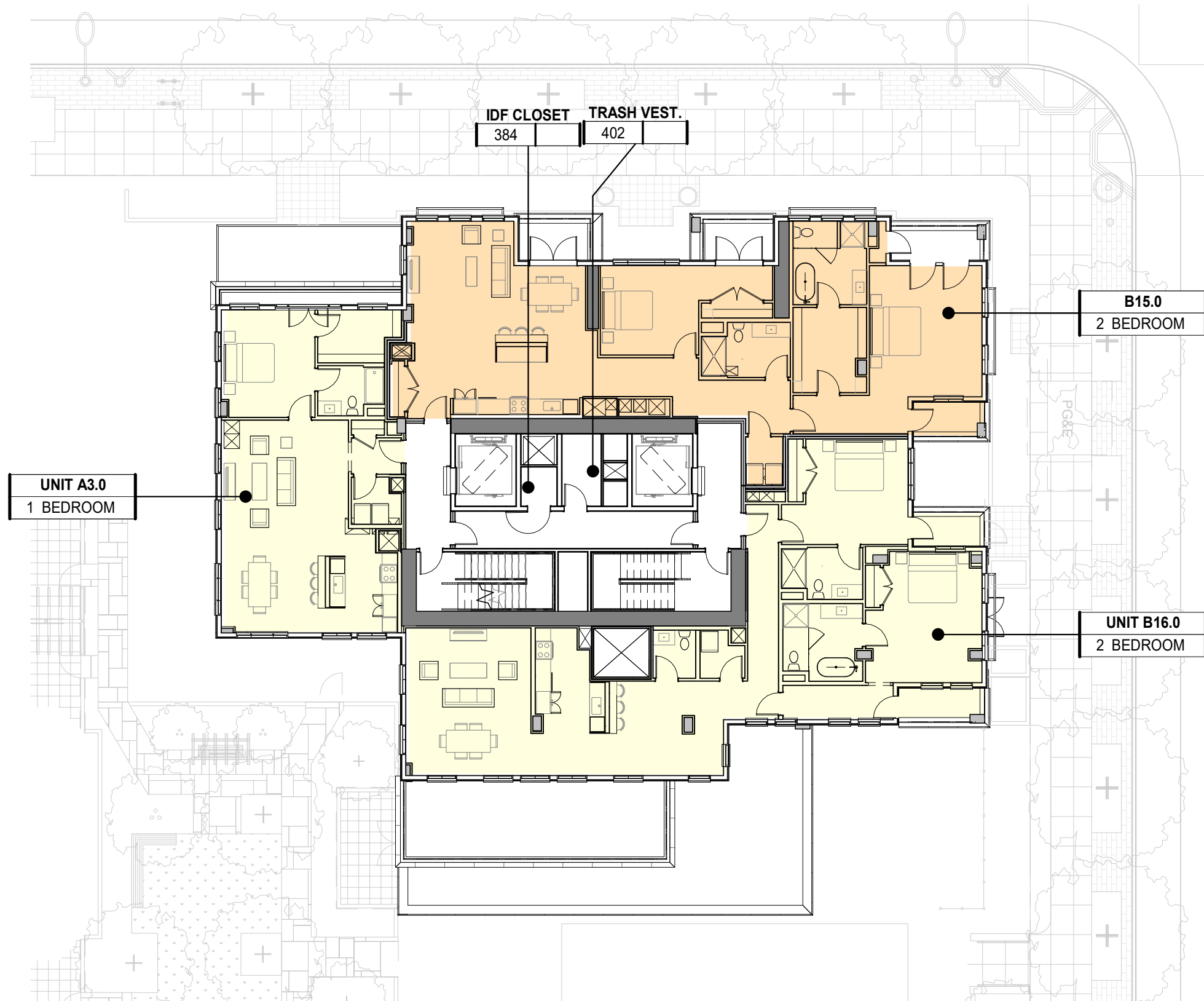




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# BUILDING PLAN - FLOOR 6 - B12



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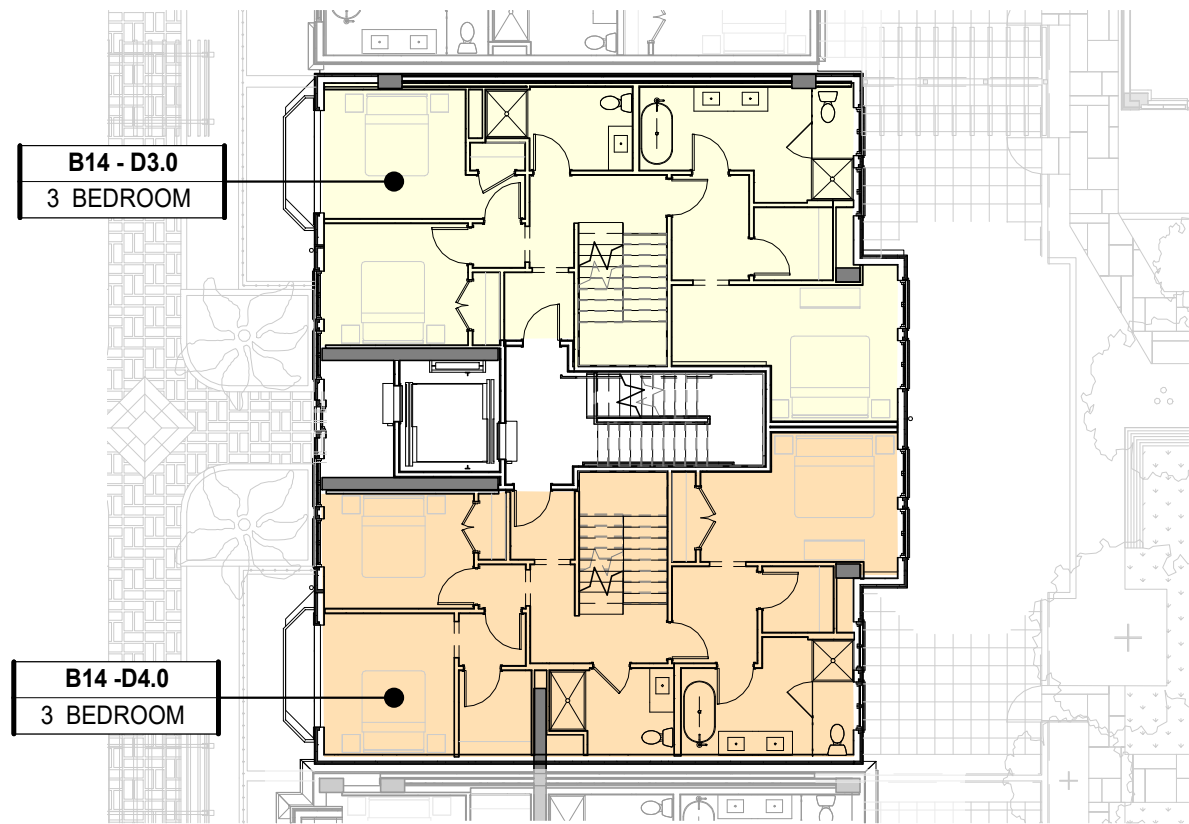


# BUILDING PLAN - FLOOR 7 - B12

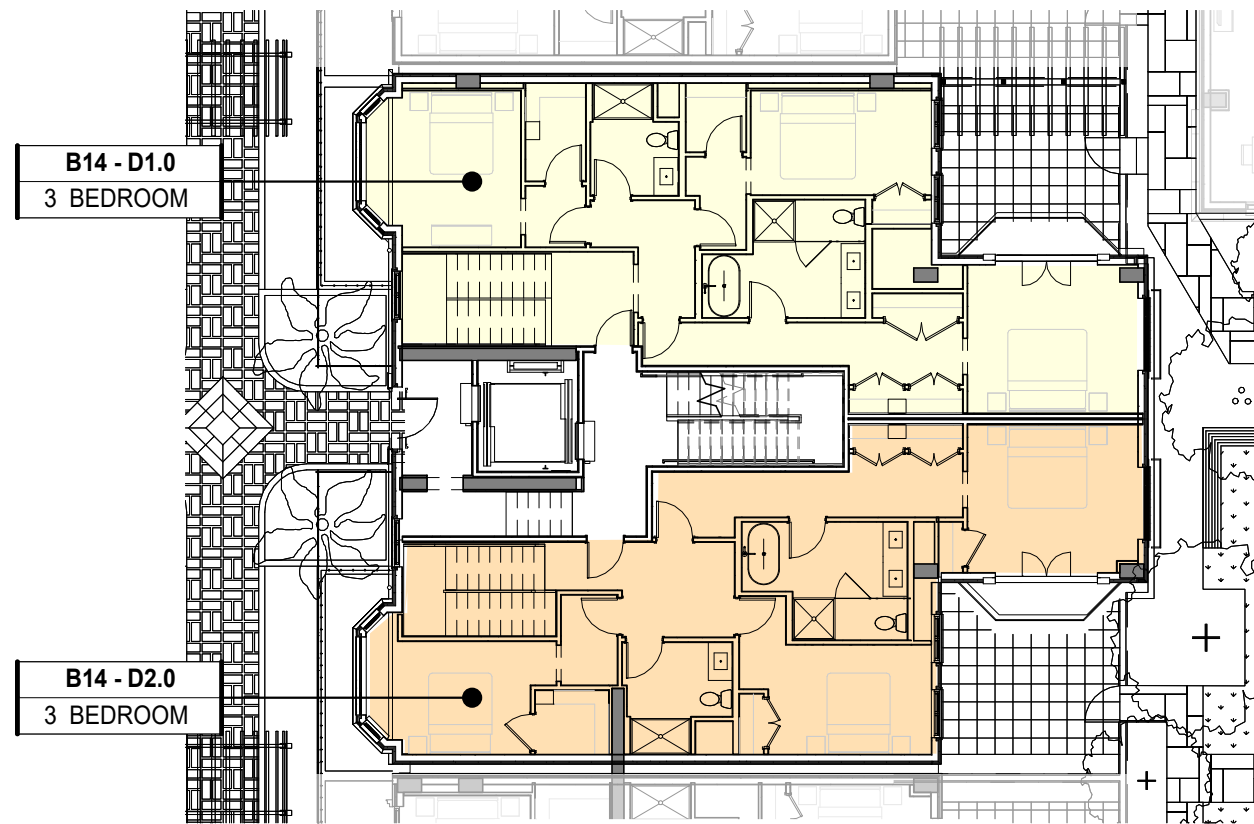
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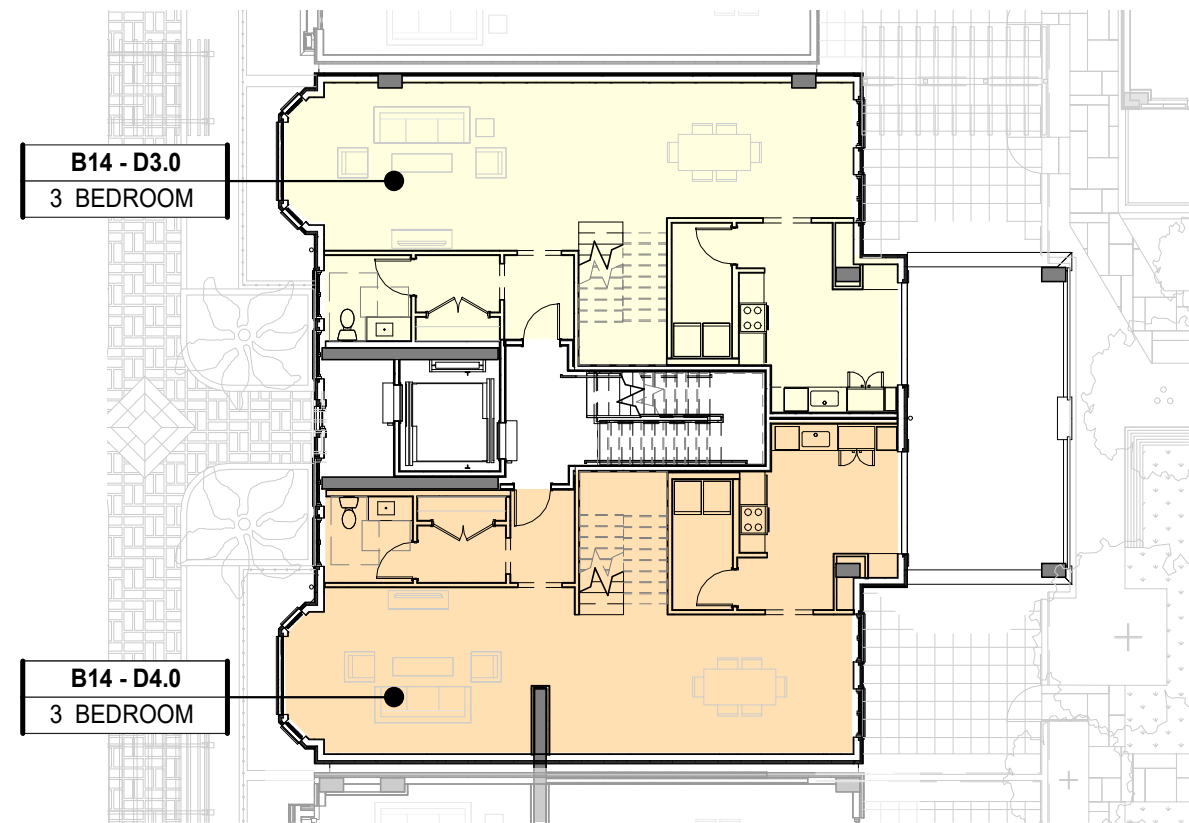




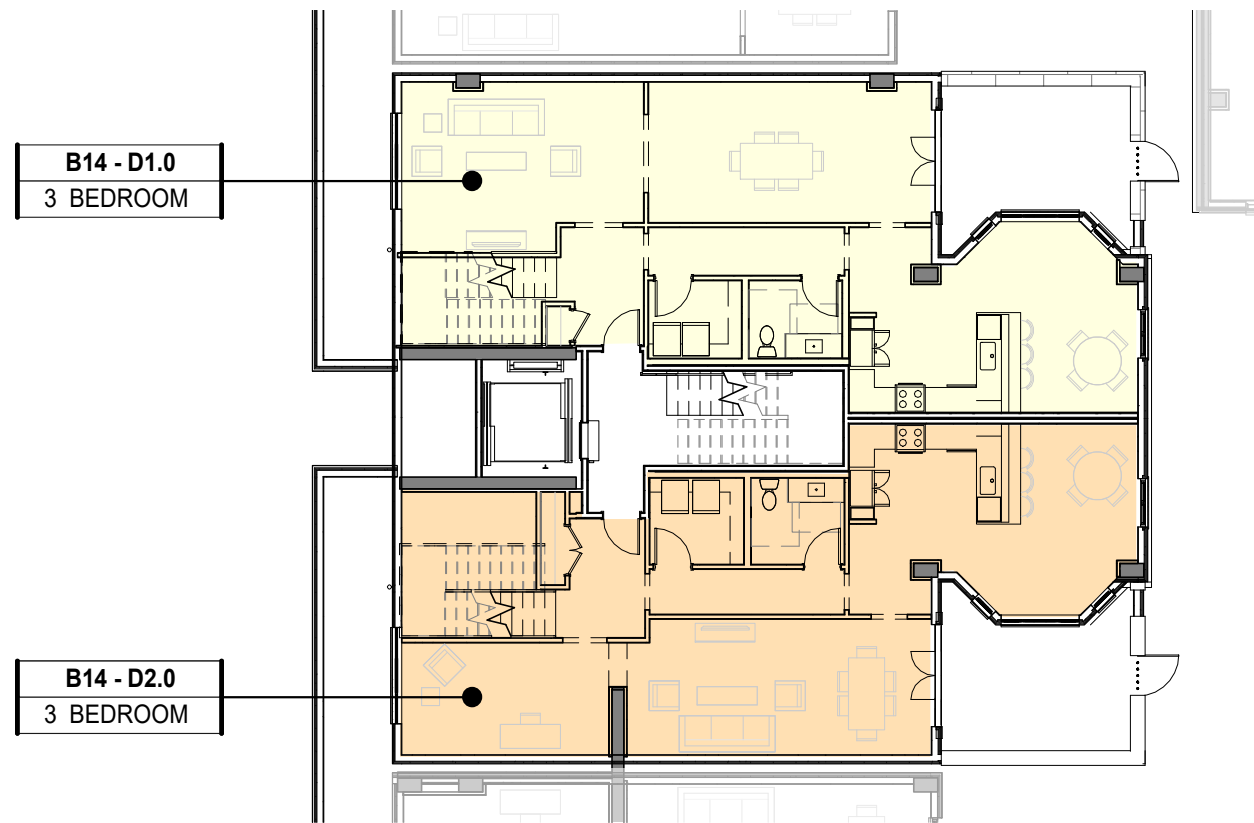
BUILDING PLAN  
FLOOR 3



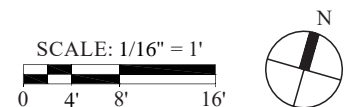
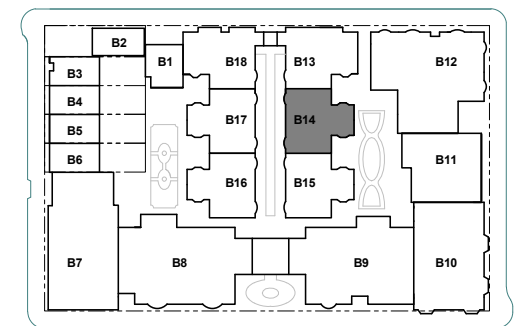
BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
FLOOR 2



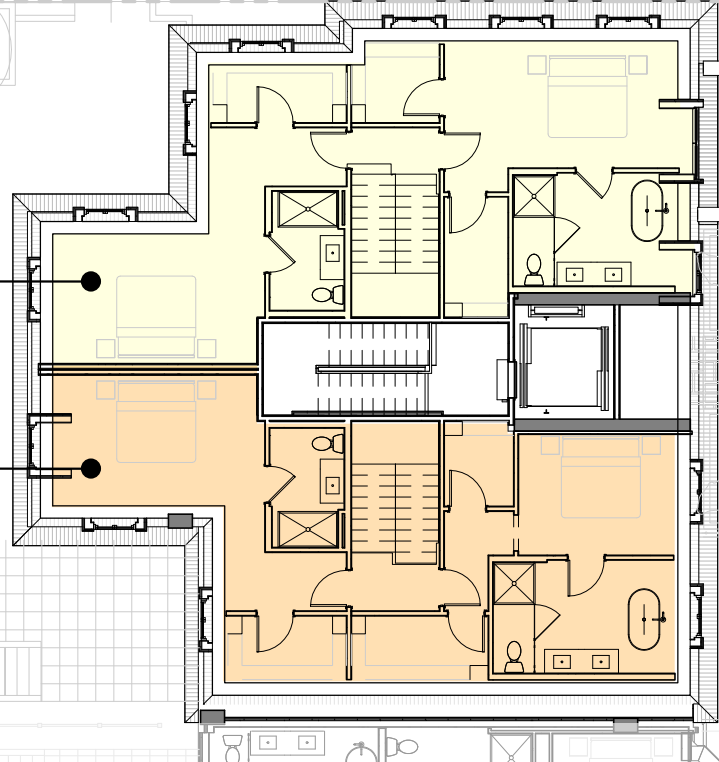
BUILDING PLAN  
BASEMENT



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B18 - D3.0  
2 BEDROOM

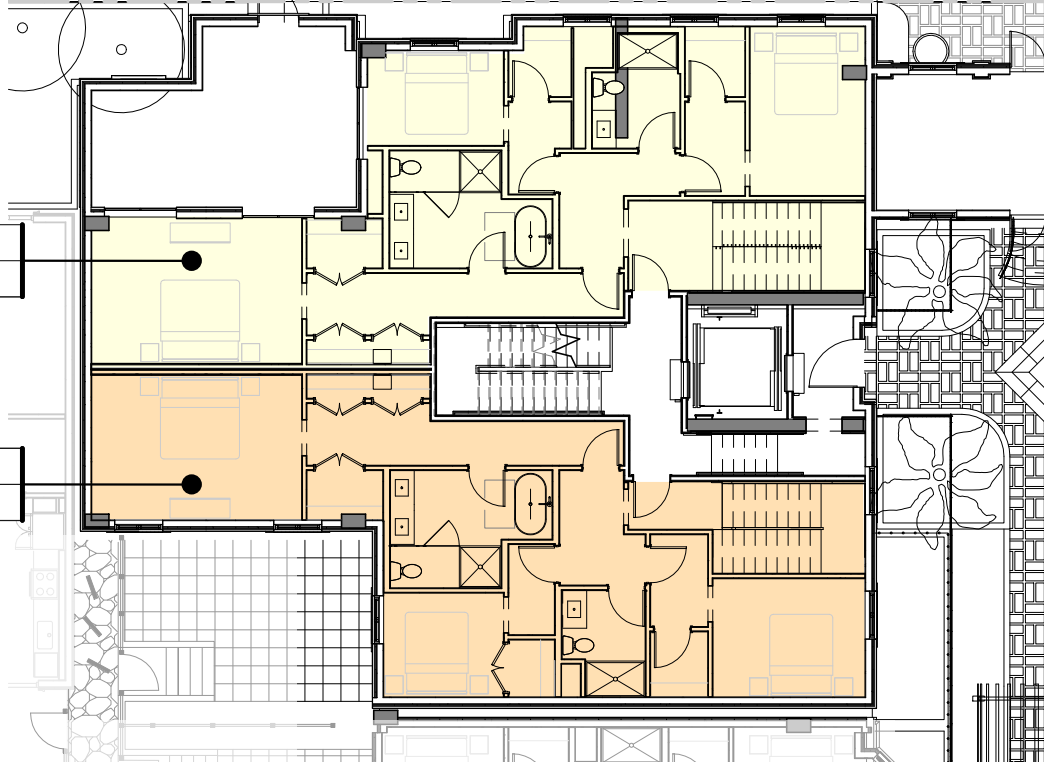
B18 - D4.0  
2 BEDROOM



BUILDING PLAN  
FLOOR 3

B18 - B1.0  
3 BEDROOM

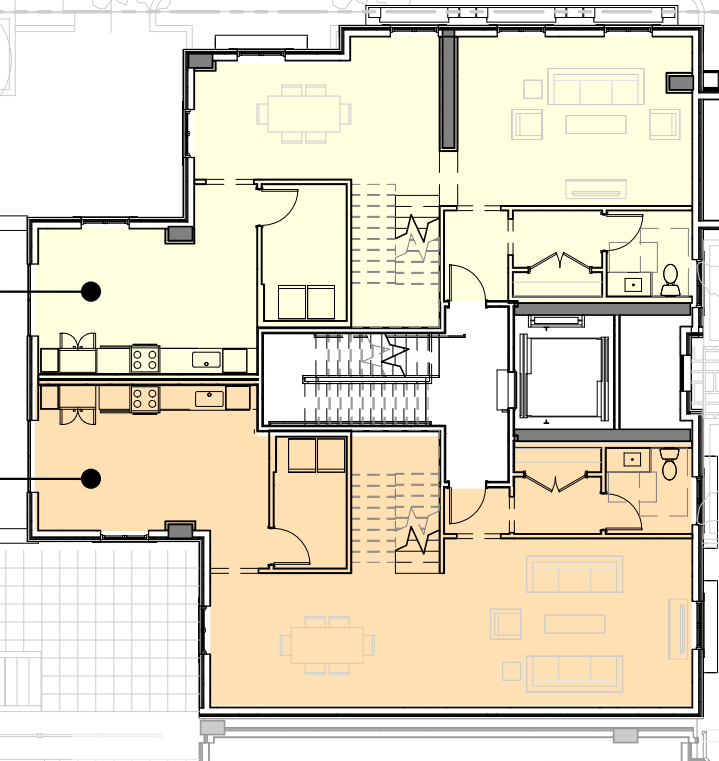
B18 - D1.0  
3 BEDROOM



BUILDING PLAN  
FLOOR 1

B18 - D3.0  
2 BEDROOM

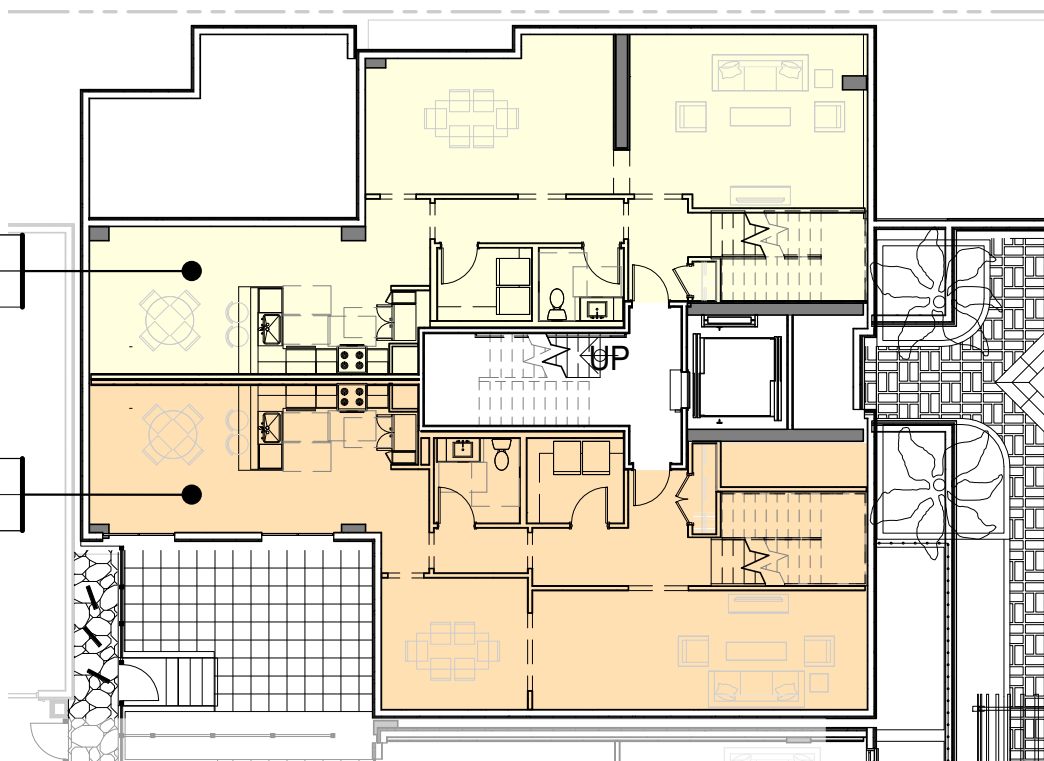
B18 - D4.0  
3 BEDROOM



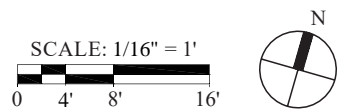
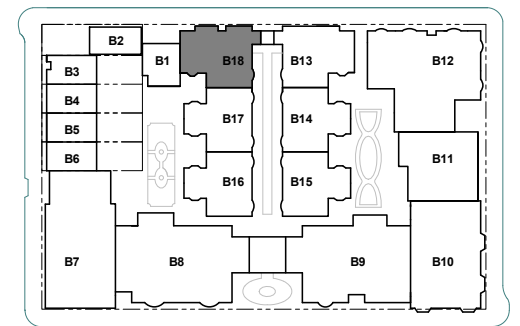
BUILDING PLAN  
FLOOR 2

B18 - D2.0  
3 BEDROOM

B18 - D1.0  
3 BEDROOM



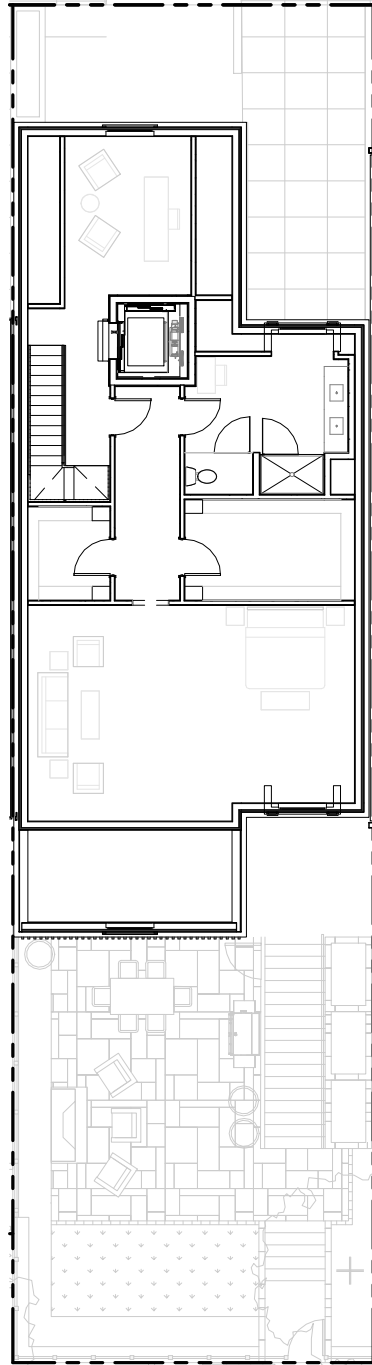
BUILDING PLAN  
BASEMENT



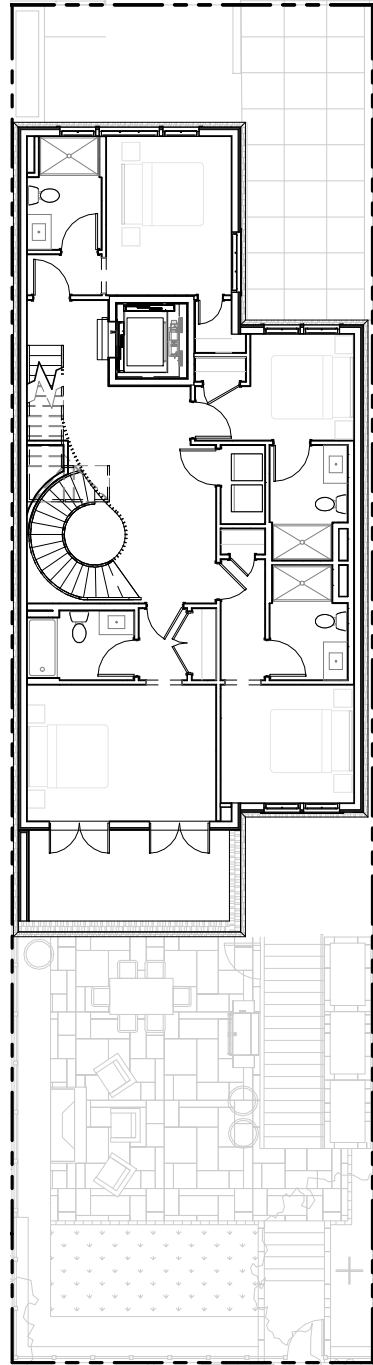


BLOCK C

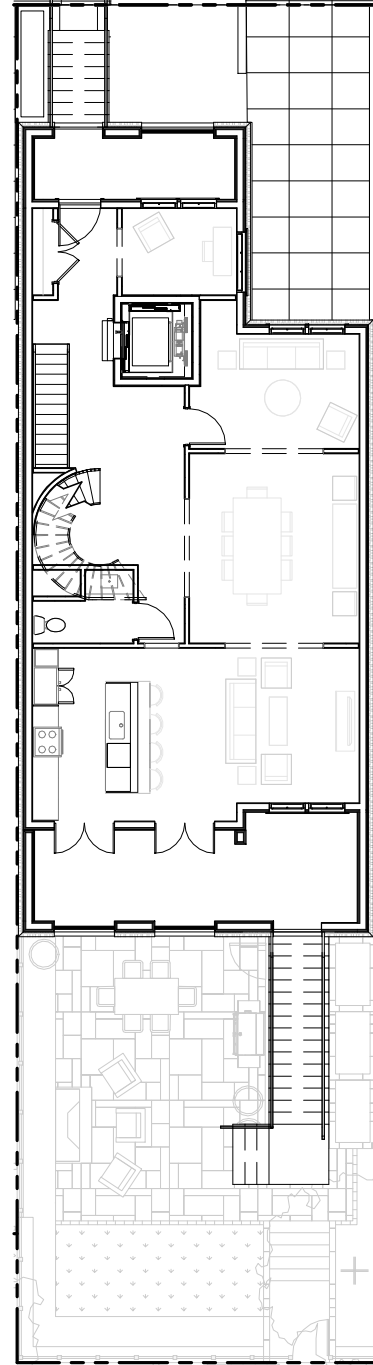
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C1	SFR	1	1	-	-	-	-	-
C2	SFR	1	1	-	-	-	-	-
C3	SFR	1	1	-	-	-	-	-
C4	Multi	22	-	-	7	10	5	-
C5	Multi	28	-	1	-	18	9	-
C6	Multi	23	-	7	16	-	-	-
C7	Amenity/MF	4	-	-	4	-	-	-
C8	Multi	3	-	-	-	3	-	-
Total:		83	3	8	27	31	14	-
%		100%	4%	10%	33%	37%	17%	0%



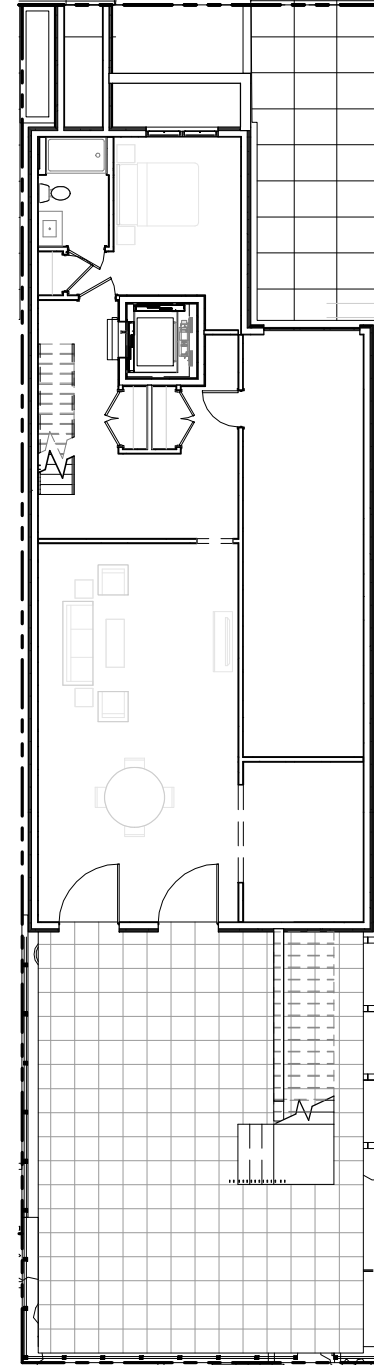
BUILDING PLAN  
FLOOR 3



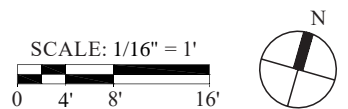
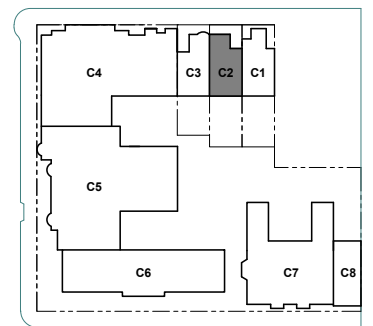
BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



BUILDING PLAN  
BASEMENT



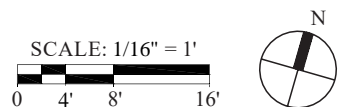
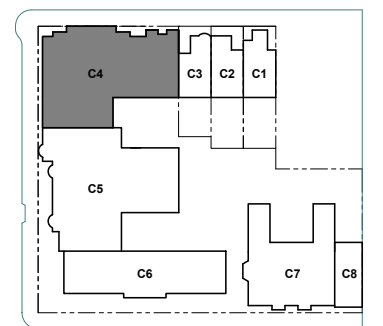
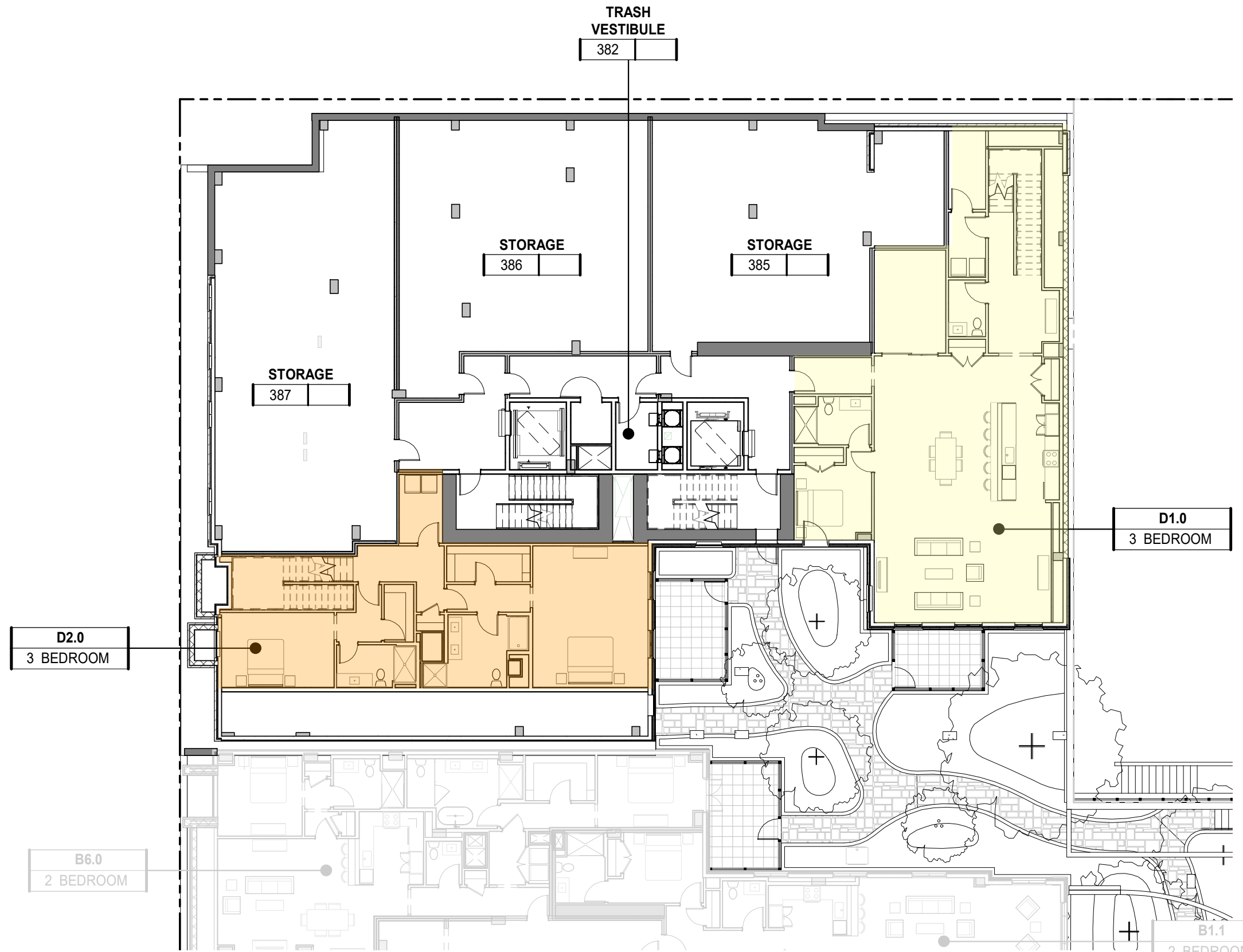
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## BUILDING PLANS - C2 (C1, C3 SIM.)

PUD/CU SUBMITTAL A2.01-C2  
NOVEMBER 2019  
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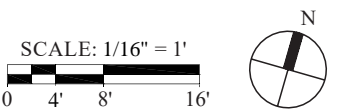
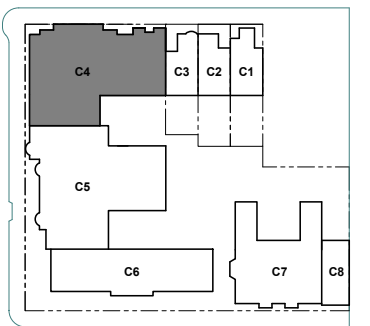
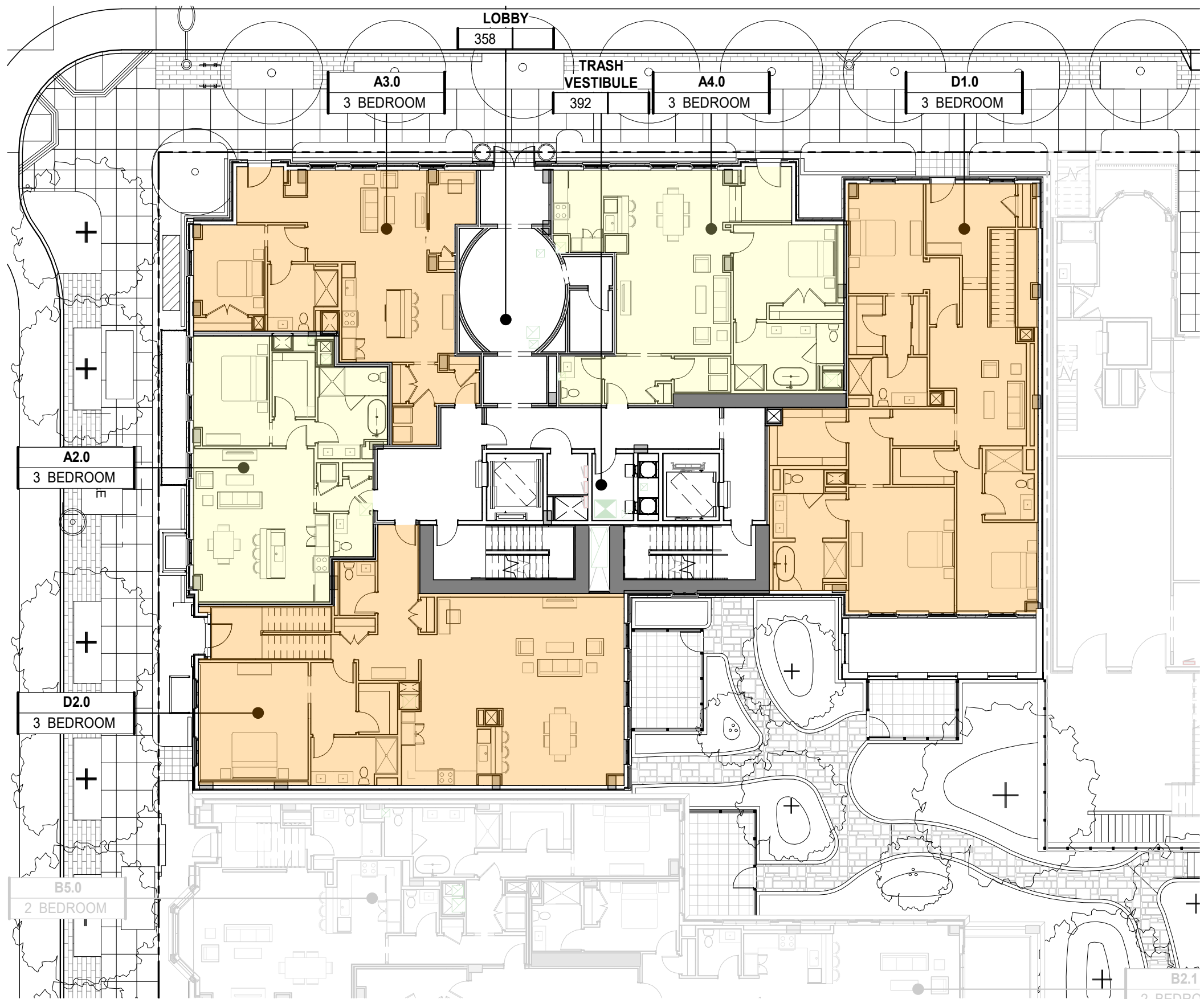


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## BUILDING PLAN - FLOOR 1 - C4

PUD/CU SUBMITTAL A2.01-C4  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



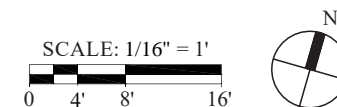
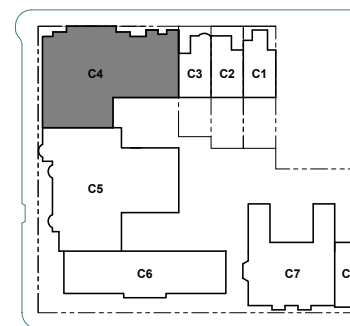
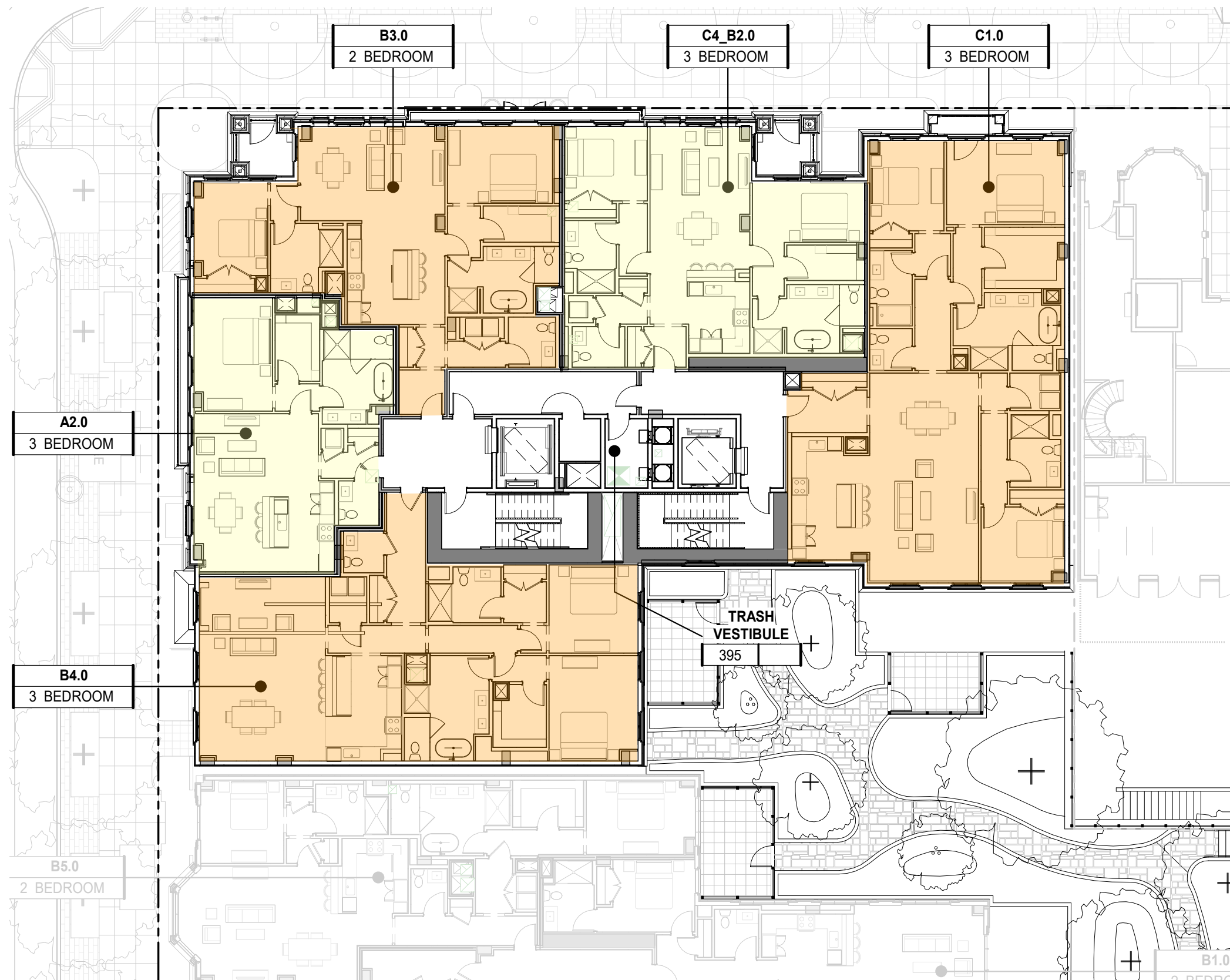
3700 CALIFORNIA STREET SAN FRANCISCO, CA



# BUILDING PLAN - FLOOR 2 - C4

PUD/CU SUBMITTAL A2.02-C4  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



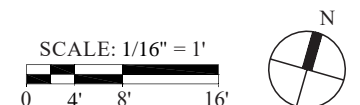
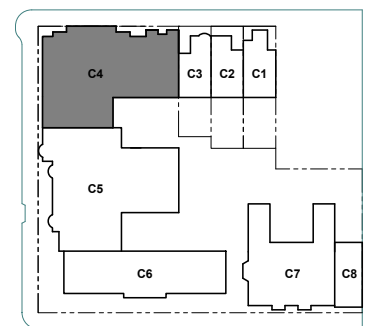


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## BUILDING PLAN - FLOOR 3 (FLOOR 4 SIM.) - C4

PUD/CU SUBMITTAL A2.03-C4  
NOVEMBER 2019  
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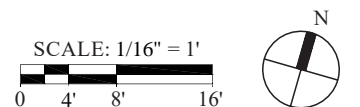
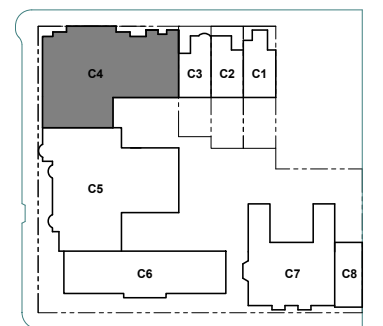
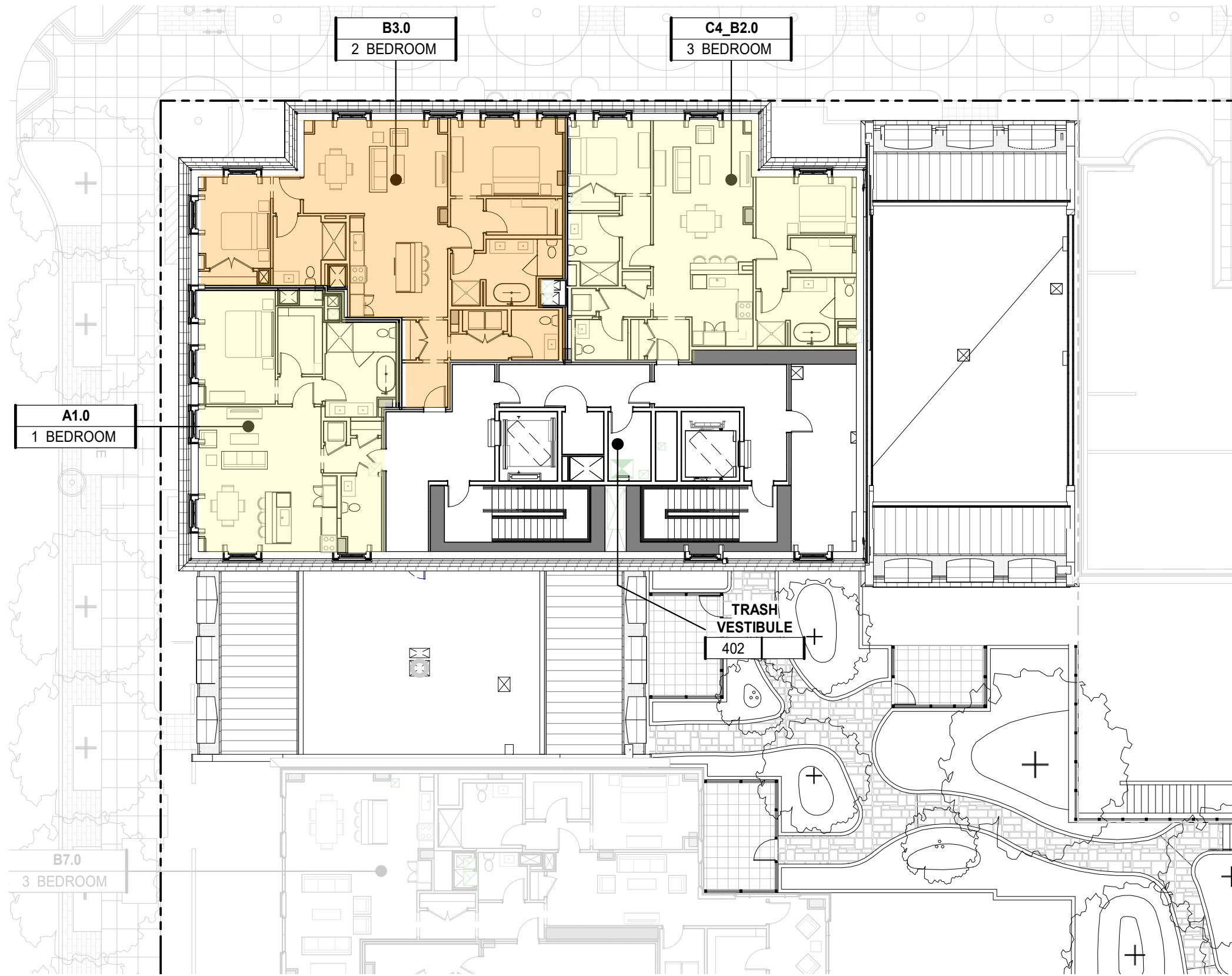
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## BUILDING PLAN - FLOOR 5 - C4

PUD/CU SUBMITTAL A2.05-C4  
 NOVEMBER 2019  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



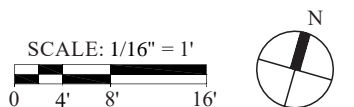
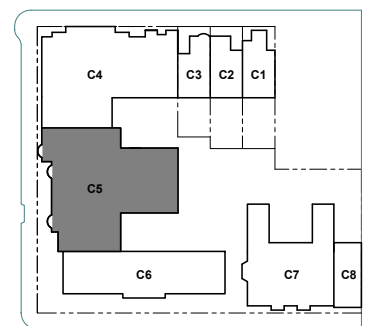
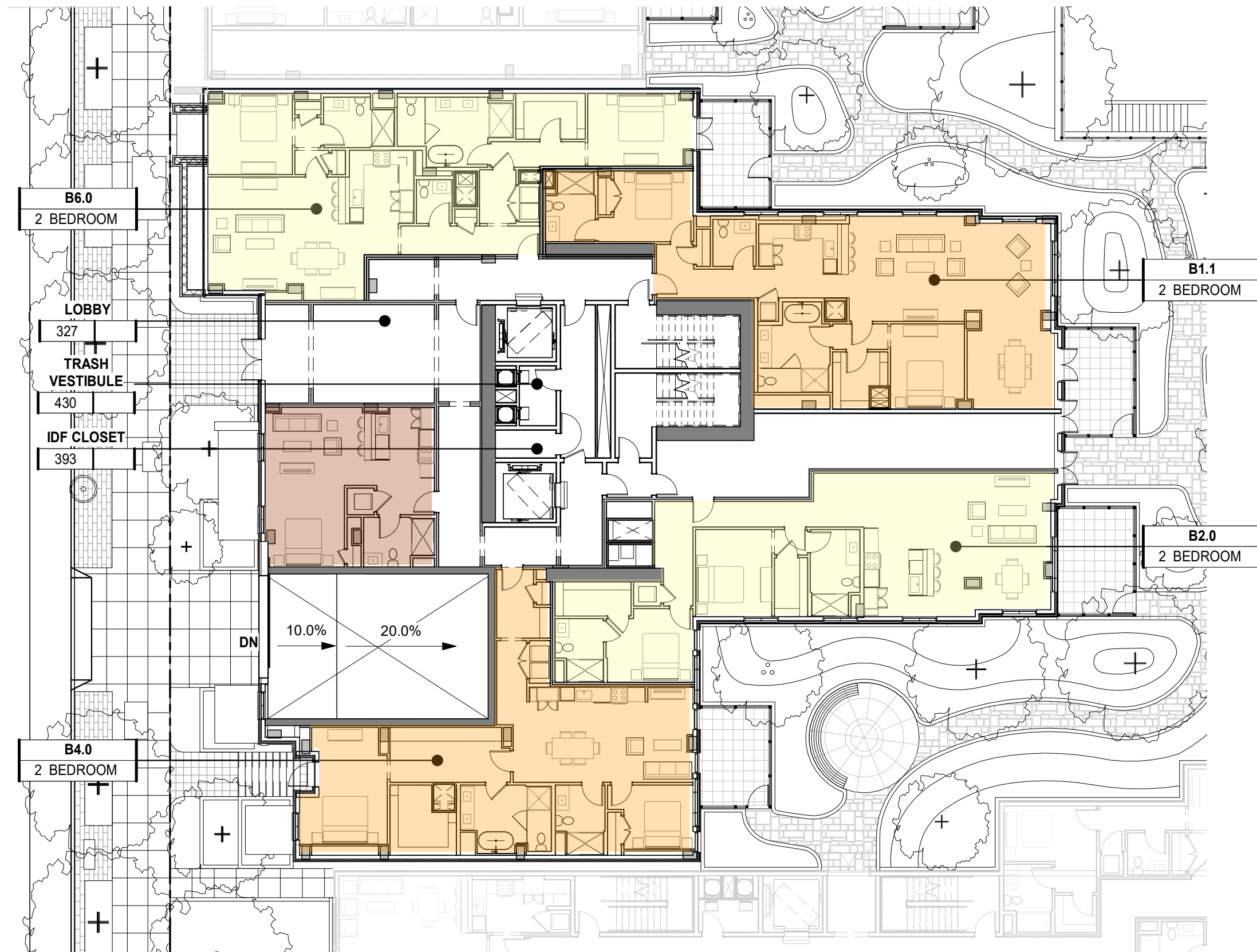


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## BUILDING PLAN - FLOOR 6 - C4

PUD/CU SUBMITTAL A2.06-C4  
 NOVEMBER 2019  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



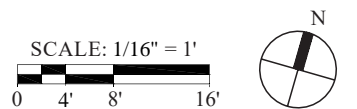
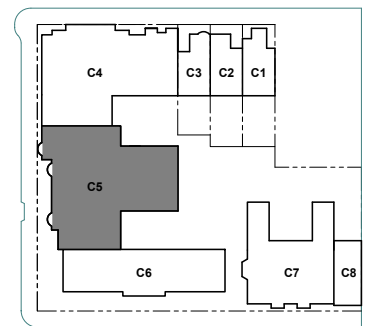
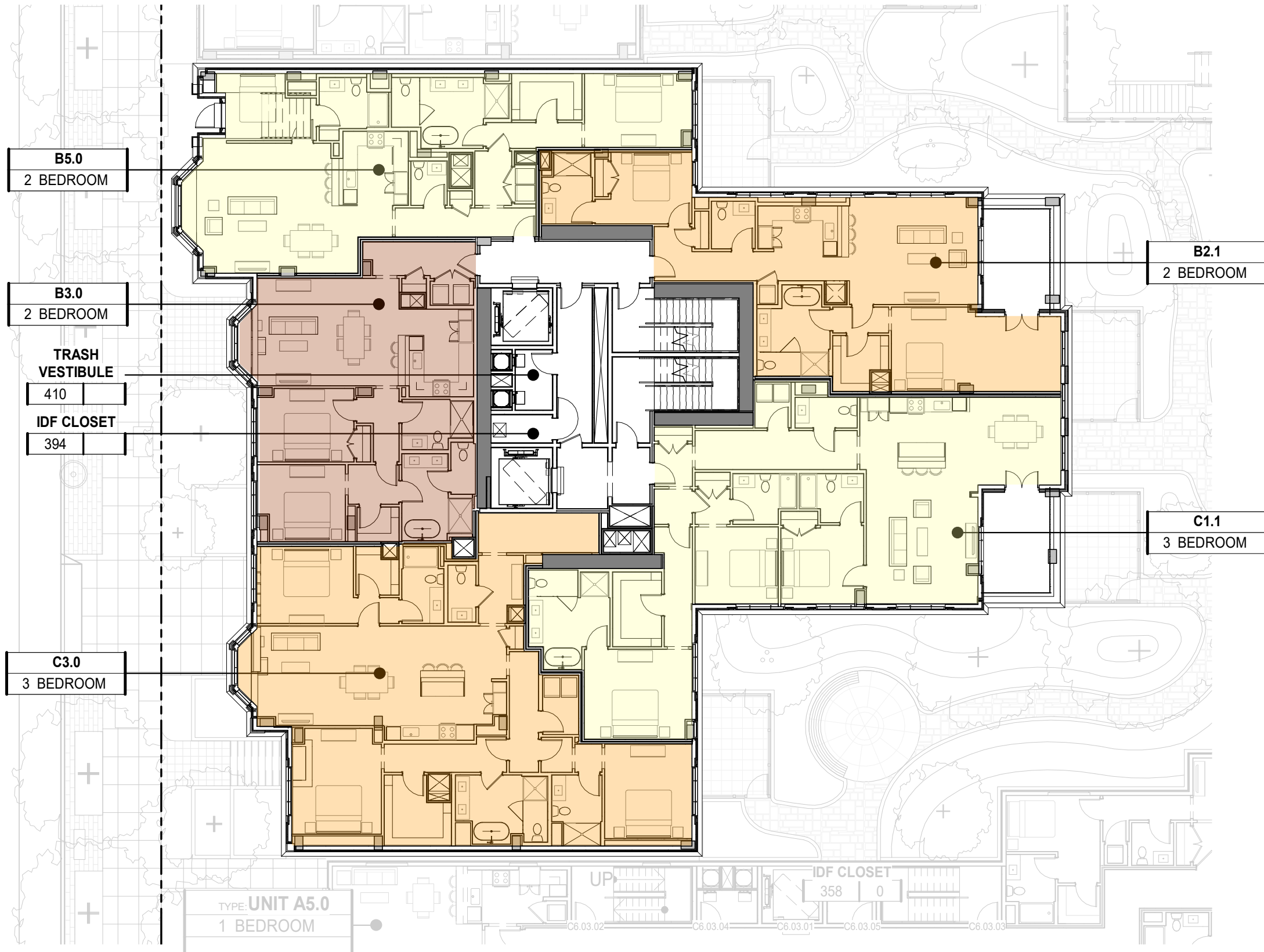
3700 CALIFORNIA STREET SAN FRANCISCO, CA



## BUILDING PLAN - FLOOR 1 - C5

PUD/CU SUBMITTAL A2.01-C5  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



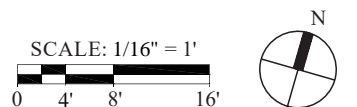
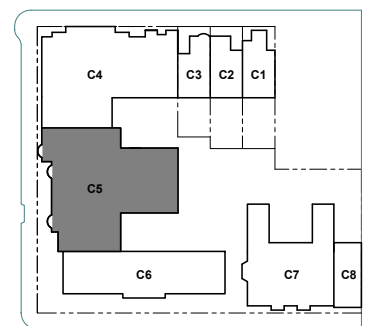
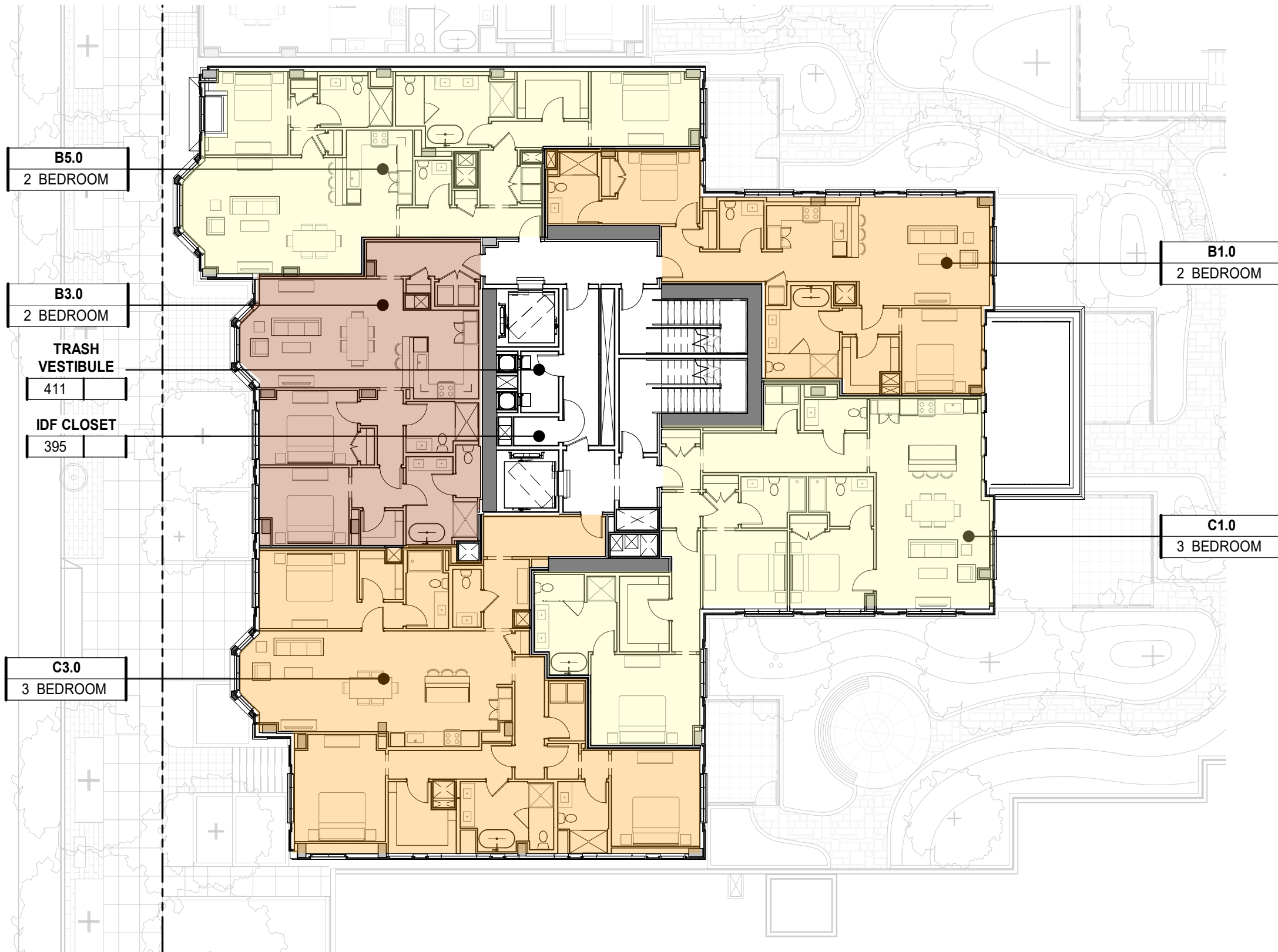


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## BUILDING PLAN - FLOOR 2 - C5

PUD/CU SUBMITTAL A2.02-C5  
NOVEMBER 2019  
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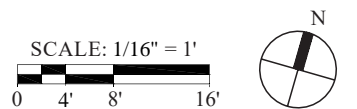
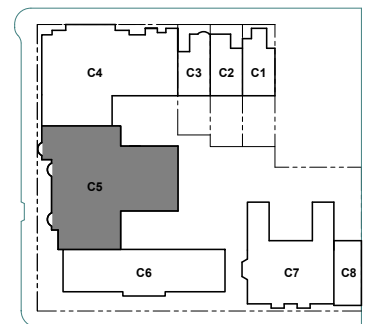
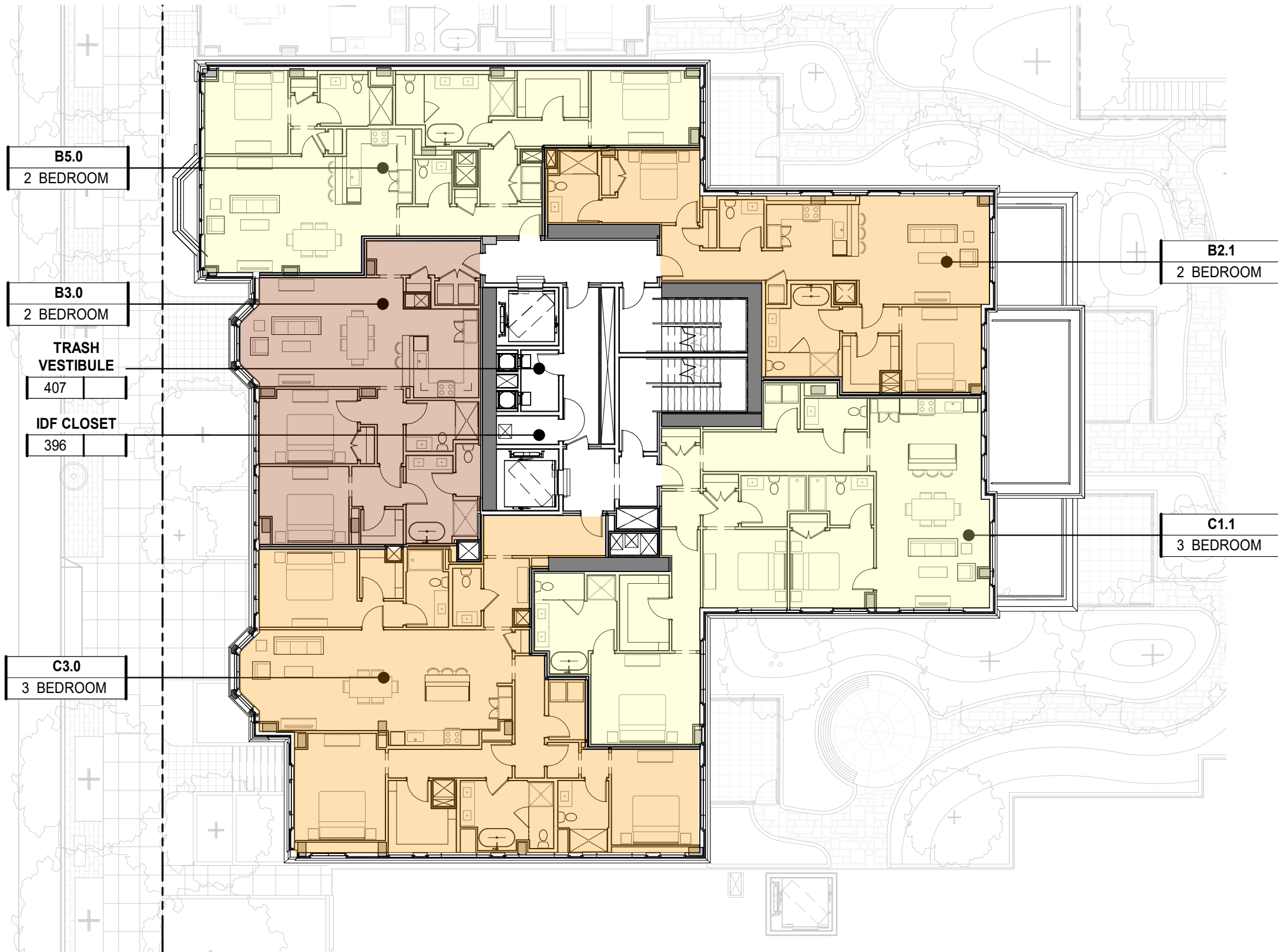
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## BUILDING PLAN - FLOOR 3 - C5

PUD/CU SUBMITTAL A2.03-C5  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.





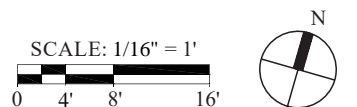
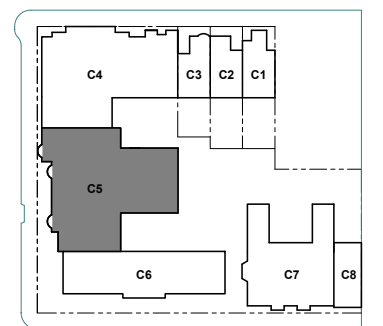
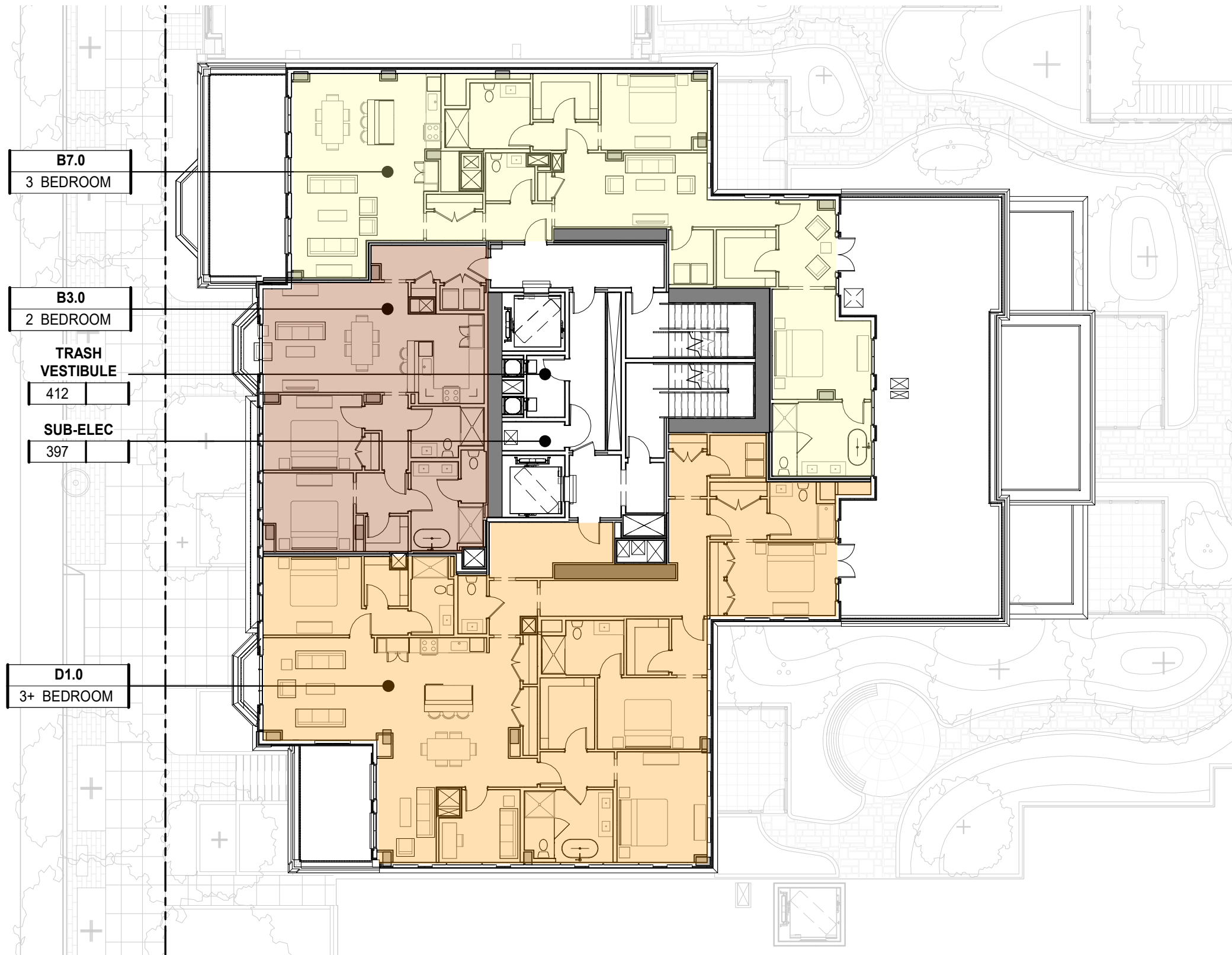
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## BUILDING PLAN - FLOOR 4 - C5

PUD/CU SUBMITTAL A2.04-C5  
NOVEMBER 2019  
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TMG  
PARTNERS  
MILLER COMPANY  
landscape architects

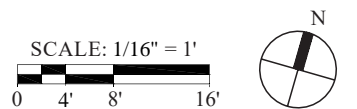
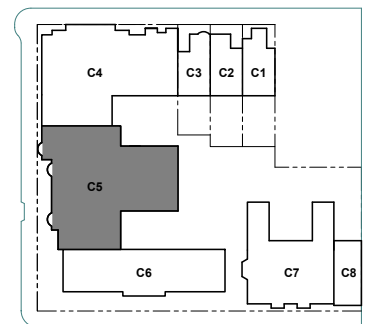
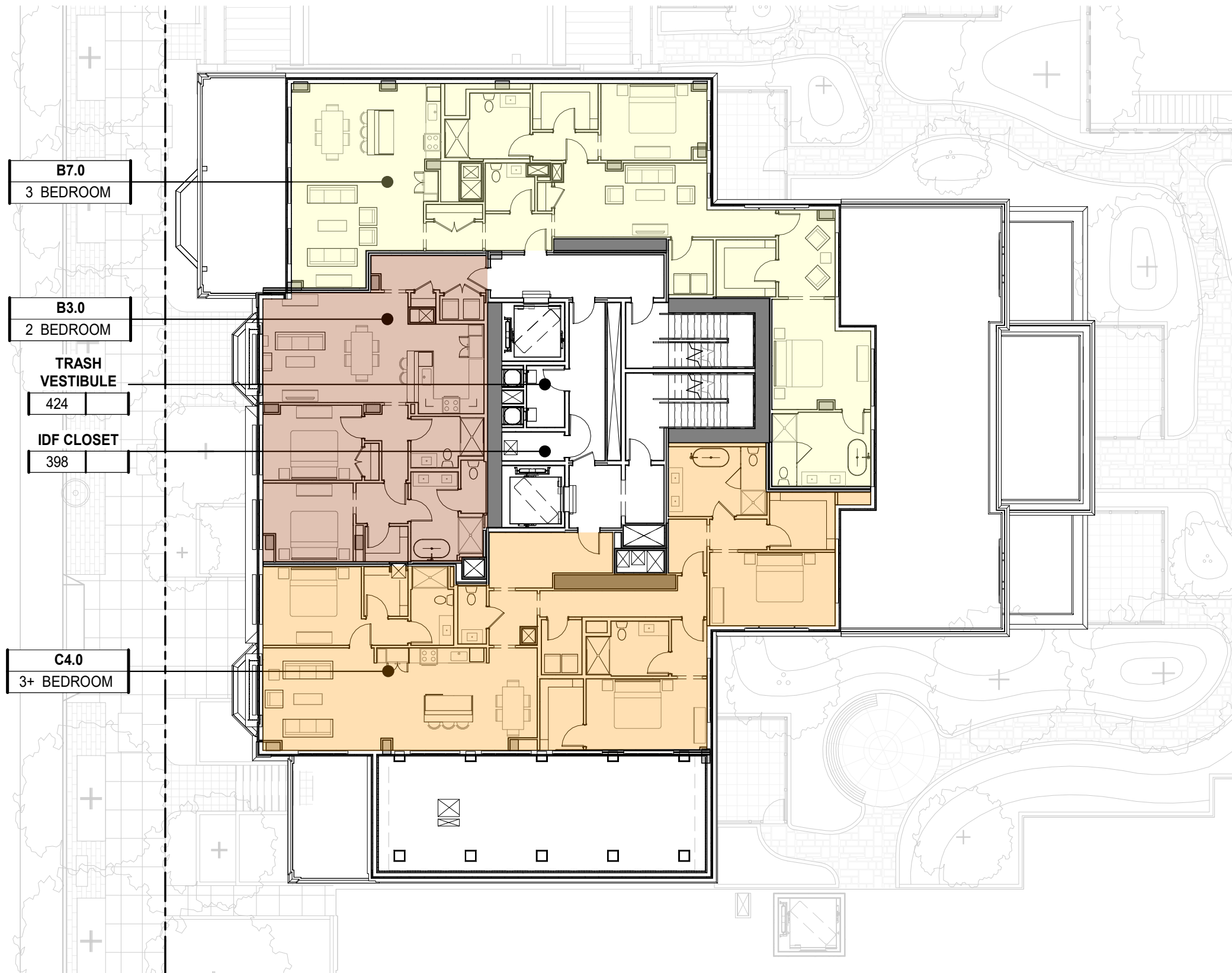
GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF 100+  
YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 5 - C5

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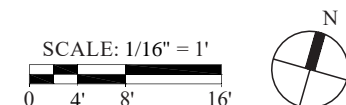
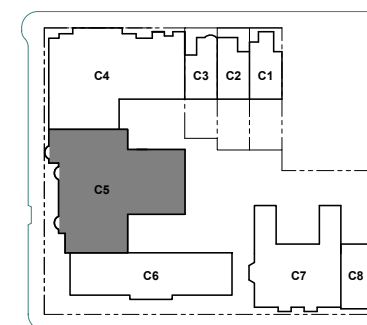
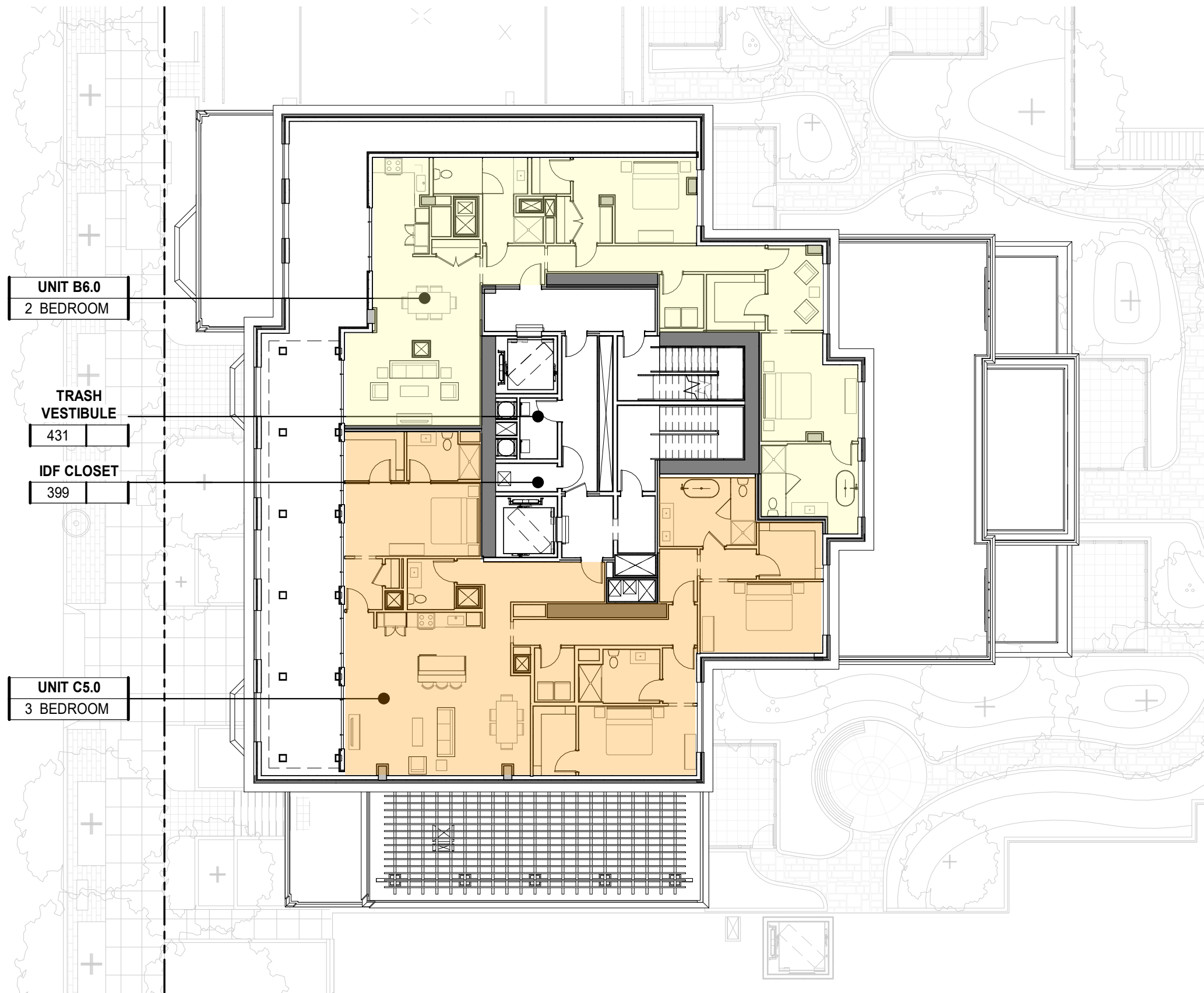
TMG  
PARTNERS  
MILLER COMPANY  
landscape architects

GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF 100+  
YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 6 - C5

PUD/CU SUBMITTAL A2.06-C5  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



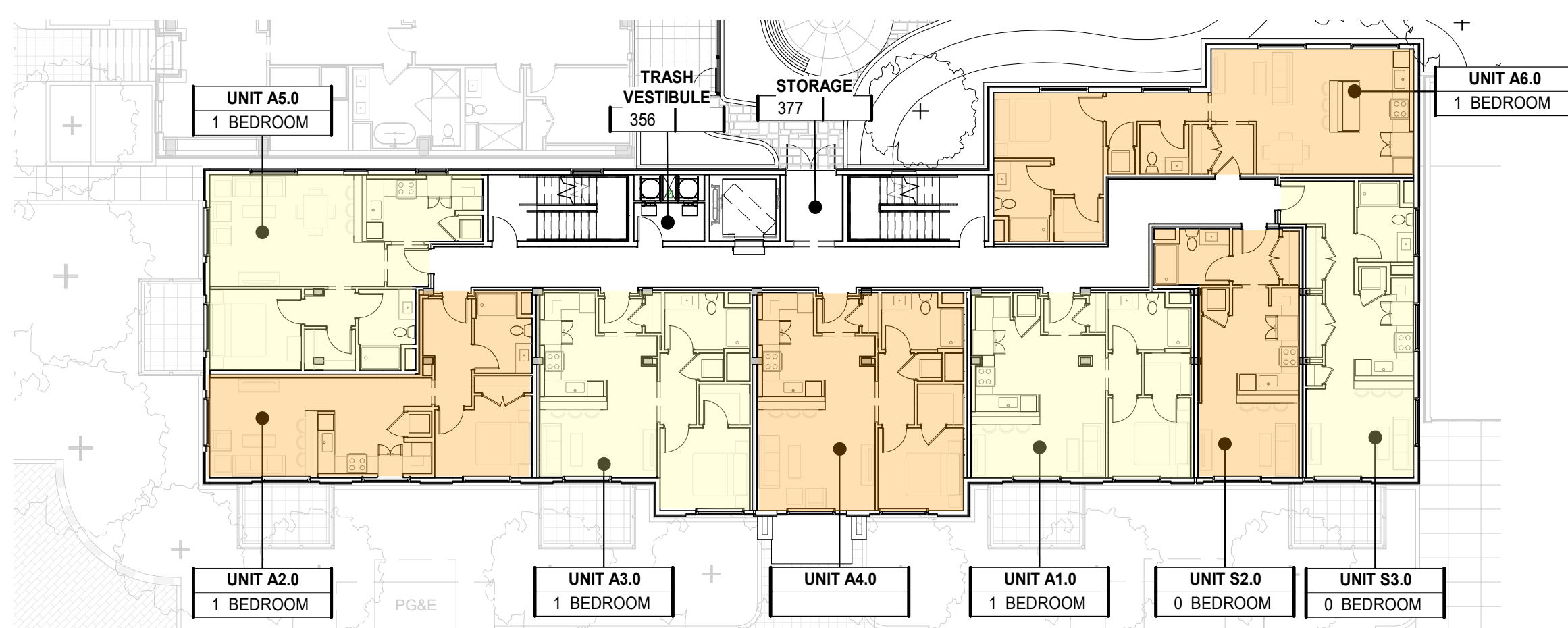
3700 CALIFORNIA STREET SAN FRANCISCO, CA



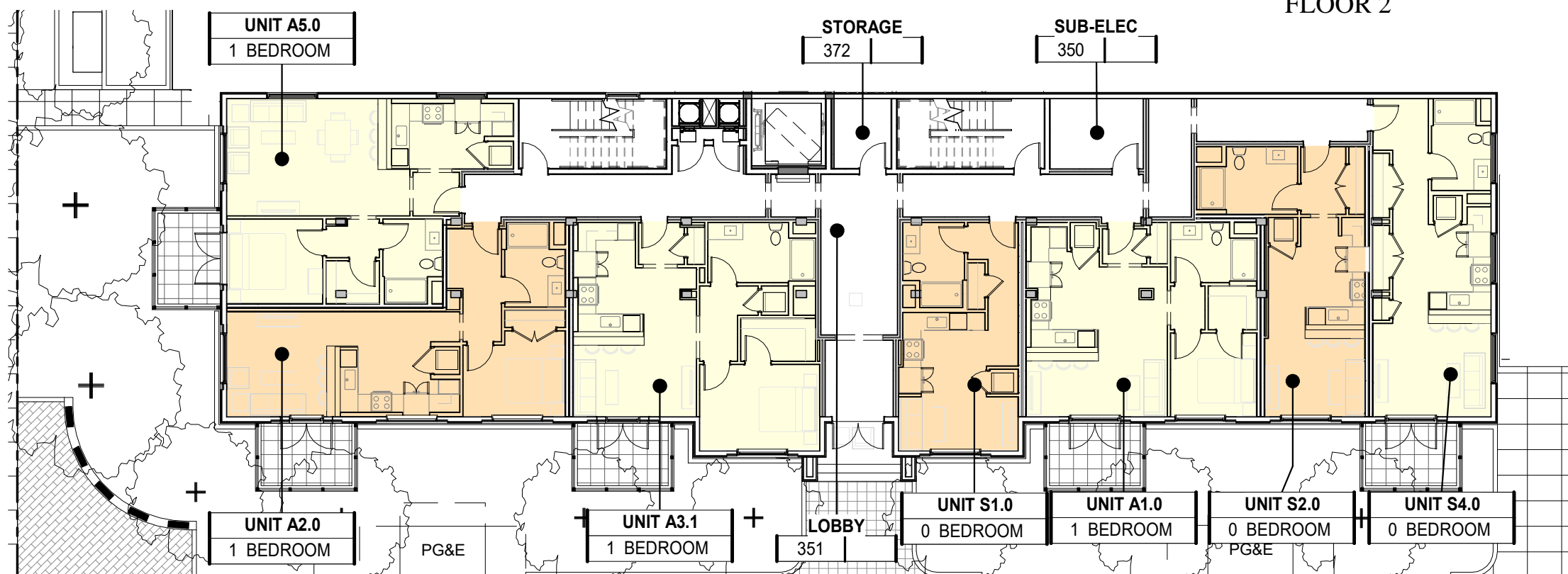
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PUD/CU SUBMITTAL A2.07-C5  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

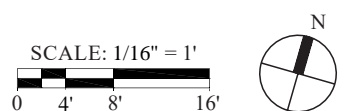
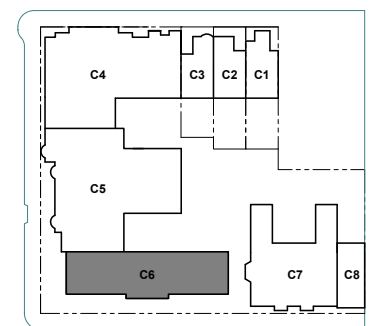




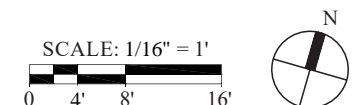
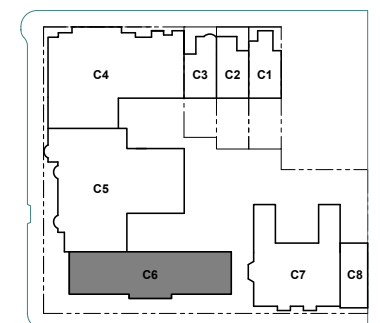
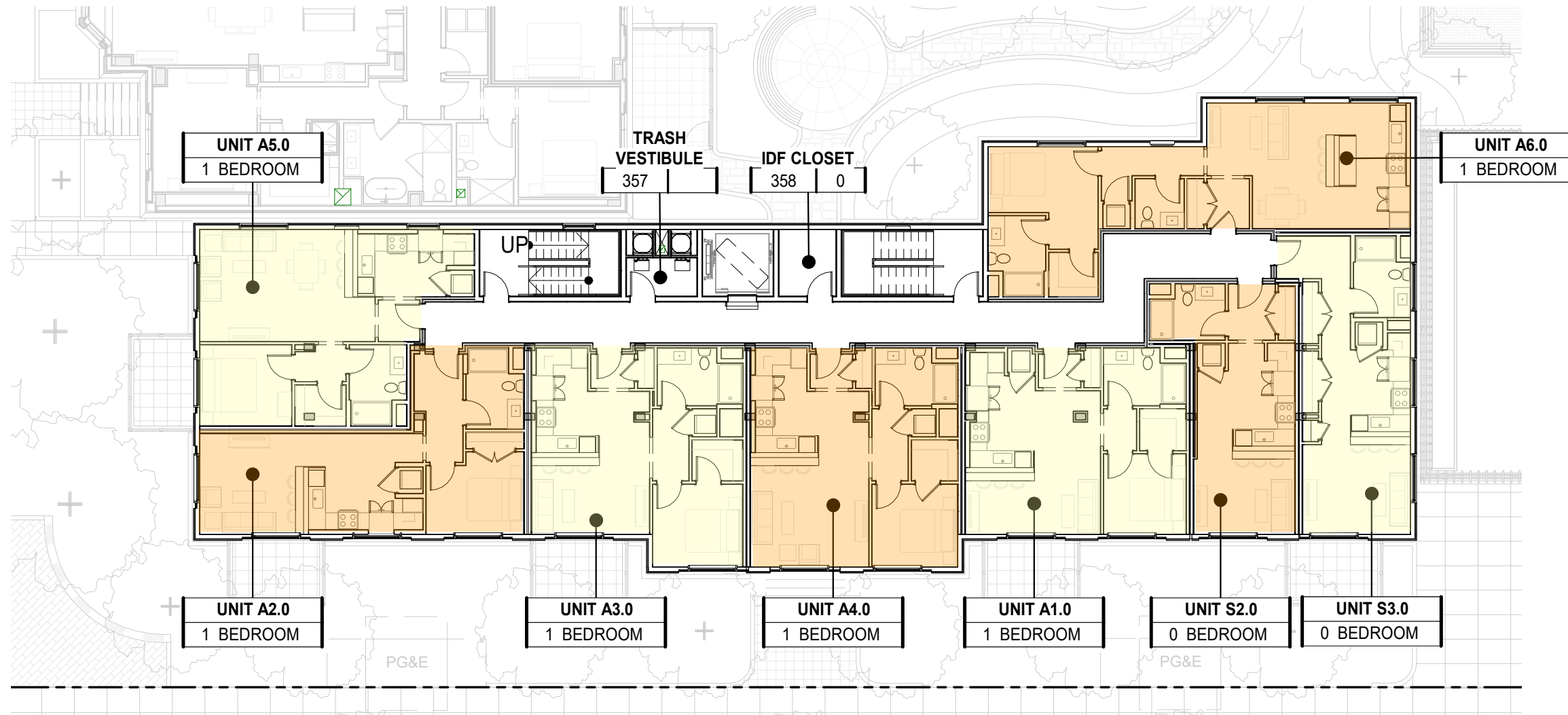
BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



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TMG PARTNERS  
MILLER COMPANY  
landscape architects

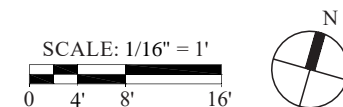
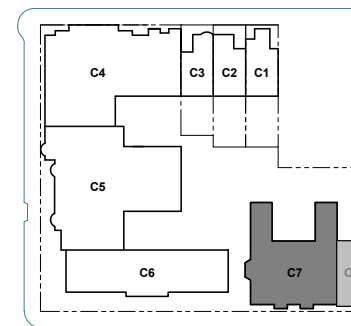
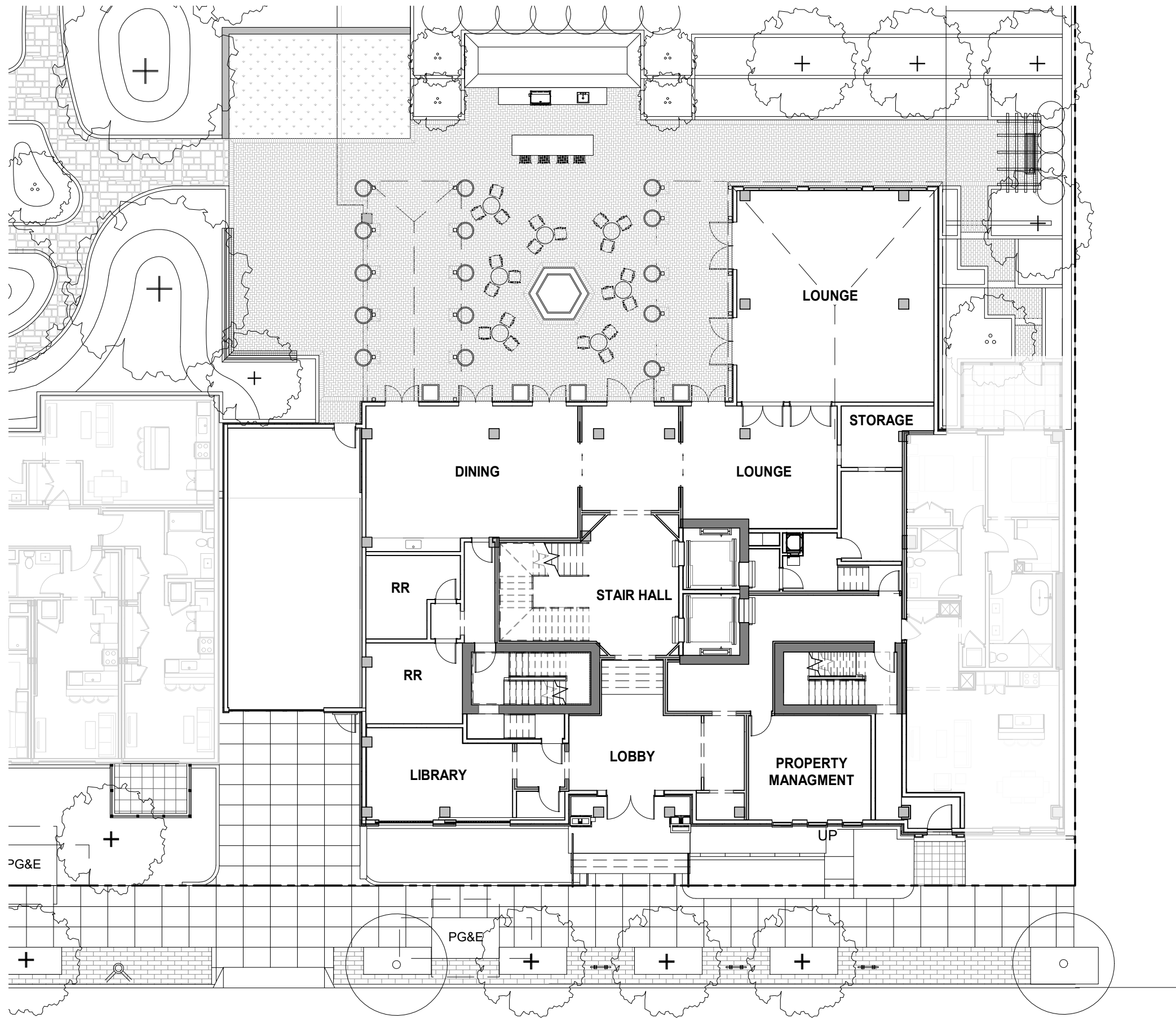
GROSVENOR  
BDE  
ARCHITECTURE

RAMSA  
ROBERT A.M. STERN ARCHITECTS  
BKF 100+ YEARS  
ENGINEERS, SURVEYORS, PLANNERS

## BUILDING PLAN - FLOOR 3 - C6

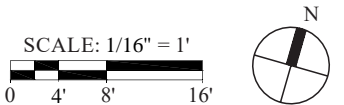
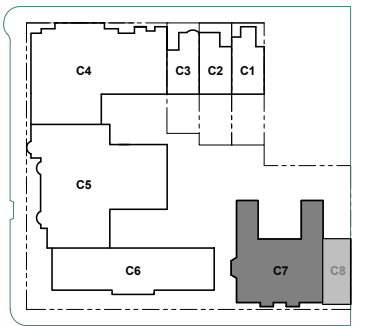
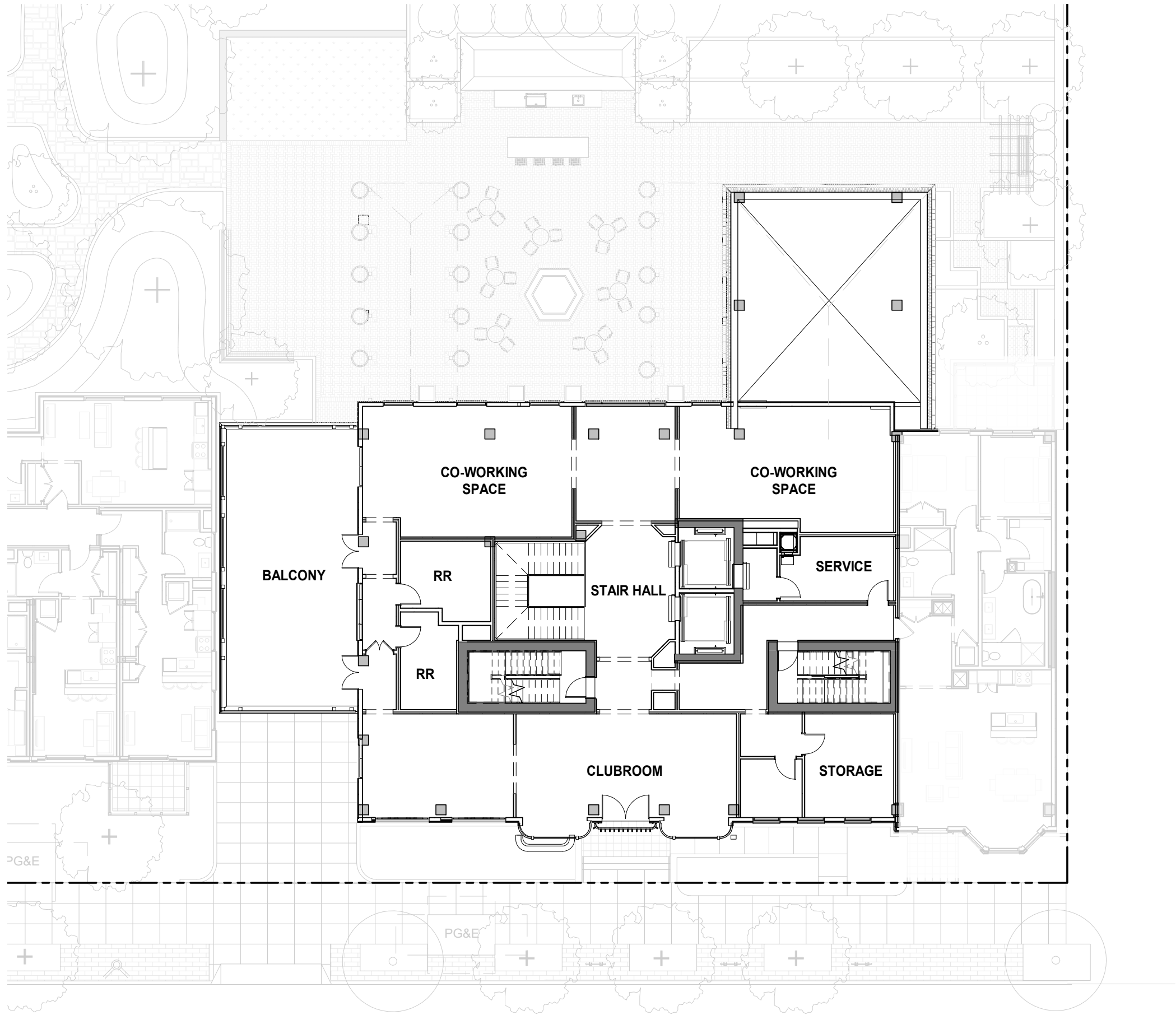
PUD/CU SUBMITTAL A2.02-C6  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.





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## BUILDING PLAN - FLOOR 1 - C7



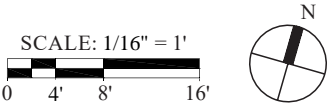
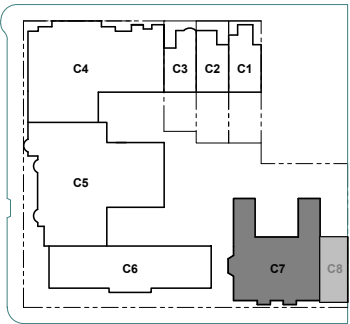
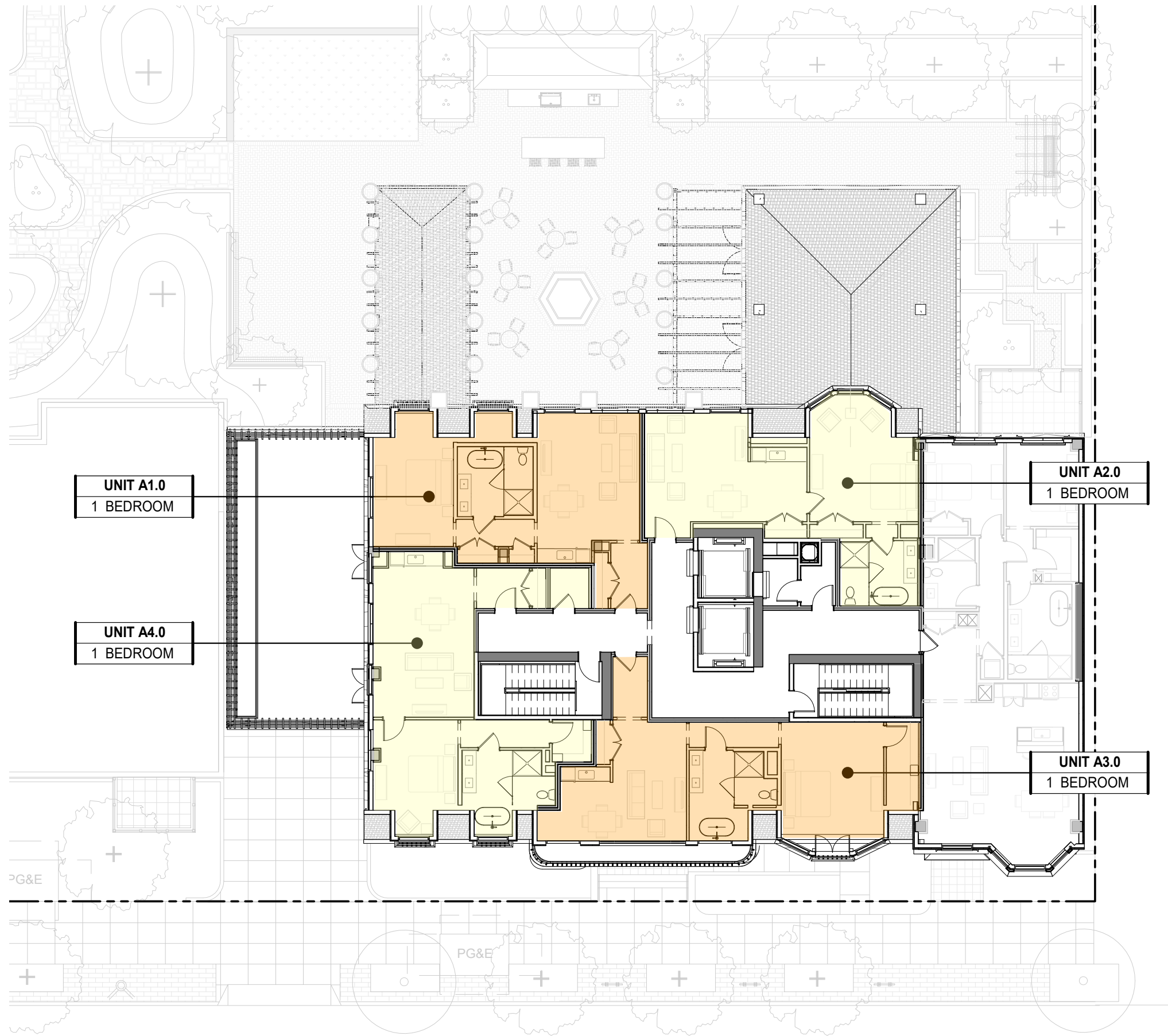
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# BUILDING PLAN - FLOOR 2 - C7

PUD/CU SUBMITTAL A2.02-C7  
 NOVEMBER 2019  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



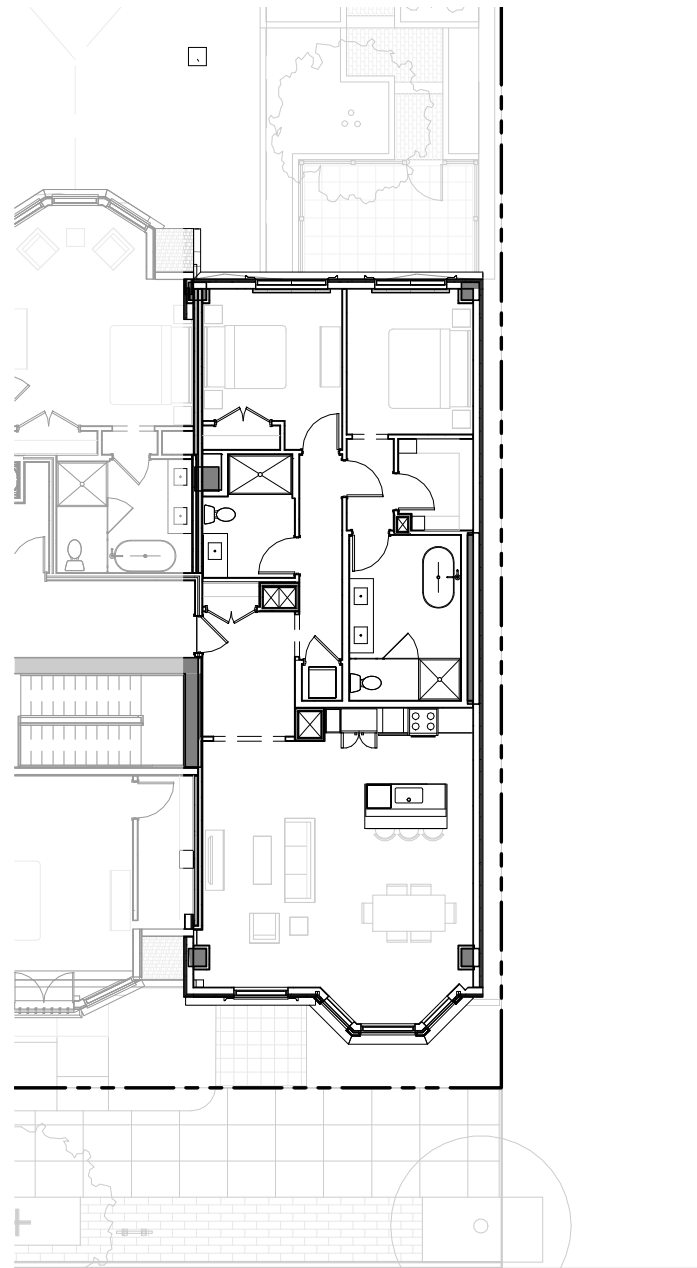


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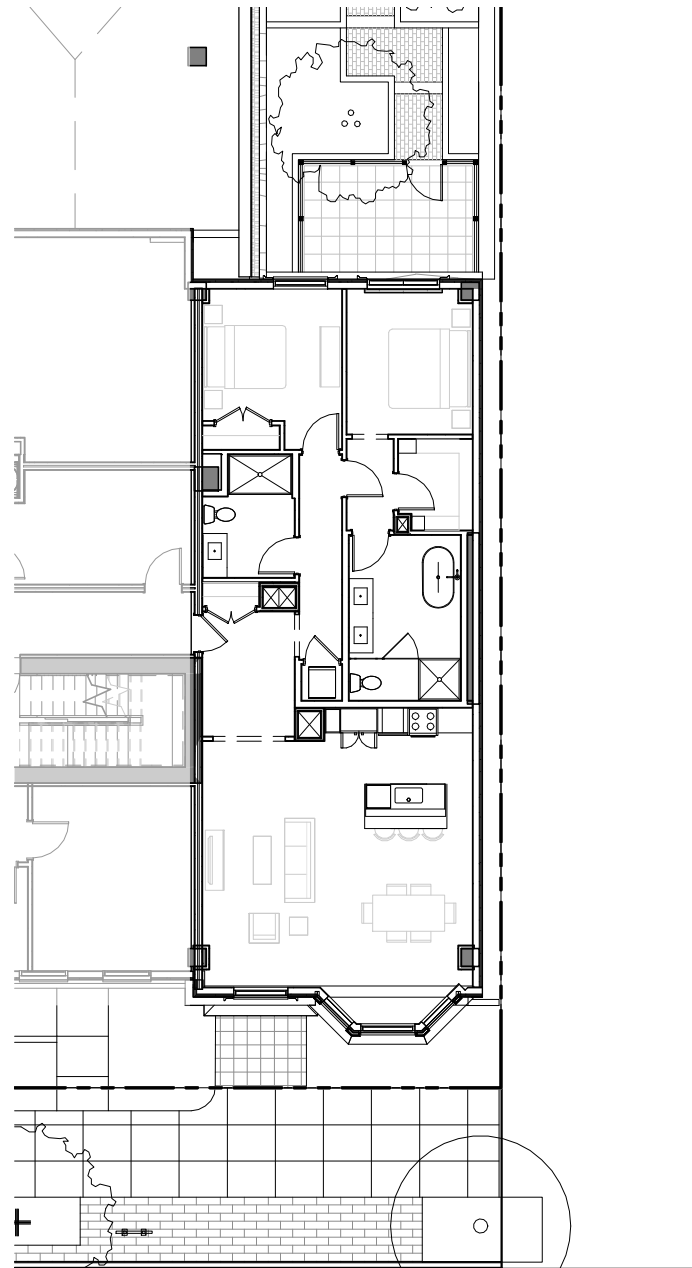


BUILDING PLAN - FLOOR 3 - C7

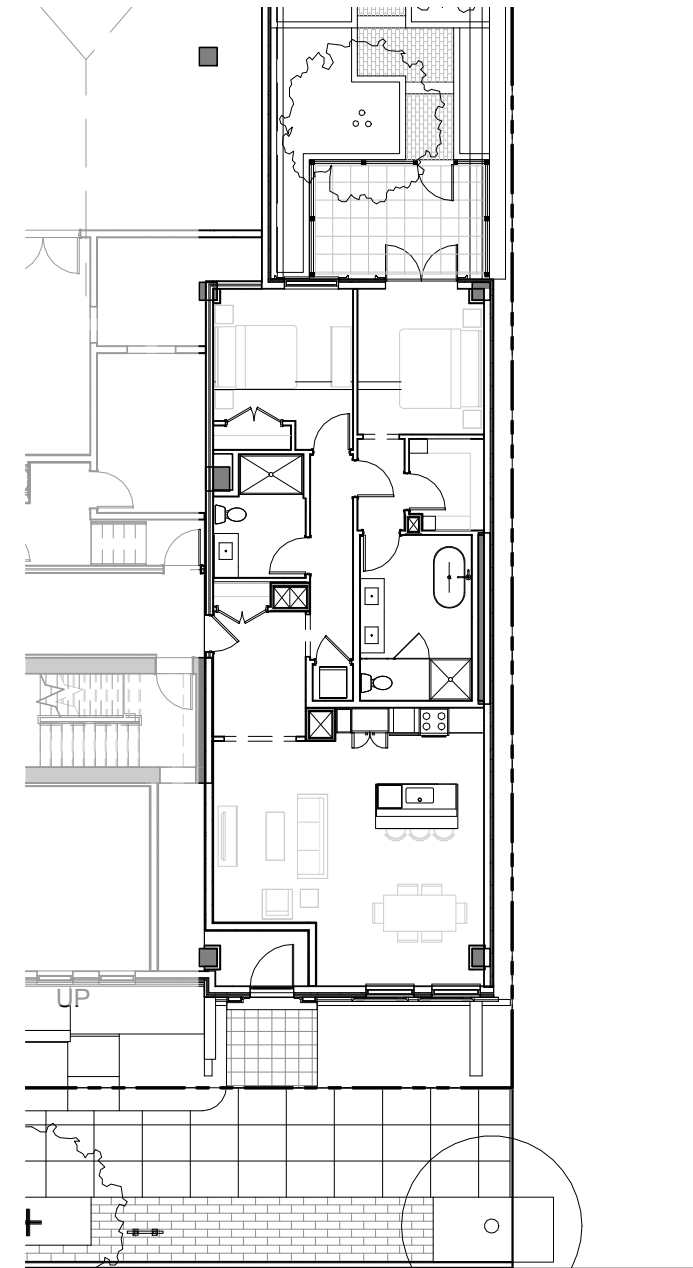
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 NOVEMBER 2019  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



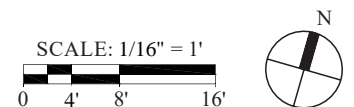
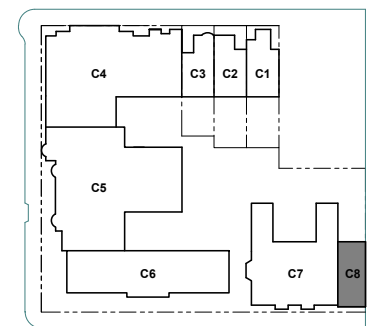
BUILDING PLAN  
FLOOR 3



BUILDING PLAN  
FLOOR 2



BUILDING PLAN  
FLOOR 1



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## BUILDING PLAN - FLOORS 1,2,3 - C8

PUD/CU SUBMITTAL A2.01-C8  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.



# LANDSCAPE

MILLER COMPANY  
landscape architects

3700 CALIFORNIA STREET SAN FRANCISCO, CA



PUD/CU SUBMITTAL  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.





**LEGEND**

- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- NEW BIKE RACKS
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- SINGLE FAMILY HOME LOT LINE

**ROOF DECK USEABLE AREAS**

- A7 - 735 SF
- B7 - 735 SF
- B8 - 735 SF
- B9 - 735 SF
- B10 - 735 SF
- C5 - 735 SF



KEY PLAN

3700 CALIFORNIA STREET

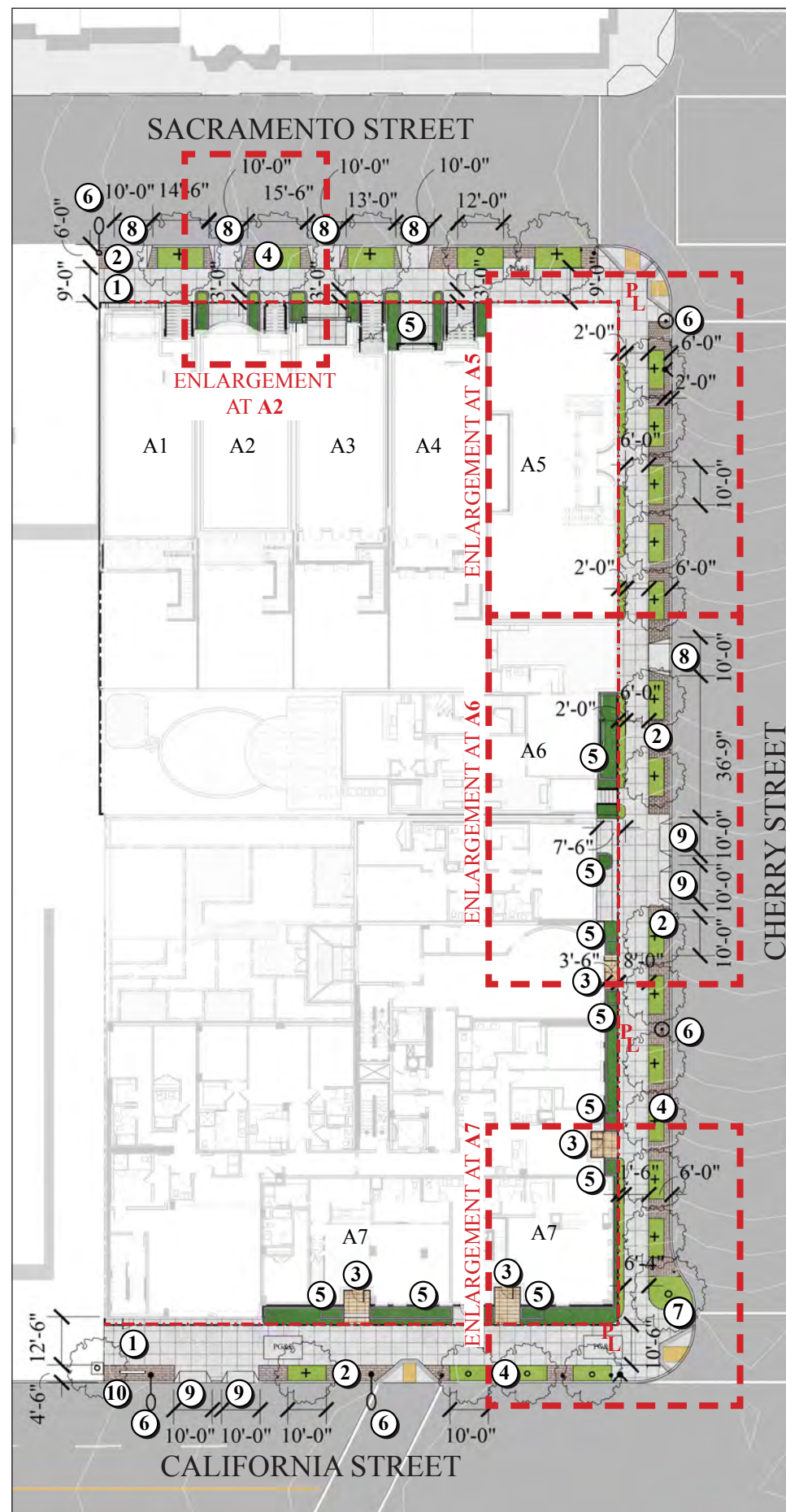
SAN FRANCISCO, CA

**OVERALL LANDSCAPE PLAN**





# STREETSCAPE PLAN - BLOCK A



## LEGEND

- ① CONCRETE SIDEWALK PAVING
- ② ENHANCED PAVING AT STREET
- ③ PAVING AT PRIVATE ENTRIES
- ④ AT GRADE STREET PLANTING
- ⑤ LOW WALL AT STREET FRONTAGE PLANTING
- ⑥ LIGHT FIXTURE
- ⑦ SIDEWALK BULBOUT
- ⑧ SINGLE FAMILY HOME DRIVEWAY
- ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY
- ⑩ BIKE RACKS
- P<sub>L</sub> PROPERTY LINE
- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT
- EXISTING STREET TREE
- PROPOSED STREET TREE
- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE

## NOTES

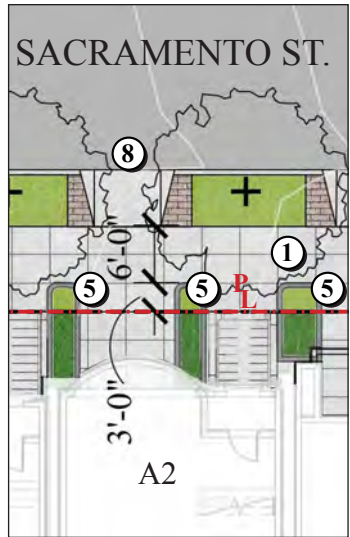
SEE SHEET L-01.02 FOR ENLARGEMENTS OF SIDEWALK PLANTING ENCROACHMENTS AT BLOCK A.



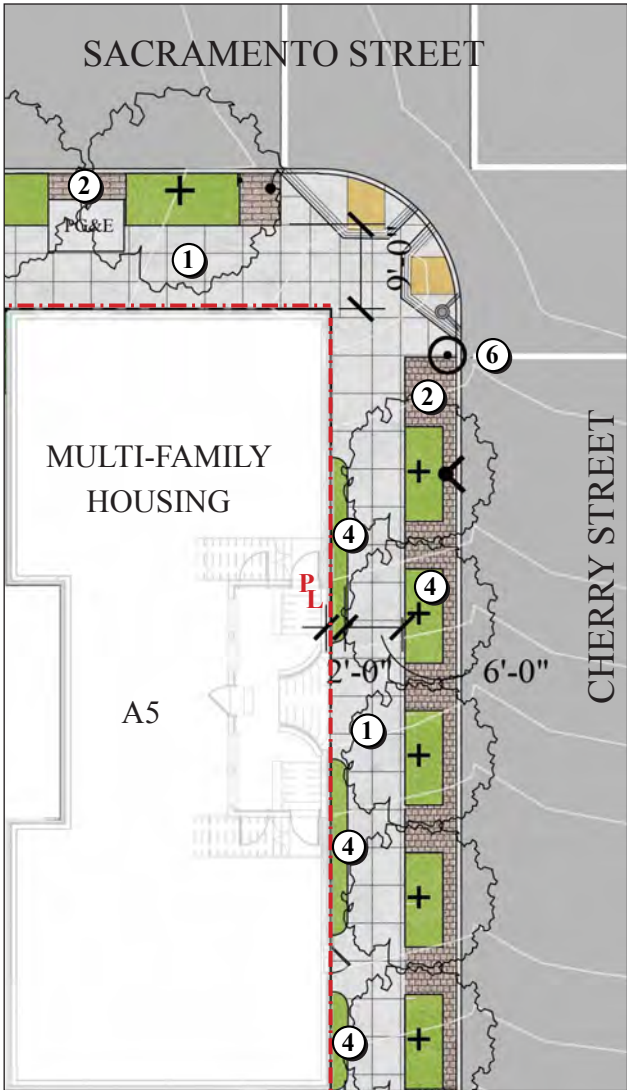
KEY PLAN



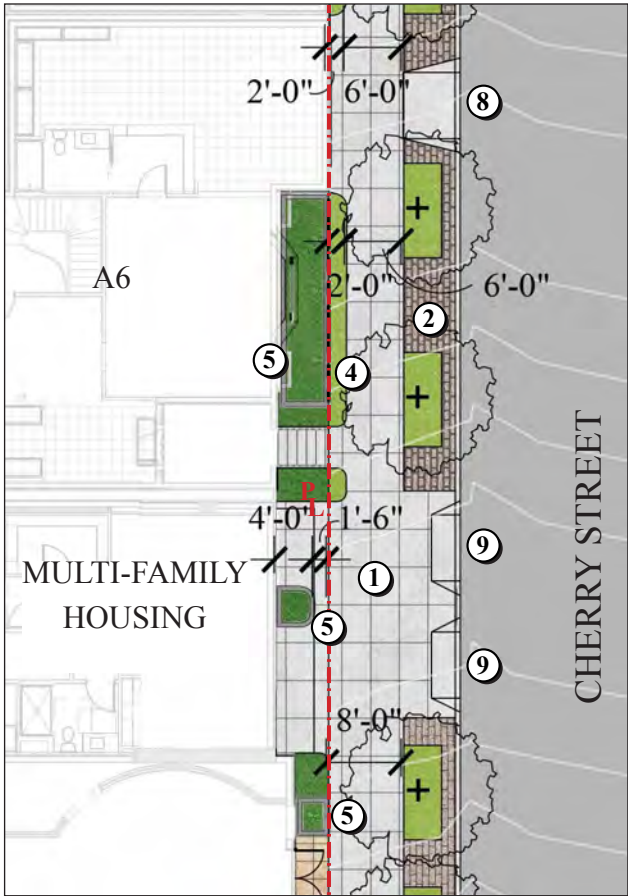




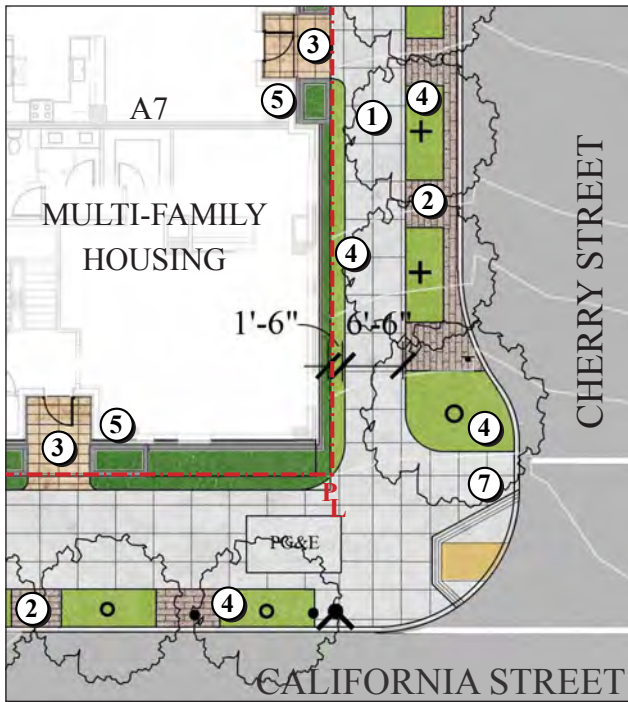
ENLARGEMENT AT A2,  
TYPICAL FOR SINGLE-  
FAMILY HOUSING  
A1 - A4



ENLARGEMENT AT A5



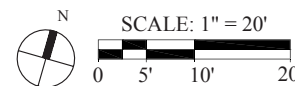
ENLARGEMENT AT A6



ENLARGEMENT AT A7

# LEGEND

- ① CONCRETE SIDEWALK PAVING
- ② ENHANCED PAVING AT STREET
- ③ PAVING AT PRIVATE ENTRIES
- ④ AT GRADE STREET PLANTING
- ⑤ LOW WALL AT STREET FRONTAGE PLANTING
- ⑥ LIGHT FIXTURE
- ⑦ SIDEWALK BULBOUT
- ⑧ SINGLE FAMILY HOME DRIVEWAY
- ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY
- ⑩ BIKE RACKS
- PL PROPERTY LINE
- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT
- EXISTING STREET TREE
- PROPOSED STREET TREE
- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## SIDEWALK ENCROACHMENT - BLOCK A





# LEGEND

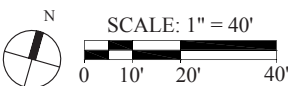
- ① CONCRETE SIDEWALK PAVING
- ② ENHANCED PAVING AT STREET
- ③ PAVING AT PRIVATE ENTRIES
- ④ AT GRADE STREET PLANTING
- ⑤ LOW WALL AT STREET FRONTAGE PLANTING
- ⑥ LIGHT FIXTURE
- ⑦ SIDEWALK BULBOUT
- ⑧ SINGLE FAMILY HOME DRIVEWAY
- ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY
- ⑩ BIKE RACKS
- PL PROPERTY LINE
- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT
- EXISTING STREET TREE
- PROPOSED STREET TREE
- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE

# NOTES

SEE SHEET L-01.04 FOR ENLARGEMENTS OF SIDEWALK PLANTING ENCROACHMENTS AT BLOCK A.



KEY PLAN

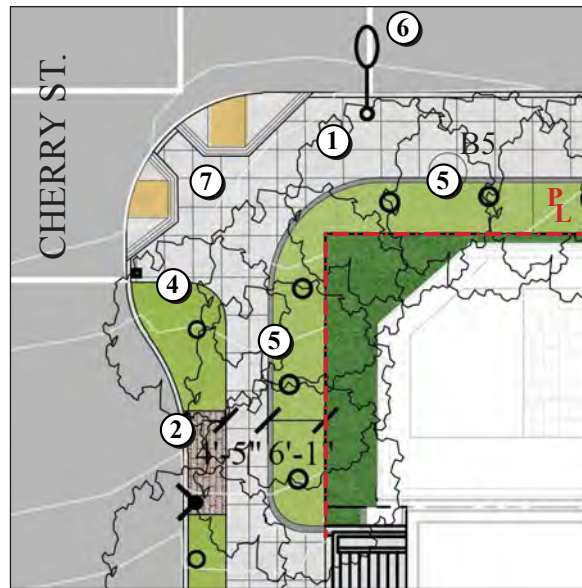


3700 CALIFORNIA STREET

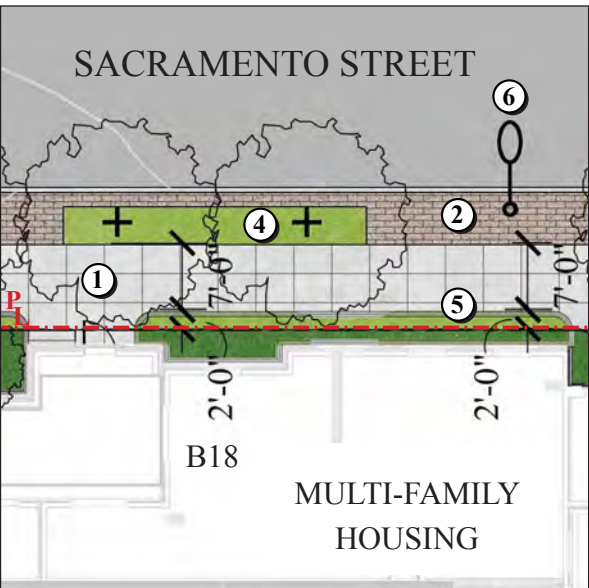
SAN FRANCISCO, CA

# STREETSCAPE PLAN - BLOCK B

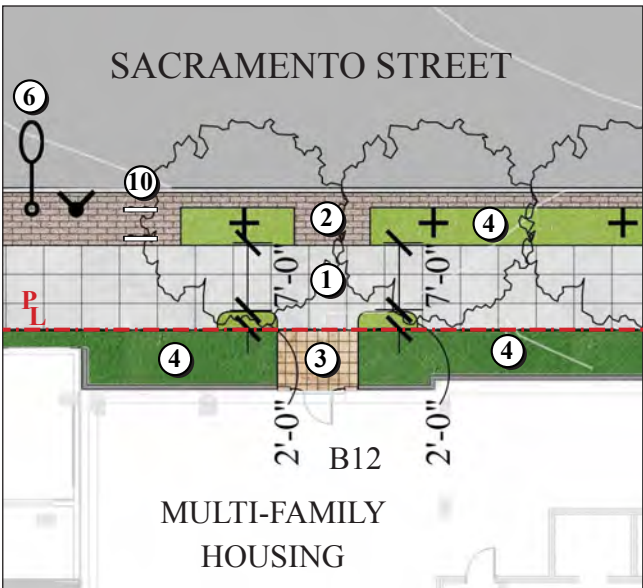




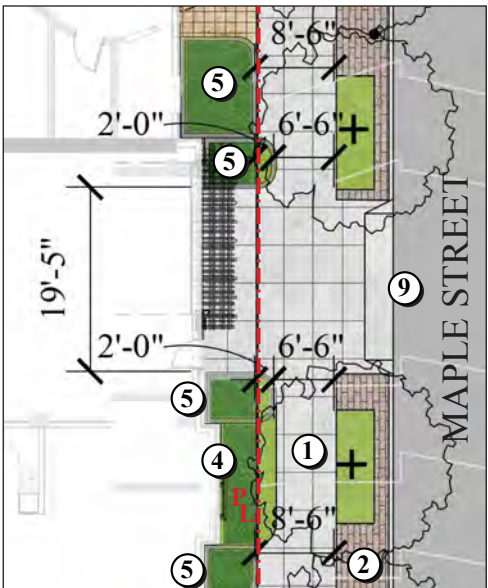
ENLARGEMENT AT **B2, B3**



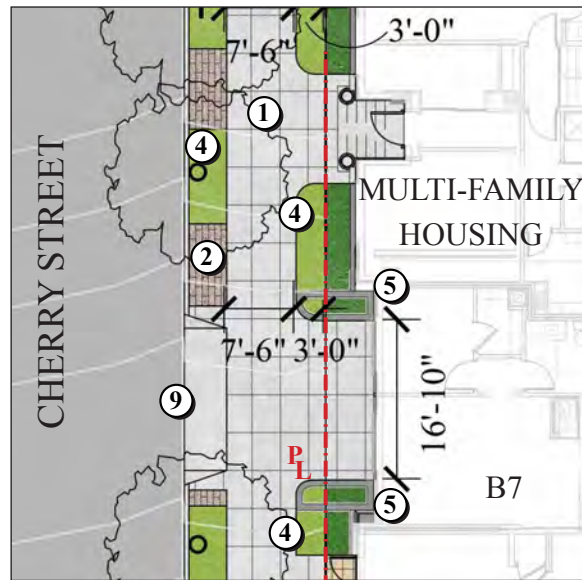
ENLARGEMENT AT **B18**



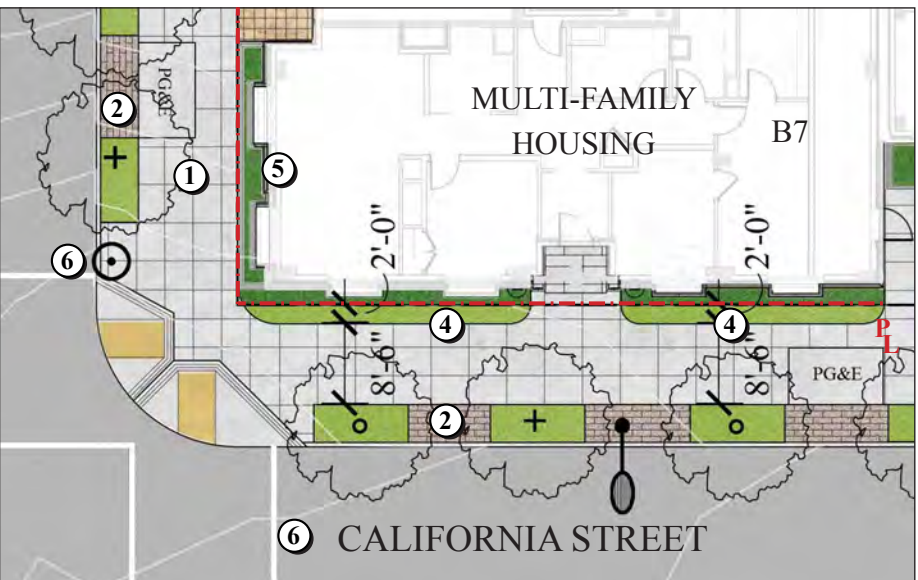
ENLARGEMENT AT **B12**



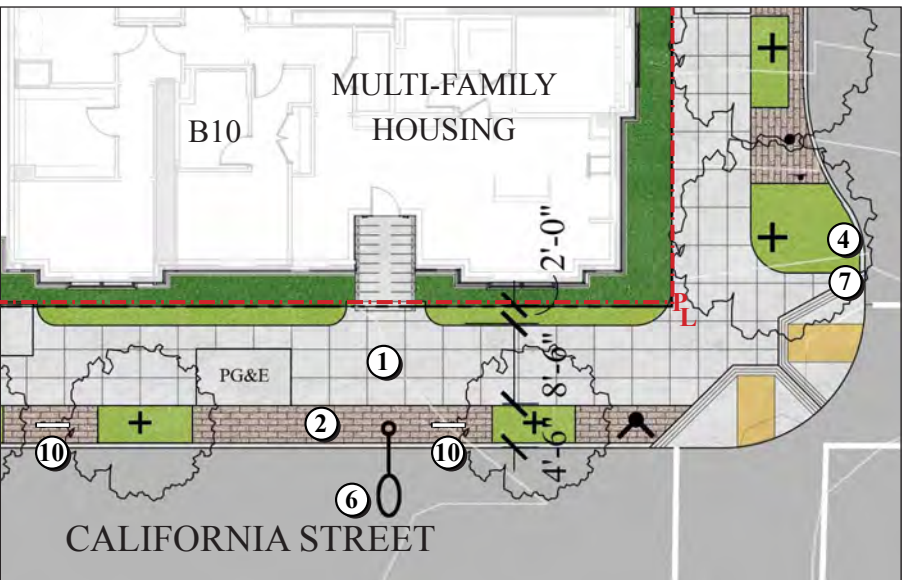
ENLARGEMENT AT **B11**



ENLARGEMENT AT **B7**  
(CHERRY STREET)



ENLARGEMENT AT **B7**,  
(CALIFORNIA STREET)

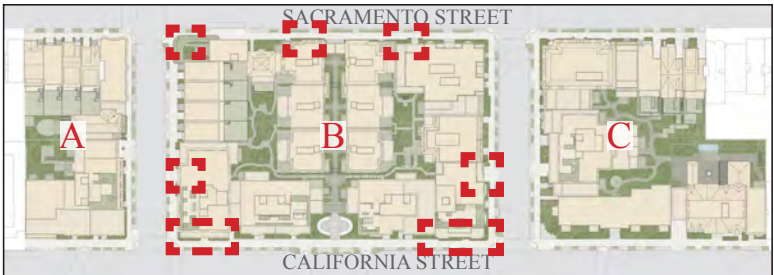


ENLARGEMENT AT **B10**  
(CALIFORNIA STREET)

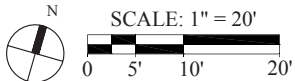
LEGEND

- |  |  |   |
|--|--|---|
| ① CONCRETE SIDEWALK PAVING             | ⑦ SIDEWALK BULBOUT                     | ○ STREET LIGHT AND MUNI POLE            |
| ② ENHANCED PAVING AT STREET            | ⑧ SINGLE FAMILY HOME DRIVEWAY          | ⊙ PEDESTRIAN STREET LIGHT               |
| ③ PAVING AT PRIVATE ENTRIES            | ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY | ⚡ FIRE HYDRANT                          |
| ④ AT GRADE STREET PLANTING             | ⑩ BIKE RACKS                           | ● MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT |
| ⑤ LOW WALL AT STREET FRONTAGE PLANTING | --- P <sub>L</sub> PROPERTY LINE       | ⊙ EXISTING STREET TREE                  |
| ⑥ LIGHT FIXTURE                        | ▨ BUS SHELTER                          | + PROPOSED STREET TREE                  |
|  | ▨ ENHANCED SIDEWALK PAVING             |   |

- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE



KEY PLAN



3700 CALIFORNIA STREET

SAN FRANCISCO, CA

SIDEWALK ENCROACHMENT - BLOCK B





## LEGEND

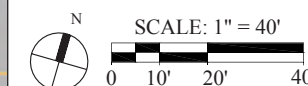
- ① CONCRETE SIDEWALK PAVING
- ② ENHANCED PAVING AT STREET
- ③ PAVING AT PRIVATE ENTRIES
- ④ AT GRADE STREET PLANTING
- ⑤ LOW WALL AT STREET FRONTAGE PLANTING
- ⑥ LIGHT FIXTURE
- ⑦ SIDEWALK BULBOUT
- ⑧ SINGLE FAMILY HOME DRIVEWAY
- ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY
- ⑩ BIKE RACKS
- P<sub>L</sub> PROPERTY LINE
- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT
- EXISTING STREET TREE
- PROPOSED STREET TREE
- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE

## NOTES

SEE SHEET L-01.06 FOR ENLARGEMENTS OF SIDEWALK PLANTING ENCROACHMENTS AT BLOCK A.



KEY PLAN



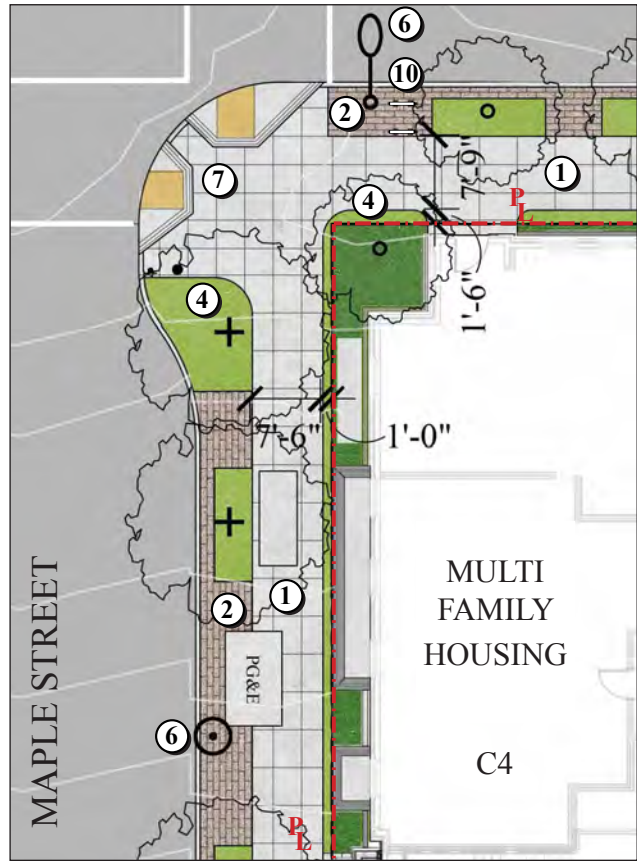
3700 CALIFORNIA STREET

SAN FRANCISCO, CA

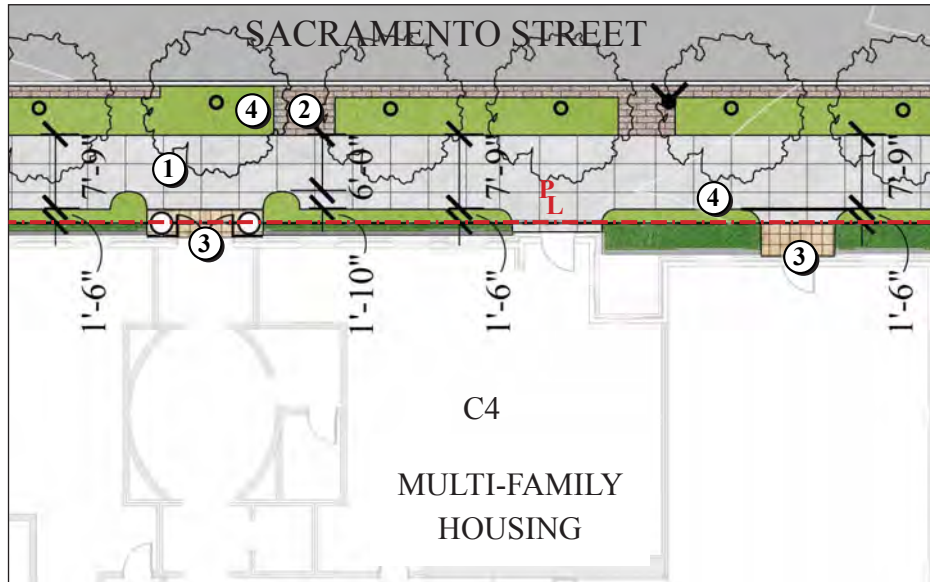
## STREETSCAPE PLAN - BLOCK C

PUD/CU SUBMITTAL  
DECEMBER 2019 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

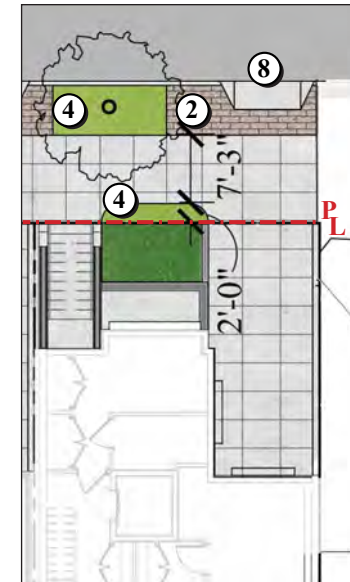




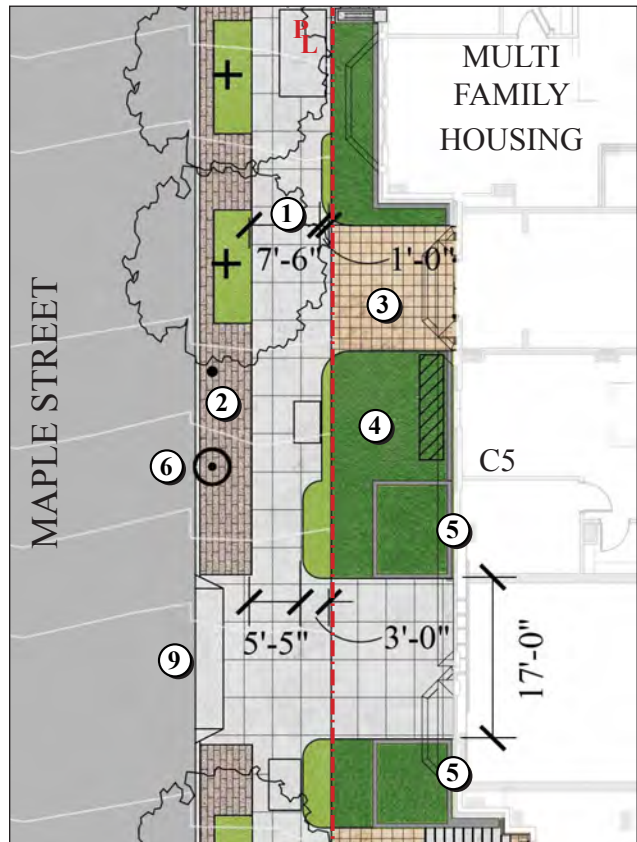
ENLARGEMENT AT C4



ENLARGEMENT AT C4  
(SACRAMENTO STREET)



ENLARGEMENT AT C1,  
TYPICAL FOR SINGLE-  
FAMILY HOUSING  
C1 - C3



ENLARGEMENT AT C5

## LEGEND

- ① CONCRETE SIDEWALK PAVING
- ② ENHANCED PAVING AT STREET
- ③ PAVING AT PRIVATE ENTRIES
- ④ AT GRADE STREET PLANTING
- ⑤ LOW WALL AT STREET FRONTAGE PLANTING
- ⑥ LIGHT FIXTURE
- ⑦ SIDEWALK BULBOUT
- ⑧ SINGLE FAMILY HOME DRIVEWAY
- ⑨ MULTI-FAMILY HOUSING GARAGE DRIVEWAY
- ⑩ BIKE RACKS
- PL PROPERTY LINE
- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT
- MUNI POLE OR PEDESTRIAN TRAFFIC LIGHT
- EXISTING STREET TREE
- PROPOSED STREET TREE
- LANDSCAPING INSIDE PROPERTY LINE
- LANDSCAPING OUTSIDE PROPERTY LINE



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

## SIDEWALK ENCROACHMENT - BLOCK C



REGULATED TREES

Street Block	Sacramento			California			Cherry		Maple		Total Street
	A	B	C	A	B	C	A	B	B	C	
Existing Trees in public ROW	3	7	12	5	9	6	7	9	--	7	65
Existing Trees in public ROW to be removed	(2)	(7)	(2)	(1)	(3)	(1)	(6)	(4)	--	(7)	(33)
Existing Trees in public ROW to remain	1	--	10	4	6	5	1	5	--	--	32
Existing Significant Trees	2	7	2		2			1			14
Existing Significant Trees to be removed	(2)	(3)	(1)		(2)			(1)			(9)
Existing Significant Trees to remain	--	4	1		--			--			5
New Trees to be planted	4	12	--	1	13	7	13	4	12	10	76
Total Proposed Regulated Trees (Remaining + New)	5	16	11	5	19	12	14	9	12	10	113
Net Increase/(Decrease) in Regulated Trees	--	2	(3)	--	8	6	7	(1)	12	3	34
Property Frontage linear measure	134'	412'	220'	134'	412'	300'	265'	265'	265'	265'	
Street Trees Required (1 tree per 20' frontage)	7	21	11	7	21	15	13	13	13	13	134
Street Tree Increase/(Deficit) Proposed vs. Required	(2)	(9)	(1)	(2)	(2)	(3)	1	(4)	(1)	(3)	(26)

UNREGULATED TREES

	Block A	Block B	Block C	Total On-Site
Existing On-site Trees	1	79	14	94
Existing On-site Trees to be removed	(1)	(69)	(14)	(84)
Existing On-site Trees to remain	--	10	--	10
New Trees to be planted	19	81	48	148
Total Proposed Unregulated Trees (Remaining + New)	19	91	48	158
Net Increase/(Decrease) in Trees On Site	18	12	34	64

PROJECT SUMMARY

	Regulated Trees	Unregulated Trees	Total Project
Existing Trees	79	94	173
Existing Trees to be removed	(42)	(84)	(126)
Existing Trees to remain	37	10	47
New Trees to be planted	76	148	224
Total Proposed Trees (Remaining + New)	113	158	271
Net Increase/(Decrease) Trees	34	64	98

Trees for the purposes of this Proposed Project are defined as having a caliper larger than 2” in diameter and being smaller than 10’ tall which are large enough to be considered trees by the SF Department of Urban Forestry. The 2017 arborist report by Tree Management Experts additionally identifies 69 small trees/shrubs which are being removed with the proposed project but are too small to be regulated by the SF Department of Urban Forestry and therefore are not reported as Trees for the purpose of the Proposed Project.

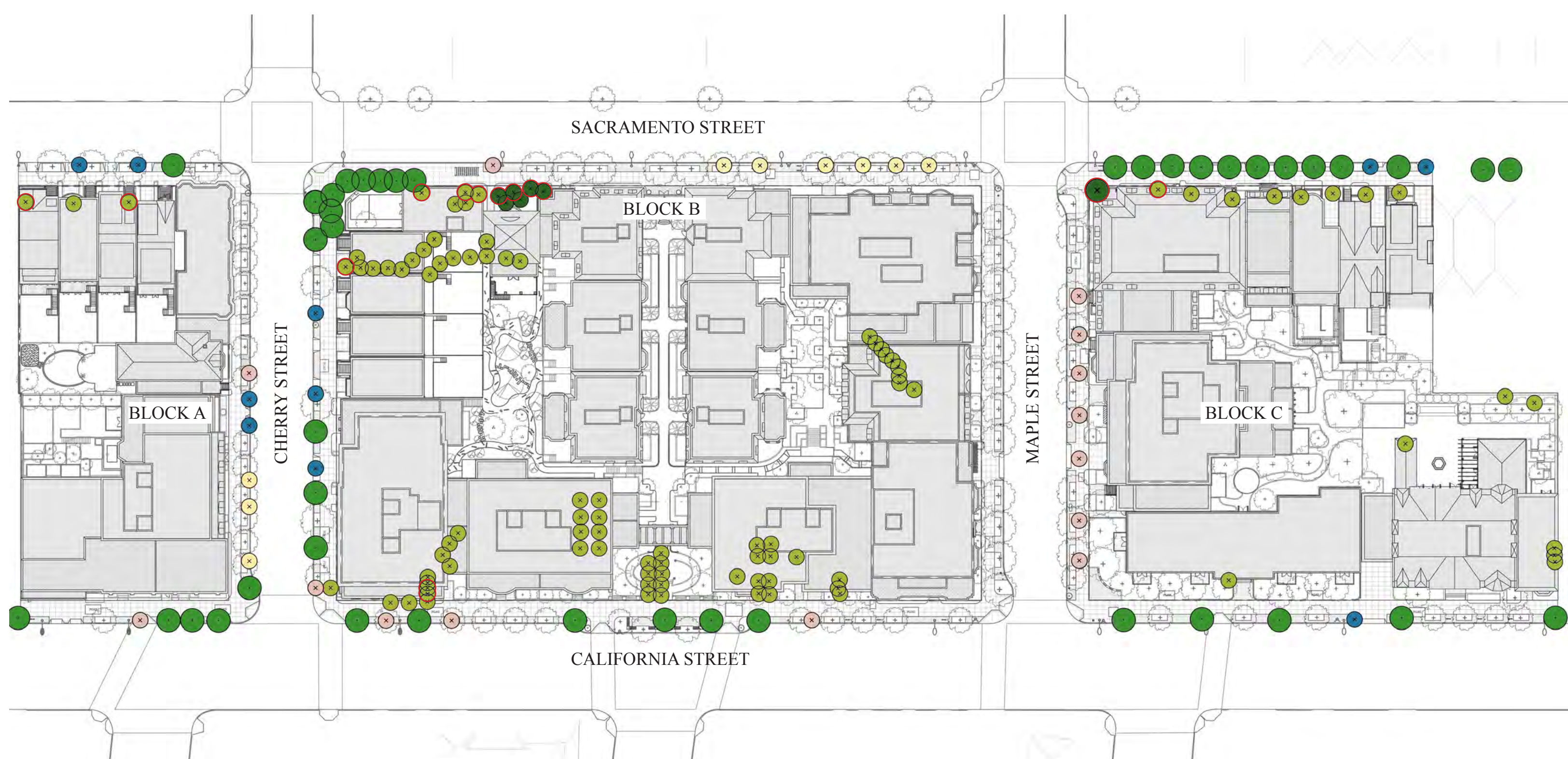
Subject to City and/or property owner approval, 6 additional street trees can be planted off-site on Sacramento Street.



KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA





**NOTES**

SIGNIFICANT TREES ARE WITHIN 10' OF STREET FRONTAGE PROPERTY LINE AND OF SIGNIFICANT STATURE.

**LEGEND**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li> TREE TO REMAIN (40) AT STREET SIDEWALK</li> <li> TREE TO REMAIN (7) WITHIN PROPERTY LINE INCLUDES (5) SIGNIFICANT TREES</li> <li> TREE TO BE REMOVED (93) IN CONFLICT WITH BUILDING OR FOUNDATION INCLUDES (9) SIGNIFICANT TREES</li> </ul> | <ul style="list-style-type: none"> <li> TREE TO BE REMOVED (10) IN CONFLICT WITH NEW DRIVEWAY OR CURB</li> <li> TREE TO BE REMOVED (14) RECOMMENDED BY BUF OR ARBORIST</li> <li> TREE TO BE REMOVED (9) RECENTLY PLANTED, LESS THAN 2" DIA CALIPER OR 10' HEIGHT</li> </ul> |
|---|---|



3700 CALIFORNIA STREET






SAN FRANCISCO, CA

**EXISTING TREE PLAN**





### LEGEND

-  TREE TO REMAIN (40)  
AT STREET SIDEWALK
-  TREE TO REMAIN (7)  
WITHIN PROPERTY LINE
-  PROPOSED STREET TREE (76)
-  PROPOSED SITE TREE (148)
-  POTENTIAL OFF-SITE STREET TREE (6)



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

## PROPOSED STREET TREE PLAN





RED MAPLE  
*ACER RUBRUM 'OCTOBER GLORY'*  
- LARGE DECIDUOUS TREE  
- FALL COLOR



ARBUTUS  
*ARBUTUS MARINA*  
- MEDIUM EVERGREEN TREE  
- FALL FLOWERS



WASHINGTON HAWTHORN  
*CRATAEGUS PHAENOPYRUM*  
- MEDIUM DECIDUOUS TREE  
- FALL COLOR



MAIDENHAIR TREE  
*GINKGO BILOBA 'AUTUMN GOLD'*  
- LARGE DECIDUOUS TREE  
- FALL COLOR



BRISBANE BOX  
*LOPHOSTEMON CONFERTUS*  
- LARGE EVERGREEN TREE



LONDON PLANE TREE  
*PLATANUS X ACERIFOLIA*  
- LARGE DECIDUOUS TREE



PURPLE LEAF PLUM  
*PRUNUS CERASIFERA*  
- MEDIUM DECIDUOUS TREE  
- COLORED FOLIAGE, SPRING FLOWERS



FLOWERING CHERRY  
*PRUNUS SARGENTII*  
- MEDIUM DECIDUOUS TREE  
- SPRING FLOWERS



CHINESE ELM  
*ULMUS PARVIFOLIA*  
- MEDIUM SEMI-EVERGREEN TREE



RED FLOWERING GUM  
*CORYMBIA FICIFOLIA*  
- MEDIUM EVERGREEN TREE



SIDEWALK PLANTING AND STREET FRONTAGE PRECEDENTS

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

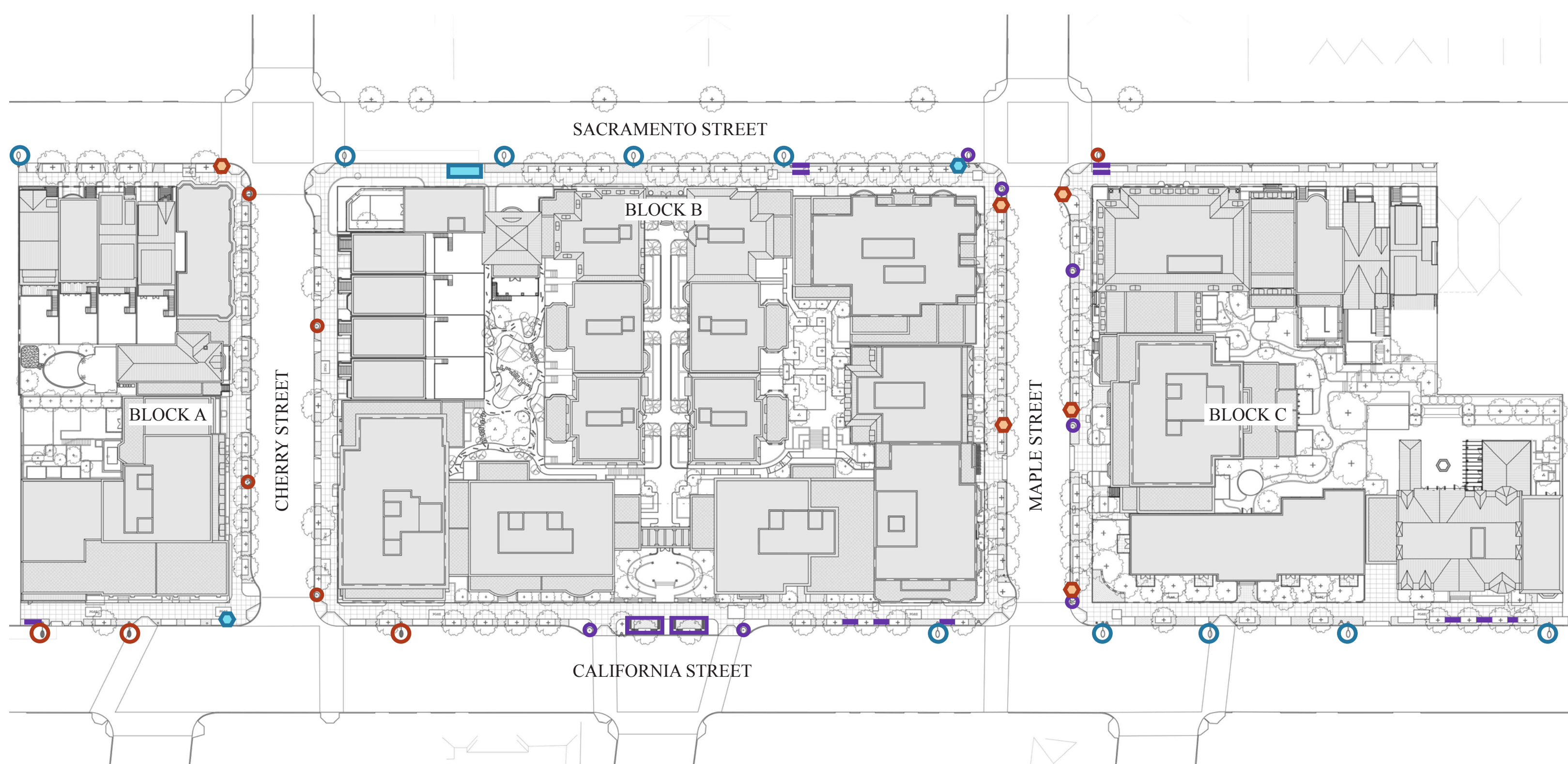
# PRECEDENT



KEY PLAN

# NEIGHBORHOOD STREET TREES & FRONTAGE PLANTING














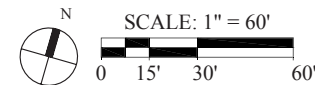
## NOTES

(13) CLASS 2 BICYCLE PARKING SPOTS REQUIRED.

(22) CLASS 2 BICYCLE PARKING SPOST PROPOSED NEAR MULTI-FAMILY HOUSING AND PUBLIC TRANSIT STOPS.

## LEGEND

- |  |                                  |   |                                  |
|--|----------------------------------|---|----------------------------------|
|  | EXISTING STREET LIGHT/MUNI POLE  |  | NEW SEATING AT STREET            |
|  | RELOCATED STREET LIGHT/MUNI POLE |  | NEW BIKE RACKS                   |
|  | EXISTING MUNI POLE               |  | BUS SHELTER IN ORIGINAL LOCATION |
|  | RELOCATED MUNI POLE              |   |                                  |
|  | RELOCATED PEDESTRIAN LIGHT       |   |                                  |
|  | NEW PEDESTRIAN LIGHT             |   |                                  |



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

# STREET FURNISHING PLAN





BACKLESS METAL BENCH



BENCH WITH INTERMEDIATE ARM REST



GALVANIZED BIKE RACK



PEDESTRIAN LIGHT



STREET LIGHT/MUNI POLE



BRICK PAVER



CONCRETE UNIT PAVER



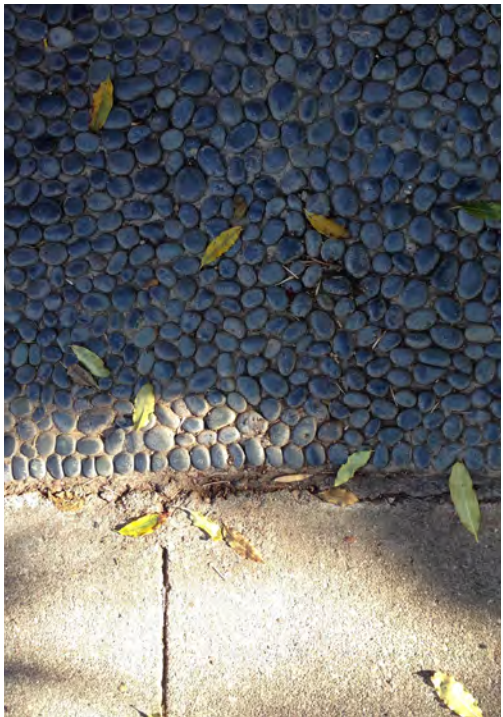
CONCRETE UNIT PAVER



CONCRETE UNIT PAVER



COBBLE STONE PAVER



MORTARED STONE EDGING

NOTES

ALL PAVING, INCLUDING ENHANCED PAVING STRIPS AT PUBLIC SIDEWALKS WILL BE ADA COMPLIANT.



KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

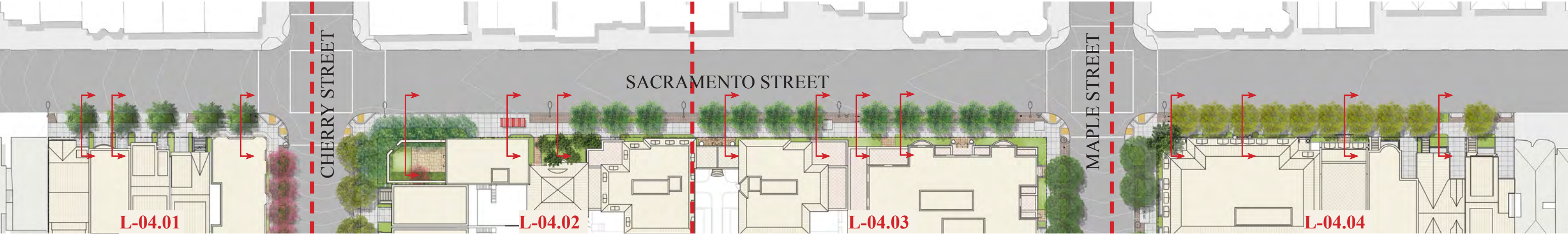
PRECEDENT

FURNISHING & ENHANCED PAVING AT STREET





SACRAMENTO STREET - OVERALL ELEVATION



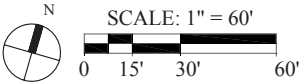
SACRAMENTO STREET - OVERALL PLAN

NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

LEGEND

- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- NEW BIKE RACKS
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT



KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

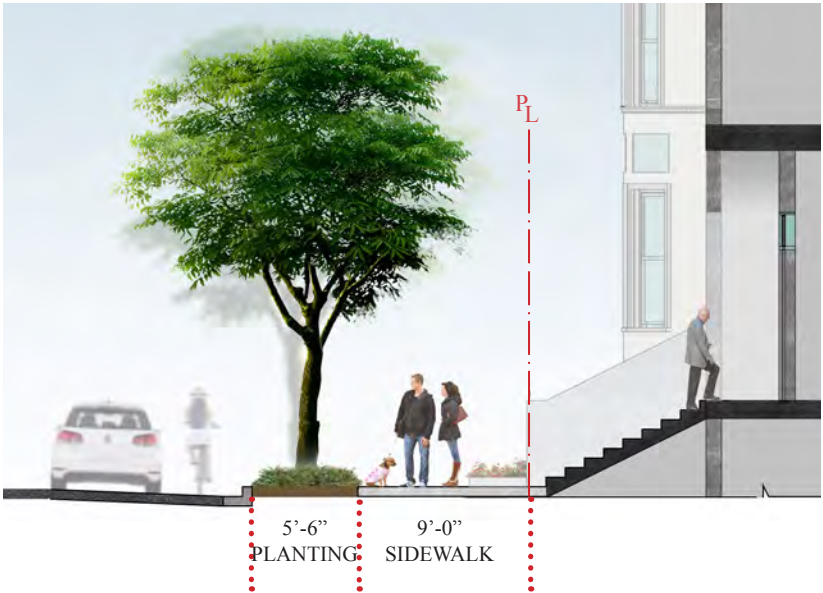


PUBLIC R.O.W. SECTION PLAN - SACRAMENTO STREET

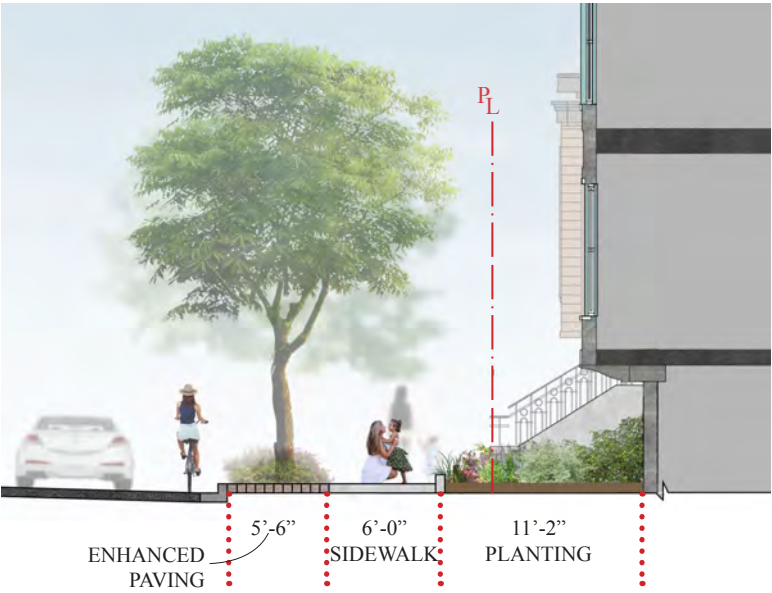




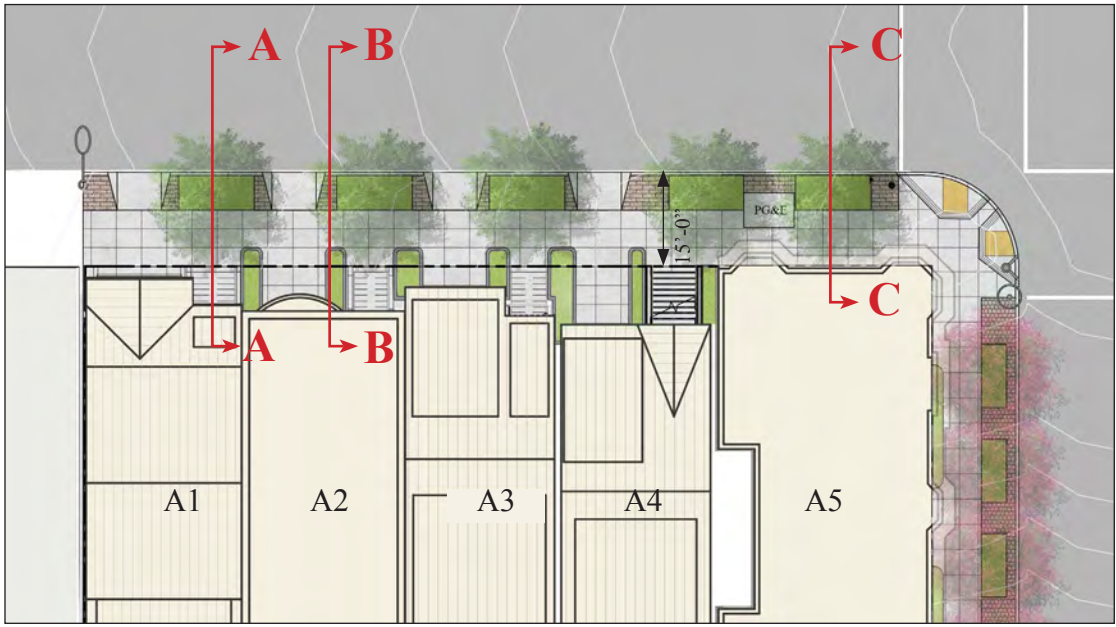
SACRAMENTO STREET ELEVATION, BLOCK A



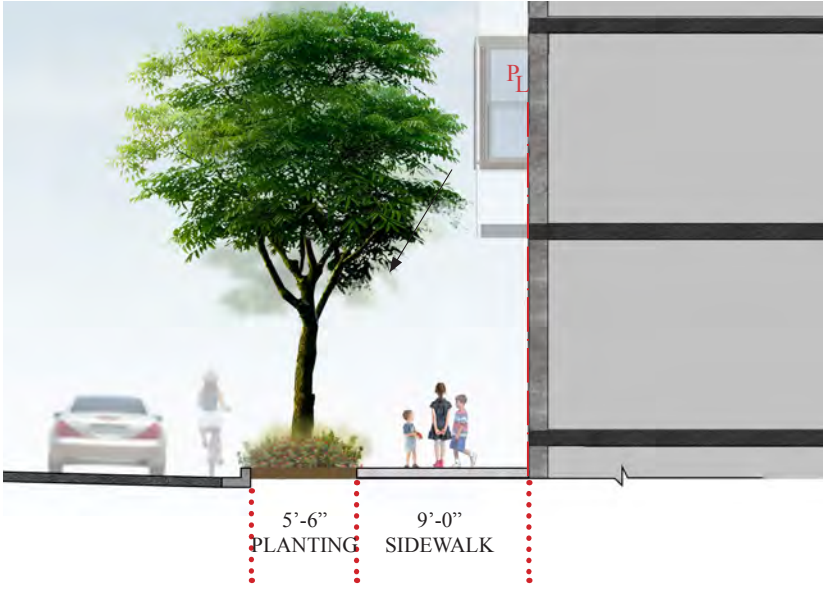
PEDESTRIAN SECTION A-A



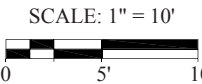
PEDESTRIAN SECTION B-B



SACRAMENTO STREET PLAN, BLOCK A



PEDESTRIAN SECTION C-C



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## SACRAMENTO STREET, BLOCK A

PUD/CU SUBMITTAL  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

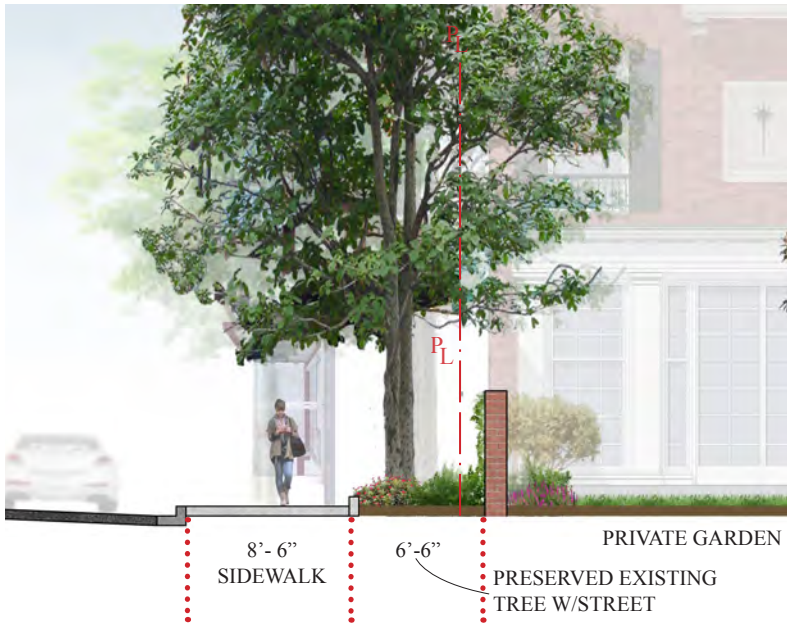
L-04.01

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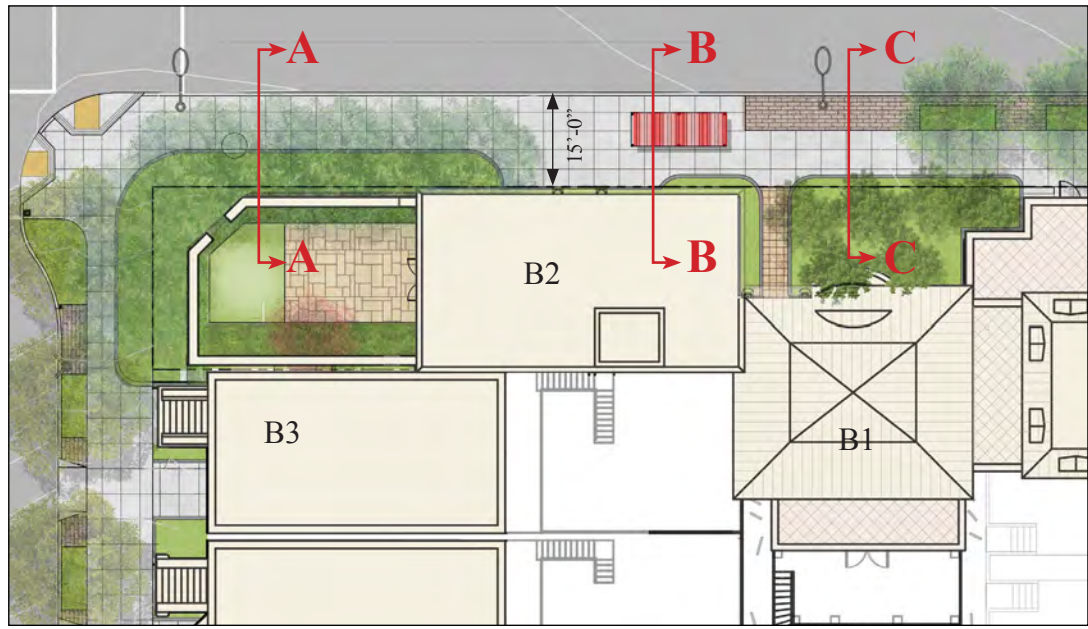
SACRAMENTO STREET ELEVATION, BLOCK **B** - WEST



PEDESTRIAN SECTION A-A



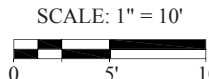
PEDESTRIAN SECTION B-B



SACRAMENTO STREET PLAN, BLOCK **B** - WEST



PEDESTRIAN SECTION C-C



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

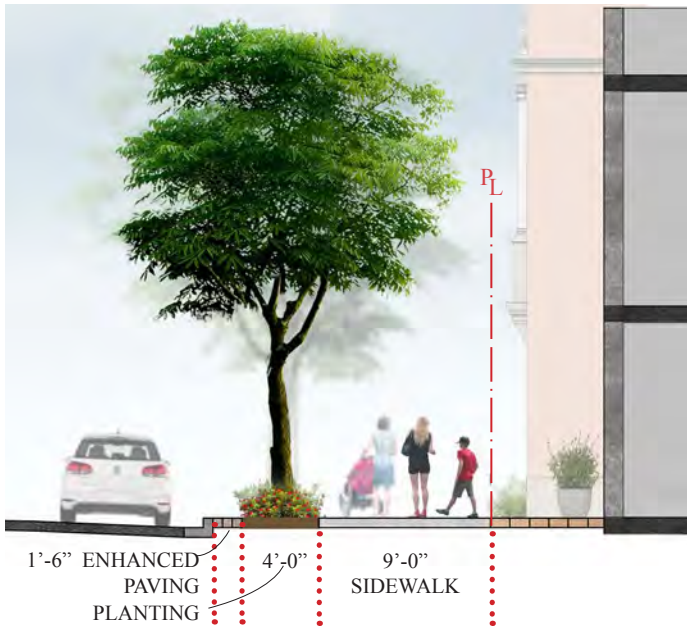
3700 CALIFORNIA STREET

SAN FRANCISCO, CA

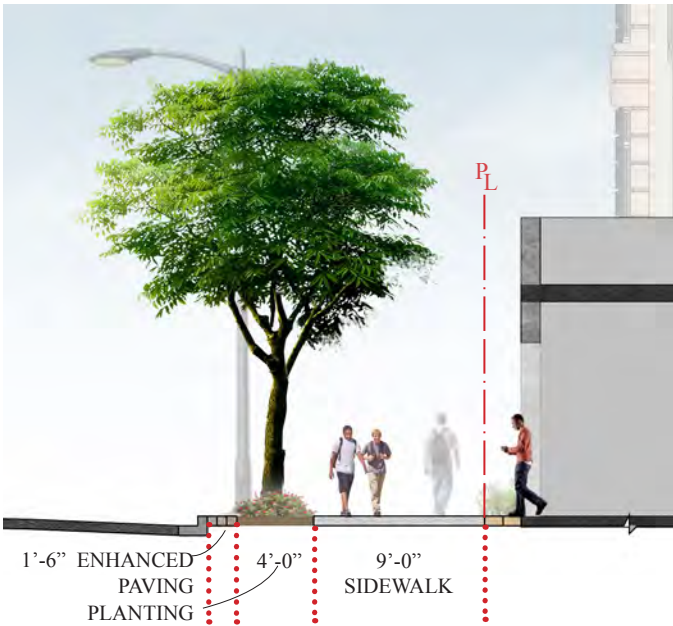




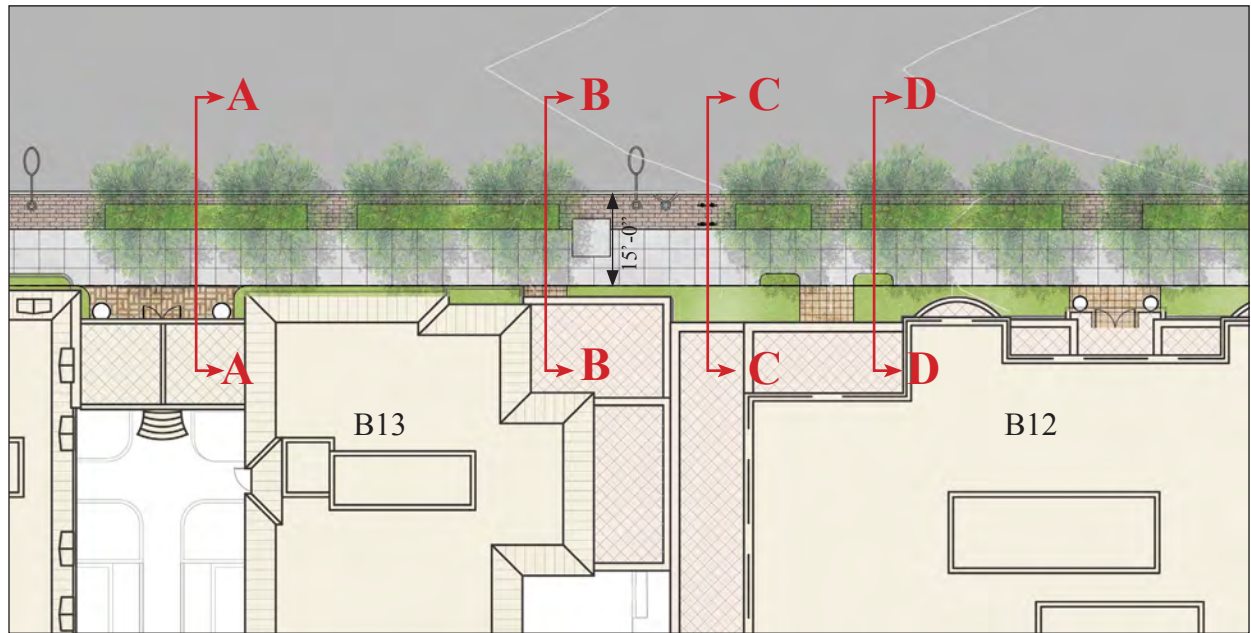
SACRAMENTO STREET ELEVATION, BLOCK **B** - EAST



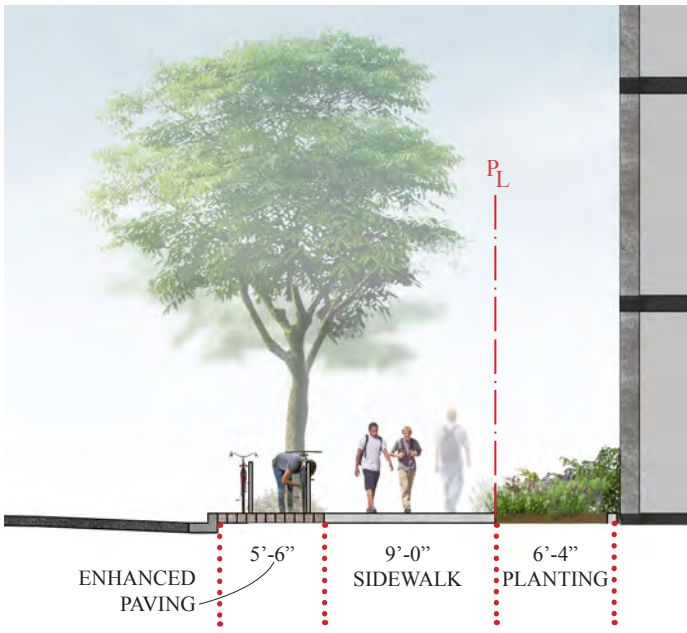
PEDESTRIAN SECTION A-A



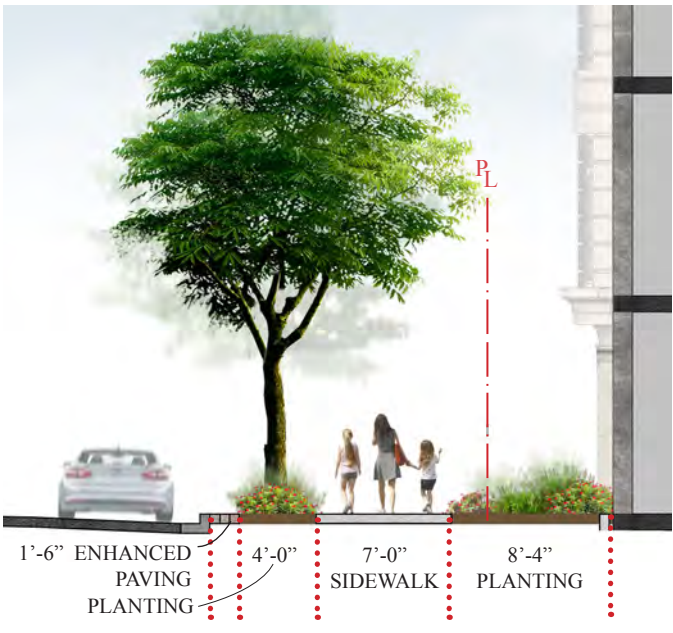
PEDESTRIAN SECTION B-B



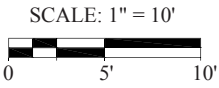
SACRAMENTO STREET PLAN, BLOCK **B** - EAST



PEDESTRIAN SECTION C-C



PEDESTRIAN SECTION D-D



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## SACRAMENTO STREET, BLOCK **B** - EAST

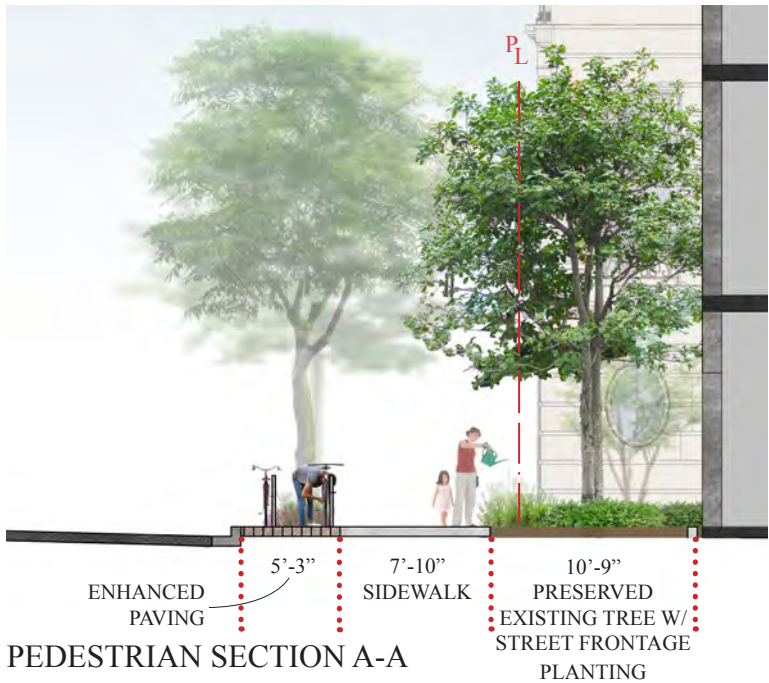
PUD/CU SUBMITTAL  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

L-04.03

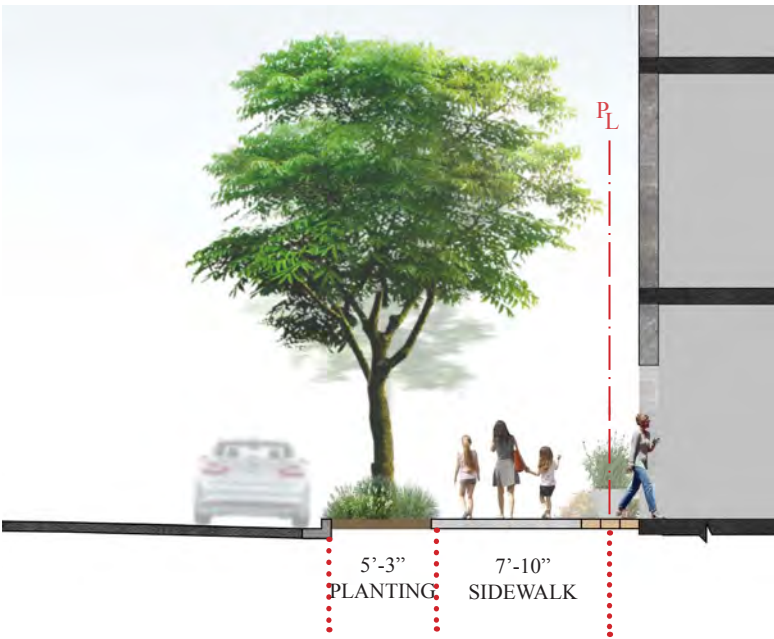




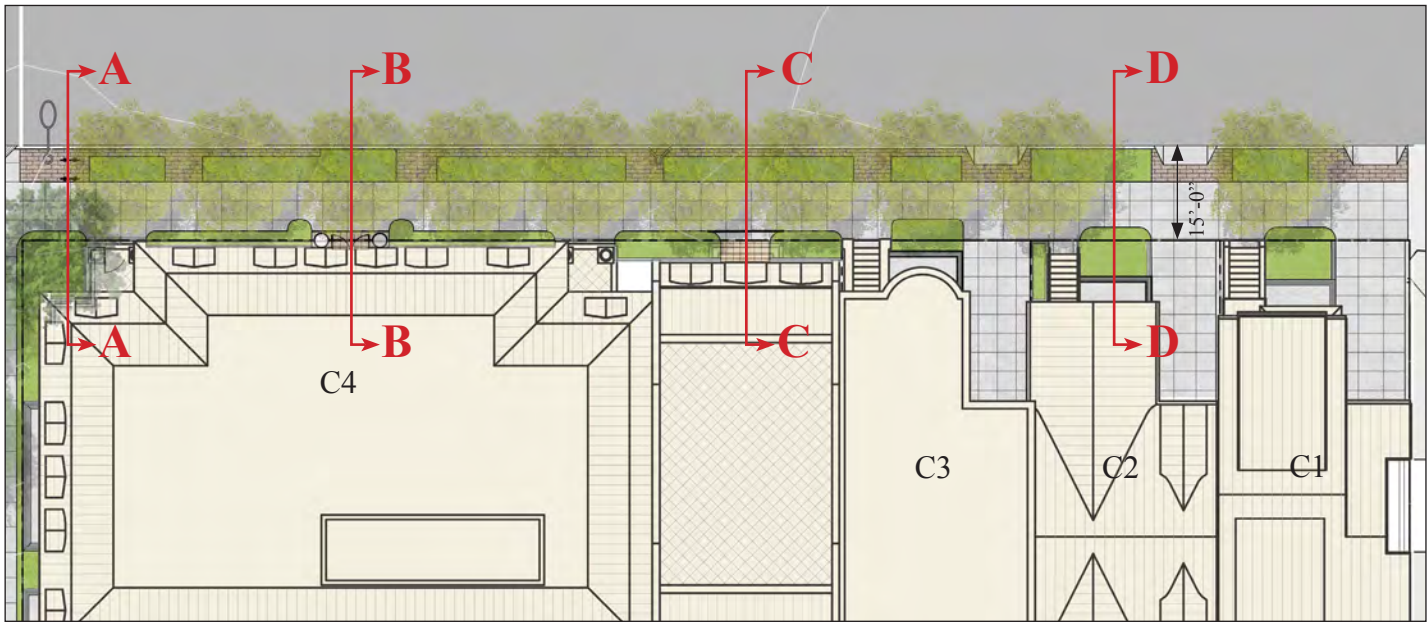
SACRAMENTO STREET ELEVATION, BLOCK C



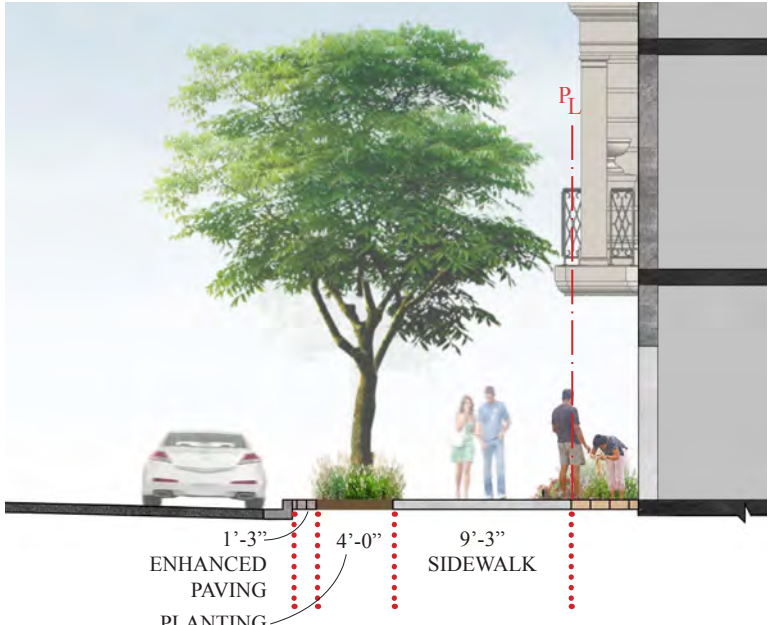
PEDESTRIAN SECTION A-A



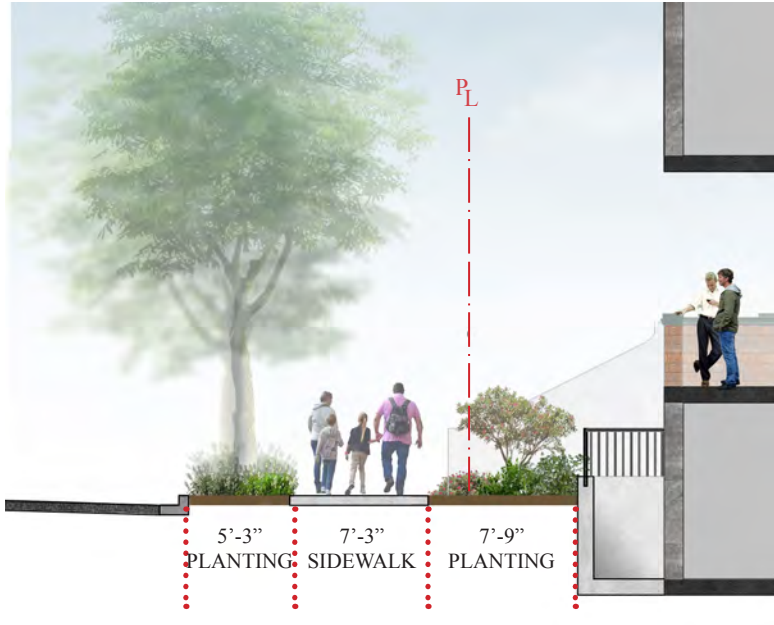
PEDESTRIAN SECTION B-B



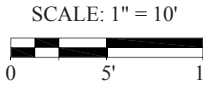
SACRAMENTO STREET PLAN, BLOCK C



PEDESTRIAN SECTION C-C



PEDESTRIAN SECTION D-D



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

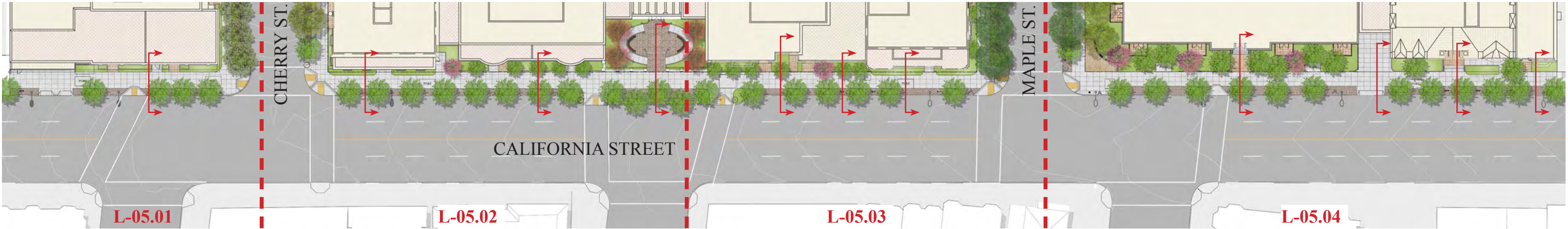
3700 CALIFORNIA STREET

SAN FRANCISCO, CA





CALIFORNIA STREET - OVERALL ELEVATION



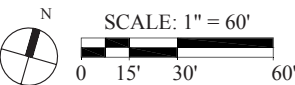
CALIFORNIA STREET - OVERALL PLAN

NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

LEGEND

- BUS SHELTER
- ENHANCED SIDEWALK PAVING
- NEW BIKE RACKS
- STREET LIGHT AND MUNI POLE
- PEDESTRIAN STREET LIGHT
- FIRE HYDRANT



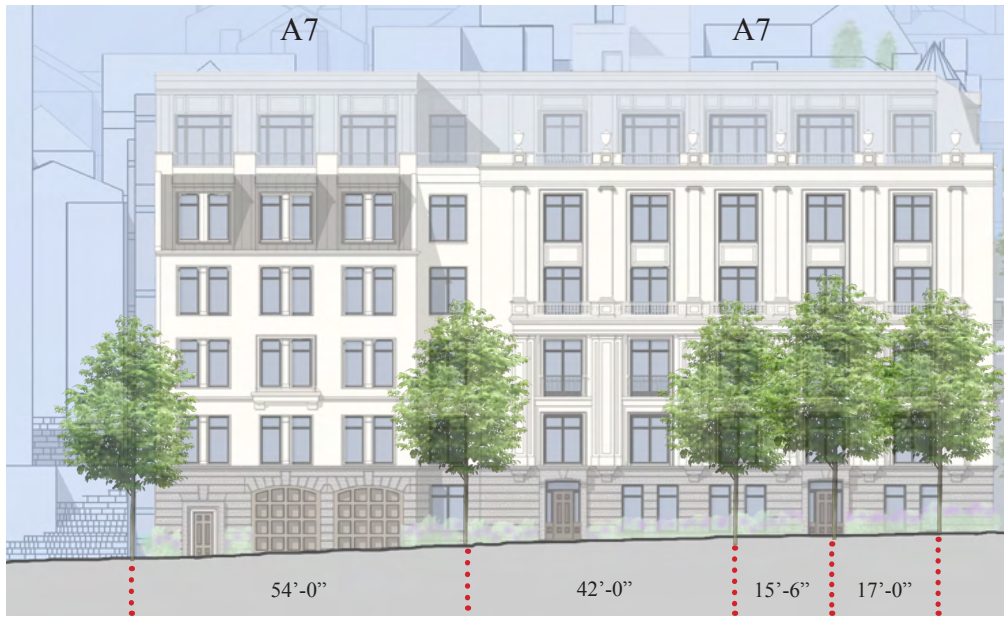
KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

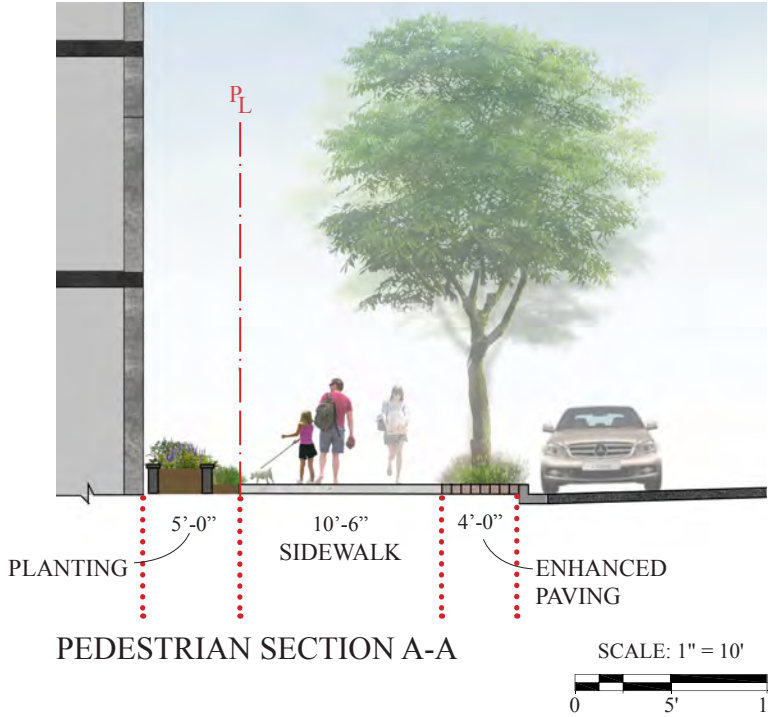


PUBLIC R.O.W. SECTION PLAN - CALIFORNIA STREET

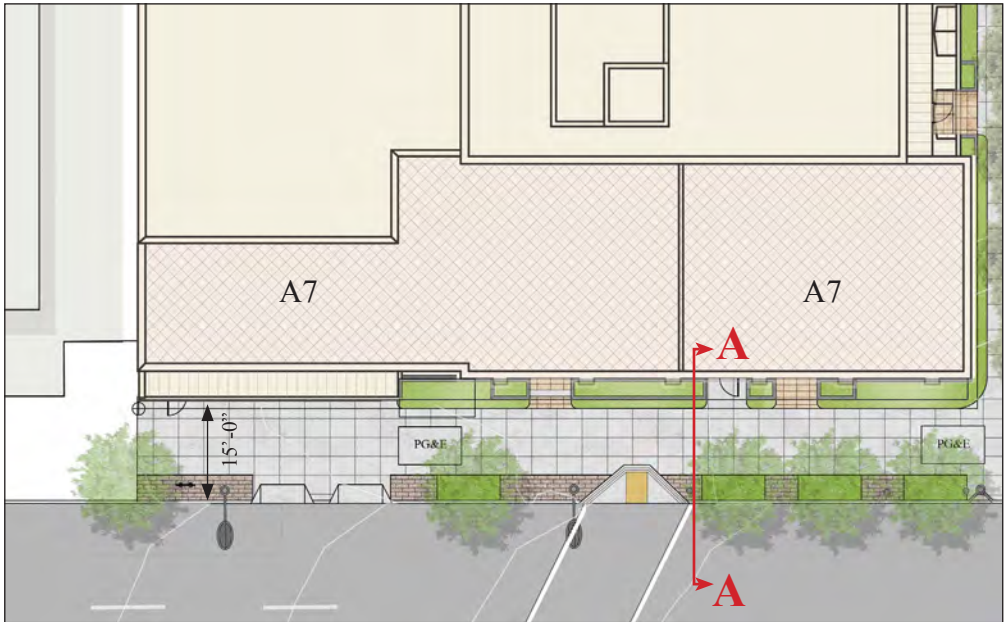




CALIFORNIA STREET ELEVATION, BLOCK A



PEDESTRIAN SECTION A-A



CALIFORNIA STREET PLAN, BLOCK A



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## CALIFORNIA STREET, BLOCK A

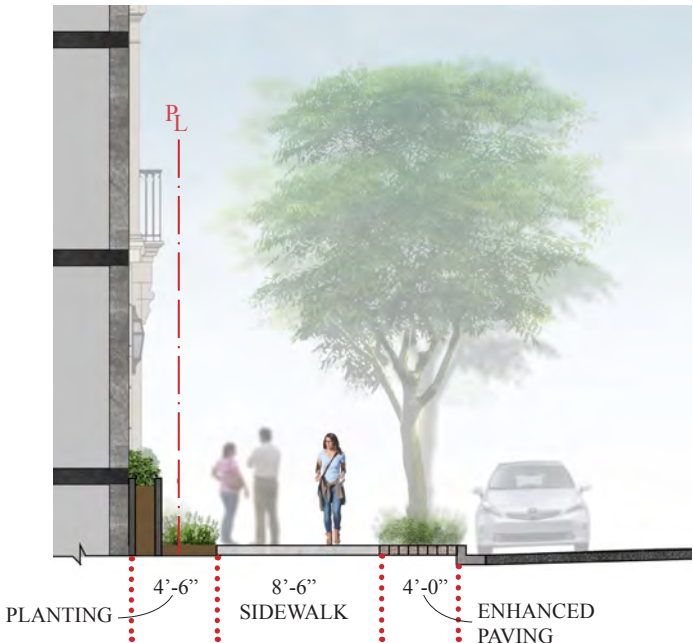
PUD/CU SUBMITTAL  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

L-05.01





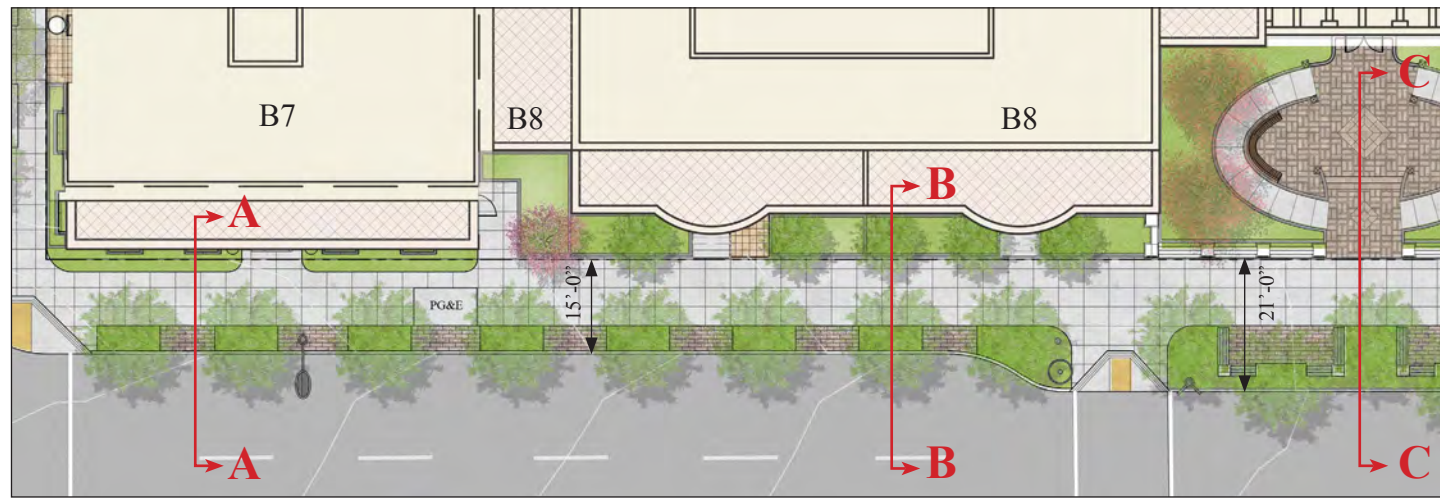
CALIFORNIA STREET, ELEVATION BLOCK **B** - WEST



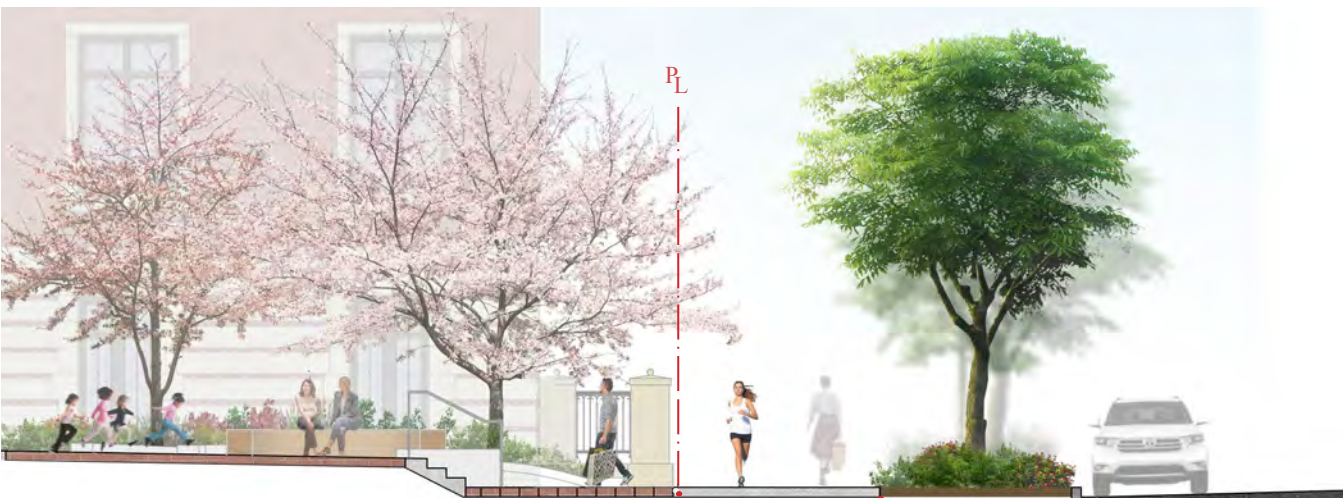
PEDESTRIAN SECTION A-A



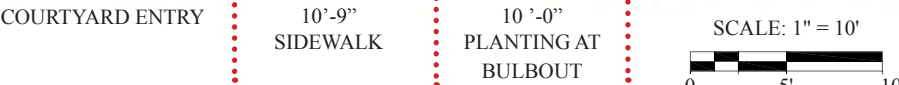
PEDESTRIAN SECTION B-B



CALIFORNIA STREET PLAN, BLOCK **B** - WEST

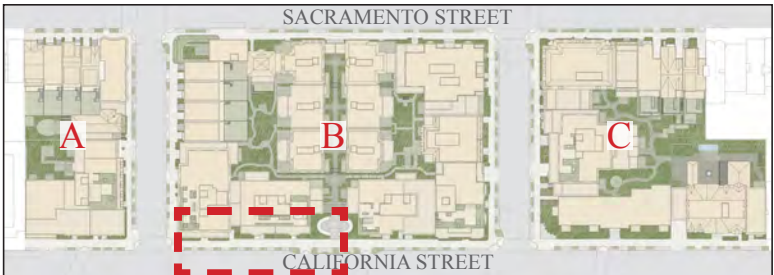


PEDESTRIAN SECTION C-C



### NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

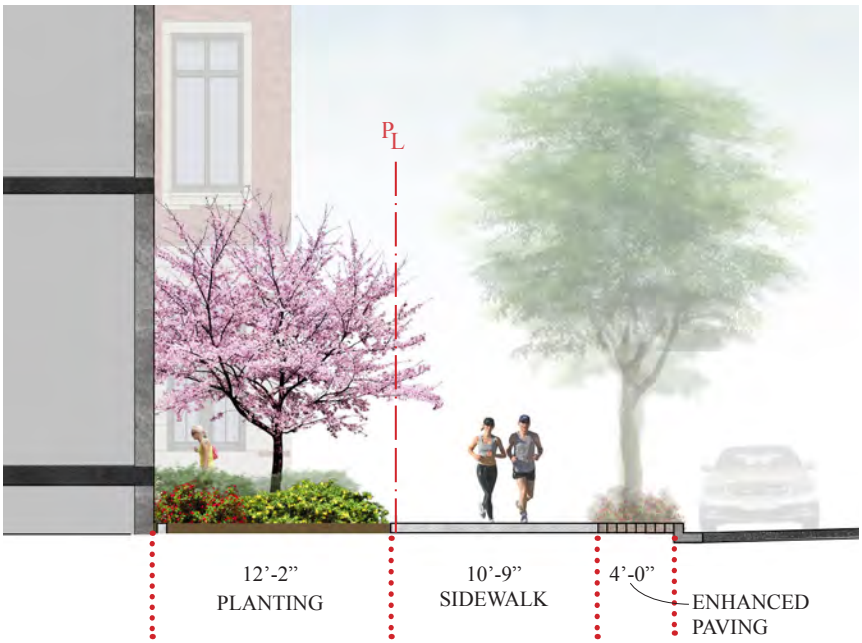


## CALIFORNIA STREET, BLOCK **B** - WEST

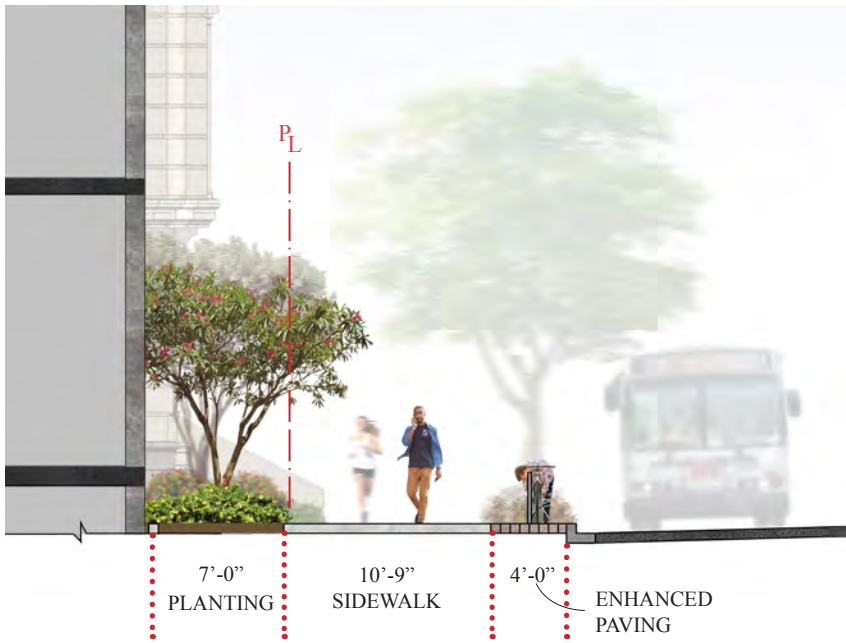




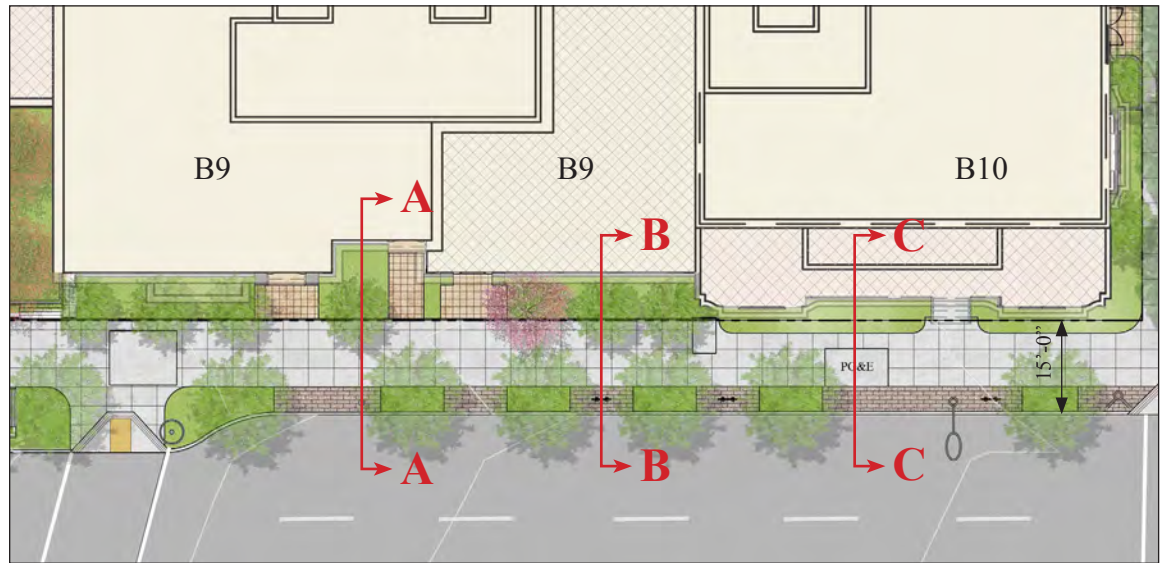
CALIFORNIA STREET ELEVATION, BLOCK **B** - EAST



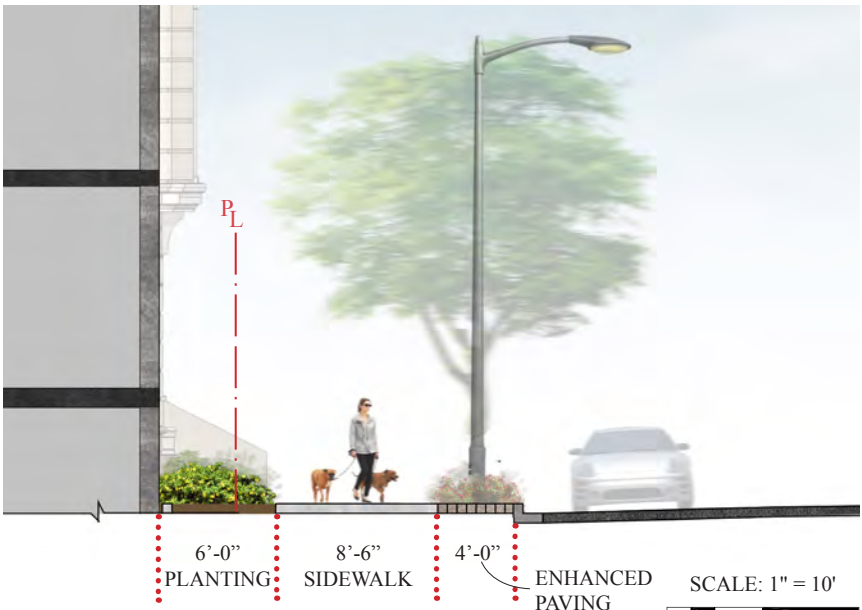
PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



CALIFORNIA STREET PLAN, BLOCK **B** - EAST



PEDESTRIAN SECTION C-C

### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA



## CALIFORNIA STREET, BLOCK **B** - EAST

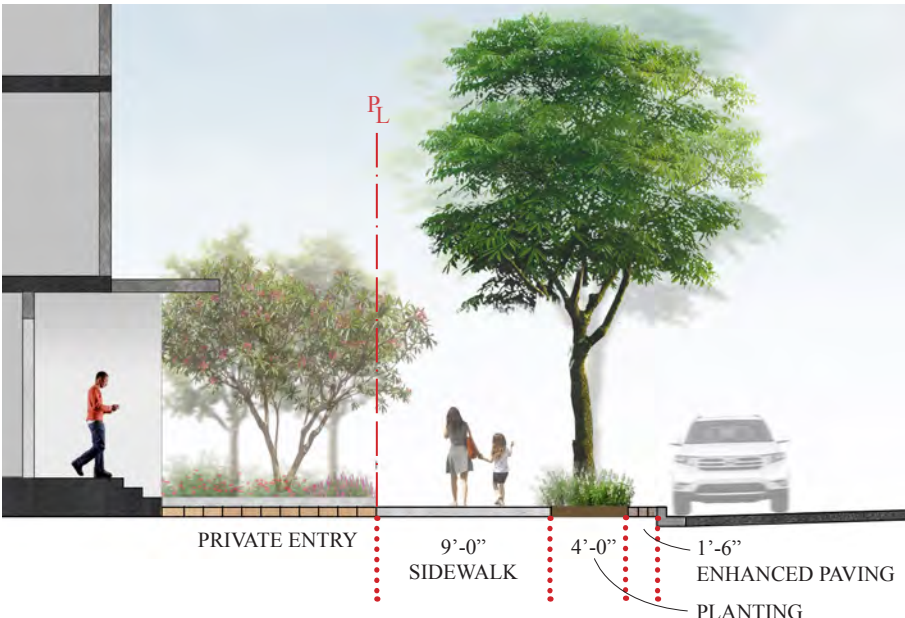
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NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

L-05.03

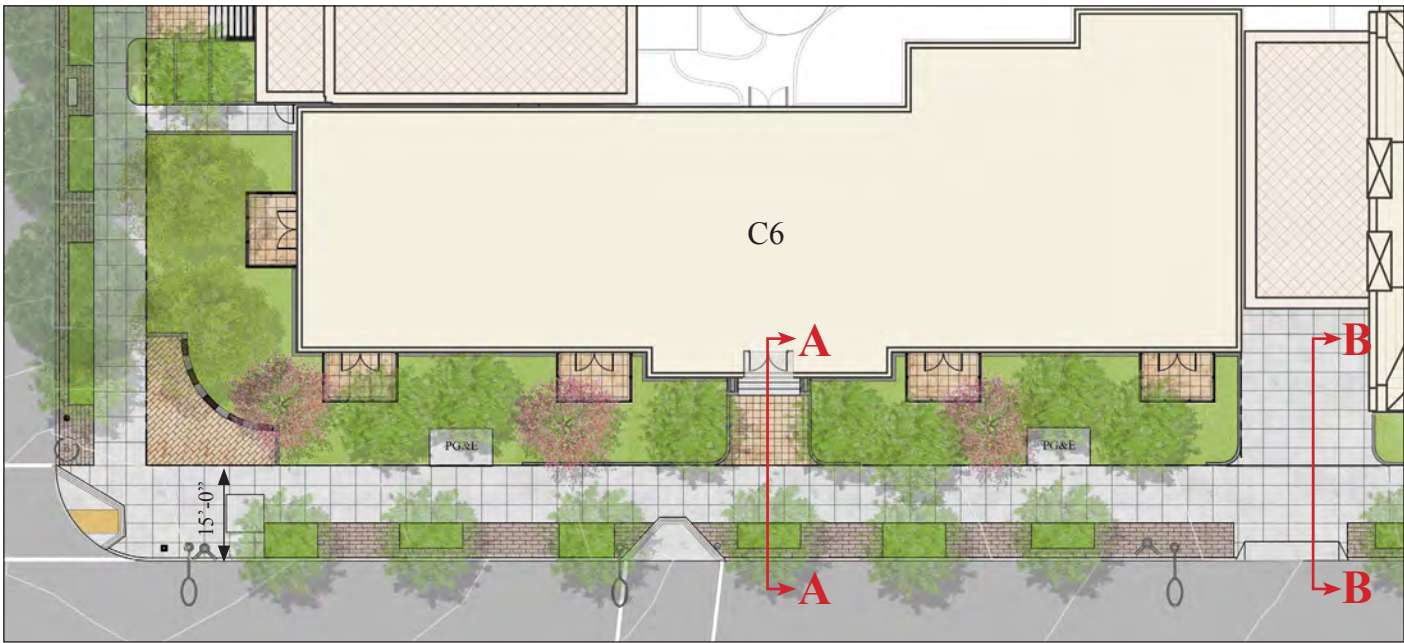




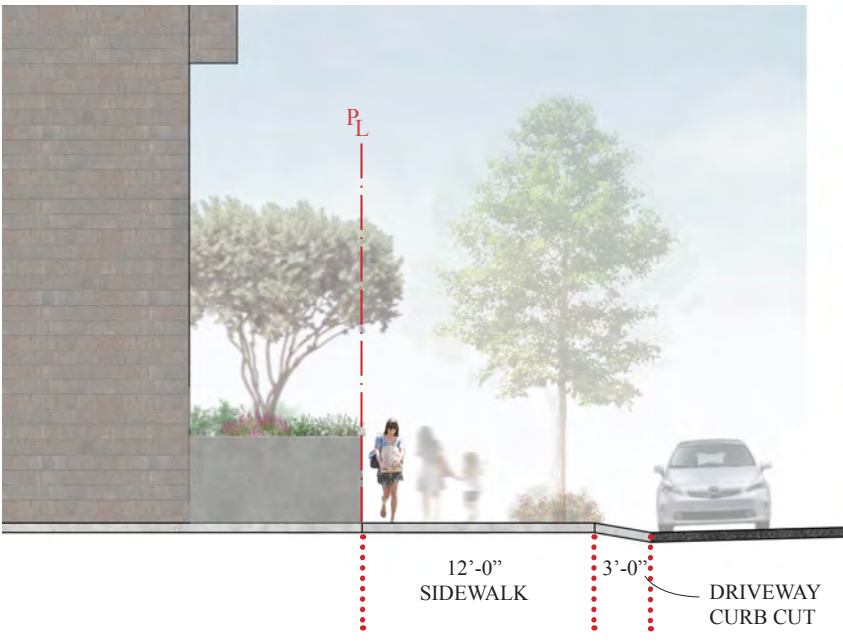
CALIFORNIA STREET ELEVATION, BLOCK C - WEST



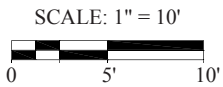
PEDESTRIAN SECTION A-A



CALIFORNIA STREET PLAN, BLOCK C - WEST



PEDESTRIAN SECTION B-B



### NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

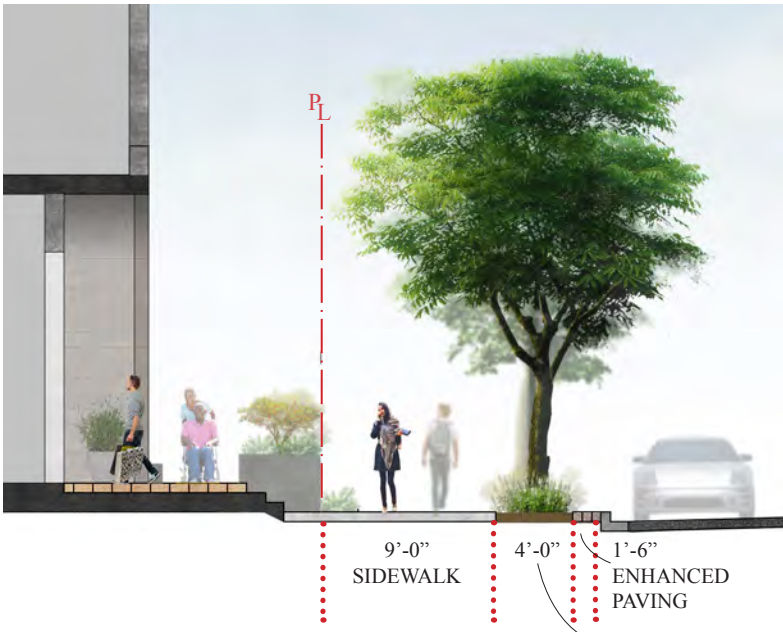


## CALIFORNIA STREET, BLOCK C - WEST

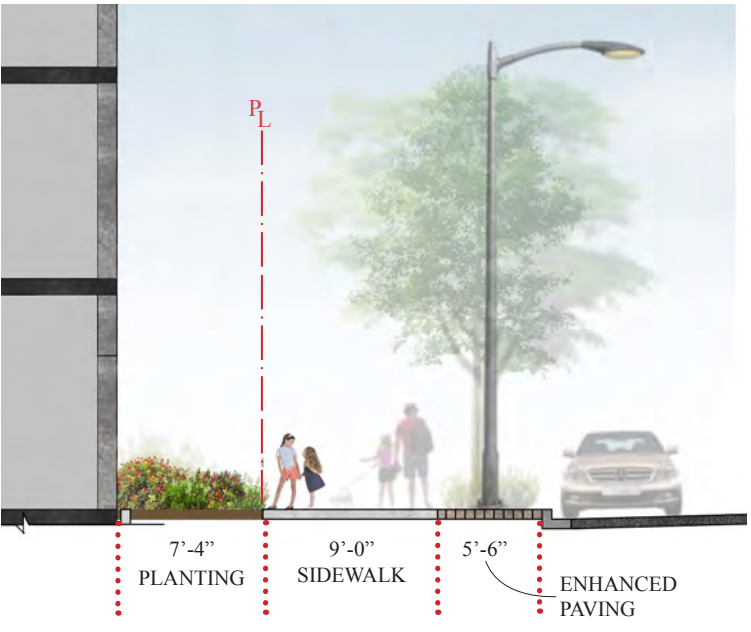




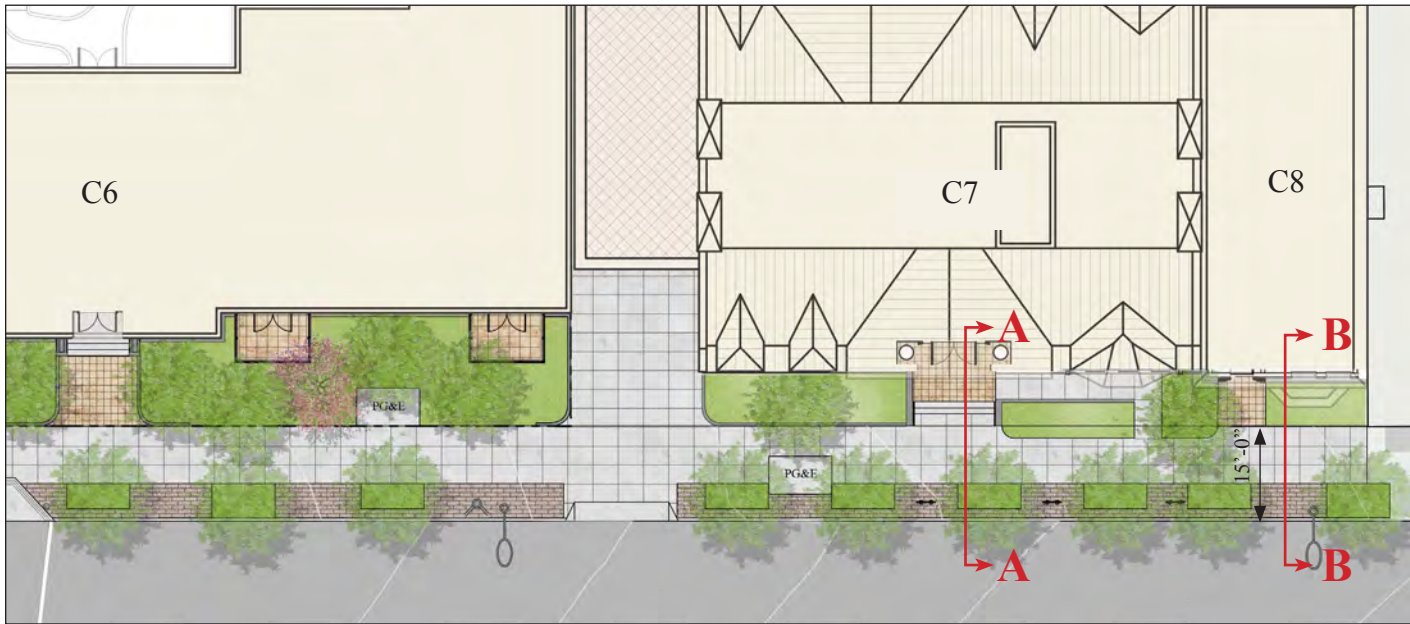
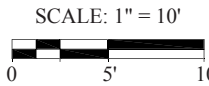
CALIFORNIA STREET ELEVATION, BLOCK C - EAST



PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



CALIFORNIA STREET PLAN, BLOCK C - EAST



### NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

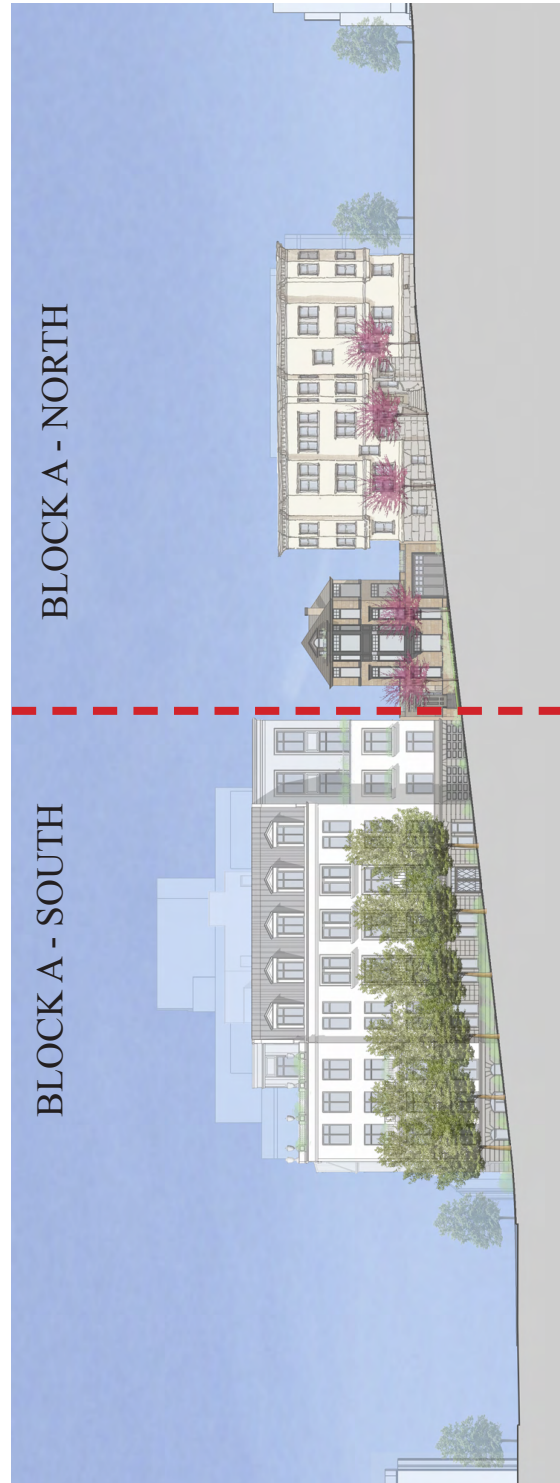


KEY PLAN

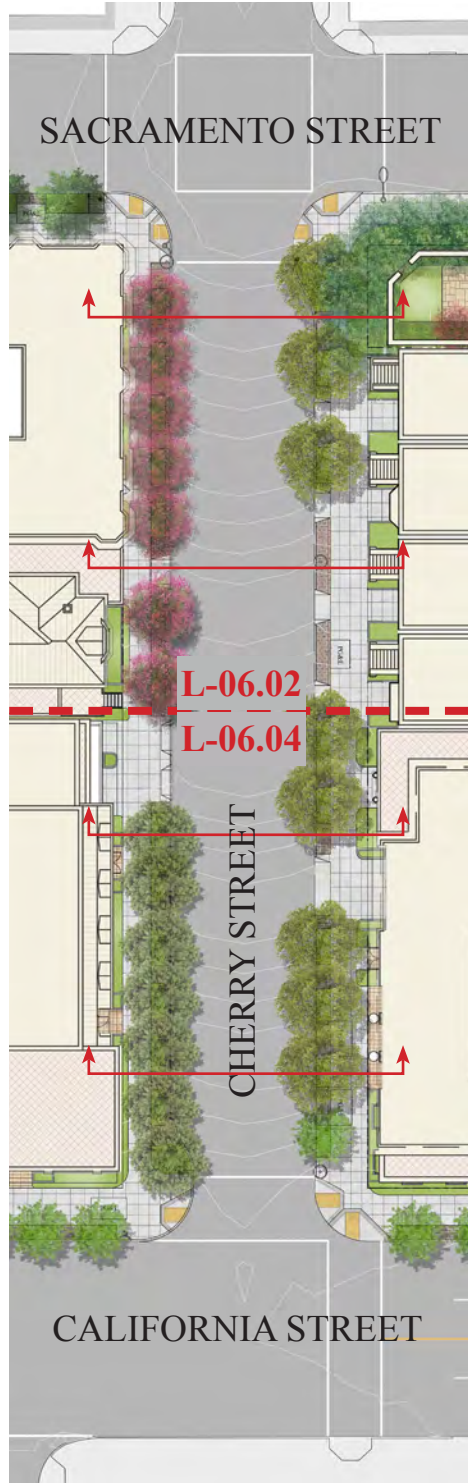
3700 CALIFORNIA STREET

SAN FRANCISCO, CA





CHERRY STREET -  
WEST ELEVATION



CHERRY STREET -  
OVERALL PLAN



CHERRY STREET -  
EAST ELEVATION



## NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

## LEGEND

- BUS SHELTER
- ENHANCED SIDEWALK
- NEW BIKE RACKS
- STREET LIGHT AND MUNI
- PEDESTRIAN STREET
- FIRE HYDRANT

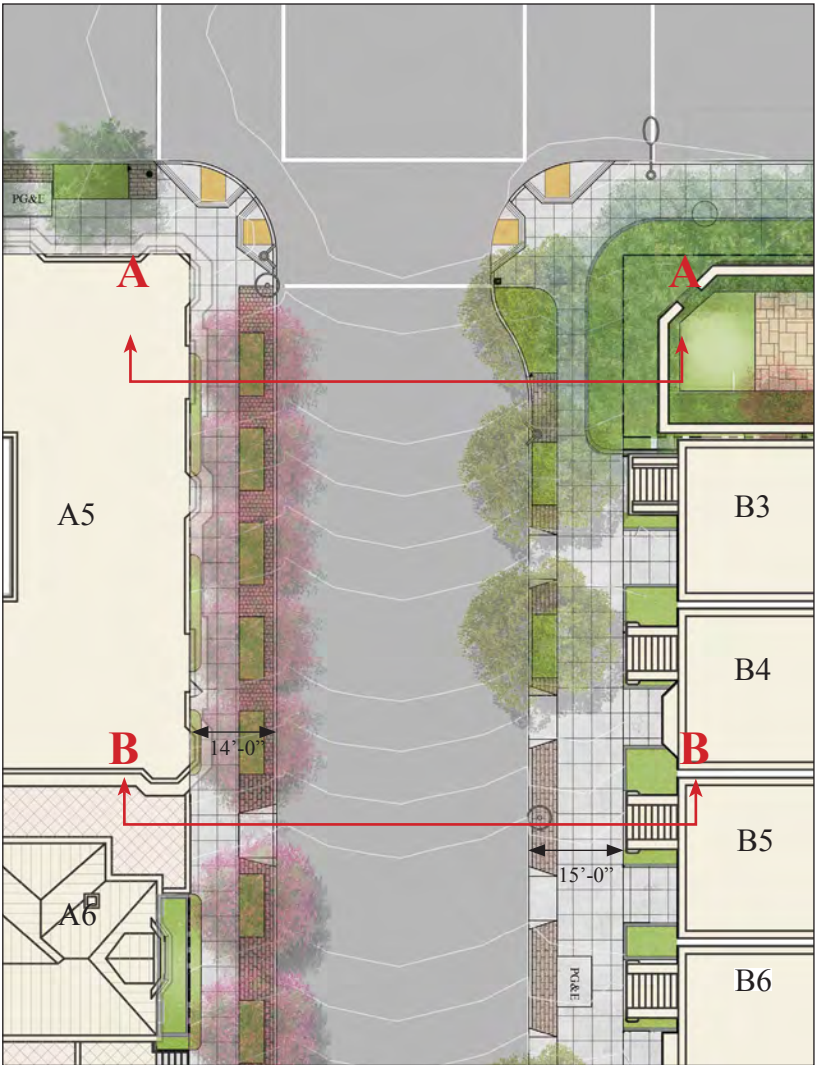


KEY PLAN

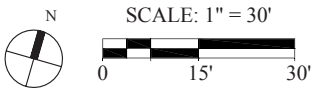




CHERRY STREET WEST ELEVATION,  
BLOCK **A** - NORTH



CHERRY STREET PLAN - NORTH



CHERRY STREET EAST ELEVATION, BLOCK **B** - NORTH

### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

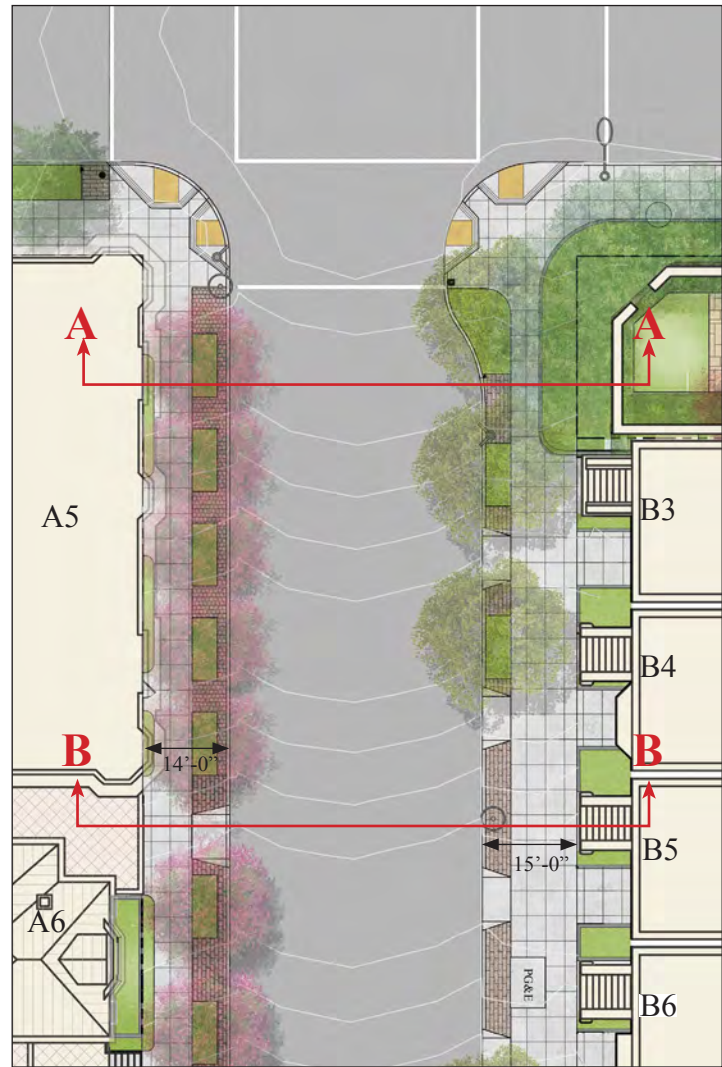


## CHERRY STREET - NORTH

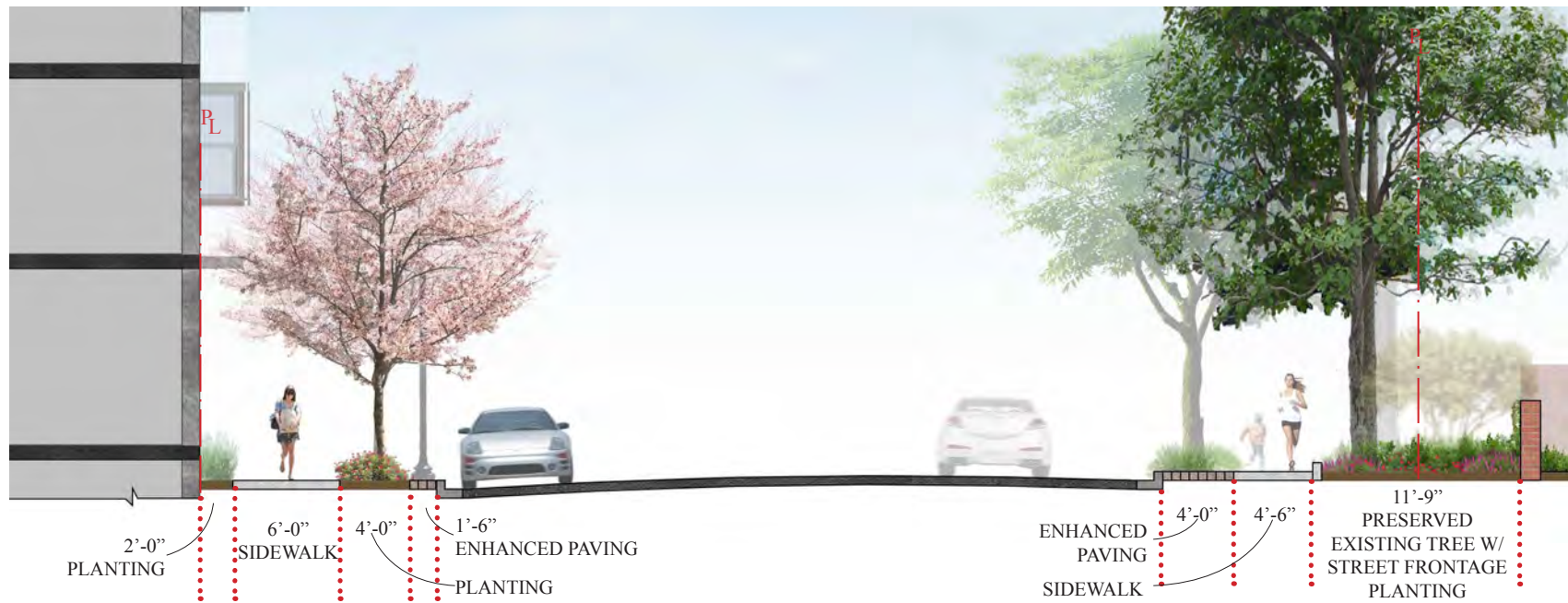
PUD/CU SUBMITTAL  
NOVEMBER 2019  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

L-06.01





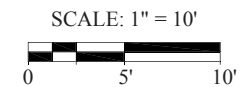
CHERRY STREET PLAN - NORTH



PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



## NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

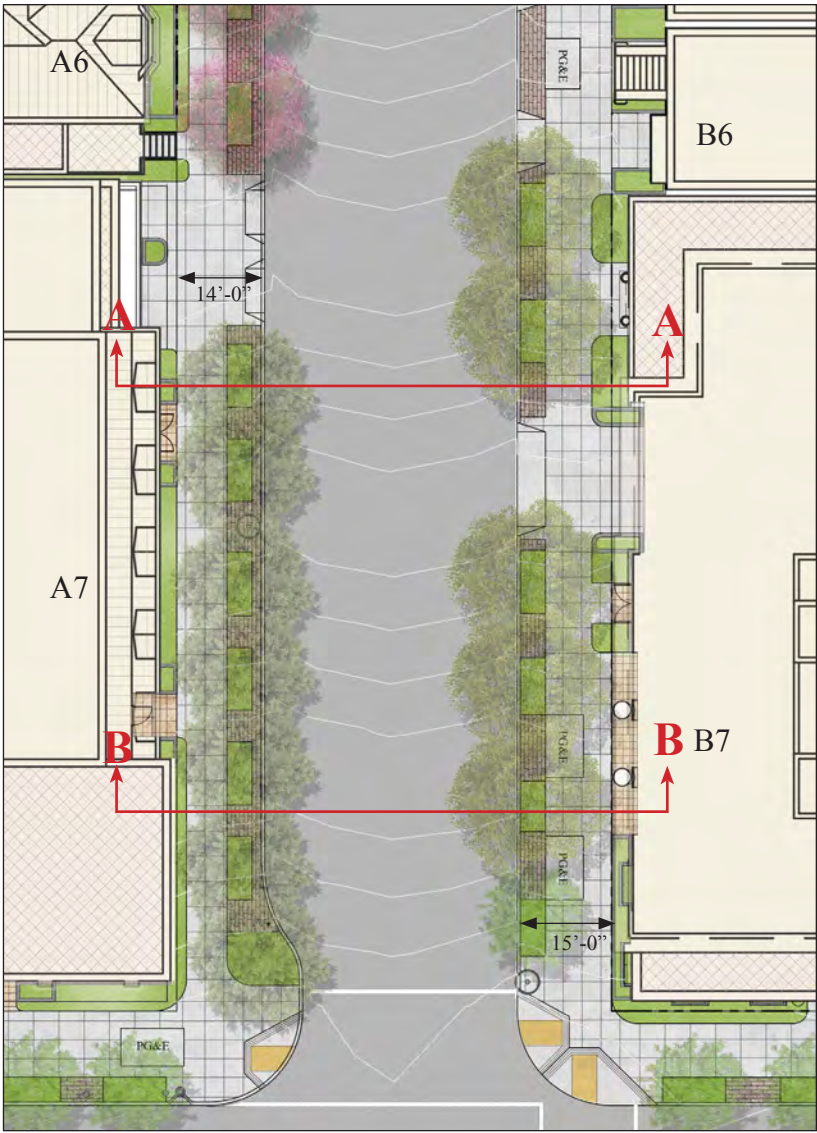
3700 CALIFORNIA STREET

SAN FRANCISCO, CA





CHERRY STREET WEST ELEVATION, BLOCK A - SOUTH



CHERRY STREET PLAN - SOUTH



CHERRY STREET EAST ELEVATION, BLOCK B - SOUTH

**NOTES**

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

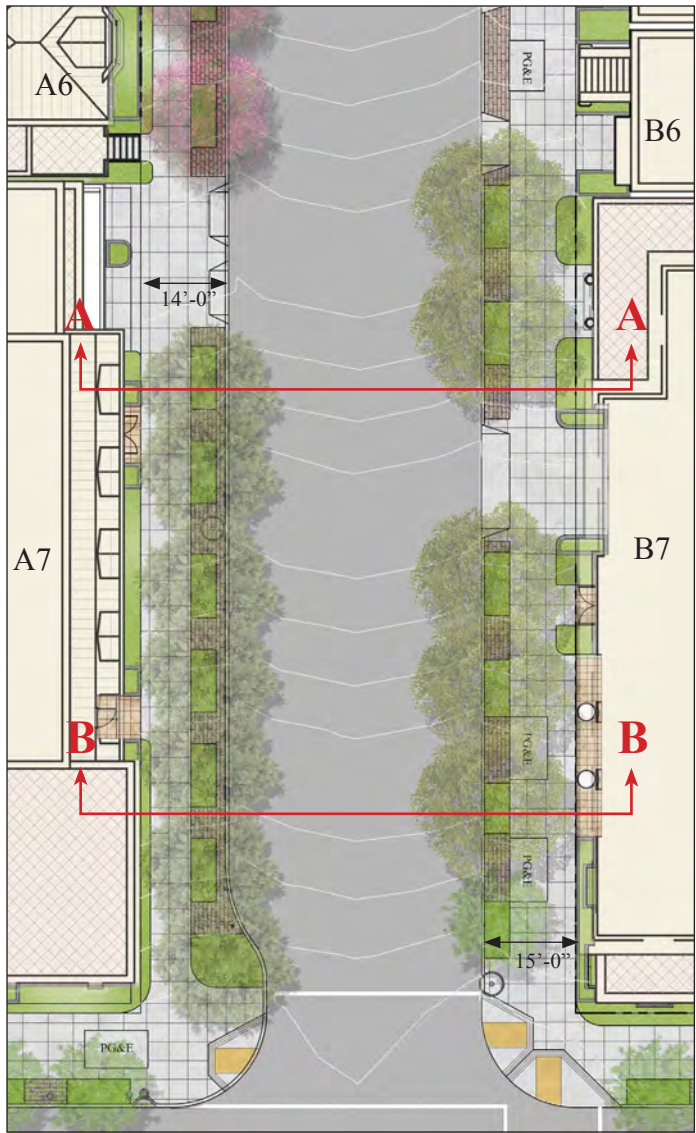


KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

CHERRY STREET - SOUTH





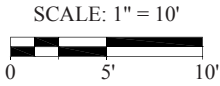
CHERRY STREET PLAN - SOUTH



PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



**NOTES**

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



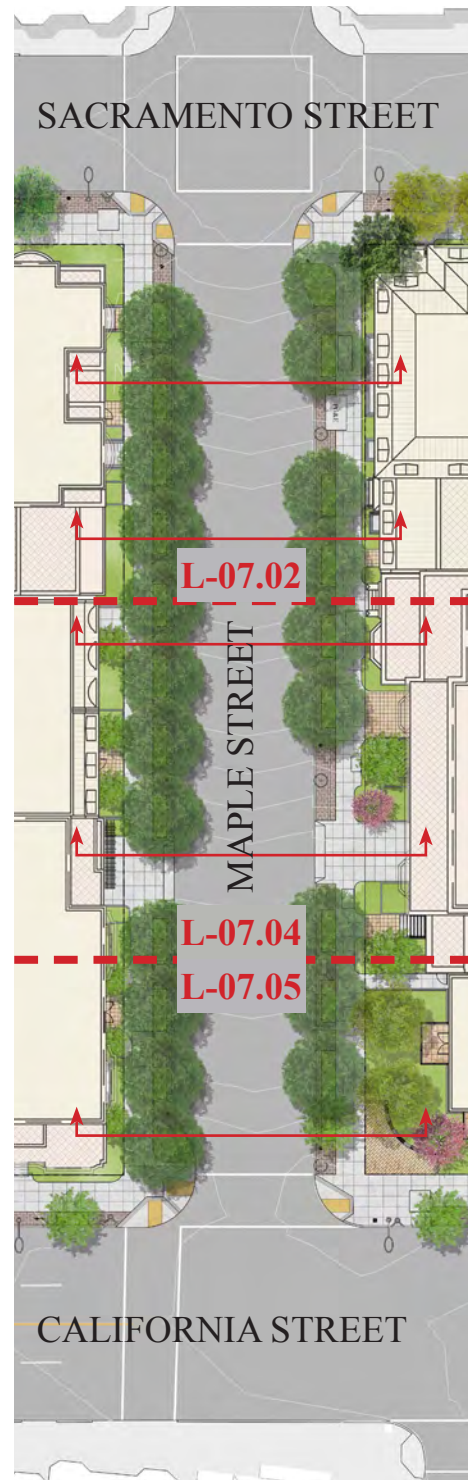
KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

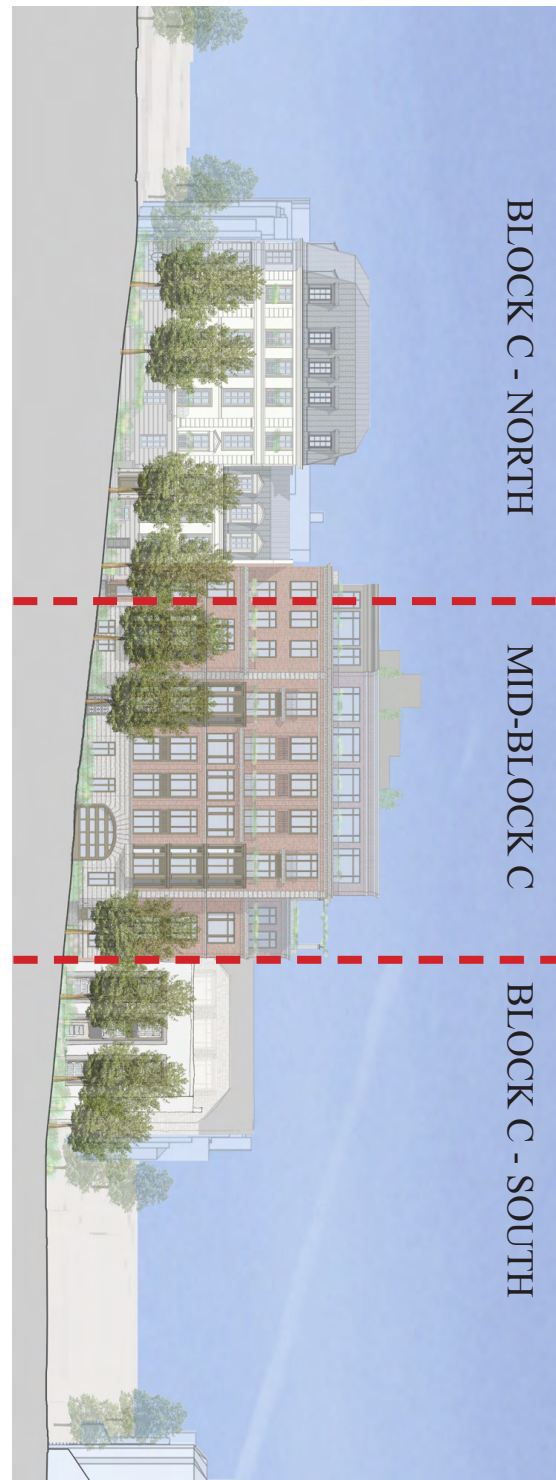




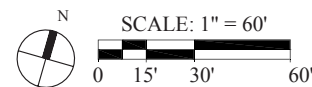
MAPLE STREET -  
WEST ELEVATION



MAPLE STREET -  
OVERALL PLAN



MAPLE STREET -  
EAST ELEVATION



### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

### LEGEND

- BUS SHELTER
- ENHANCED SIDEWALK
- NEW BIKE RACKS
- STREET LIGHT AND MUNI
- PEDESTRIAN STREET
- FIRE HYDRANT



KEY PLAN

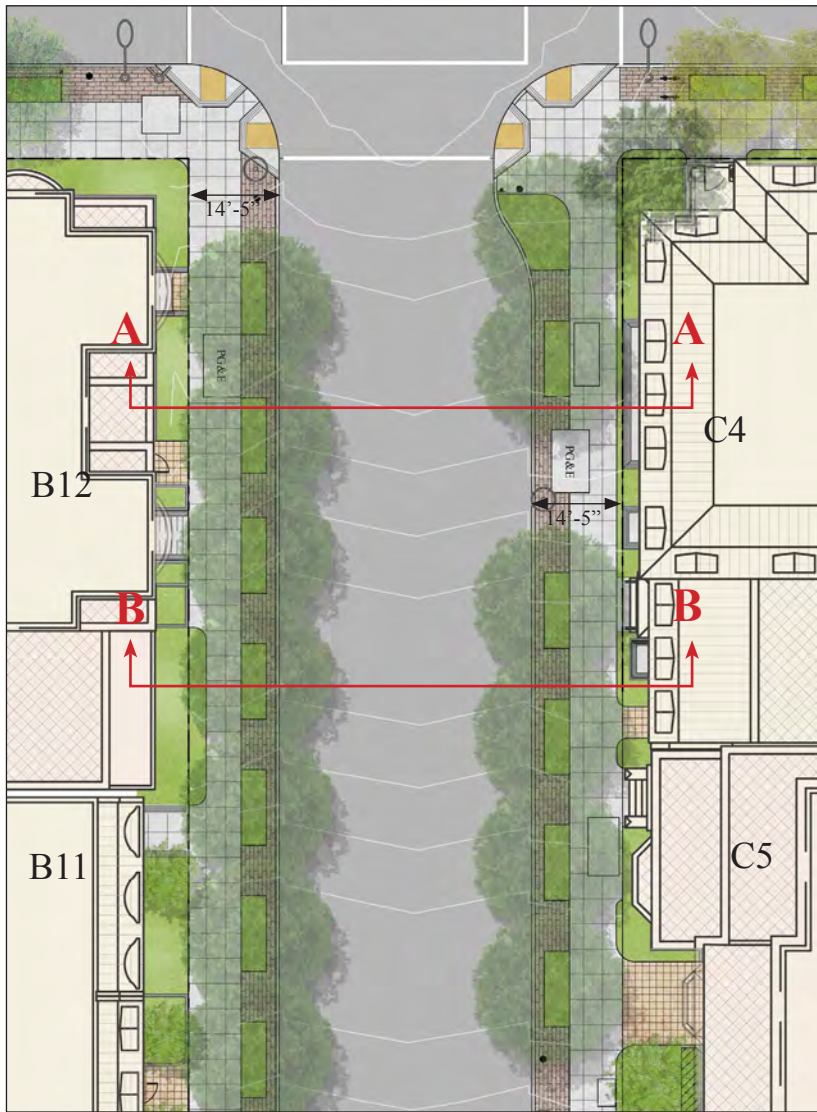
3700 CALIFORNIA STREET

SAN FRANCISCO, CA

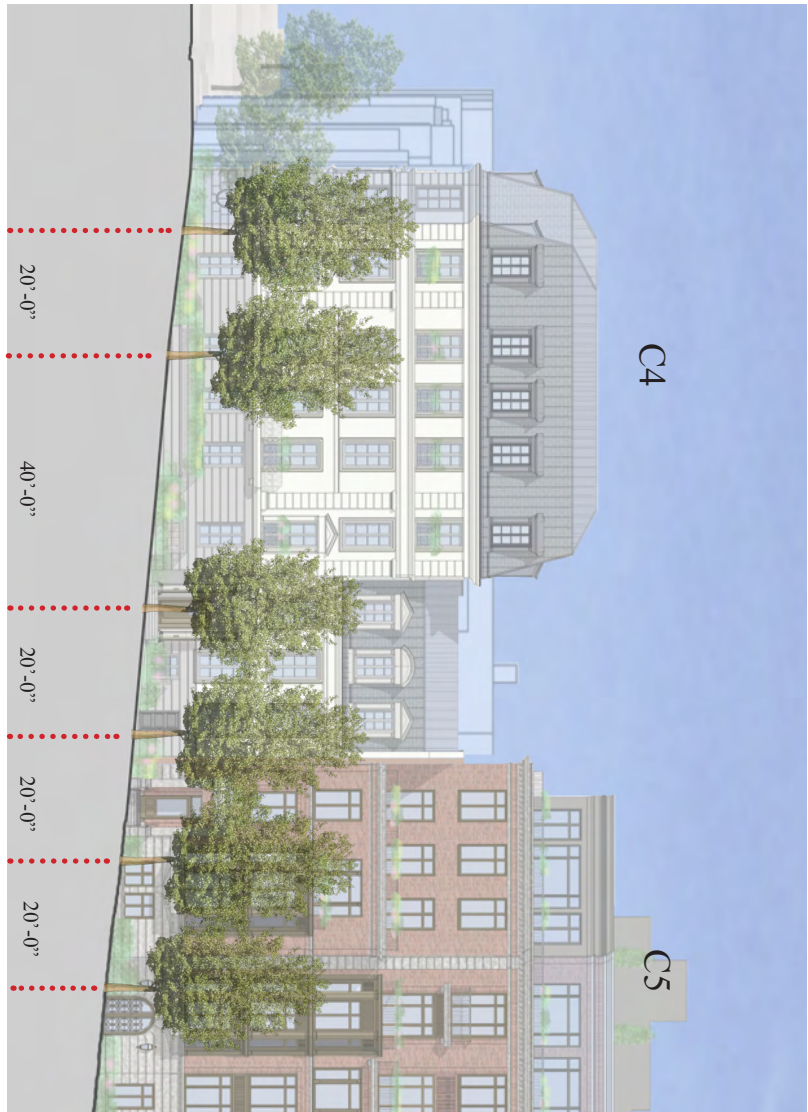




MAPLE STREET WEST ELEVATION, BLOCK **B** - NORTH



MAPLE STREET PLAN - NORTH



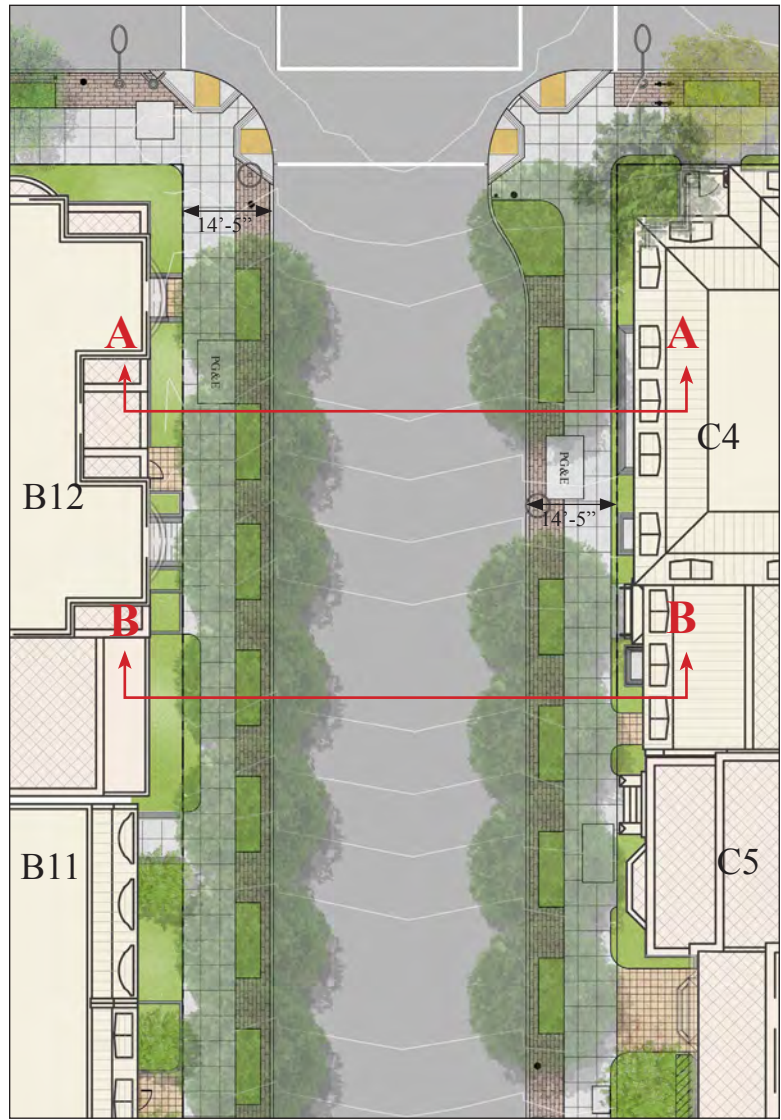
MAPLE STREET EAST ELEVATION, BLOCK **C** - NORTH

- NOTES**
- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
  - RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
  - SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN





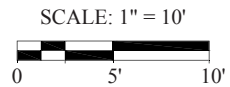
MAPLE STREET PLAN - NORTH



PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



NOTES

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA

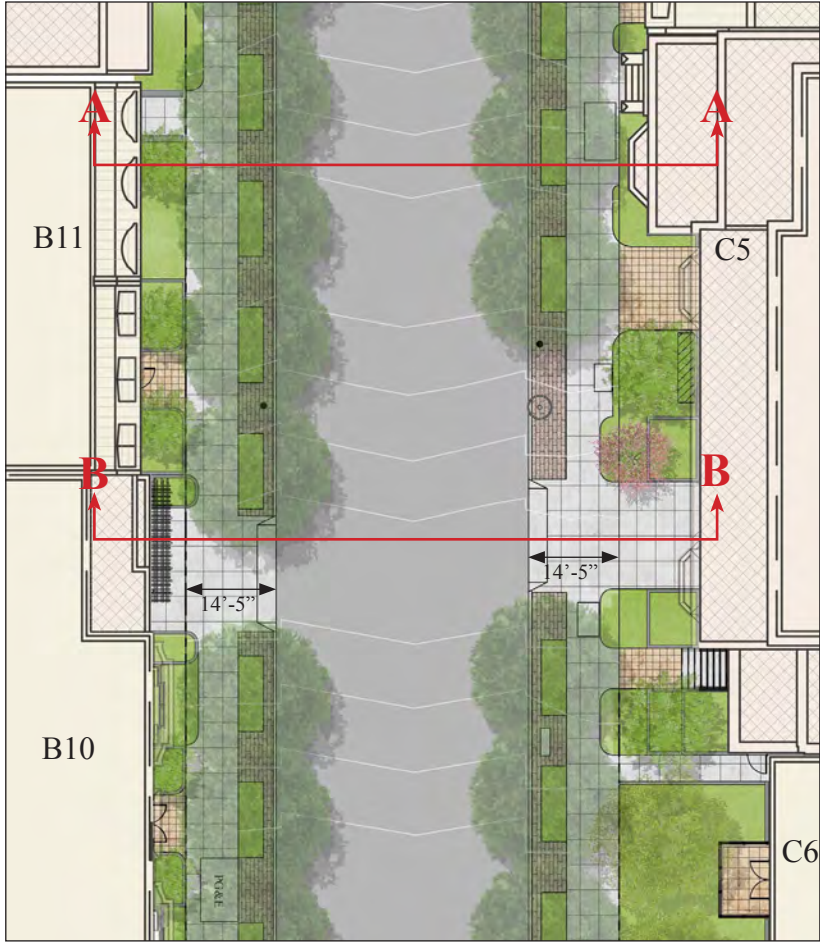


MAPLE STREET - NORTH

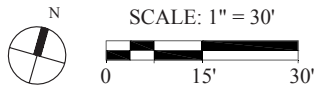




MAPLE STREET WEST ELEVATION,  
BLOCK **B** - MIDDLE



MAPLE STREET PLAN - MID BLOCK



MAPLE STREET EAST ELEVATION,  
BLOCK **C** - MIDDLE

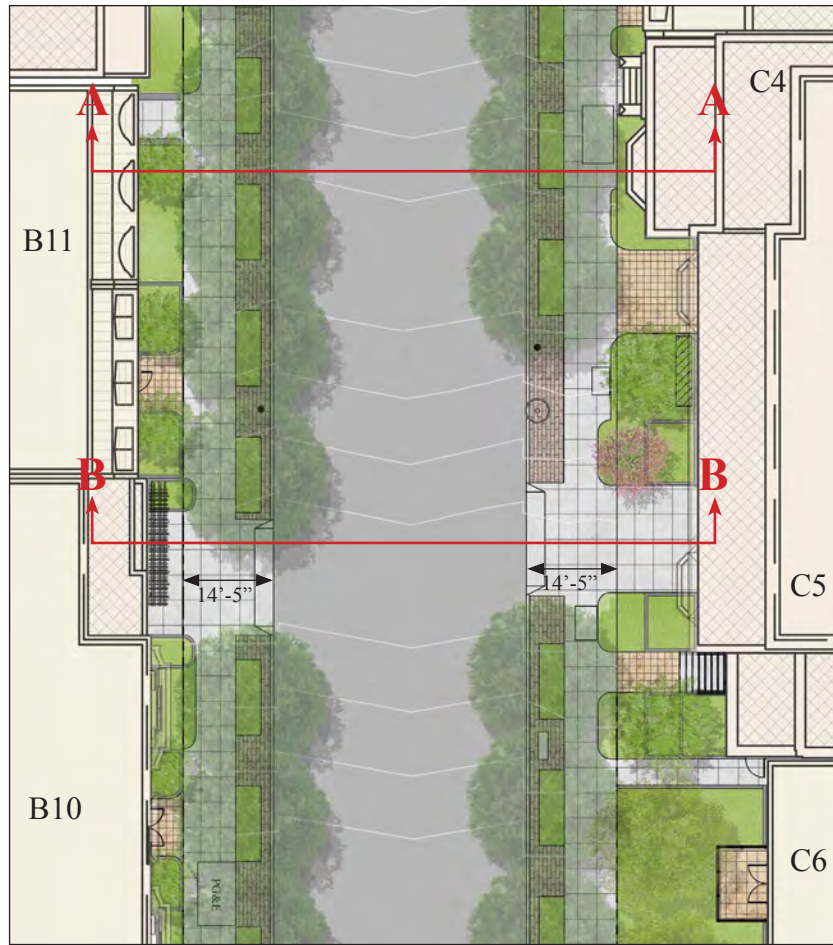
**NOTES**

- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
- RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
- SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.

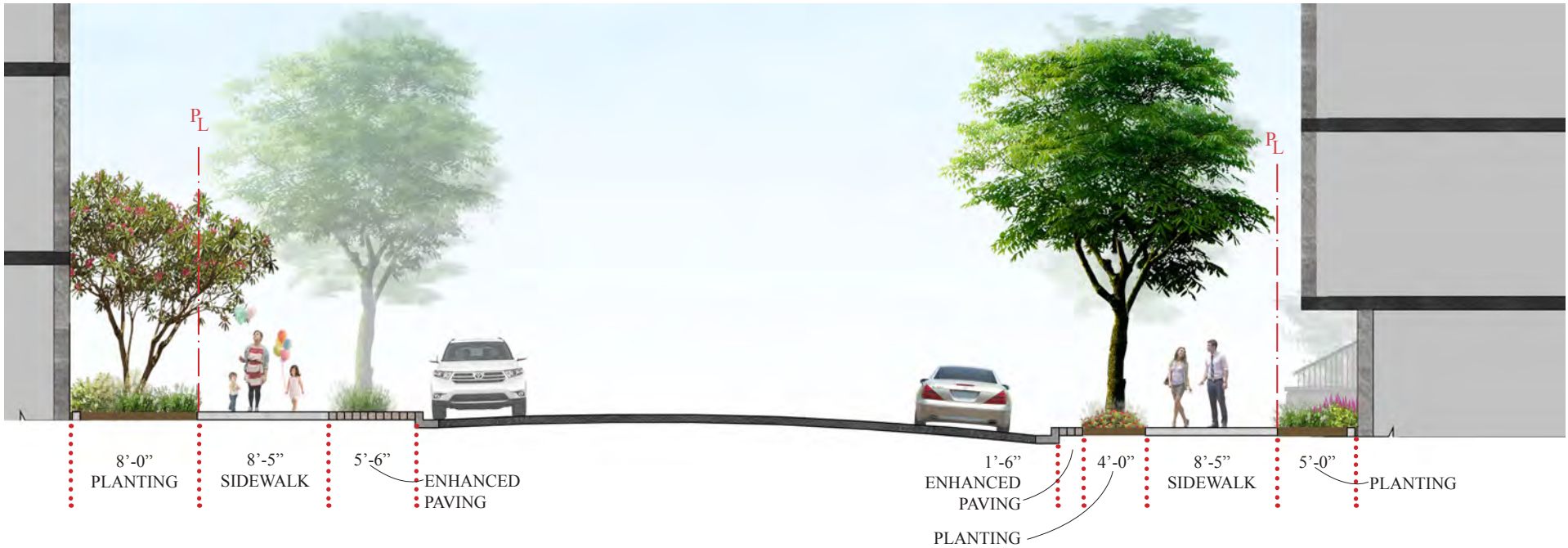
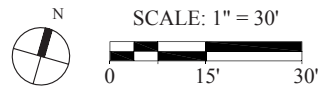


KEY PLAN





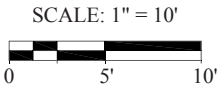
MAPLE STREET PLAN - MID BLOCK



PEDESTRIAN SECTION A-A



PEDESTRIAN SECTION B-B



- NOTES**
- ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.
  - RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.
  - SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



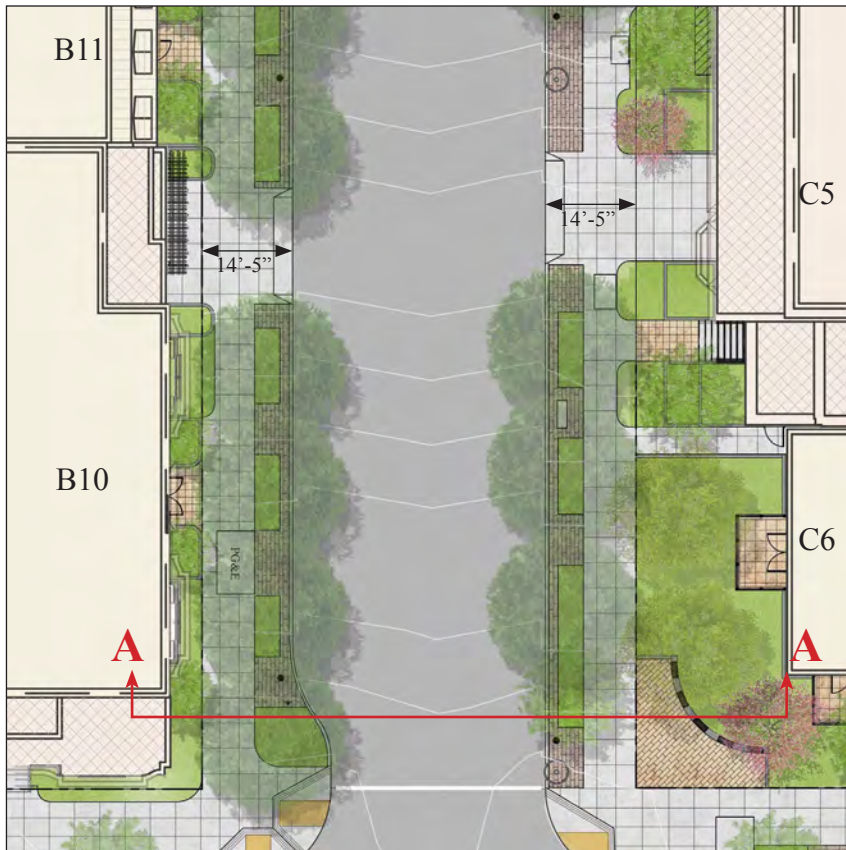
KEY PLAN

3700 CALIFORNIA STREET SAN FRANCISCO, CA





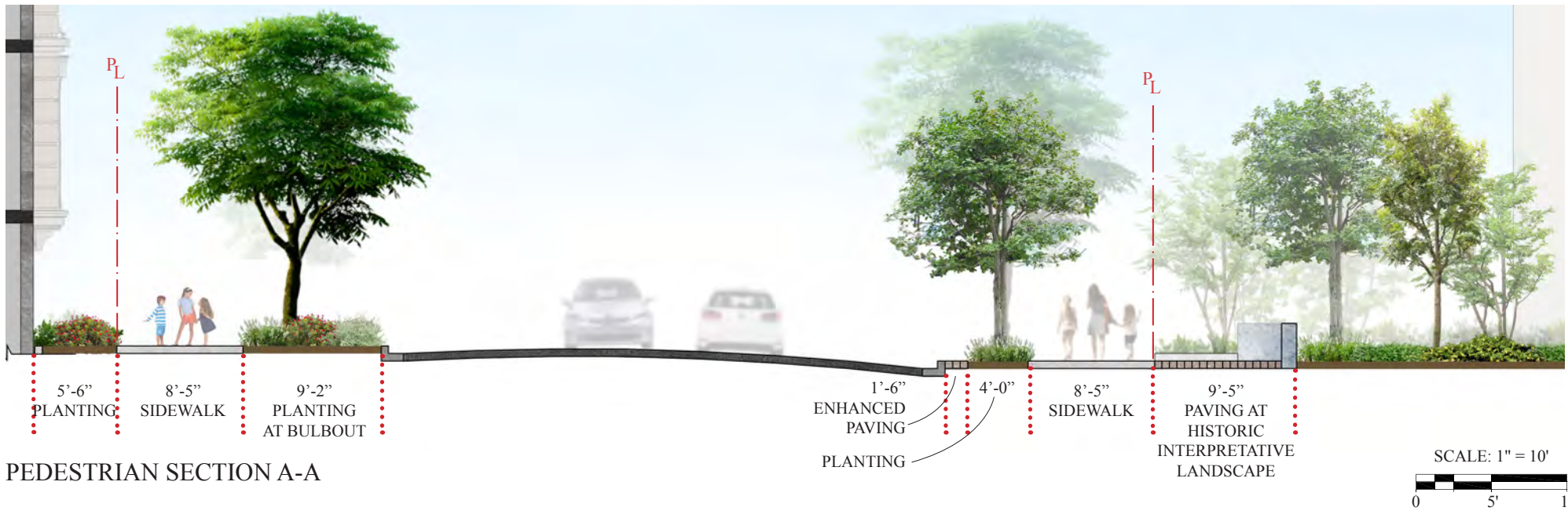
MAPLE STREET WEST ELEVATION, BLOCK **B** - SOUTH



MAPLE STREET PLAN - SOUTH



MAPLE STREET EAST ELEVATION, BLOCK **C** - SOUTH



PEDESTRIAN SECTION A-A

### NOTES

ACCESS AT DESIGNATED MAIN LOBBY ENTRIES WILL BE ADA COMPLIANT.

RELATIVE GRADES SHOWN IN PUBLIC R.O.W. SECTIONS ARE APPROXIMATE.

SEE C-02.00 AND C-02.05 FOR GENERAL GRADING PLAN.



KEY PLAN

3700 CALIFORNIA STREET

SAN FRANCISCO, CA

## MAPLE STREET - SOUTH



# CIVIL



3700 CALIFORNIA STREET  
SAN FRANCISCO, CA



PUD/CU SUBMITTAL  
FEBRUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

DRAWING NAME: K:\2016\160010\_CPMC-CA\ENG\01-PLANNING\00-SHEET INDEX.dwg  
PLOT DATE: 01-22-20

WEST SEGMENT - SEE C-XX.00 SHEETS

EAST SEGMENT - SEE C-XX.05 SHEETS

SACRAMENTO STREET

CHERRY STREET

MAPLE STREET

CALIFORNIA STREET

### LEGEND

- EXISTING PROPERTY LINE
- SEGMENT BOUNDARY

### SHEET LIST

SHEET	NAME
C-00.00	SHEET INDEX
C-01.00	SURFACE IMPROVEMENTS - WEST
C-01.05	SURFACE IMPROVEMENTS - EAST
C-02.00	STREET GRADING - WEST
C-02.05	STREET GRADING - EAST
C-03.00	COMBINED SEWER - WEST
C-03.05	COMBINED SEWER - EAST
C-04.00	DOMESTIC/FIRE WATER - WEST
C-04.05	DOMESTIC/FIRE WATER - EAST
C-04.10	FIRE HYDRANT COVERAGE
C-05.00	GAS - WEST
C-05.05	GAS - EAST
C-06.00	ELECTRICAL - WEST
C-06.05	ELECTRICAL - EAST
C-07.00	COMMUNICATIONS - WEST
C-07.05	COMMUNICATIONS - EAST

GRAPHIC SCALE



3700 CALIFORNIA STREET SAN FRANCISCO, CA

## SHEET INDEX

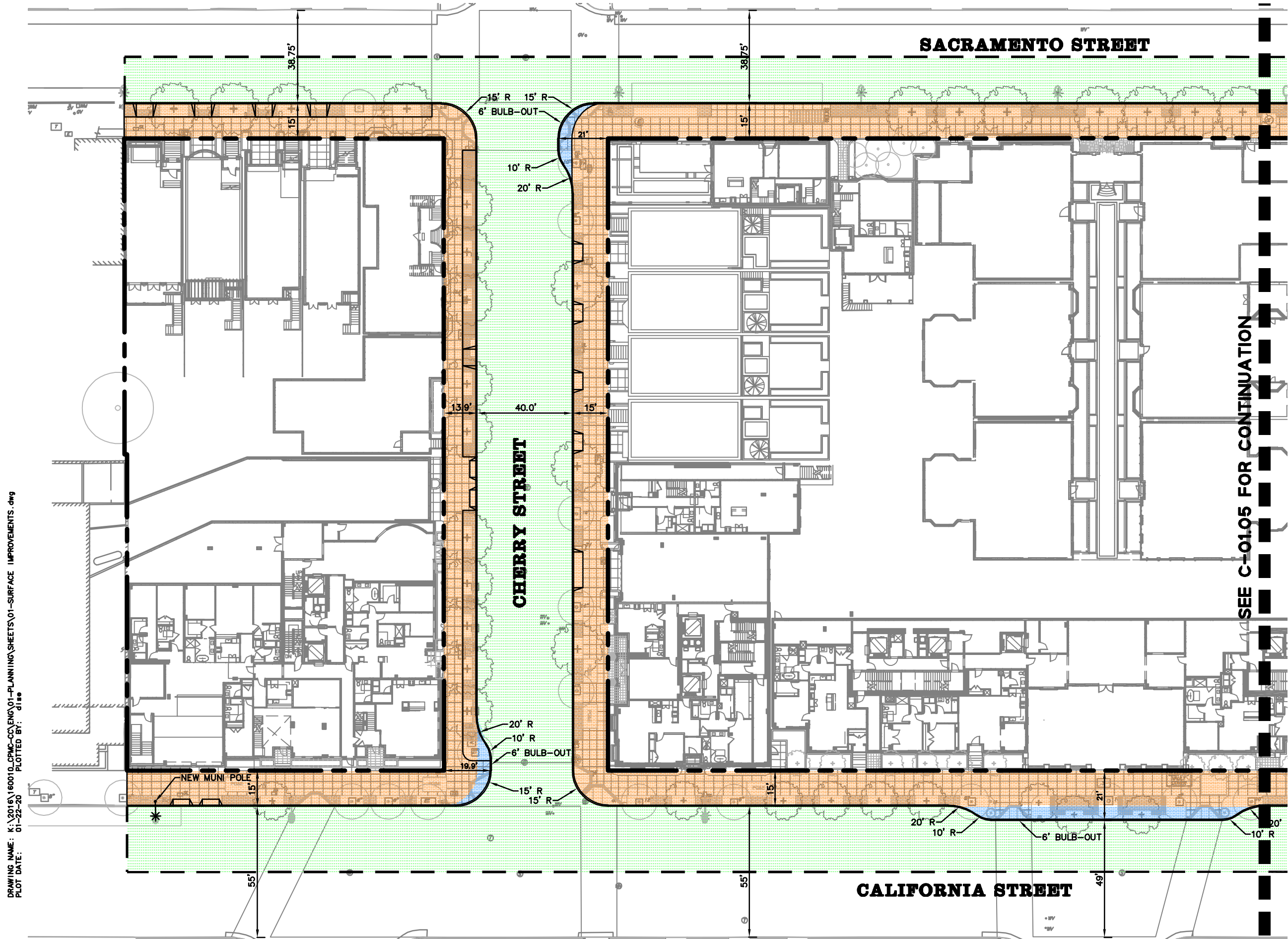
## CONCEPTUAL CIVIL PLANS

PUD/CU SUBMITTAL  
JANUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

C-00.00



DRAWING NAME: K:\2016\160010.CPMG-CA.ENG\01-PLANNING\01-SURFACE IMPROVEMENTS.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls



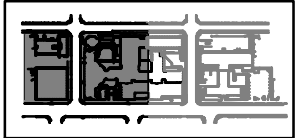
**LEGEND**

- EXISTING PROPERTY LINE
- STREET SURFACE IMPROVEMENT/RESURFACING
- SIDEWALK IMPROVEMENT
- SIDEWALK WIDENING
- SAWCUT LINE/LIMIT OF WORK

**NOTES**

- PROJECT IS PROPOSING TO MATCH EXISTING SIDEWALK WIDTHS ON ALL FRONTAGES WITH THE EXCEPTION OF MAPLE STREET. SIDEWALKS ALONG MAPLE STREET WILL BE WIDENED FROM 7.8' WIDE IN THE EXISTING CONDITION TO 15.0' IN THE PROPOSED CONDITION. CURB BULB-OUTS (SIDEWALK WIDENINGS) WILL BE ADDED TO LOCATIONS INDICATED ON THE PLANS.

**KEY PLAN**



**GRAPHIC SCALE**



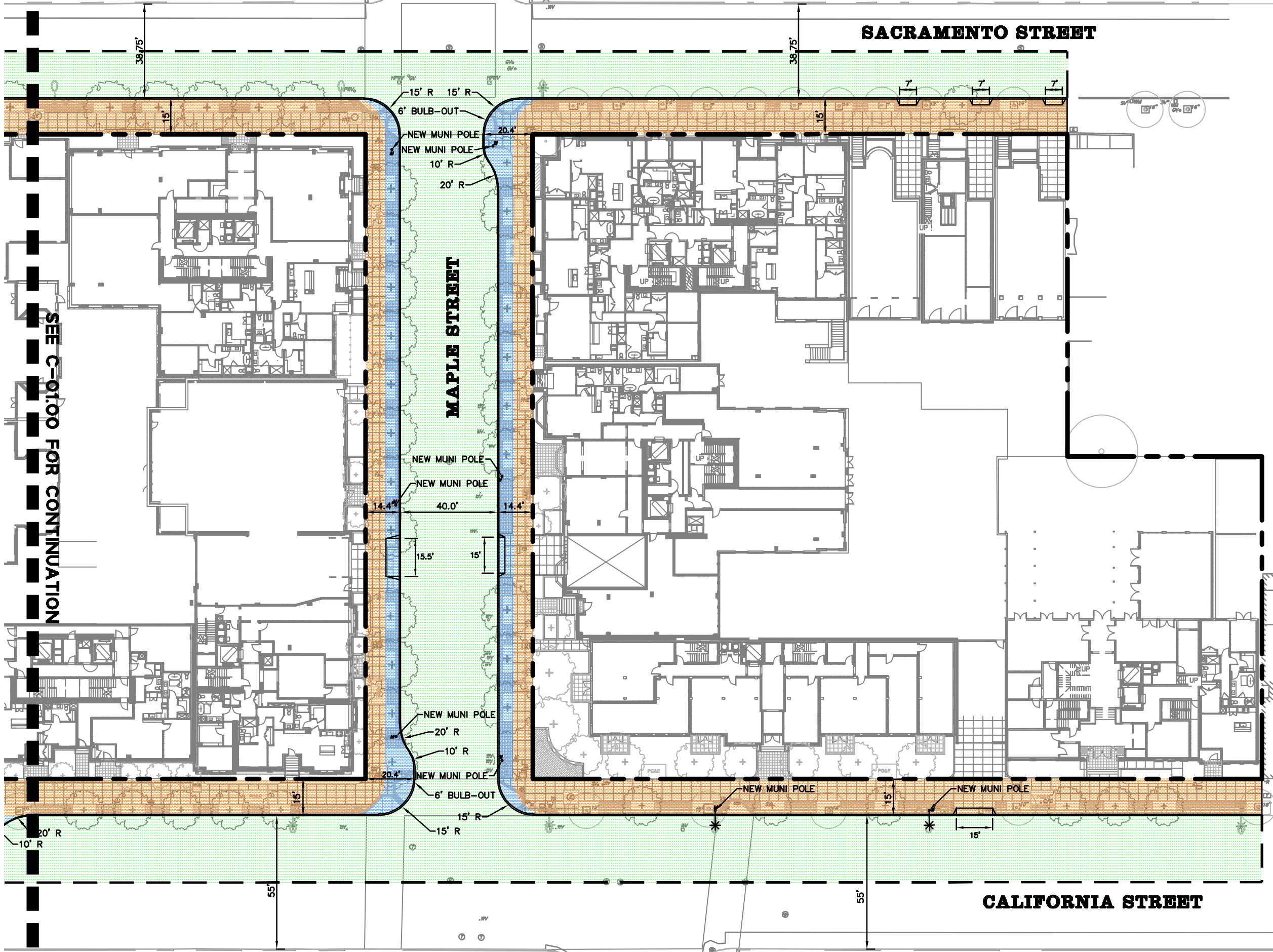
3700 CALIFORNIA STREET SAN FRANCISCO, CA

**STREET IMPROVEMENTS - WEST**

**CONCEPTUAL CIVIL PLANS**

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PLOT DATE: 01-22-20 PLOTTED BY: d1a

SEE C-0100 FOR CONTINUATION



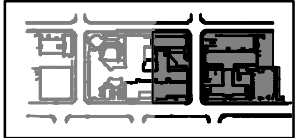
**LEGEND**

- EXISTING PROPERTY LINE
- STREET SURFACE IMPROVEMENT/RESURFACING
- SIDEWALK IMPROVEMENT
- SIDEWALK WIDENING
- SAWCUT LINE/LIMIT OF WORK

**NOTES**

- PROJECT IS PROPOSING TO MATCH EXISTING SIDEWALK WIDTHS ON ALL FRONTAGES WITH THE EXCEPTION OF MAPLE STREET. SIDEWALKS ALONG MAPLE STREET WILL BE WIDENED FROM 7.8' WIDE IN THE EXISTING CONDITION TO 15.0' IN THE PROPOSED CONDITION. CURB BULB-OUTS (SIDEWALK WIDENINGS) WILL BE ADDED TO LOCATIONS INDICATED ON THE PLANS.

**KEY PLAN**



**GRAPHIC SCALE**



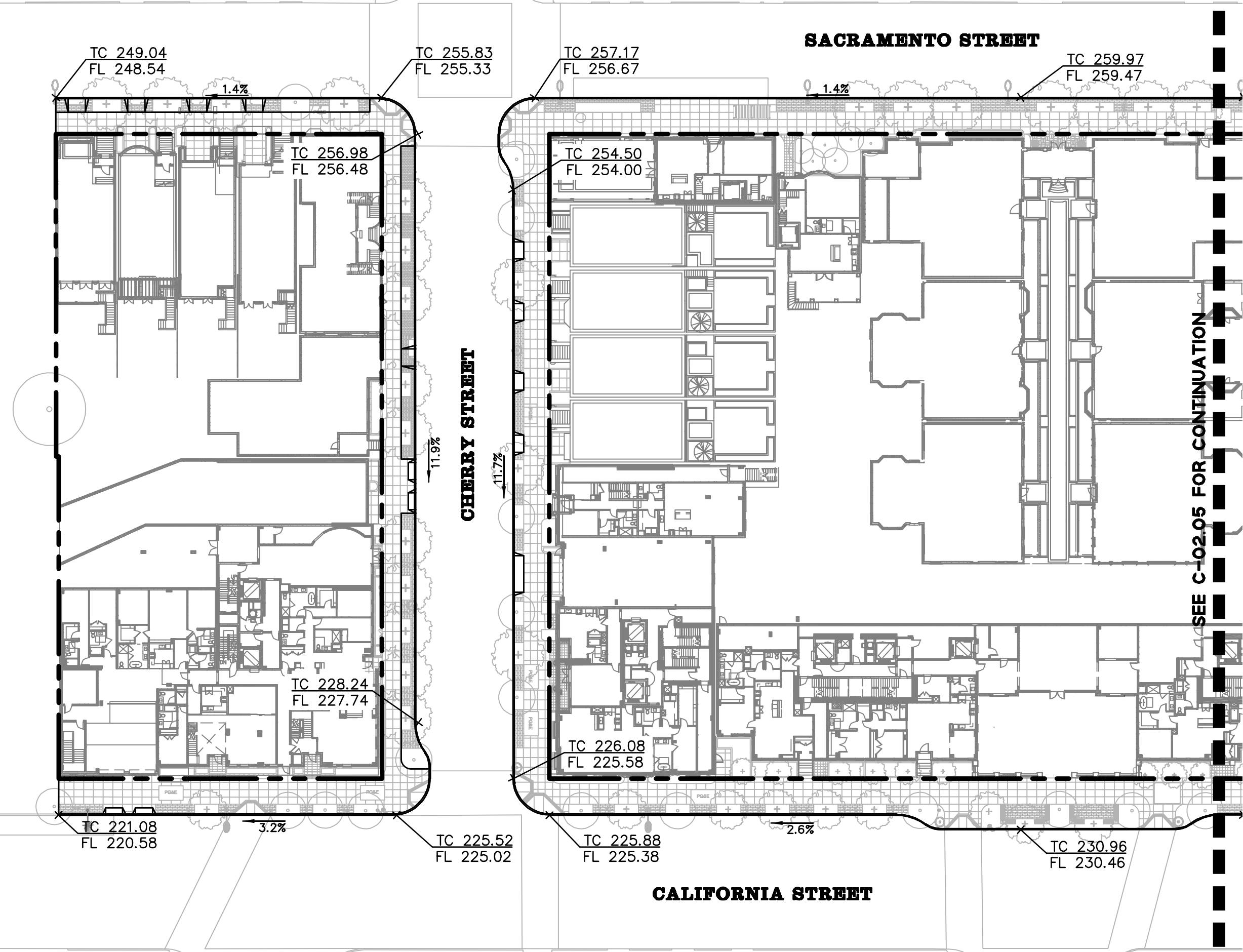
3700 CALIFORNIA STREET SAN FRANCISCO, CA

**STREET IMPROVEMENTS - EAST**

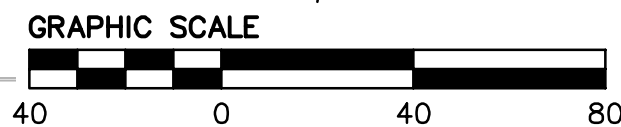
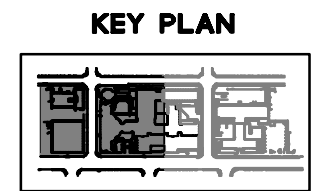
**CONCEPTUAL CIVIL PLANS**



DRAWING NAME: K:\2016\160010\_CPMC-CA\ENG\01-PLANNING\02-STREET GRADING.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls



- LEGEND**
- EXISTING PROPERTY LINE
  - TC TOP OF CURB ELEVATION
  - FL FLOW LINE ELEVATION

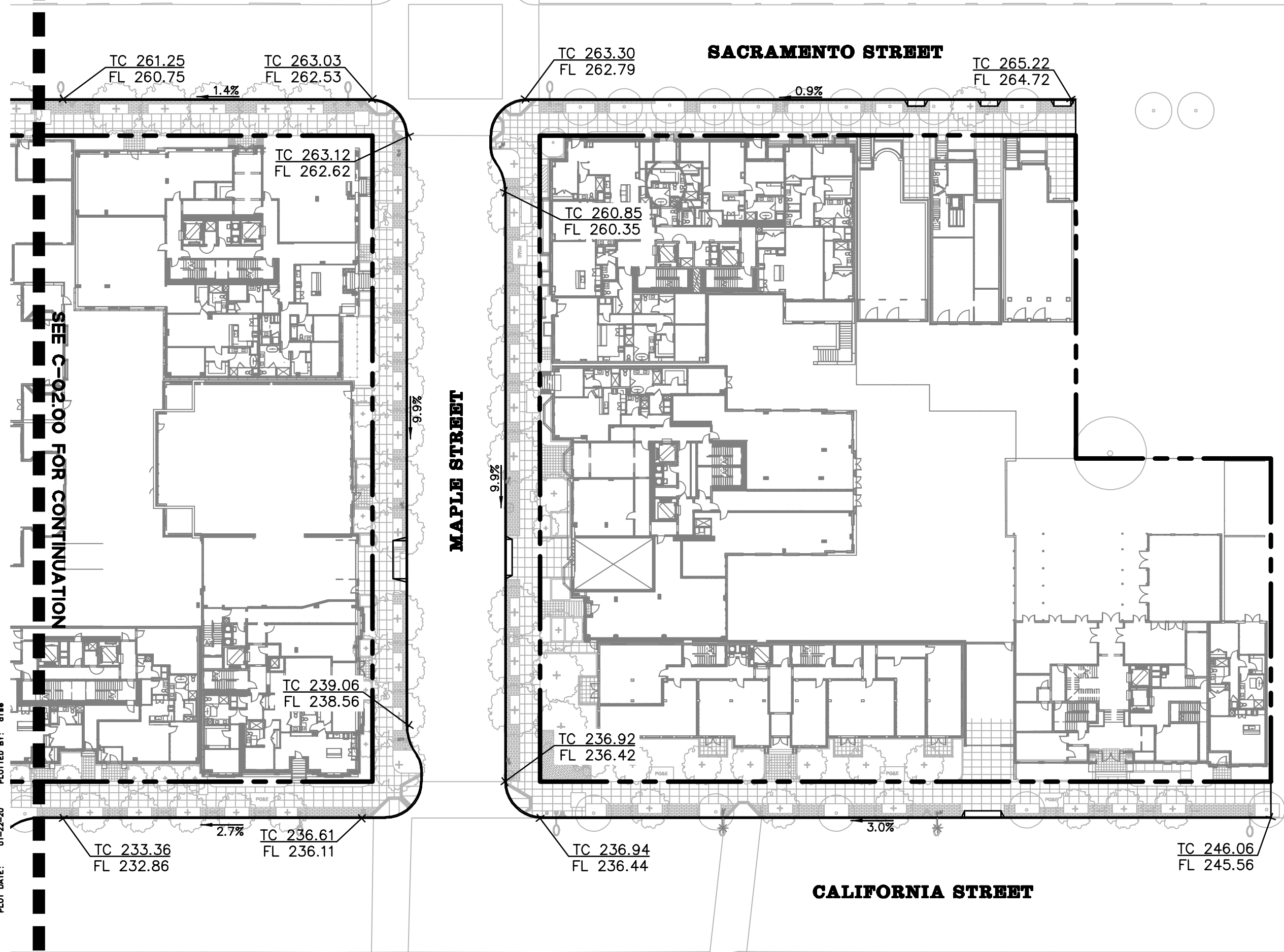


3700 CALIFORNIA STREET SAN FRANCISCO, CA

**STREET GRADING - WEST**  
**CONCEPTUAL CIVIL PLANS**

DRAWING NAME: K:\2016\160010.CPMG-CA\ENG\01-PLANNING\02-STREET GRADING.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls

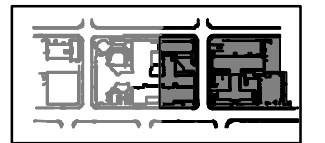
SEE C-02.00 FOR CONTINUATION



**LEGEND**

- EXISTING PROPERTY LINE
- TC TOP OF CURB ELEVATION
- FL FLOW LINE ELEVATION

**KEY PLAN**



**GRAPHIC SCALE**



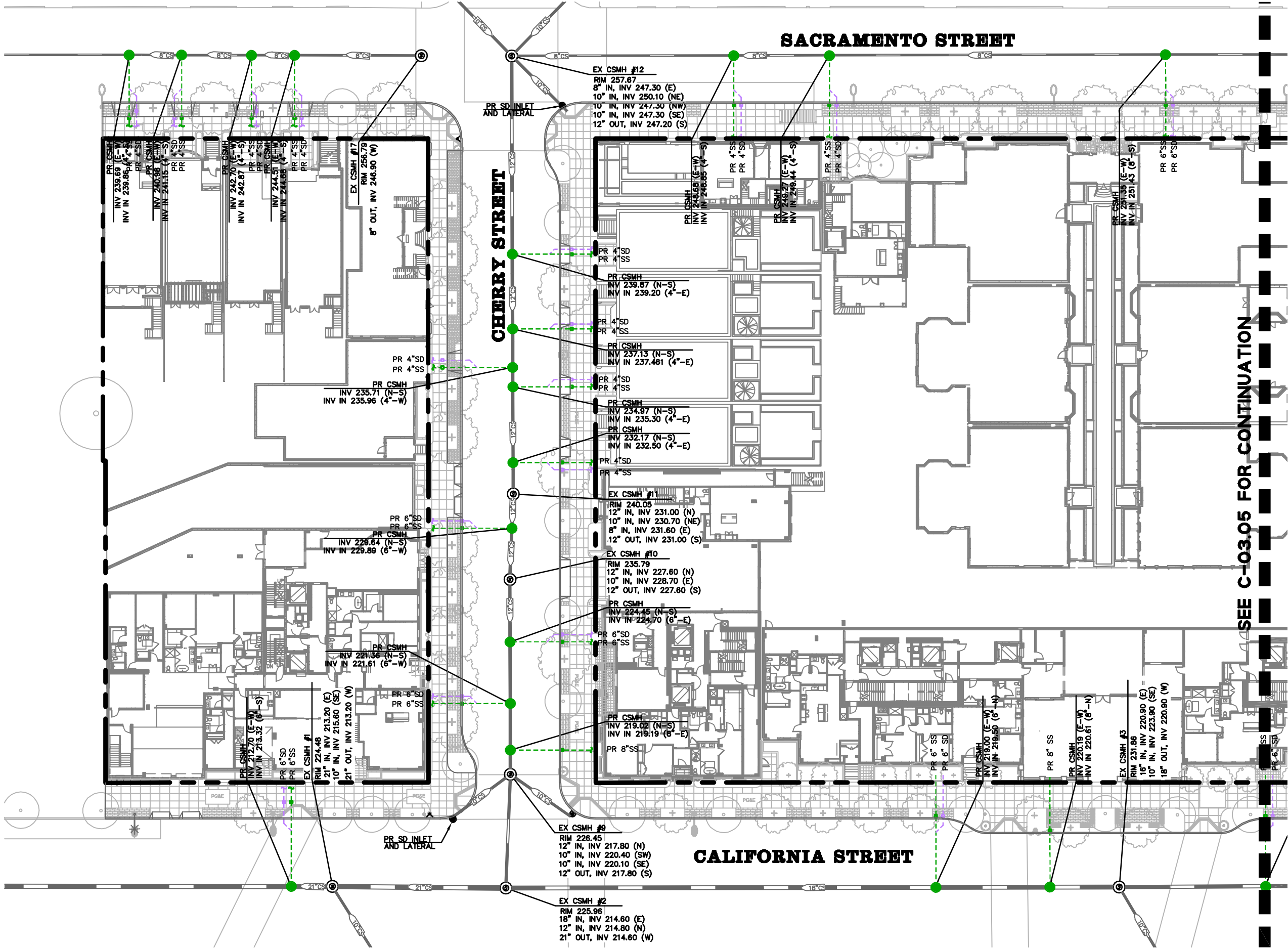
3700 CALIFORNIA STREET SAN FRANCISCO, CA

**STREET GRADING - EAST**

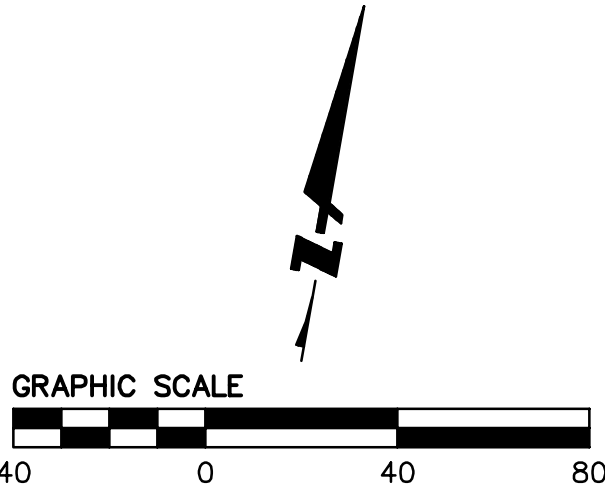
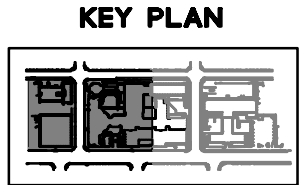
**CONCEPTUAL CIVIL PLANS**



DRAWING NAME: K:\2016\160010\_CPMC-CA\ENG\01-PLANNING\03-COMBINED SEWER.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: d1a



- LEGEND**
- EXISTING PROPERTY LINE
  - EXISTING UTILITY LINE
  - - - - - PROPOSED SS LINE
  - - - - - PROPOSED SD LINE
  - ◀ X"CS ▶ DIRECTION OF FLOW
  - CS COMBINED SEWER
  - EX EXISTING
  - INV INVERT
  - PR PROPOSED
  - RIM RIM ELEVATION
  - SD STORM DRAIN
  - SS SANITARY SEWER
  - CSMH COMBINED SEWER MANHOLE

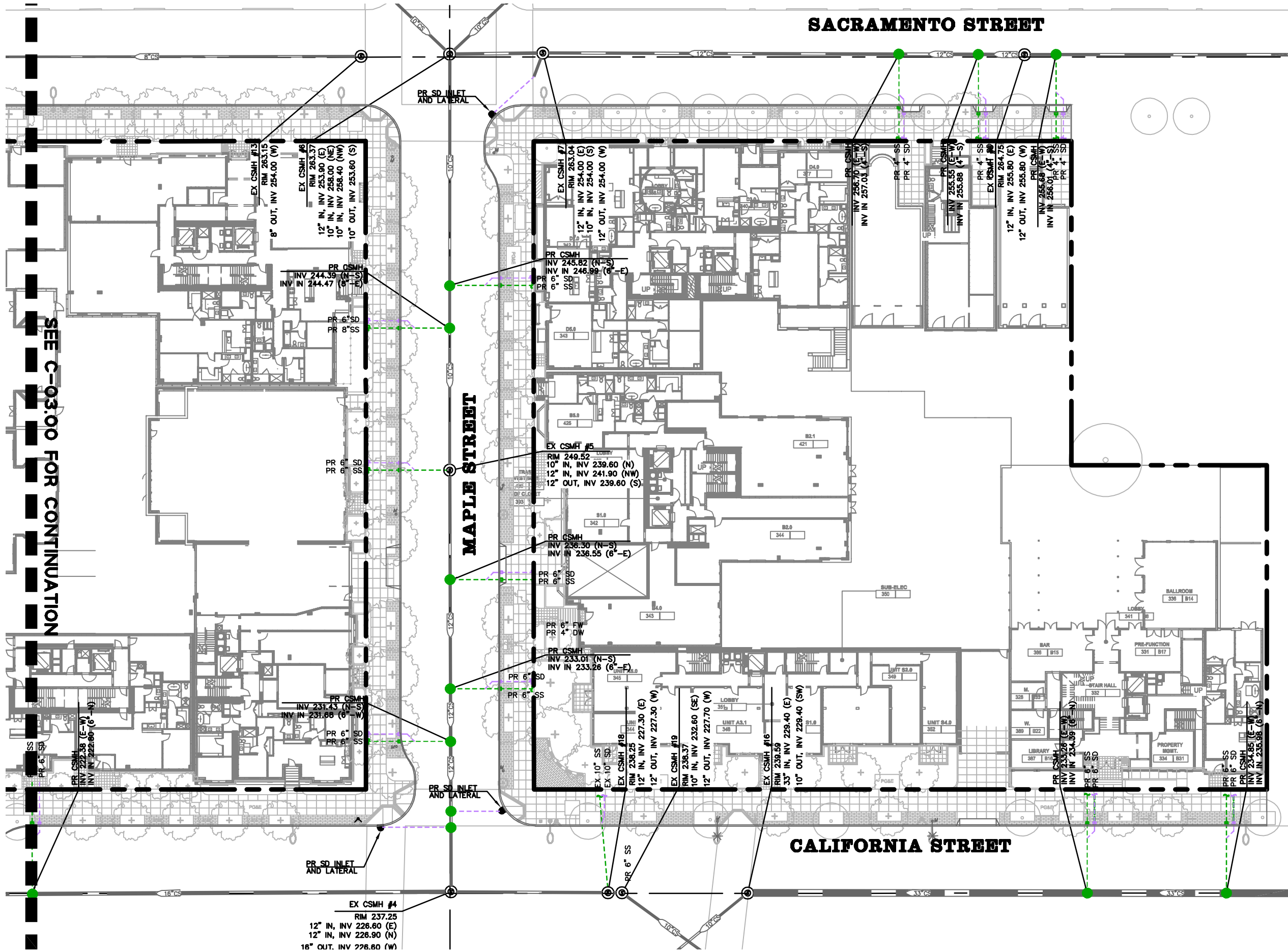


3700 CALIFORNIA STREET SAN FRANCISCO, CA

**COMBINED SEWER - WEST**  
**CONCEPTUAL CIVIL PLANS**

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PLOT DATE: 01-22-20 PLOTTED BY: d1a

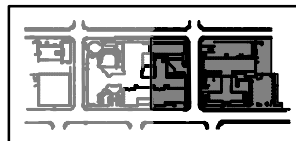
SEE C-03.00 FOR CONTINUATION



### LEGEND

- EXISTING PROPERTY LINE
- EXISTING UTILITY LINE
- PROPOSED SS LINE
- PROPOSED SD LINE
- X"CS DIRECTION OF FLOW
- CS COMBINED SEWER
- EX EXISTING
- INV INVERT
- PR PROPOSED
- RIM RIM ELEVATION
- SD STORM DRAIN
- SS SANITARY SEWER
- CSMH COMBINED SEWER MANHOLE

### KEY PLAN



### GRAPHIC SCALE

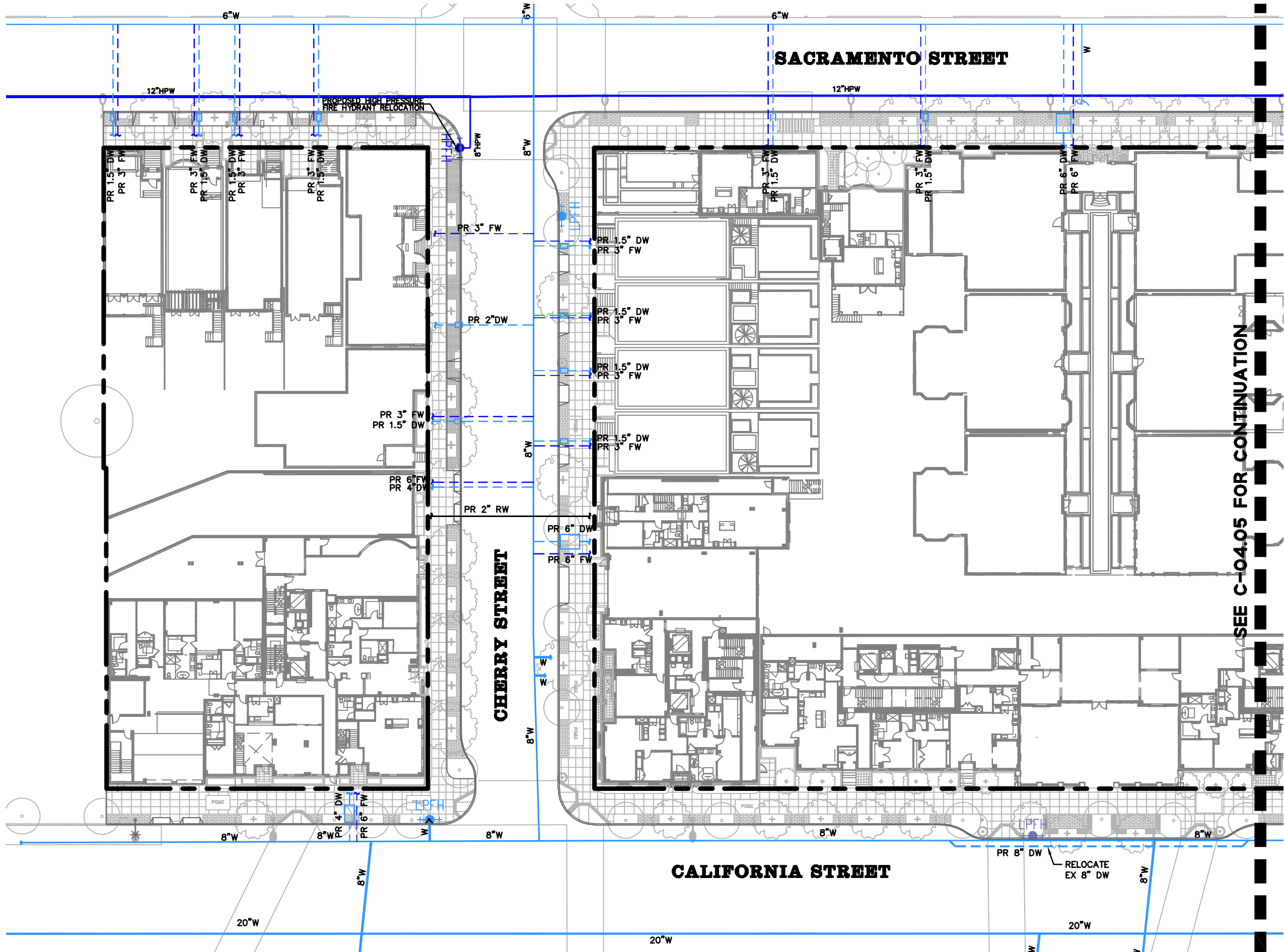


3700 CALIFORNIA STREET SAN FRANCISCO, CA

## COMBINED SEWER - EAST CONCEPTUAL CIVIL PLANS



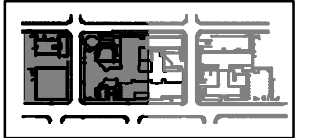
DRAWING NAME: K:\2016\160010.CPMC-CA.ENG\01-PLANNING\04.00-WATER.DWG  
PLOT DATE: 01-22-20



**LEGEND**

- EXISTING PROPERTY LINE
- EXISTING LOW PRESSURE WATER
- EXISTING HIGH PRESSURE WATER
- - - PROPOSED DOMESTIC WATER LINE
- - - PROPOSED FIRE WATER LINE
- LPFH +•+ EXISTING LOW PRESSURE FIRE HYDRANT
- HPFH +•+ EXISTING HIGH PRESSURE FIRE HYDRANT
- PROPOSED WATER METER
- PR PROPOSED
- DW DOMESTIC WATER
- FW FIRE WATER
- RW RECYCLED WATER
- W WATER LINE
- HPW HIGH PRESSURE WATER
- LPFH LOW PRESSURE FIRE HYDRANT
- HPFH HIGH PRESSURE FIRE HYDRANT

**KEY PLAN**



**GRAPHIC SCALE**



3700 CALIFORNIA STREET SAN FRANCISCO, CA

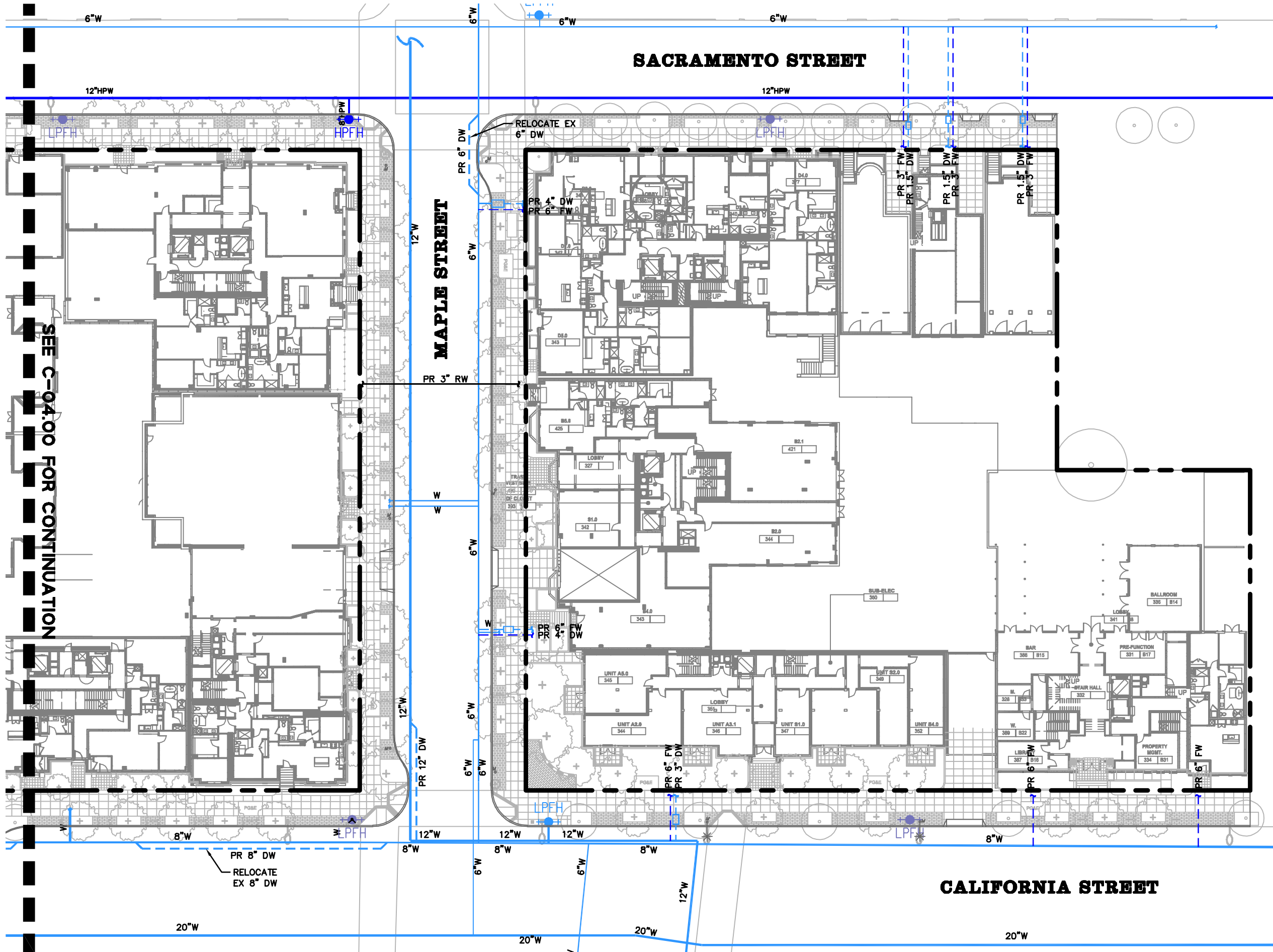
**DOMESTIC/FIRE WATER - WEST**

**CONCEPTUAL CIVIL PLANS**



DRAWING NAME: K:\2016\160010.CPMC-CA.ENG\01-PLANNING\04.00-WATER.DWG  
PLOT DATE: 01-22-20

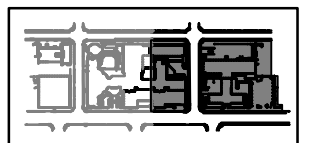
SEE C-04.00 FOR CONTINUATION



### LEGEND

- EXISTING PROPERTY LINE
- EXISTING LOW PRESSURE WATER
- EXISTING HIGH PRESSURE WATER
- - - PROPOSED DOMESTIC WATER LINE
- - - PROPOSED FIRE WATER LINE
- LPFH +•+ EXISTING LOW PRESSURE FIRE HYDRANT
- HPFH +•+ EXISTING HIGH PRESSURE FIRE HYDRANT
- PROPOSED WATER METER
- PR PROPOSED
- DW DOMESTIC WATER
- FW FIRE WATER
- RW RECYCLED WATER
- W WATER LINE
- HPW HIGH PRESSURE WATER
- LPFH LOW PRESSURE FIRE HYDRANT
- HPFH HIGH PRESSURE FIRE HYDRANT

### KEY PLAN



### GRAPHIC SCALE



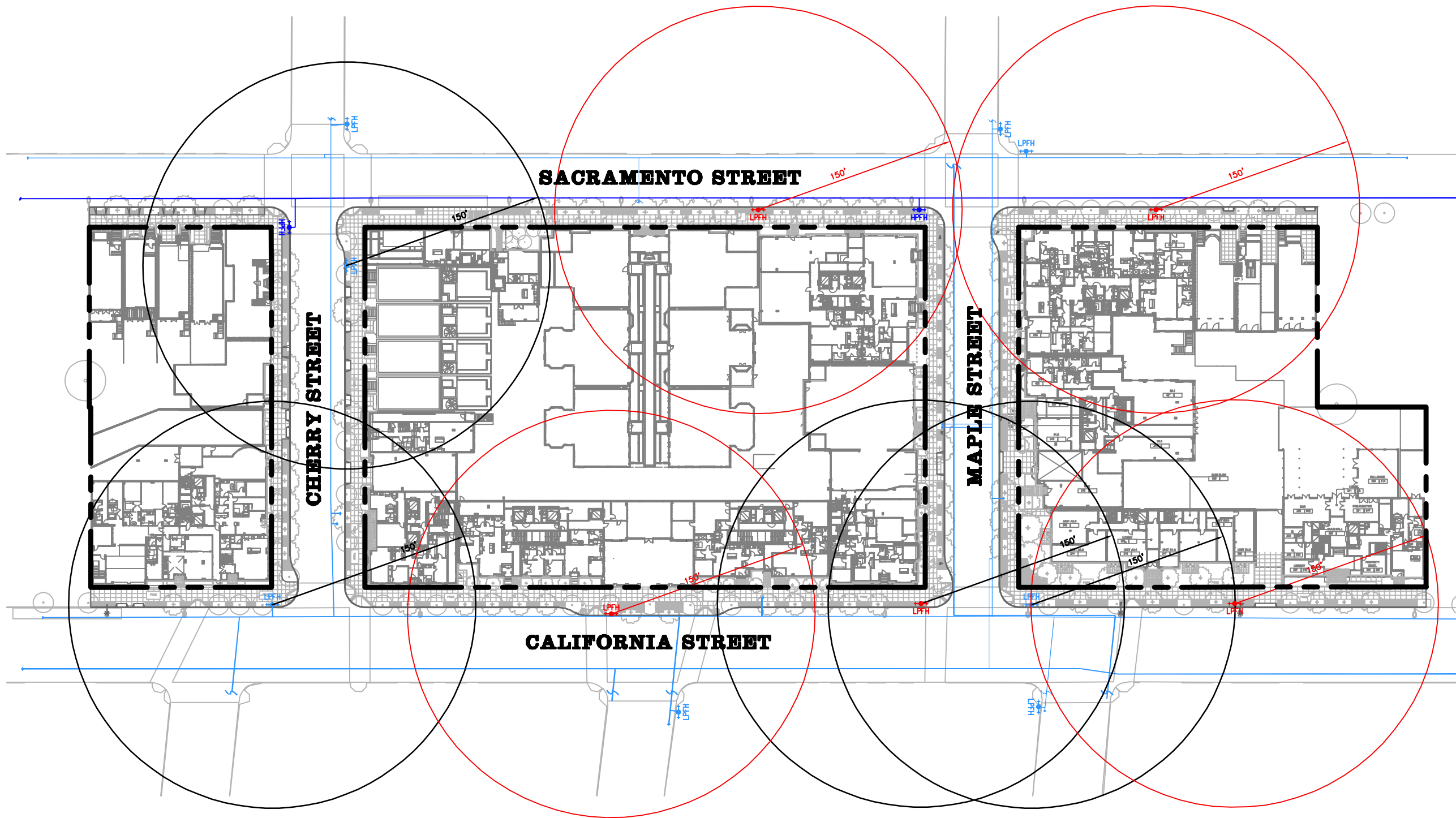
3700 CALIFORNIA STREET SAN FRANCISCO, CA

DOMESTIC/FIRE WATER - EAST

CONCEPTUAL CIVIL PLANS



DRAWING NAME: K:\2016\160010\_CPMC-CC-ENG\01-PLANNING\04-10-FIRE HYDRANT.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dia



## NOTES

1. FIRE HYDRANTS ACROSS FROM CALIFORNIA STREET AND SACRAMENTO STREET HAVE NOT BEEN COUNTED FOR SITE COVERAGE. IN ORDER TO AVOID RUNNING HOSES ACROSS TRAFFIC DURING A FIRE, THE FIRE DEPARTMENT TYPICALLY DOES NOT COUNT HYDRANTS ACROSS STREETS.
2. LOCATIONS OF PROPOSED FIRE HYDRANTS ARE SUBJECT TO REVIEW BY THE FIRE DEPARTMENT. ADDITIONAL HYDRANTS BEYOND WHAT IS SHOWN MAY BE REQUIRED BASED ON LOCATIONS OF BUILDING FIRE DEPARTMENT CONNECTIONS (FDC) AND FIRE DEPARTMENT INPUT.

## LEGEND

---	EXISTING PROPERTY LINE
---	EXISTING LOW PRESSURE FIRE WATER
---	EXISTING HIGH PRESSURE FIRE WATER
LPFH	EXISTING LOW PRESSURE FIRE HYDRANT
HPFH	EXISTING HIGH PRESSURE FIRE HYDRANT
LPFH	PROPOSED LOW PRESSURE FIRE HYDRANT (SEE NOTE 2)
---	EXISTING LOW PRESSURE FIRE WATER COVERAGE
---	PROPOSED LOW PRESSURE FIRE WATER COVERAGE (SEE NOTE 2)
(E)	EXISTING
W	WATER LINE
HPW	HIGH PRESSURE WATER
LPFH	LOW PRESSURE FIRE HYDRANT
HPFH	HIGH PRESSURE FIRE HYDRANT



## GRAPHIC SCALE



3700 CALIFORNIA STREET SAN FRANCISCO, CA

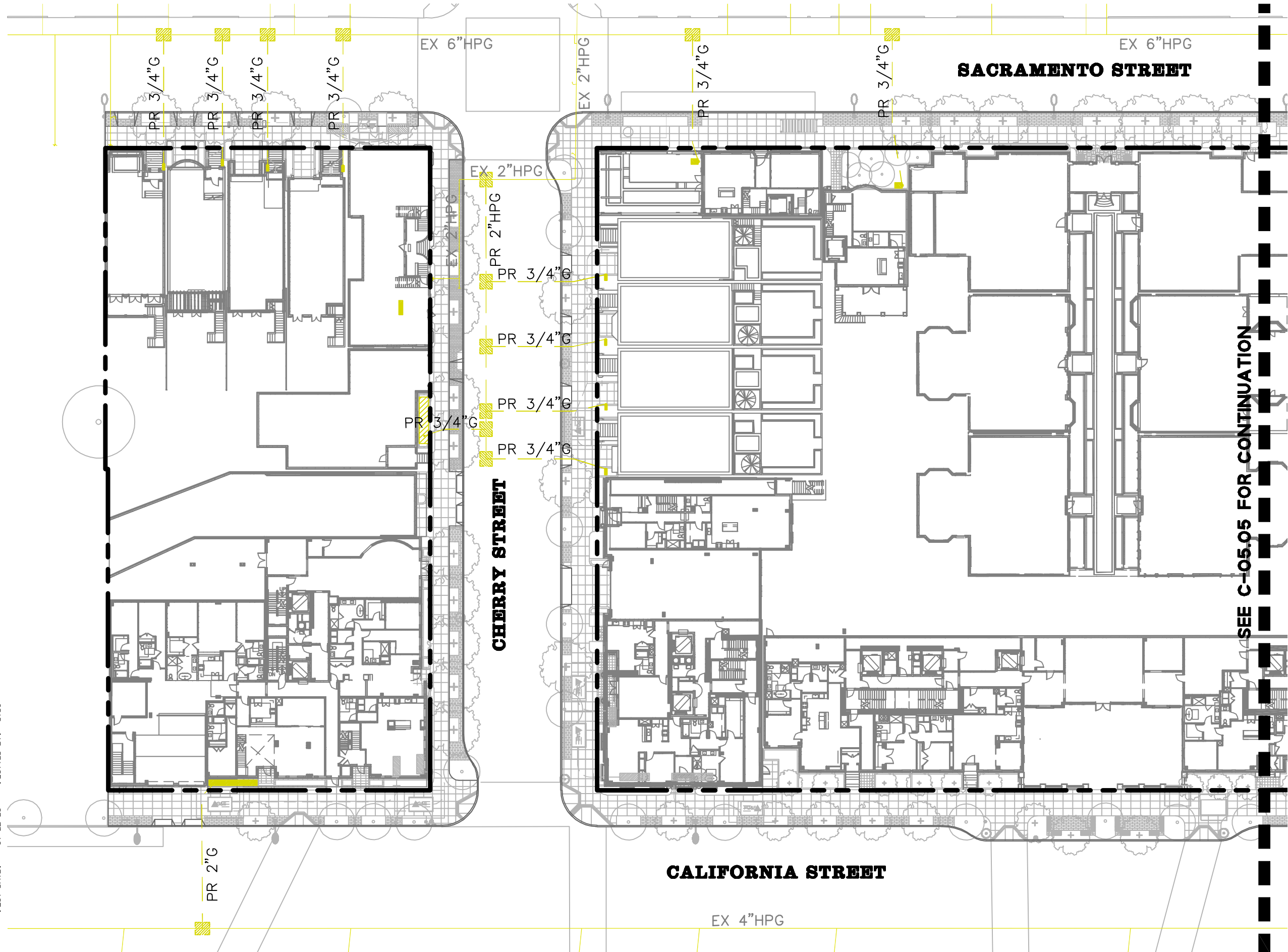
## FIRE HYDRANT COVERAGE CONCEPTUAL CIVIL PLANS

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PLOT DATE: 01-22-20 PLOTTED BY: dia

3700 CALIFORNIA STREET SAN FRANCISCO, CA



**GAS - WEST**  
**CONCEPTUAL CIVIL PLANS**



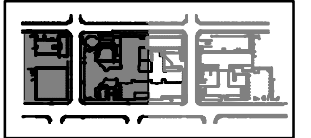
**LEGEND**

- EXISTING PROPERTY LINE
- EXISTING GAS LINE
- PROPOSED GAS LINE
- G GAS LINE
- HPG HIGH PRESSURE GAS
- PR PROPOSED

**NOTES**

1. DRY UTILITY DESIGN IS BASED ON SCHEMATIC DESIGN PLANS PROVIDED BY GIACALONE, DATED SEPTEMBER 13, 2019.

**KEY PLAN**

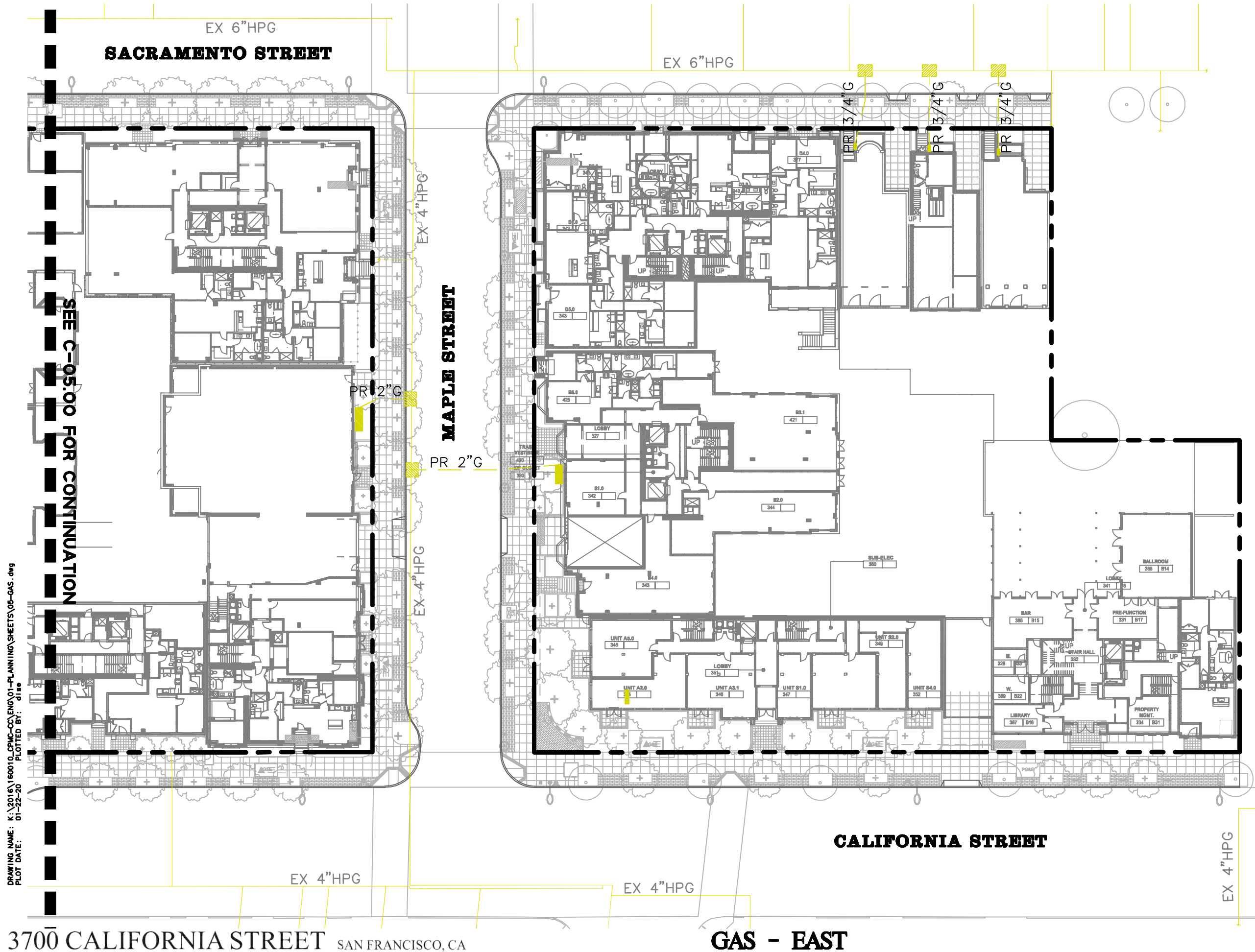


**GRAPHIC SCALE**





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PLOT DATE: 01-22-20



SEE C-05.00 FOR CONTINUATION

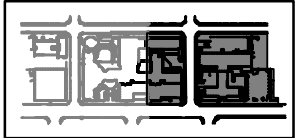
**LEGEND**

- EXISTING PROPERTY LINE
- EXISTING GAS LINE
- PROPOSED GAS LINE
- G GAS LINE
- HPG HIGH PRESSURE GAS
- PR PROPOSED

**NOTES**

1. DRY UTILITY DESIGN IS BASED ON SCHEMATIC DESIGN PLANS PROVIDED BY GIACALONE, DATED SEPTEMBER 13, 2019.

**KEY PLAN**



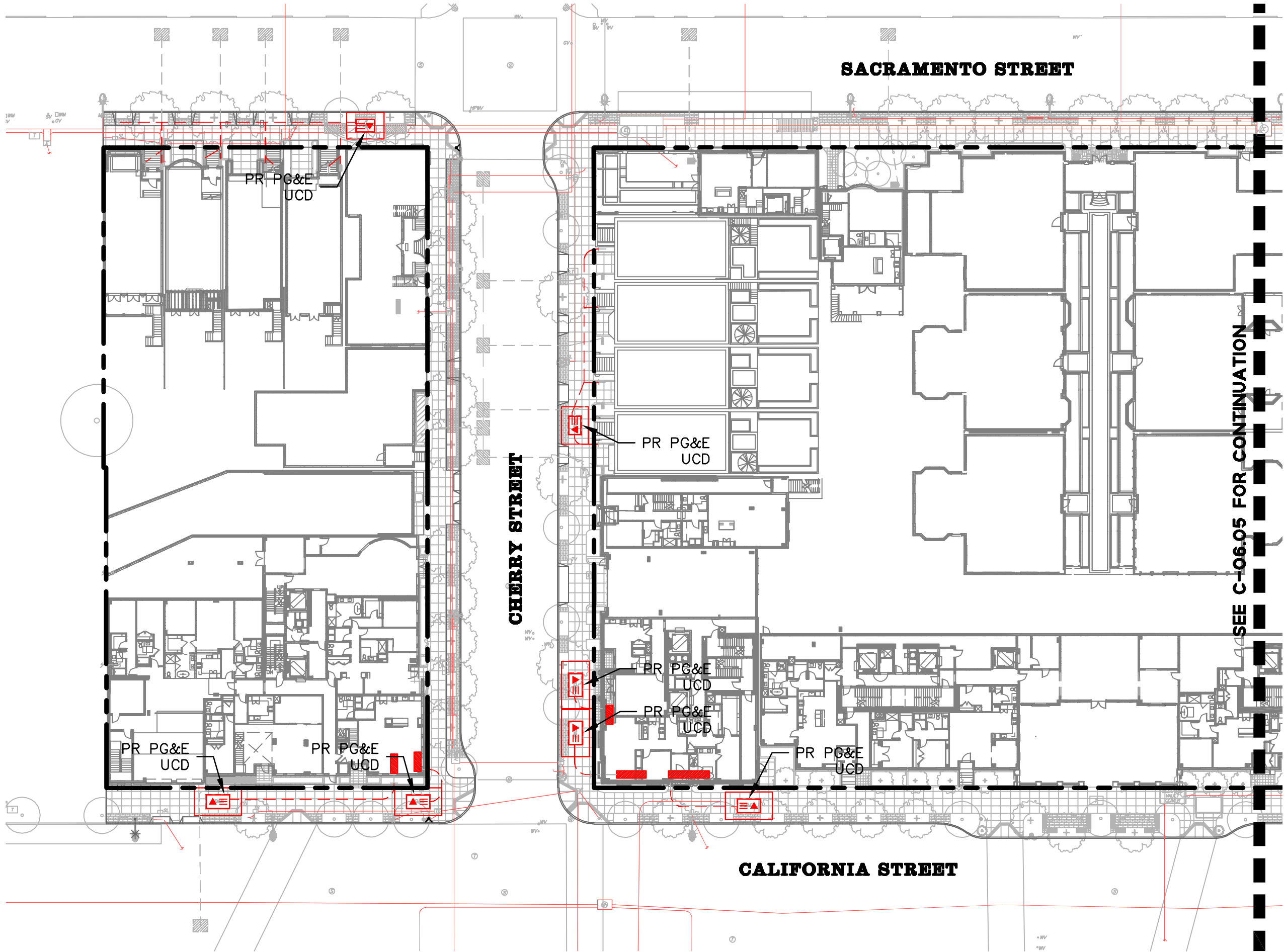
**GRAPHIC SCALE**



3700 CALIFORNIA STREET SAN FRANCISCO, CA

GAS - EAST

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PLOT DATE: 01-22-20 PLOTTED BY: dls



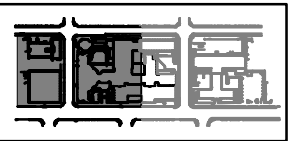
**LEGEND**

- EXISTING PROPERTY LINE
- EXISTING ELECTRICAL LINE
- - - PROPOSED ELECTRICAL LINE
- PROPOSED PG&E UCD
- PR PROPOSED

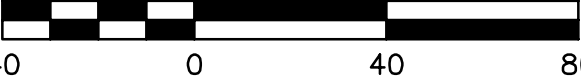
**NOTES**

1. DRY UTILITY DESIGN IS BASED ON SCHEMATIC DESIGN PLANS PROVIDED BY GIACALONE, DATED SEPTEMBER 13, 2019.

**KEY PLAN**



**GRAPHIC SCALE**



3700 CALIFORNIA STREET SAN FRANCISCO, CA

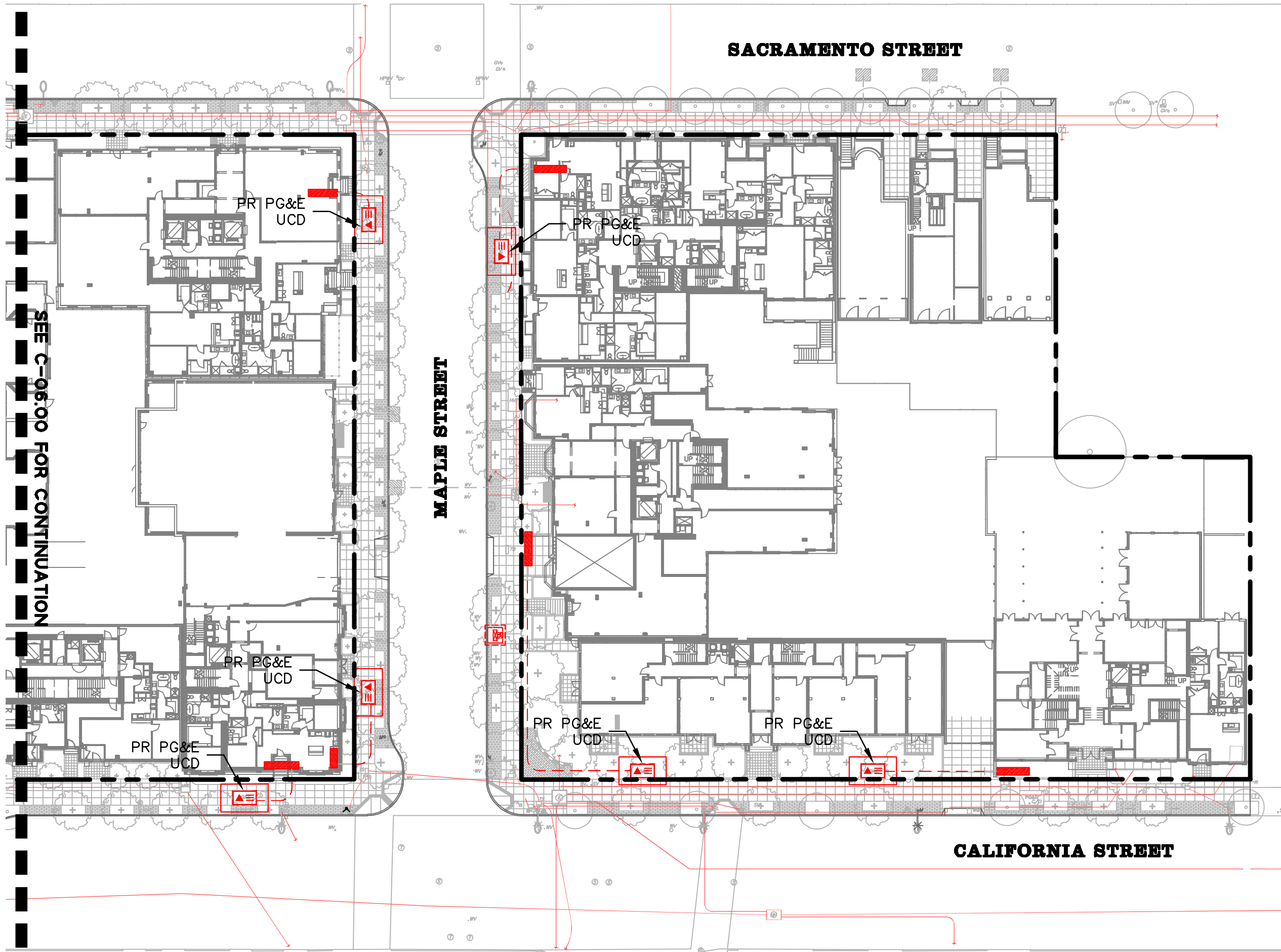
**ELECTRICAL - WEST**

**CONCEPTUAL CIVIL PLANS**




DRAWING NAME: K:\2016\160010.CPMC-CA\ENG\01-PLANNING\06-ELECTRIC.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls

SEE C-06.00 FOR CONTINUATION



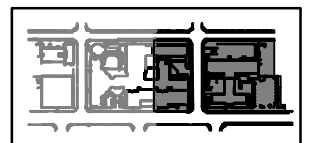
### LEGEND

- EXISTING PROPERTY LINE
- EXISTING ELECTRICAL LINE
- - - PROPOSED ELECTRICAL LINE
-  PROPOSED PG&E UCD
- PR PROPOSED

### NOTES

1. DRY UTILITY DESIGN IS BASED ON SCHEMATIC DESIGN PLANS PROVIDED BY GIACALONE, DATED SEPTEMBER 13, 2019.

### KEY PLAN



### GRAPHIC SCALE



3700 CALIFORNIA STREET SAN FRANCISCO, CA

ELECTRICAL - EAST

CONCEPTUAL CIVIL PLANS

PUD/CU SUBMITTAL  
JANUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.

C-06.05

DRAWING NAME: K:\2016\160010\_CPMC-CA\ENG\01-PLANNING\07-COMM.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls

3700 CALIFORNIA STREET SAN FRANCISCO, CA



# COMMUNICATIONS - WEST CONCEPTUAL CIVIL PLANS

SACRAMENTO STREET

CHERRY STREET

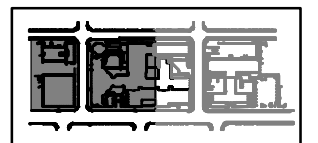
CALIFORNIA STREET

SEE C-07.05 FOR CONTINUATION

## LEGEND

- EXISTING PROPERTY LINE
- EXISTING COMMUNICATION LINE
- (E) EXISTING

## KEY PLAN



GRAPHIC SCALE

40 0 40 80



DRAWING NAME: K:\2016\160010\_CPMC-CA\ENG\01-PLANNING\SHEETS\07-COMM.dwg  
PLOT DATE: 01-22-20 PLOTTED BY: dls

SEE C-07.00 FOR CONTINUATION

MAPLE STREET

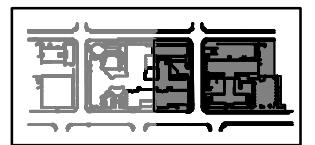
SACRAMENTO STREET

CALIFORNIA STREET

**LEGEND**

- EXISTING PROPERTY LINE
- EXISTING COMMUNICATION LINE
- (E) EXISTING

**KEY PLAN**



**GRAPHIC SCALE**



3700 CALIFORNIA STREET SAN FRANCISCO, CA

COMMUNICATIONS - EAST

CONCEPTUAL CIVIL PLANS



PUD/CU SUBMITTAL  
JANUARY 2020 REVISION  
NOT INTENDED FOR CONSTRUCTION PURPOSES.  
**C-07.05**

# **Exhibit C:**

## **Environmental Determination**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028





# SAN FRANCISCO PLANNING DEPARTMENT

## DRAFT Planning Commission Motion NO. M-XXXXX

HEARING DATE: February 27, 2020

*Record No.:* 2017-003559ENV  
*Project Address:* 3700 California Street and various parcels  
*Zoning:* RH-2 (Residential - House, Two-Family) and RM-2 (Residential - Mixed, Moderate Density) Zoning Districts  
*Block/Lot:* 1015/001, 052 & 053; 1016/001-009; 1017/027 & 028  
*Project Sponsor:* Denise Pinkston  
TMG Partners  
100 Bush Street  
San Francisco, CA 94104  
*Staff Contact:* Jeanie Poling – (415) 575-9072  
[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)

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

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

**ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED PROJECT AT 3700 CALIFORNIA STREET, WHICH INCLUDES THE CHANGE OF USE FROM AN INSTITUTIONAL USE TO A RESIDENTIAL USE FOR THE EXISTING BUILDING AT 3698 CALIFORNIA STREET, THE RETENTION AND RENOVATION OF THE EXISTING BUILDING AT 401 CHERRY STREET; THE DEMOLITION OF FIVE INSTITUTIONAL USE BUILDINGS (FORMERLY D.B.A. CALIFORNIA PACIFIC MEDICAL CENTER) AND THE CONSTRUCTION OF 31 NEW BUILDINGS RANGING FROM FOUR TO EIGHT STORIES AND CONTAINING 264 NEW DWELLING UNITS WITHIN THE RH-2 (RESIDENTIAL-HOUSE, TWO-FAMILY) AND RM-2 (RESIDENTIAL - MIXED, MODERATE DENSITY) ZONING DISTRICTS AND 40-X AND 80-E HEIGHT AND BULK DISTRICTS**

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the final Environmental Impact Report identified as Case No. 2017-003559ENV, at 3700 California Street and various other parcels, above (hereinafter "Project"), based upon the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*, hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").
  - A. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on September 19, 2018.
  - B. On June 13, 2019, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the

DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice and to property owners and occupants within a 300-foot radius of the site; mailed or otherwise delivered to persons requesting it and to government agencies, the latter both directly and through the State Clearinghouse; and posted on and near the project site. The notice was also posted at the County Clerk's office.

- C. On July 10, 2019, a revised notice of availability of the DEIR was published, listing a revised date and time of the public hearing and end date for public comment 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; mailed or otherwise delivered to persons requesting it and to government agencies, the latter both directly and through the State Clearinghouse; and posted on and near the project site. The revised notice was also posted at the County Clerk's office.
  - D. Notice of Completion of the DEIR was filed with the State Secretary of Resources via the State Clearinghouse on July 10, 2019.
2. The Commission held a duly advertised public hearing on said DEIR on September 19, 2019, 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 September 24, 2019.
  3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 104-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 February 13, 2020, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.
  4. A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Responses to Comments document all as required by law.
  5. Project EIR files have been made available for review by the Commission and the public. These files are available for public review at the Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission.
  6. On February 27, 2020, 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.
  7. The Planning Commission finds that the FEIR does not add significant new information to the DEIR that would require recirculation because the information added to the DEIR does not involve a new



significant environmental impact, a substantial increase in the severity of a significant environmental impact, or a feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project that the Project Sponsors declines to adopt, and no information indicates that the DEIR was inadequate or conclusory.

8. The Planning Commission hereby does find that the FEIR concerning File No. 2017-003559ENV reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Responses to Comments document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA and the CEQA Guidelines.
9. The Commission, in certifying the completion of said FEIR, hereby does find that the project described in the EIR will have no significant project-specific or cumulative effects on the environment that cannot be reduced to less than significant with implementation of mitigation measures identified in the FEIR.
10. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of February 27, 2020.

Jonas Ionin  
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED:



## RESPONSES TO COMMENTS

### 3700 California Street

PLANNING DEPARTMENT  
CASE NO. 2017-003559ENV

STATE CLEARINGHOUSE NO. 2018092043

Draft	Draft EIR Publication Date:	JUNE 13, 2019
	Draft EIR Public Hearing Date:	SEPTEMBER 19, 2019
	Draft EIR Public Comment Period:	JUNE 13, 2019 – SEPTEMBER 24, 2019
Final	Final EIR Certification Hearing Date:	FEBRUARY 27, 2020



SAN FRANCISCO  
PLANNING  
DEPARTMENT





# SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: February 13, 2020  
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. 2017-003559ENV: 3700 California Street  
Project**

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

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 February 27, 2020.** The Planning Commission will receive public testimony on the final EIR certification at the February 27, 2020 hearing. Please note that the public review period for the draft EIR ended on September 24, 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 Jeanie Poling at 415-575-9072.

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

## RESPONSES TO COMMENTS

### 3700 California Street

PLANNING DEPARTMENT  
CASE NO. 2017-003559ENV

STATE CLEARINGHOUSE NO. 2018092043

Draft	Draft EIR Publication Date:	JUNE 13, 2019
	Draft EIR Public Hearing Date:	SEPTEMBER 19, 2019
	Draft EIR Public Comment Period:	JUNE 13, 2019 – SEPTEMBER 24, 2019
Final	Final EIR Certification Hearing Date:	FEBRUARY 27, 2020



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT



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# 1. INTRODUCTION TO RESPONSES AND 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 (EIR) for the proposed 3700 California Street Project, respond in writing to comments on environmental issues, and revise the draft EIR as necessary to provide additional clarity. Comments were made in written form during the public comment period from June 13, 2019, to September 24, 2019, and as oral testimony before the San Francisco Planning Commission as part of the public hearing on the draft EIR held on September 19, 2019. A complete transcript of proceedings from the public hearing on the draft EIR as well as all written comments are included herein in their entirety. A complete list of commenters is provided in RTC Section 3, *Public Agencies and Commissions, Non-Governmental Organizations, and Individuals Commenting on the Draft EIR*.

Pursuant to the California Environmental Quality Act (CEQA)<sup>1</sup> section 21091(d)(2)(A) and (B) and the CEQA Guidelines,<sup>2</sup> the San Francisco Planning Department (planning department) has considered the comments received on the draft EIR, evaluated the issues raised, and provided 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 and therefore require a good-faith, reasoned analysis in a written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in the response may correspond to the level of detail provided in the comment. Where appropriate, this RTC document also includes EIR text changes that were made in response to comments.

In accordance with CEQA, the responses to the 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 significant effects on the environment.<sup>3</sup> Therefore, this document focuses on responding to comments related to physical environmental

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<sup>1</sup> Public Resources Code sections 21000–21189 (the California Environmental Quality Act or CEQA).

<sup>2</sup> 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).

<sup>3</sup> CEQA Guidelines section 15064(e).



issues, in compliance with CEQA.<sup>4</sup> 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, beyond those analyzed in the EIR, nor do the comments identify feasible project alternatives or mitigation measures that would be considerably different from those analyzed in the EIR and would reduce the significant environmental impacts of the proposed project but the project sponsor has not agreed to study or implement.

The planning department is the lead agency under CEQA and is responsible for administering the environmental review of projects within the City and County of San Francisco. The draft EIR and this RTC document constitute the final EIR for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The final EIR has been prepared in compliance with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. This EIR is an informational document for use by (1) governmental agencies (e.g., the planning department) and the public, aiding 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 San Francisco Board of Supervisors prior to their decision to approve, disapprove, or modify the project. If the San Francisco Planning Commission, San Francisco Board of Supervisors, or other City and County of San Francisco (City) entities approve the proposed project, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP or mitigation program) to ensure that the mitigation measures identified in the final EIR are implemented.

## **B. ENVIRONMENTAL REVIEW PROCESS**

### **NOTICE OF PREPARATION**

On September 19, 2018, the planning department published a notice of preparation (NOP) of an environmental impact report (EIR Appendix A), announcing its intent to solicit public comments on the scope of the environmental analysis and prepare and distribute an EIR for the 3700 California Street Project. The planning department mailed the notice of availability of an NOP to the State Clearinghouse and relevant state and regional agencies, occupants of the site

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<sup>4</sup> CEQA Guidelines sections 15382, 15064(c), and 15064(d).

and adjacent properties, property owners within 300 feet of the project site, and other potentially interested parties, including neighborhood organizations that requested such notice. A legal notice in the newspaper was also published on September 19, 2018.

Publication of the NOP initiated a 31-day public review and comment period that ended on October 19, 2018. During the NOP review and comment period, a total of 14 comment letters and emails were submitted to the planning department. The comment letters and emails received in response to the NOP are available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/PIM/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the “More Details” link under the project’s environmental record number 2017-003559ENV, and then clicking on the “Related Documents” link. The planning department considered the comments made by the public in preparation of the draft EIR for the proposed project.

## **DRAFT EIR**

The planning department prepared the draft EIR for the 3700 California Street Project in accordance with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. The draft EIR was published on June 13, 2019. An initial study was attached to the draft EIR (EIR Appendix B). The draft EIR was circulated for a 104-day public comment period, from June 13, 2019, through September 24, 2019. During this time, public comments were solicited on the adequacy and accuracy of the information presented in the draft EIR. A public hearing regarding the draft EIR was held on September 19, 2019, to solicit additional comments. Copies of the draft EIR and appendices were made available for public review at the Planning Information Center’s first-floor counter at 1660 Mission Street, San Francisco, and the San Francisco Main Library at 100 Larkin Street, San Francisco. Electronic copies were also available for review or download on the planning department’s web page (<http://sf-planning.org/environmental-impact-reports-negative-declarations>). The planning department distributed paper copies of the notice of public hearing and availability of the EIR through the U.S. Postal Service to 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 requested such notice.<sup>5</sup> The planning department also distributed the notice electronically, using email, to recipients who had provided email addresses; published notification of its availability in a newspaper of

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<sup>5</sup> Because of an error in the original notification distribution on June 13, 2019, the Notice of Public Hearing and Availability of a Draft Environmental Impact Report was reissued on July 11, 2019, to notify the public that the public hearing date had been changed to September 19, 2019, and the close of comment period had been extended to September 24, 2019.



general circulation in San Francisco; and posted the Notice of Public Hearing and Availability of the EIR at the County Clerk's office and multiple locations on the project site.

Comments on the draft EIR were made in written form during the public comment period or received as oral testimony at the public hearing on the draft EIR before the San Francisco Planning Commission on September 19, 2019. A court reporter was present at the public hearing to transcribe the oral comments verbatim and provide a written transcript.

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,<sup>6</sup> members of the public may comment on any aspect of the project. Furthermore, 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 comments that raise significant environmental issues during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft EIR with respect to disclosing the significance of the physical environmental impacts of the proposed project evaluated in the draft EIR.

The planning department will distribute this RTC document to the San Francisco Planning Commission as well as 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, with respect to 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 in compliance with CEQA requirements, it will certify the final EIR and then consider the associated MMRP as well as the requested approvals for the proposed project.

Consistent with CEQA Guidelines section 15097,<sup>7</sup> 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 significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR

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<sup>6</sup> CEQA section 21082.1(b).

<sup>7</sup> CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.

identified significant environmental effects (CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092). The EIR and initial study identified 13 significant impacts related to the proposed project. These significant impacts would occur in the areas of cultural resources, tribal cultural resources, biological resources, paleontological resources, and noise. All of the proposed project's significant impacts would be mitigated to a less-than-significant level with implementation of the mitigation measures identified in the EIR and initial study. The EIR did not identify any impacts that would remain significant and unavoidable after mitigation. The project sponsor would be required to implement the MMRP as a condition of project approval.

## C. DOCUMENT ORGANIZATION

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

- Section 1, *Introduction to Responses and 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, as presented in draft EIR Chapter 2, that the project sponsor initiated since publication of the draft EIR. The revisions and clarifications consist of information that updates, supplements, or replaces certain project description information as well as the associated environmental analysis previously presented in the draft EIR. RTC Section 2 analyzes whether these revisions and clarifications to the proposed project would result in any new environmental impacts that were 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 two tables: Public Agencies and Commissions 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), the format (i.e., public hearing transcript, letter, email), and date for each set of comments.
- Section 4, *Comments and Responses*, presents substantive comments, excerpted verbatim from the public hearing transcript and written correspondence. The complete transcript as well as the letters and emails with 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 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 “A-,” followed an abbreviation for the agency’s or commission’s name; and
- Comments from individuals are designated “I-,” followed 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 abbreviation for the organization’s name is followed by a sequential number, assigned 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. Therefore, each discrete comment has a unique comment code. The coded comment excerpts in Section 4 tie in with the bracketed comments presented in Attachments A and B of this RTC document.

Preceding each group of comments is an introduction that summarizes the issues raised about a specific topic. Following each comment or group of comments on a topic are the planning department’s responses. The responses generally clarify the text in the draft EIR. 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 ~~striketrough~~ text.

- Section 5, *Draft EIR Revisions*, presents text changes to the draft EIR that were made as a result of a response to a comment; it also presents staff-initiated text changes that were made by the planning department to update, correct, or clarify the text of the draft EIR. 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, 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 written correspondence received by the planning department during the public comment period for the draft EIR, with individual comments bracketed and coded as described above. An additional code points the reader to the topic and subtopic in Section 4 where the bracketed comment appears as well as the response that addresses it.

Upon certification of the EIR, the draft EIR and the RTC document will together represent the project’s final EIR.

## 2. REVISIONS AND CLARIFICATIONS TO THE PROJECT DESCRIPTION

### A. INTRODUCTION

Since the June 13, 2019, publication of the draft EIR for the 3700 California Street Project, the project sponsor has initiated revisions and clarifications to the project description described in draft EIR Chapter 2, *Project Description*. This section of the RTC document describes the revisions and analyzes whether such revisions would result in any new significant environmental impacts that were not already discussed in the draft EIR or initial study or whether the revisions would result 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 after publication of the draft EIR but before certification. 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 notes 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 notes 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 would not result in new significant impacts that were not already identified in the draft EIR or initial study, nor would these changes increase the severity of any identified significant impact. Although the revisions to the proposed project 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 (EIR Appendix B) for the proposed project would continue to be required to reduce or avoid significant environmental impacts of the revised project. No new measures would be required to mitigate the significant impacts of the proposed project. Therefore, recirculation of the EIR pursuant to CEQA Guidelines section 15088.5 is not required.



## B. SUMMARY OF REVISIONS AND CLARIFICATIONS

### BUILDING HEIGHTS, BUILDING MASSING, BUILDING AREA, AND ROOF DECKS

The project sponsor proposes revisions to the building heights, building massing, building area, and roof decks since the draft EIR publication. The proposed roof heights of some proposed three-story buildings (without appurtenances) in the proposed project would increase by up to 8 feet and some building roof heights would decrease by up to 4 feet. The proposed building heights and building massing were adjusted as the project design evolved to reflect additional detail resulting from unit planning, site grading, and location of mechanical and plumbing systems. In addition, the proposed overall residential building area has increased by approximately 1.4 percent (9,000 square feet) since the draft EIR publication.

The draft EIR showed a summary of project characteristics by block and building in Table 2-2 (p. 2-14). To reflect these changes, the following text revisions have been made to Table 2-2 (new text is double-underlined and deletions are shown in ~~striketrough~~):

**(Revised) Table 2-2. Proposed Project Characteristics**

Building <sup>1</sup>	Lot Area	Floors	Roof Height <u>without</u> <u>Appurtenances</u>	Roof Height <u>with</u> <u>Appurtenances</u>	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space
<b>Block A</b>									
A1 (SFR)	2,500	3	40	<u>n/a</u>	5,200	1	2	1,100	n/a
A2 (SFR)	2,500	3	40	<u>n/a</u>	4,800	1	2	<del>1,100</del> <u>1,000</u>	n/a
A3 (SFR)	2,500	3	40	<u>n/a</u>	4,800	1	2	<del>1,300</del> <u>1,000</u>	n/a
A4 (SFR)	2,500	3	40	<u>n/a</u>	4,600	1	2	<del>1,200</del> <u>1,000</u>	n/a
A5 (MF, existing)	2,800	4	40	<u>n/a</u>	7,000	9	in podium	n/a <sup>2</sup>	0
A6 (SFR)	5,000	3	40	<u>n/a</u>	5,900	1	2	<del>2,900</del> <u>2,700</u>	n/a
A7 (MF)	17,600	5	65	<u>81</u>	<del>61,200</del> <u>63,000</u>	29	57	<del>4,600</del> <u>4,400</u>	<del>2,900</del> <u>3,900</u>
<b>Block A Total</b>	<b>35,400</b>				<del>93,500</del> <u>95,300</u>	<b>43</b>	<b>67</b>	<del>12,200</del> <u>11,200</u>	<del>2,900</del> <u>3,900</u>
<b>Block B</b>									
B3 (SFR)	2,500	3	<del>40</del> <u>48<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B4 (SFR)	2,500	3	<del>40</del> <u>47<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B5 (SFR)	2,500	3	<del>40</del> <u>46<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a

Building <sup>1</sup>	Lot Area	Floors	Roof Height without Appurtenances	Roof Height with Appurtenances	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space
B6 (SFR)	2,500	3	<del>40</del> <u>48<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B1 (SFRH)	99,400	3	40	<u>n/a</u>	4,900	1	215	<del>1,400</del> <u>1,300</u>	<u>11,500</u> <u>15,900</u>
B2 (SFRH)		3	40	<u>n/a</u>	5,800	1		<del>1,300</del> <u>1,000</u>	
B7 (MF)		7	80	<u>96</u>	<del>48,200</del> <u>47,300</u>	<del>26</del> 25		<del>2,200</del> <u>1,800</u>	
B8 (MF)		5	<del>66</del> <u>65</u>	<u>82</u>	<del>35,900</del> <u>36,000</u>	<del>17</del> 16		<del>2,700</del> <u>2,500</u>	
B9 (MF)		5	<del>66</del> <u>62</u>	<u>82</u>	<del>35,000</del> <u>33,600</u>	<del>14</del> 15		<del>3,500</del> <u>3,100</u>	
B10 (MF)		7	80	<u>96</u>	<del>44,000</del> <u>43,800</u>	<del>16</del> 17		<del>900</del> <u>1,000</u>	
B11 (MF)		5	58	<u>n/a</u>	<del>21,200</del> <u>23,200</u>	10		<del>700</del> <u>300</u>	
B12 (MF)		7	80	<u>n/a</u>	<del>66,000</del> 66,800	34		<del>3,000</del> <u>2,600</u>	
B13 (MF)		3	40	<u>n/a</u>	<del>10,400</del> 11,600	4		<del>1,000</del> <u>900</u>	
B14 (MF)		3	40	<u>n/a</u>	<del>11,600</del> 11,700	4		1,000	
B15 (MF)		3	40	<u>n/a</u>	<del>11,600</del> 11,900	4		1,000	
B16 (MF)		3	40	<u>n/a</u>	<del>11,600</del> 11,000	4		1,000	
B17 (MF)		3	40	<u>n/a</u>	<del>11,600</del> 11,000	4		1,000	
B18 (MF)		3	<del>40</del> <u>36</u>	<u>n/a</u>	<del>10,400</del> 11,300	4		<del>1,000</del> <u>900</u>	
<b>Block B Total</b>	<b>109,400</b>				<del>346,200</del> <u>347,900</u>	<b>147</b>	<b>223</b>	<del>26,100</del> <u>23,800</u>	<b>11,500</b> <b>15,900</b>
<b>Block C</b>									
C1 (SFR)	3,400	3	<del>38</del> <u>37</u>	<u>n/a</u>	5,500	1	2	1,500	n/a
C2 (SFR)	3,400	3	<del>36</del> <u>37</u>	<u>n/a</u>	5,700	1	2	<del>1,400</del> <u>1,500</u>	n/a
C3 (SFR)	3,100	3	<del>42</del> <u>40</u>	<u>n/a</u>	5,700	1	2	<del>1,100</del> <u>1,000</u>	n/a
C4 (MF)	59,100	5	<del>58</del> <u>57</u>	<u>n/a</u>	<del>50,400</del> <u>50,600</u>	22	120	<del>4,000</del> <u>2,600</u>	<u>19,000</u> <u>20,600</u>
C5 (MF)		7	80	<u>96</u>	<del>59,200</del> <u>58,200</u>	<del>27</del> 28		<del>5,700</del> <u>5,100</u>	
C6 (MF)		3	36	<u>n/a</u>	<del>18,800</del> <u>18,500</u>	<del>24</del> 23		900	
C7(Amenity/MF)		3	50	<u>n/a</u>	<del>28,700</del> <u>35,900</u>	4		n/a	



Building <sup>1</sup>	Lot Area	Floors	Roof Height without Appurtenances	Roof Height with Appurtenances	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space
C8 (MF)		3	<del>38</del> <u>45</u>	<u>n/a</u>	<del>4,200</del> <u>3,900</u>	3		<del>0</del> <u>100</u>	
<b>Block C Total</b>	<b>69,000</b>				<del>178,200</del> <u>184,000</u>	<b>83</b>	<b>126</b>	<del>14,500</del> <u>12,700</u>	<del>19,000</del> <u>20,600</u>
<b>Proposed Project Total</b>	<b>213,800</b>				<del>618,200</del> <u>627,200</u>	<b>273</b>	<b>416</b>	<del>52,800</del> <u>47,700</u>	<del>33,400</del> <u>40,400</u>

Notes: Numbers may not sum due to rounding.

SFR = single family residence. MF = multi-family. SFRH = single-family rowhouse (on podium).

<sup>1</sup> Refer to Figure 5 for building locations.

<sup>2</sup> Building A5 is an existing legal nonconforming use.

<sup>3</sup> ~~In addition to the common spaces included in this table, some buildings may have common roof deck areas. Subject to a planned unit development (PUD) exception to the way in which height is measured under Sec. 261(b)(2).~~

Since the draft EIR publication, building roof heights (without appurtenances) that have increased (subject to a PUD exception to the way in which height is measured under section 261(b)(2)) are as follows:

- Building B3 (from 40 feet to up to 48 feet),
- Building B4 (from 40 feet to up to 47 feet),
- Building B5 (from 40 feet to up to 46 feet),
- Building B6 (from 40 feet to up to 48 feet),
- Building C2 (from 36 feet to up to 37 feet), and
- Building C8 (from 38 feet to up to 45 feet).

Since the draft EIR publication, building roof heights (without appurtenances) that have decreased are as follows:

- Building B8 (from 66 feet to up to 65 feet),
- Building B9 (from 40 feet to up to 62 feet),
- Building B18 (from 40 feet to up to 36 feet),
- Building C1 (from 38 feet to up to 37 feet),
- Building C3 (from 42 feet to up to 40 feet), and
- Building C4 (from 58 feet to up to 57 feet).

Refer to (Revised) RTC Figure 2-6a and (Revised) RTC Figure 2-6b, pp. 2-13 to 2-14, for the revised proposed elevations. RTC figure numbers parallel those in draft EIR Chapter 2, *Project Description*, for ease of comparison. (Revised) RTC Figure 2-6a and (Revised) RTC Figure 2-6b replace Figure 2-6 in the draft EIR. The revisions to these figures are for informational purposes

and do not change the analysis in the draft EIR, and thus would not require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5.

The draft EIR stated that some buildings may include common roof decks (p. 2-1). The draft EIR identified maximum rooftop structure heights of 75 feet on Block A (p. 2-17) and 90 feet on Blocks B and C (pp. 2-24—2-25). At the time of publication for the draft EIR, the specific locations and heights for the roof decks had not yet been identified. The specific locations and heights for the project's proposed roof decks have been identified since the draft EIR publication.

Refer to (New) RTC Figure 2-16, p. 2-15, for the locations of the proposed roof decks. RTC figure numbers parallel those in draft EIR Chapter 2, *Project Description*, for ease of comparison. (New) RTC Figure 2-16 is in addition to, and does not replace, the figures in Chapter 2, *Project Description*, of the draft EIR. The new figure is for informational purposes, does not change the analysis in the draft EIR, and thus would not require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5.

Since publication of the draft EIR, roof deck locations and building heights with roof deck and related appurtenances (i.e., stair and elevator penthouses) have been identified for the following buildings:

- Building A7 (up to 81 feet),
- Building B7 (up to 96 feet),
- Building B8 (up to 82 feet),
- Building B9 (up to 82 feet),
- Building B10 (up to 96 feet), and
- Building C5 (up to 96 feet).

To reflect these changes, the following text revisions have been made (new text is double-underlined and deletions are shown in ~~striketrough~~):

- Page 2-17: When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~75~~ 81 feet.
- Page 2-24: When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~90~~ 96 feet.
- Page 2-25: When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 38 to ~~90~~ 96 feet.

The total building area for the proposed project has increased to a total of 627,200 square feet. The total building area for Block A has increased to 95,300 square feet, Block B has increased to 347,900 square feet, and Block C has increased to 184,000 square feet.



Since the draft EIR publication, buildings with square footage increases are as follows:

- Building A7 (up to 63,000 square feet),
- Building B7 (up to 47,300 square feet),
- Building B8 (up to 36,000 square feet),
- Building B11 (up to 23,200 square feet),
- Building B12 (up to 66,800 square feet),
- Building B13 (up to 11,600 square feet),
- Building B14 (up to 11,700 square feet),
- Building B15 (up to 11,900 square feet),
- Building B18 (up to 11,300 square feet),
- Building C4 (up to 50,600 square feet), and
- Building C7 (up to 35,900 square feet).

Since the draft EIR publication, buildings with square footage decreases are as follows:

- Building B9 (up to 33,600 square feet)
- Building B10 (up to 43,800 square feet),
- Building B16 (up to 11,000 square feet),
- Building B17 (up to 11,000 square feet),
- Building C5 (up to 58,200 square feet),
- Building C6 (up to 18,500 square feet), and
- Building C8 (up to 3,900 square feet).

To reflect these changes, the following text revisions have been made (new text is double-underlined and deletions are shown in ~~striketrough~~):

- Page 2-12: The proposed project would construct or renovate approximately ~~618,200~~ 627,200 square feet of residential uses and accessory amenity space on Blocks A, B, and C and excavate approximately 61,800 cubic yards for below-grade parking podiums totaling approximately 221,000 square feet of parking area.
- Page 2-12: Overall, the project proposes to reduce the approximately 629,000 square feet of existing hospital/residential uses and 439 parking stalls to approximately ~~618,200~~ 627,200 square feet of residential use with 416 parking stalls.

## RESIDENTIAL UNITS

The proposed total number of dwelling units and the total number of dwelling units in each block have not changed since the draft EIR publication. However, the configuration of units in some buildings in Block B and Block C have been rearranged. Since the draft EIR publication, changes to the residential unit configurations are as follows:

- Building B7: decrease by one unit to 25 units,
- Building B8: decrease by one unit to 16 units,
- Building B9: increase by one unit to 15 units,
- Building B10: increase by one unit to 17 units,
- Building C5: increase by one unit to 28 units, and
- Building C6: decrease by one unit to 23 units.

To reflect these changes, the following text revisions have been made (new text is double-underlined and deletions are shown in ~~striketrough~~):

- Page 2-12: The project's 273 residential units would include 14 single-family homes and 19 multi-family residential buildings with ~~69~~ 83 studios and one-bedroom units, ~~88~~ 91 two-bedroom units, ~~96~~ 79 three-bedroom units, and 20 four-bedroom units. Approximately ~~75~~ 70 percent of the residential units would contain two or more bedrooms.

## OPEN SPACE

The project sponsor proposes revisions to the proposed open space since the draft EIR publication. According to the draft EIR, the project would provide approximately 86,200 square feet of open space comprised of 52,800 square feet of private open space and 33,400 square feet of common open space (p. 2-27). The total open space for the project would increase by 1,900 square feet to 88,100 square feet comprised of 47,700 square feet of private open space and 40,400 square feet of common open space. This change is achieved by decreasing the total private open space by 5,100 square feet and increasing the total common open space by 7,000 square feet. Refer to (Revised) Table 2-2, p. 2-2, for updated open space square footage.

In Block A, private open space would decrease by a total of 1,000 square feet, as shown below, and common open space would increase by a total of 1,000 square feet. Since the draft EIR publication, changes to open space areas at buildings in Block A are as follows:

- Building A2: (decrease private open space S to 1,000 square feet),
- Building A3: (decrease private open space S to 1,000 square feet),
- Building A4: (decrease private open space to 1,000 square feet),



- Building A6: (decrease private open space to 2,700 square feet), and
- Building A7: (increase common open space to 3,900 square feet).

In Block B, private open space would decrease by a total of 2,300 square feet, as shown below, and common open space would increase (distributed among all of the buildings shown below) by a total of 4,400 square feet. Buildings B3, B4, B5, and B6 would have no changes to open space areas. Since the draft EIR publication, changes to open space areas at buildings in Block B are as follows:

- Building B1: (decrease private open space to 1,300 square feet),
- Building B2: (decrease private open space to 1,000 square feet),
- Building B7: (decrease private open space to 1,800 square feet),
- Building B8: (decrease private open space to 2,500 square feet),
- Building B9: (decrease private open space to 3,100 square feet),
- Building B10: (decrease private open space to 1,00 square feet),
- Building B11: (decrease private open space to 300 square feet),
- Building B12: (decrease private open space to 2,600 square feet), and
- Building B13: (decrease private open space to 900 square feet).

In Block C, private open space would decrease by a total of 1,800 square feet, as shown below, and common open space would increase by 1,600 square feet (distributed among all of the multi-family residential buildings: Buildings C4, C5, C6, C7, and C8). Since the draft EIR publication, changes to open space areas at buildings in Block C are as follows:

- Building C2: (increase private open space to 1,500 sf),
- Building C3: (decreased private open space to 1,000 sf),
- Building C4: (decreased private open space to 2,600 sf),
- Building C5: (decreased private open space to 51,00 sf), and
- Building C8: (increased private open space to 100 sf).

To reflect these changes, the following text revisions have been made (new text is double-underlined and deletions are shown in ~~striketrough~~):

- Page 2-1: The proposed project would include shared onsite amenity space and approximately ~~86,200~~ 88,100 square feet of private and common open space<sup>1</sup> areas for residents, which may include common roof decks for some of the buildings.
- Page 2-24: Approximately ~~12,200~~ 11,200 square feet of private open space and ~~2,900~~ 3,900 square feet of common open space for residents would be provided on Block A.<sup>7</sup>

- Page 2-24: Approximately ~~26,100~~ 23,800 square feet of private open space and ~~11,500~~ 15,900 square feet of common open space for residents would be provided on Block B.<sup>8</sup>
- Page 2-25: Approximately ~~14,500~~ 12,700 square feet of private open space and ~~19,000~~ 20,600 square feet of common open space would be provided for residents on Block C.<sup>9</sup>
- Page 2-27: In total, the project would provide approximately ~~86,200~~ 80,100 square feet of open space comprised of ~~52,800~~ 47,700 square feet of private open space and ~~33,400~~ 40,400 square feet of common open space.

## CURB CUTS AND COLORS

The project sponsor proposes revisions to the proposed curb cuts and colors since the draft EIR publication. The draft EIR presented proposed curb cuts and colors in Figure 4.2-6, p. 4.2-39. Project design refinements have resulted in minor changes to the proposed plans for the curb cuts and curb colors. Specifically, the driveway for single-family home C3 was relocated from the left side of the building to the right. This change created one additional on-street parking space for this block of Sacramento Street and narrowed the parking space between homes C2 and C3 from a standard street parking space to a “constrained” public parking space.<sup>1</sup> In addition, the white zone on California Street in front of Block C was extended by approximately 10 feet. The adjacent red zone west of the truck-only driveway is now correspondingly shorter.

Refer to (Revised) RTC Figure 4.2-6 and (New) RTC Figure 4.2-6.1, pp. 2-16 to 2-17, for diagrams pertaining to curb colors and curb cuts, respectively. RTC figure numbers parallel those in draft EIR Section 4.2, *Transportation and Circulation*, for ease of comparison. (Revised) RTC Figure 4.2-6 replaces Figure 4.2-6 in the draft EIR; (New) RTC Figure 4.2-6.1 is in addition to, and does not replace, the figures in Section 4.2, *Transportation and Circulation*, of the draft EIR. The revisions to these figures are for informational purposes and do not change the analysis in the draft EIR, and thus would not require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5.

## STREET AND OTHER TREES

The project sponsor proposes revisions to the number of existing trees, trees to be removed, and proposed new trees since the draft EIR publication. The draft EIR stated the existing tree count as 163 trees (p. 2-11), and proposed removal of 42 of the existing 77 street trees and planting of 68 new street trees (Table 2-3; p. 2-26). The total existing tree count has been revised to 173 trees because the tree planting and removal summary used in the draft EIR did not accurately

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<sup>1</sup> A standard street parking space in San Francisco has minimum dimensions of 9 feet wide by 18 feet long. A “constrained” street parking space is anything shorter (measuring between 9 feet wide and 15 feet to 18 feet long).



categorize existing plantings as either trees or non-trees according to Department of Urban Forestry standards. The Department of Urban Forestry defines “trees” as having a caliper larger than 2 inches in diameter and being more than 10 feet tall. Based on this standard, an updated tree planting and removal summary (December 2019) states that there are 173 existing trees on the project site, including 94 unregulated trees, 65 street trees, and 14 significant trees.

In addition, project design refinements have resulted in minor changes to the proposed street tree layout to accommodate project driveways and public safety improvements to sidewalk areas, including street lights. In response to comments received on the draft EIR, eight coast redwoods at the corner of Sacramento and Cherry streets that were previously proposed for removal would be retained. As a result of these changes, the project would remove 33 of the existing 65 street trees and plant 76 new street trees, for a total of 108 street trees, instead of 103 stated in the draft EIR. Additionally, the project would remove 84 (instead of 70) unregulated trees, and would provide replacement for 144 (instead of 148) unregulated trees (p. 2-11, and Table 2-3). Overall, 126 trees would be removed (instead of 121), 224 trees would be planted (instead of 214), and the project would include a total of 271 trees (instead of 256). The updated tree planting and removal summary (December 2019) identifies the individual trees that are proposed for removal and is available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/PIM/>. The net effect of these changes is that the partial waiver from the Public Works Department to provide 31 fewer street trees than is required (as stated on draft EIR p. 2-35 and 3-11) has been reduced to a waiver for 26 street trees. This minor change to the proposed project does not change the analysis in the draft EIR, and thus would not require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5.

To reflect these changes, the following text revisions have been made (new text is double-underlined and deletions are shown in ~~striketrough~~):

**(Revised) Table 2-3. Existing and Proposed Trees**

Type of Tree	Existing Trees	Trees to Be Removed	New Trees	Total Trees
Unregulated Trees	<del>72</del> <u>94</u>	<del>70</del> <u>84</u>	<del>146</del> <u>148</u>	<del>148</del> <u>158</u>
Street Trees	<del>77</del> <u>65</u>	<del>42</del> <u>33</u>	<del>68</del> <u>76</u>	<del>103</del> <u>108</u>
Significant Trees	14	-9	--	5
<b>Total</b>	<del>163</del> <u>173</u>	<del>121</del> <u>126</u>	<del>214</del> <u>224</u>	<del>256</del> <u>271</u>

Sources: TMG Partners, 3700 California Street, Tree Planting & Removal Summary. ~~December 2018~~ December 2019 Revision.

- Page 2-11: The project site currently contains ~~163~~173 trees; ~~91~~79 of the trees are regulated trees (i.e., ~~77~~65 street trees and 14 significant trees)<sup>3</sup> and ~~72~~94 are non-regulated trees.<sup>4</sup>
- Page 2-11: There are ~~77~~65 street trees along Sacramento Street, California Street, Cherry Street, and Maple Street project frontages, which together comprise approximately 2,700 feet of street frontage.
- Page 2-26: The proposed project would lead to a net increase of trees at the project site. As shown in Table 2-3, the project site currently contains ~~163~~173 trees: ~~91~~79 are regulated trees (~~77~~65 street trees and 14 significant trees) and ~~72~~94 are non-regulated trees. The proposed project would remove ~~42~~33 of the ~~77~~65 existing street trees and plant ~~68~~76 new street trees, for a total of ~~103~~108 street trees. Nine of the 14 significant trees would be removed due to conflicts with the proposed buildings. Of the other ~~72~~94 non-regulated trees on-site, ~~70~~84 would be removed and would be replaced with ~~146~~148 new trees.<sup>11</sup> Overall, the project would increase the total number of trees onsite from ~~163~~173 to ~~256~~271 due to the planting of ~~214~~224 new trees.
- Page 2-35: Approval of a permit to remove and plant street trees and partial waiver from Public Works Code section 806(d) to provide ~~31~~ 26 fewer street trees than required.

## MINOR DESIGN REVISIONS

In addition to the open space, roof shape, and building height adjustments described above, the project sponsor proposes other minor design refinements since the draft EIR publication. These include, but are not limited to, minor modifications to exterior window placement (due to interior unit planning), alteration and more detailed configuration of the interior areas for the below-grade parking podiums, and further detailing of the exterior design. Refer to (Revised) Table 2-2, p. 2-2, for updated proposed project characteristics. These minor changes to the proposed project do not change the analysis in the draft EIR, and thus would not require recirculation of the EIR pursuant to CEQA Guidelines section 15088.5.



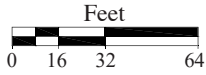
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CALIFORNIA STREET



SACRAMENTO STREET



SOURCE: RAMSA 2019. 3700 California Street, San Francisco, CA. Street Elevations. December 20.

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BLOCK A – SOUTH      BLOCK A – NORTH

WEST ELEVATION

CHERRY STREET - BLOCK A



BLOCK B - NORTH      BLOCK B - SOUTH

EAST ELEVATION

CHERRY STREET - BLOCK B



BLOCK B – SOUTH      MID-BLOCK B      BLOCK B – NORTH

WEST ELEVATION

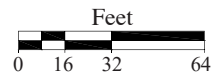
MAPLE STREET - BLOCK B



BLOCK C - NORTH      MID-BLOCK C      BLOCK C - SOUTH

EAST ELEVATION

MAPLE STREET - BLOCK C



SOURCE: RAMSA 2019. 3700 California Street, San Francisco, CA. Street Elevations. December 20.

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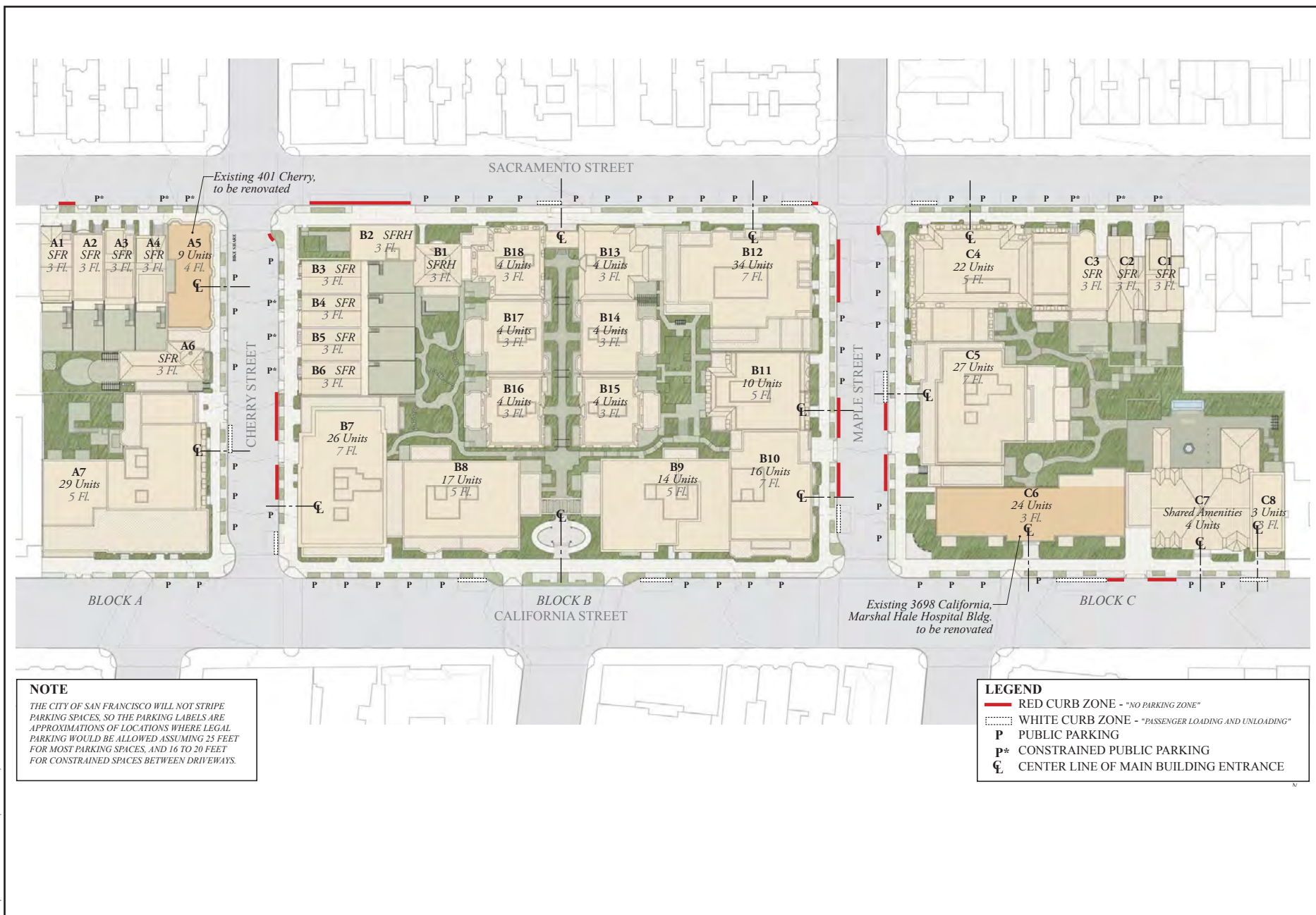


SOURCE: RAMSA. 2019. 3700 California Street, San Francisco, CA.

3700 California Street  
Case No. 2017-003559ENV

(New) RTC Figure 2-16  
Proposed Roof Plan





3700 California Street  
Case No. 2017-003559ENV

(Revised) RTC Figure 4.2-6  
Revised Curb Colors and Street Parking



3700 California Street  
Case No. 2017-003559ENV

(New) RTC Figure 4.2-6.1  
Proposed Curb Cuts



## 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. 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 that would be considerably different from others that were previously analyzed and would clearly lessen the environmental impacts of the proposed project, but the project sponsor has declined 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 description for the proposed project 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 impacts identified in the draft EIR. Mitigation measures identified in the draft EIR and the initial study (EIR Appendix B) would continue to be required to reduce or avoid the significant environmental impacts of the proposed project. No new or modified measures would be required to mitigate the significant impacts identified for the revised proposed project 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. It also considers the revisions and clarifications to the project description for the proposed project. Because the revisions and clarifications to the project description are minor, the analysis focuses on the topics for which there could be an effect; it does not discuss topics for which there is no potential for the revisions and clarifications to change the analysis in the draft EIR and initial study (e.g., the increased height of the rooftop structures would have no effect on hydrology and water quality). Based on the nature of the revisions and clarifications, the environmental effects of the following topics are addressed below: land use and planning, population and housing, shadow, biological resources, and transportation and circulation. As discussed in the initial study, p. 8 (draft EIR Appendix B), aesthetic impacts of the proposed project are not to be considered significant impacts on the environment, pursuant to California Public Resources Code section 21099(d). Therefore, the changes to rooftop heights and shapes are not evaluated in the context of aesthetics.

The responses to comments presented in RTC sections 4 and 5 include consideration of the environmental effects of the revised project in the analyses provided below.

## **LAND USE AND PLANNING**

The proposed building heights and building massing were adjusted as the project design evolved to reflect additional detail resulting from unit planning, site grading, and location of mechanical and plumbing systems. Specifically, the roof heights of some three-story buildings (without appurtenances) in the proposed project have increased by as much as 8 feet, and some building roof heights have decreased by as much as 4 feet. Additionally, the specific locations and heights for the project's proposed roof decks (appurtenances) have now been identified. Also, the overall residential building area has increased by approximately 1.4 percent (9,000 square feet). These changes to the project description are relatively minor, and the revised rooftop structure heights would be in compliance with the City's zoning ordinance, with planning commission approval. The changes to curb cuts and curb colors would also be minor and would not present any conflicts with existing zoning requirements or inconsistencies with plans. The changes to existing and proposed tree counts are similarly minor, and overall reduce the scope of a waiver from the street tree requirement from 31 to 26 street trees. No new discretionary approvals would be required. Therefore, the changes to the proposed project would not alter any of the conclusions regarding land use and planning impacts of the project either individually or cumulatively.

## **POPULATION AND HOUSING**

The changes to the residential unit configuration would not change the initial study's conclusions regarding population and housing impacts. The proposed changes would increase the number of studios and one-bedroom units (83 instead of 69), increase the number of two-bedroom units (91 instead of 88), and decrease the number of three-bedroom units (79 instead of 96). No changes are proposed to the number of four-bedroom units (20), and the overall unit count (273) has not changed. Studios, one-bedroom, and two-bedroom units generate less population than three-bedroom and four-bedroom units. Therefore, the increase in studio, one-bedroom, and two-bedroom units and the decrease in three-bedroom units would result in less population generated than what was stated in the initial study under Impact PH-1 (pp. 16-21). Therefore, the changes to the proposed project would not alter any of the conclusions regarding population and housing impacts of the project either individually or cumulatively.

## **SHADOW**

The increased heights of the rooftop appurtenances at Blocks A, B, and C would not change the initial study's conclusions regarding shadow impacts. As described in the initial study, p. 54



(draft EIR Appendix B), a preliminary shadow fan was prepared for the proposed project. The previous shadow fan already accounted for a height up to 96 feet for Blocks B and C; therefore, a change in the analysis is not needed. However, Building A7 on Block A would reach a height of 81 feet, which is 5 feet higher than the maximum height assumed for Block A in the shadow fan (i.e., 76 feet). The shadow fan was revised for this parcel on Block A to extend the maximum height from 76 feet to 81 feet.<sup>2</sup> The updated shadow fan shows a minor extension of the project's shadow on public streets and sidewalks, but such shadow would not be in excess of what is commonly expected in an urban environment. No new outdoor public recreation facilities or open spaces would be shaded by the project. Therefore, the changes to the proposed project would not alter any of the conclusions regarding shadow impacts of the project either individually or cumulatively.

## BIOLOGICAL RESOURCES

The proposed changes to the number of existing trees, removed trees, and planted trees would not change the initial study's conclusions regarding impacts to biological resources. The changes reflect corrections to the existing tree count to ensure consistency with Department of Urban Forestry standards, and project design refinements that resulted in minor changes to the proposed street tree layout. The project is also proposing to retain eight Coast redwoods at the corner of Sacramento and Cherry streets that were previously identified for removal. As a result of these changes, 126 trees would be removed (instead of 121), 224 trees would be planted (instead of 214), and the project would include a total of 271 trees (instead of 256). As stated under Impact BI-3 from Section 14, *Biological Resources*, of the initial study (Appendix B, p. 91) impacts associated with conflicts with any local policies or ordinances protecting biological resources would be less than significant with approval of a partial waiver from Public Works Code section 806(d) to provide fewer street trees than required or payment of an in-lieu fee. The proposed changes would reduce the waiver from 31 to 26 fewer street trees than required, and this conclusion would not change. Impacts BI-1 and BI-2, from Section 14, *Biological Resources*, of the initial study (Appendix B, pp. 86–91) also relate to tree removal impacts of the project. As discussed, the proposed project would implement Mitigation Measure M-BI-1 to reduce potential impacts on candidate, sensitive, and special-status species, and American peregrine falcon and native birds protected under the Migratory Bird Treaty Act and California Fish and Game Code sections 3503 and 3513, to a less-than-significant level (Impact BI-1). With implementation of Mitigation Measure M-BI-1 as well as compliance with Planning Code section 139, Standards for Bird - Safe Buildings, impacts on native resident or migratory birds would be less than significant (Impact BI-2). This conclusion would not change with the five additional tree removals resulting

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<sup>2</sup> San Francisco Planning Department, *3800 California Street Shadow Fan 76' to 81'*, October 8, 2019.

from the proposed changes because the five additional tree removals would be subject to the same mitigation and requirements.

## TRANSPORTATION AND CIRCULATION

The changes to the residential unit configuration would not change the EIR's conclusions regarding transportation impacts. The proposed changes would increase the number of studios (16 instead of 13) and one-bedroom units (67 instead of 56), increase the number of two-bedroom units (91 instead of 88), and decrease the number of three-bedroom units (79 instead of 96). No changes are proposed to the number of four-bedroom units (20), and the overall unit count (273) has not changed. Studios, one-bedroom, and two-bedroom units generate fewer person trips than three-bedroom and four-bedroom units. Therefore, the increase in studio, one-bedroom, and two-bedroom units and the decrease in three-bedroom units would result in fewer person trips generated than what was stated in Section 4.2, *Transportation and Circulation*, of the draft EIR.

As noted in the draft EIR under Impact TR-9, Parking, p. 4.2-67, the proposed project would not result in a substantial deficit related to parking. The project design refinements, noted above, that have resulted in minor changes to the proposed plans for the curb cuts and curb colors would not affect this conclusion. As noted under Impact TR-7, Loading, p. 4.2-66, the proposed project would result in less-than-significant impacts related to passenger loading. The minor changes to the plans for curb cuts and curb colors would not affect this conclusion. Therefore, changes to the proposed project would not alter any of the conclusions regarding transportation and circulation impacts of the project either individually or cumulatively.

## CONCLUSION

For the reasons above, the proposed minor revisions and clarifications to the project description 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, and individuals submitted written comments (letters and emails) on the draft EIR for the 3700 California Street Project. The City received comments during the 104-day public comment period, starting on June 13, 2019.<sup>1</sup> On September 19, 2019, the San Francisco Planning Commission held a public hearing about the draft EIR and received comments as oral testimony.

RTC Table 3-1 lists the public agencies and commissioners who commented on the draft EIR; RTC Table 3-2 lists the individuals who commented on the draft EIR. Along with the names of the commenters. The tables include corresponding comment codes, which were used in RTC Section 4, *Comments and Responses*, to denote each set of comments, the comment format, and the comment date. This RTC document assigns the comments to two categories:

- Comments from local, state, or federal agencies and commissions are designated “A-,” followed by an abbreviation for the name of the agency. Comments from the San Francisco Planning Commission are designated “A-SFPC-.”
- Comments from individuals are designated “I-,” followed by the individual’s last name.

Within each category, comments are listed in alphabetical order. If a commenter spoke at the public hearing and also submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number (e.g., I-Sullivan1, I-Sullivan2).

**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-DBI	David Leung, P.E., Department of Building Inspection	Email	September 19, 2019
A-NAHC	Gayle Totten, Native American Heritage Commission	Letter and attachment	July 2, 2019
A-SFPC	Kathrin Moore, Commissioner	Draft EIR hearing transcript	September 19, 2019

<sup>1</sup> Because of an error in distribution for the notification, the public hearing date was changed to September 19, 2019, and the close of comment period was extended to September 24, 2019.



**RTC Table 3-2: Individuals Commenting on the Draft EIR**

<b>Comment Code</b>	<b>Name of Person Submitting Comments</b>	<b>Comment Format</b>	<b>Comment Date</b>
I-Alexander1	Sara Alexander	Email	September 4, 2019
I-Alexander2	Sara Alexander	Email	September 16, 2019
I-Alexander3	Sara Alexander	Email	September 23, 2019
I-Basoco	Leonard Basoco	Draft EIR hearing transcript	September 19, 2019
I-Hargett	Victor Hargett	Draft EIR hearing transcript	September 19, 2019
I-Hillson1	Rose Hillson	Email	September 11, 2019
I-Hillson2	Rose Hillson	Draft EIR hearing transcript	September 19, 2019
I-Hong	Dennis Hong	Email	July 31, 2019
I-Klipp1	Joshua Klipp	Email	September 20, 2019
I-Klipp2	Joshua Klipp	Email	September 24, 2019
I-Liner1	Marcy Liner	Email	September 5, 2019
I-Liner2	Marcy Liner	Email	September 5, 2019
I-Linn	Michael Linn	Email	June 14, 2019
I-Parks	Dennis Parks	Email	September 18, 2019
I-Sullivan1	Marie Laidas Sullivan	Email	September 21, 2019
I-Sullivan2	Marie Sullivan	Draft EIR hearing transcript	September 19, 2019

The Planning Commission hearing transcript is included as Attachment A. Comment letters and emails received are included as Attachment B.

## 4. COMMENTS AND RESPONSES

### A. INTRODUCTION

This section presents quoted excerpts from comments received on the draft EIR and responses to those comments. For the full text of each comment in the context of the public hearing transcript or comment letter or email in which it appears, refer to RTC Attachments A and B, respectively.

Comments are organized by topic. Within each topic, similar comments are grouped together under subheadings, designated by a topic code and sequential number. For example, the comments in Section B, *Project Description*, coded as “PD,” are organized under headings PD-1 through PD-4. Comments related to cultural resources, presented in Section I, *Cultural Resources*, are coded as “CR” and organized under heading CR-1. The order of the comments, and the responses in this section, is shown below, along with the prefix assigned to each topic.

Section	Topic Code	Topic Code Prefix
B	Project Description	PD
C	Plans and Policies	PP
D	Environmental Setting and Impacts	ESI
E	Transportation and Circulation	TR
F	Noise	NO
G	Air Quality	AQ
H	Public Services	PS
I	Cultural Resources	CR
J	Tribal Cultural Resources	TCR
K	Greenhouse Gas Emissions	GHG
L	Shadow	SH
M	Utilities and Service Systems	UT
N	Geology and Soils	GEO
O	Hydrology and Water Quality	HWQ
P	Hazards and Hazardous Materials	HZ
Q	Biological Resources	BIO
R	CEQA Process	CEQA
S	General Environmental Comments	GE
T	Merits of the Project	ME
U	General Comments	GC



Each comment is presented verbatim and concludes with the commenter's name and, if applicable, title and affiliation; the comment source (i.e., public hearing transcript, letter, email); the comment date; and the comment code, as described on p. 3.1 of Section 3, *Public Agencies and Commissions, Non-Governmental Organizations, and Individuals Commenting on the Draft EIR*. 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. Please refer to Attachment B for the reproduction of any figures or images that are not legible in the excerpted comments presented below. Some comments cite sections of CEQA and/or the CEQA Guidelines that may be from a previous edition of the CEQA Guidelines. The Office of Planning and Research recently amended the CEQA Guidelines; 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 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 clarify the text in the draft EIR and may include revisions or additions to the text in the draft EIR. Revisions to the draft EIR are shown as indented text, with new text double-underlined and deleted material shown with strikethrough. Revisions to the draft EIR presented in the responses to comments in this section are also shown in Section 5, *Draft EIR Revisions*.

Documents and other information cited in the subsequent sections of this RTC document are available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/PIM/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number 2017-003559ENV, and then clicking on the "Related Documents" link.

## **B. PROJECT DESCRIPTION**

The comments and corresponding responses in this section concern draft EIR Chapter 2, *Project Description*. The comments are further grouped according to the following project description–related issues that the comments raise:

- PD-1, Open Space and Trees
- PD-2, Building Heights and Views
- PD-3, Housing
- PD-4, Approvals

A corresponding response follows each grouping of comments.

**COMMENT PD-1: OPEN SPACE AND TREES**

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“Thanks for your time on the phone today. I did look at the EIR more carefully this evening and its not clear but it looks like all the trees under discussion will be destroyed. Chris May returns tomorrow so maybe he will get back to me with what the TMG partners have to say about it.”  
(Sara Alexander, Email, September 16, 2019 [I-Alexander2-1])

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“I want to call your attention to 28 beautiful and very large trees on the SE corner of Sacramento and Cherry in a park-like area adjacent to the #33 Muni Stop. There are 10 Redwood trees that are 4 to 5 stories tall and another 18 healthy and mature trees (sorry that I do not know the species) that are between 3 and 5 stories tall. About half of these trees are within 18 feet of the curb (within 9 feet of the sidewalk) which, I have been told, makes them “significant trees”, protected from removal by SF tree policies.

The tree diagram that I received from Tuija Catalano, the project sponsor, (lawyer for the developer) indicates that 22 of these 28 beautiful and mature trees *will* be destroyed (drawing attached below). I am hoping that by bringing this to your attention something might be done to preserve more, or even, all of these trees, and ... perhaps...to preserve some bit of precious open space for this (my) neighborhood.

I had hoped to have had an opportunity to make my comments earlier on in the design process. I would requested the preservation of some fraction of both the tree canopy and the open sky that currently extend from the enormous (gated) garden behind Marshall Hale hospital to this wooded (public access) corner of Sacramento and Cherry Street. Trees and open spaces and courtyards extend along all the blocks from Spruce Street to Arguello Avenue. (in front of apartment complexes, the Claire Lillienthal school, etc.)

The developers *could* leave this small open space at Sacramento and Cherry exactly as it is right now: accessible to the public, and a home to these beautiful trees...and the habitat that these trees support. But if I correctly understand the plans, there will be solid wall of buildings the whole length of Sacramento Street and the 33,000 sf of Open Space that the developers propose will exist (hidden) on the inside of a perimeter of housing, in what appear to be a “gated community”. i.e. the open space that currently exists at the edges of both of the hospital sites will be buried inside the housing site and will be removed from the character and enjoyment of the neighborhood.

The particular building that will require the destruction of 80% the significant trees at the corner of Sacramento and Cherry *could* be built nine or more feet away from the sidewalk. Such a design change could preserve 100% of these trees...and also some of the current feel of the neighborhood.



It will be many decades before the newly planted trees that the developer proposes achieve a small fraction of the grace and stature (and ability to requester carbon dioxide from the atmosphere) of the 28 beautiful and healthy trees that currently frame this small park. Growing new trees takes a very long time frame. *You* have an opportunity *here* to simply to save a few trees that do not need to be destroyed.

This opportunity seems even more **urgent** in the context of the current call to arms to mitigate the devastation of climate change. And even more **timely** in light of the threatened loss of about 275 additional trees within one mile, at the 3333 California Street development.” (Sara Alexander, Email, September 23, 2019 [I-Alexander3-1])

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“Page 2-11, 2.3.6 “Open Space and Vegetation”:

States “On the northwest corner of Block B, at the intersection of Cherry Street and Sacramento Street, there is a publicly accessible outdoor plaza with hardscape features, trees and seating areas.” Is this what is referred to as a “City Park” in the DEIR?

This area is about 1,000 square feet in size from what I can tell from the diagrams in the DEIR. See Page 3-11, “Street Trees.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-12])

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“Page 2-26, Table 2-3, “Existing and Proposed Trees”: This shows 42 street trees to be removed with 68 new trees resulting in 103 street trees.

See Page 3-11, “Street Trees.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-15])

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“Page 2-27, 2.5.5 “Open Space”:

States “The project would not include publicly accessible open space.” Please confirm this to mean that there will not be any POPOS (“Privately Owned Public Open Space”). While a developer is not required to provide open space for the public, what is the city’s policy on loss of public open space for a neighborhood? Should that open space be located elsewhere in the neighborhood? Prop M policy includes protection of open space (also referenced in 3700 California St. DEIR on Page 3-7).” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-16])

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“Page 3-11, “Street Trees”: States that 134 street trees are required. The proposed project is deficient in street trees by 23% under the Better Streets Plan.

With 31 trees less than that required, where could those trees be put or donated to otherwise? Would they be planted along Parker Avenue and one other area most impacted by the increase of vehicular traffic?

This is also in addition to the loss of the 1,000 sq. ft. open space with native redwood trees at Cherry and Sacramento.

See Page 2-11, Page 2-27 & Page 3-10.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-28])

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“Negative 23% street trees is -- well, not environmentally friendly.” (Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-8])

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#### **RESPONSE PD-1: OPEN SPACE AND TREES**

The comments refer to removal of the outdoor plaza on the corner of Cherry and Sacramento streets, the city’s policy on loss of public open space and Proposition M, the proposed tree removals, the effect the proposed tree removals would have on the tree canopy and open sky along the Sacramento Street frontage (a portion of which includes the project site), and the effect the proposed tree removals would have on carbon sequestration. One comment requests clarification regarding whether the project includes privately owned public open space (POPOS).

The existing publicly accessible outdoor plaza, with hardscape features, trees, and seating areas on the northwest corner of Block B, at the intersection of Cherry Street and Sacramento Street, is not a “city park,” nor is it described as a city park in the draft EIR. As stated on p. 2-11 in Chapter 2, *Project Description*, of the draft EIR, this area is a publicly accessible open space that is privately owned and part of the California Pacific Medical Center (CPMC) campus. The commenter is correct in saying that the plaza is approximately 1,000 square feet. Page 59 of the initial study (Appendix B of the draft EIR) states that the “existing project site does not contain any publicly owned parks or recreational facilities.” The commenter is also correct in saying that the project would not include public open space, including POPOS. As described in draft EIR Chapter 2, *Project Description*, p. 2-27, onsite recreational facilities, private and shared garden areas, and open space would be included in the proposed project for project residents. This provision of open space for project residents would be in excess of planning code requirements for usable open space in the project’s zoning district. With regard to “loss of public open space” and Proposition M, the project site does not contain any existing public open space, as stated above. Proposition M, which pertains to public open space, is explained in draft EIR Chapter 3, *Plans and Policies*, p. 3-7. Proposition M requires projects to make findings that



demonstrate consistency with eight priority policies “prior to issuing of a permit for any project that requires an initial study or EIR under CEQA; 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.” Policy 8, “protection of open space,” applies only to public open spaces. There would be no loss of public open space as a result of the project. Please refer to the specific revisions to open space in Section 2, *Revisions and Clarifications to the Project Description* and Section 5, *DEIR Revisions*.

The commenter states the number of existing street trees and proposed street trees with the project (Comment I-Hillson1-15) and claims that there is a deficit with respect to street trees required by the Better Streets Plan. The commenter suggests donating trees from other locations for planting (Comment I-Hillson1-28). Additional comments pertain to tree removal as a result of the project and request that the project retain some trees that are slated for removal (Comments I-Alexander2-1, I-Alexander3-1, I-Klipp-2). The commenters express disappointment in not being involved earlier in the development process associated with tree removal (Comments I-Alexander3-1, I-Klipp-3).

An analysis of the project’s consistency with the Better Streets Plan is provided in draft EIR Chapter 3, *Plans and Policies*, pp. 3-16 and 3-17. Draft EIR Chapter 2, *Project Description*, p. 2-35, explains that the project would request a partial waiver from Public Works Code section 806(d) to provide 26 fewer street trees than the required 134 trees. Since the publication of the draft EIR, this partial waiver has been reduced to 26 street trees as a result of changes made to the existing and proposed tree counts presented in draft EIR Chapter 2, *Project Description*, p. 2-26, Table 2-3. Please refer to the specific revisions to Table 2-3 in Section 2, *Revisions and Clarifications to the Project Description*. The updated existing and proposed tree counts do not change the analysis presented in the draft EIR or the initial study. As explained in the *Biological Resources* section of the initial study (Appendix B, p. 92), “with approval of the partial waiver, the project would comply with the department of public works and the urban forestry ordinances. If a waiver is not granted, the project sponsor would be required to pay an in-lieu fee, per Public Works Code section 807(f), to the Urban Forestry Department.” The project sponsor has not yet determined which option or what combination of the two options will be used. To the extent that an in-lieu fee is paid for any waived street trees, the funds will be deposited with the Adopt-a-Tree Fund maintained by the City. The current in-lieu fee (per July 2019–June 2020 fee schedule) is \$2,122 per waived tree. The in-lieu fee is intended to cover the cost for the City to plant a tree and water it for three years.

The project’s street and streetscape improvements (i.e., *Streetscape Plan*) have been designed to meet the City’s Better Streets Design Guidelines (Chapter 3, *Plans and Policies*, p. 3-6). A request for the partial waiver from Public Works Code section 806(d) would not necessarily present a conflict with the Better Streets Plan. Per Planning Code section 138.1, the project would require

Planning Commission approval of the Streetscape Plan and a partial waiver request for providing 26 fewer street trees than required.

As detailed in draft EIR Chapter 2, *Project Description*, p. 2-26, Table 2-3, notwithstanding the partial waiver request for the street trees requirement, the project would lead to a net increase in the number of trees at the project site and on adjacent sidewalks overall. The draft EIR states that “the project site currently contains 163 trees; 91 are regulated trees (77 street trees and 14 significant trees) and 72 are non-regulated trees. The proposed project would remove 42 of the 77 existing street trees and plant 68 new street trees, for a total of 103 street trees. Nine of the 14 significant trees would be removed because of conflicts with the proposed buildings. Of the other 72 non-regulated trees onsite, 70 would be removed and replaced with 146 new trees. Overall, the project would increase the total number of trees onsite from 163 to 256 with the planting of 214 new trees”. As discussed above, the existing and proposed tree counts have since been updated in Table 2-3, shown in Section 2, *Revisions and Clarifications to the Project Description* and Section 5, *DEIR Revisions*. As discussed in Section 2, *Revisions and Clarifications to the Project Description*, the changes reflect corrections to the existing tree count to ensure consistency with Department of Urban Forestry standards, and project design refinements that resulted in minor changes to the proposed street tree layout. As a result of these changes, 126 trees would be removed (instead of 121), 224 trees would be planted (instead of 214), and the project would include a total of 271 trees (instead of 256). Thus, with the proposed changes to the tree removal and planting program, the project would still result in a net increase in trees on the project site and adjacent sidewalks, and the total number of trees would be greater than what is stated in the draft EIR.

The updated tree planting and removal summary (December 2019) identifies the individual trees that are proposed for removal and is available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/PIM/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the “More Details” link under the project’s environmental record number 2017-003559ENV, and then clicking on the “Related Documents” link. In response to comments received on the draft EIR, the project sponsor is proposing to retain eight Coast redwoods at the corner of Sacramento and Cherry streets that were previously identified for removal.

The analysis in the initial study Section 14, *Biological Resources*, p. 91 (Appendix B), addresses tree removal and associated impacts from the proposed project to biological resources. As stated in the initial study, p. 91, the reasons for the removal of street trees vary and include (a) a poor health or poor structure determination by the arborist report and/or the Bureau of Urban Forestry inspector, based on the September 26, 2017 site visit, and (b) conflicts with the proposed buildings, driveways, or tree planting standards. As stated above, the project would increase the overall total number of trees onsite. Newly planted trees would consist of a variety of species with different growth rates, which would take 6 to 12 years to mature depending on



the species. Once the new trees mature, the overall tree canopy on the project site would very likely increase compared with existing conditions. The analysis under Impact BI-3 in Section 14, *Biological Resources*, of the initial study (Appendix B) found that the proposed project would not conflict with any local policies or ordinances that protect biological resources, such as a tree preservation policy or ordinance, with approval of a partial waiver from Public Works Code section 807(f) to provide 26 fewer street trees than required (note that this number that has been reduced from 31). Impacts BI-1 and BI-2, from Section 14, *Biological Resources*, of the initial study (Appendix B, pp. 86–91) also relate to tree removal impacts of the project. As discussed, the proposed project would implement Mitigation Measure M-BI-1 to reduce potentially significant impacts on candidate, sensitive, and special-status species, and American peregrine falcon and native birds protected under the Migratory Bird Treaty Act and California Fish and Game Code sections 3503 and 3513, to less-than-significant levels (Impact BI-1). With implementation of Mitigation Measure M-BI-1 as well as compliance with Planning Code section 139, Standards for Bird-Safe Buildings, impacts on native resident or migratory birds would be less than significant (Impact BI-2). As discussed in Section 2, *Revisions and Clarifications to the Project Description*, the updated existing and proposed tree counts do not change this analysis in the initial study.

Impacts related to greenhouse gas (GHG) emissions are also related to project impacts associated with tree removal. The analysis of GHG emissions, starting on p. 45 of the initial study (Appendix B), accounts for the project's proposed tree removals and plantings. As noted above, notwithstanding the partial waiver request for the provision of fewer street trees than required, the project would, over time, lead to a net increase in the number of trees at the project site overall, which would result in greater carbon sequestration at the project site. Also, refer to Response GHG-1, p. 4-126, for a discussion of tree removal and the relationship to GHGs. As discussed in Section 2, *Revisions and Clarifications to the Project Description*, the updated existing and proposed tree counts do not change this analysis in the initial study.

The commenter's request to redesign the project to retain more trees at the project site reflects the commenter's preference. As previously stated above, the project sponsor is proposing to retain eight Coast redwoods at the corner of Sacramento and Cherry streets that were previously identified for removal. The comment does not include questions or direct comments on the analyses in the draft EIR or initial study related to tree removal, as described above. Nonetheless, the commenter is directed to Chapter 6, Alternatives, in the draft EIR and particularly to Alternative C: Rehabilitation/Reuse Alternative. This alternative was identified in part to reduce impacts to biological resources (i.e., impacts on nesting birds resulting from tree removal) (pp. 6-5 and 6-22). This alternative would retain the existing trees and landscaping on the project site. (p. 6-23). With regard to the portion of the comment that refers to opportunities for the public to provide input in the design process, please refer to Response CEQA-1 on p. 4-145, which describes the public outreach process conducted for the project.

Other comments express matters of opinion such as design preferences, the appearance of some trees on the project site, and the general “environmental friendliness” of the project and do not relate to adequacy or accuracy of the environmental analysis presented in the EIR and do not require a response pursuant to CEQA guidelines section 15088. The Planning Commission will consider these comments, the EIR, and other factors when deciding whether to approve or disapprove the proposed project.

#### **COMMENT PD-2: BUILDING HEIGHTS AND VIEWS**

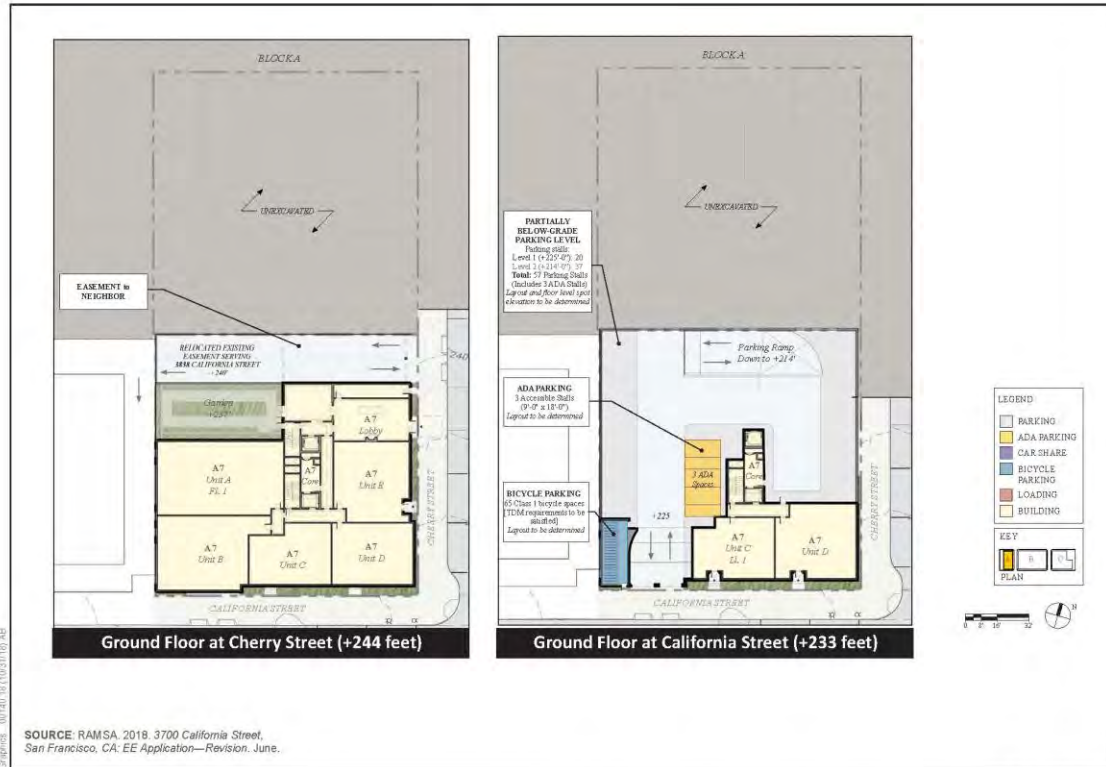
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“Pages 2-28, 2-30 & 2-31, Figures 2-13, 2-14, & 2-15<sup>1</sup>, “Access, Circulation and Ground-Floor Parking Plan” (each for Blocks A, B & C): While this is about parking, this has an impact on building height. With building height appearing to loom over the California Parker view corridor from the south, perhaps parking stackers could lessen the higher portion of the building heights of Blocks B & C as one looks from the south towards the north (from California to Sacramento). Building C on Sacramento when seen from Parker & California appears to be very tall due to the huge slope from California to Sacramento. Suggestion to decrease the individual subterranean spaces to parking stackers and shift some livable space lower. Can you provide how much of the taller buildings on Blocks B & C could be lessened if stackers were used? This would lessen the impact to those looking uphill from California to Sacramento and from the view westward along California looking at the taller portions of the buildings for Blocks B & C.

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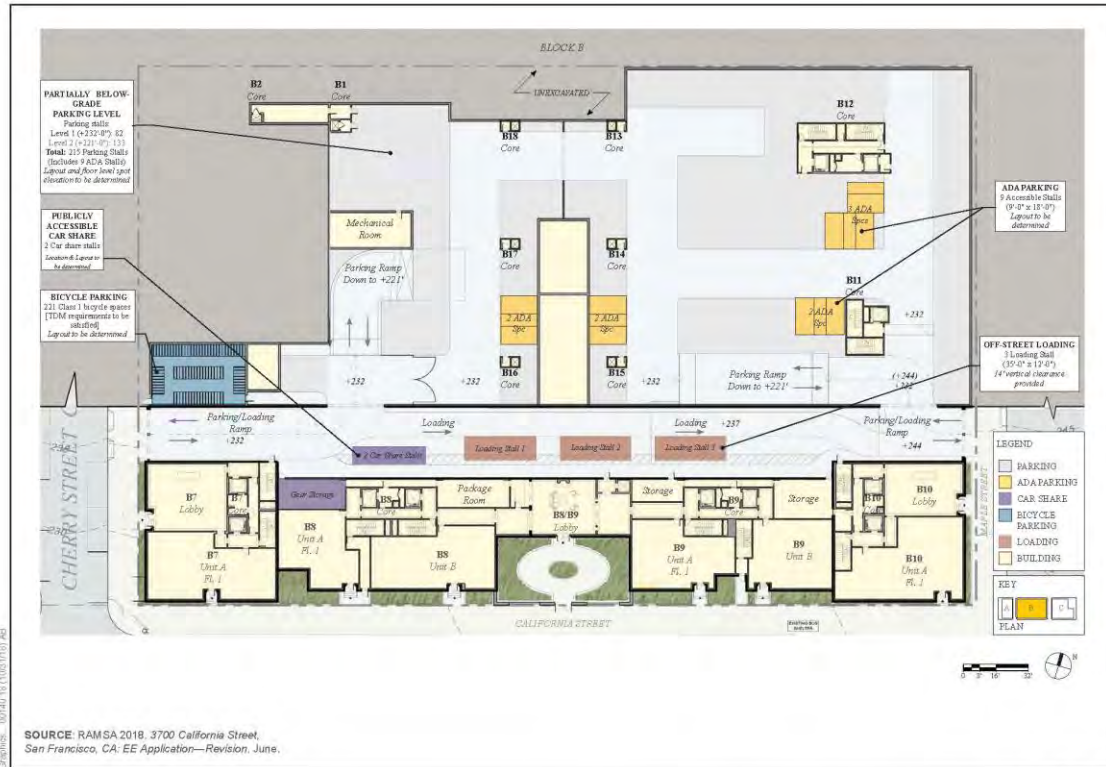
<sup>1</sup> The figures included in the original comment letter have been reproduced herein with more legible versions of the same image.





3700 California Street  
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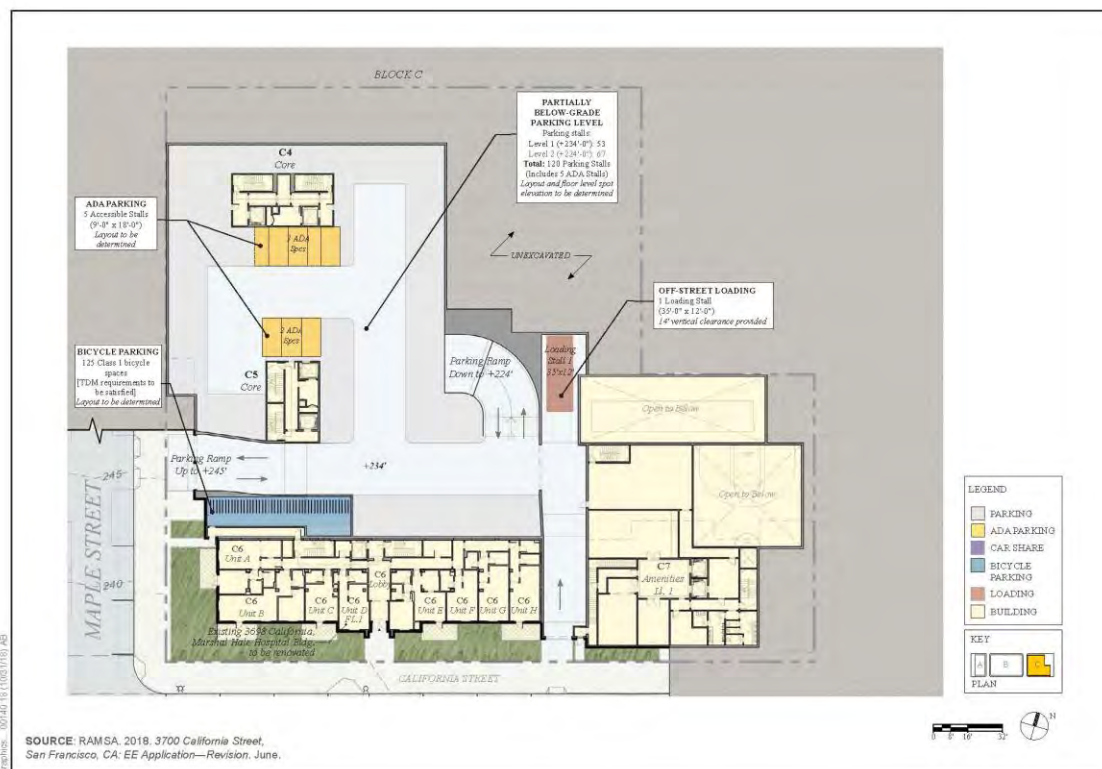
**Figure 2-13**  
**Block A Access, Circulation, and Ground-Floor Parking Plan**



3700 California Street  
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**Figure 2-14**  
**Block B Access, Circulation, and Ground-Floor Parking Plan**





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**Figure 2-15**  
**Block C Access, Circulation, and Ground-Floor Parking Plan**

" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-17])

"Here are the views Page 2-20 & 2-21, Figures 2-9 & 2-10<sup>2</sup> provided in the EIR for Buildings B & C. The 7-8-story higher portions of Building B (SE corner) & Building C (overall at 96 ft. + rooftop appurtenances) is a much more looming impact on the pedestrian on the sidewalk in this area of mostly 40-foot tall residential buildings in the JPIA area. Having 1 story less on the SE portion of Building B & 1 less story on Building C would create a more harmonious and smoother transition to the lower heights of JPIA buildings. The camera angle in the pictures in the DEIR do not show from a nearby pedestrian's perspective but from farther away and even that is not such a smooth transition.

<sup>2</sup> The figures included in the original comment letter have been reproduced herein with more legible versions of the same image.



3700 California Street  
Case No. 2017-003559ENV

**Figure 2-10**  
**View of Blocks B and C from**  
**California Street Looking West**

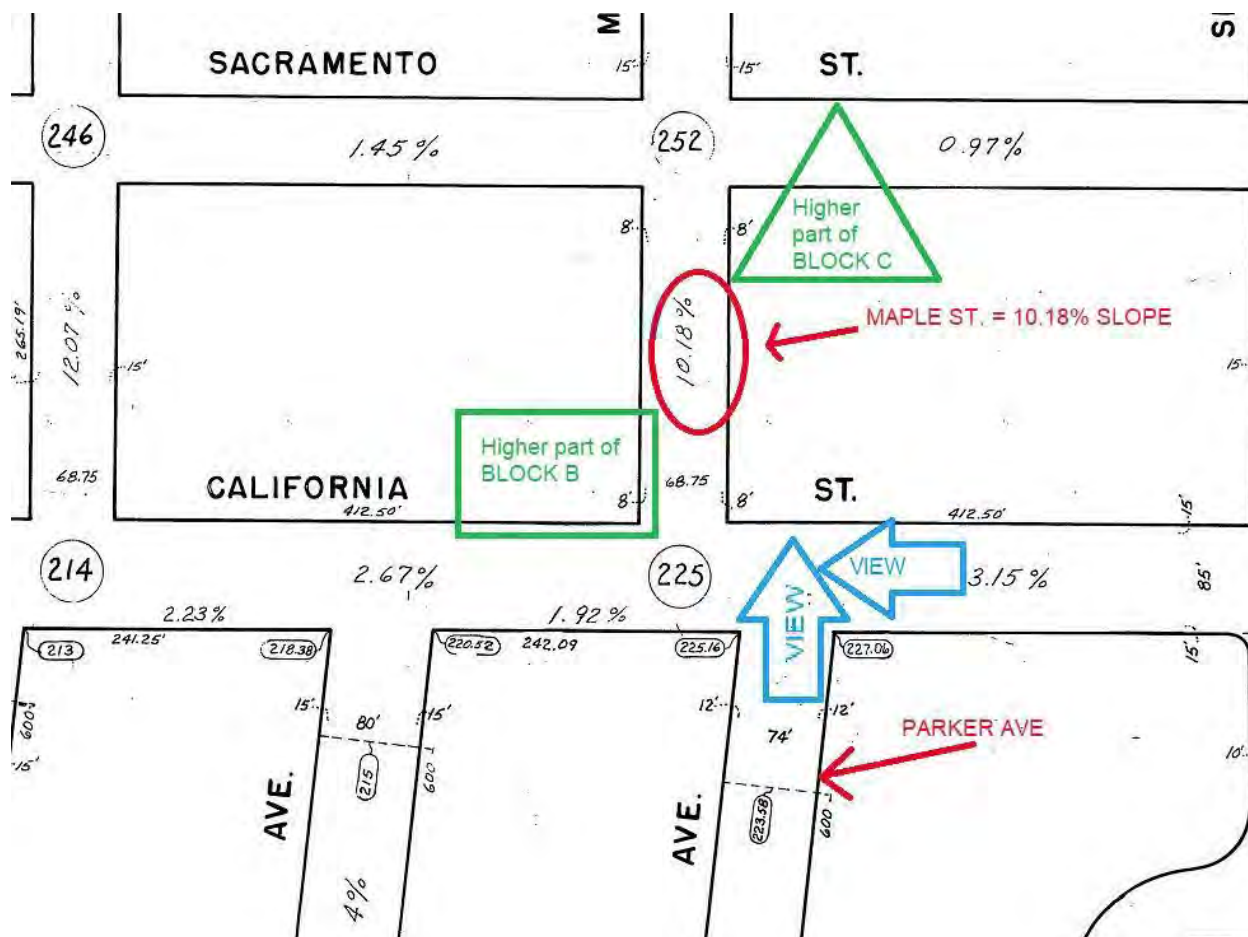


Look at Block B building in this [Figure 2-10](#). See how the 7th story is not a smooth transition looking from the historic Marshall Hale Building (where the trees on the right are). The brick building at 2 Parker is 40 feet tall. Count 4 floor up on Block B – the new proposal is 3 stories above it.

Now look at Block C building in [Figure 2-9](#). All the buildings on Parker at California are within the 40-ft. height limit. The picture is taken at least 200 feet away to make the perspective look like the 96-ft. proposed Block C building is about the same height as the up-to-40-ft-tall buildings on Parker Ave.

The slope from California to Sacramento is 10.18% so BLOCK C as viewed from Parker Ave south of California looks much taller than is depicted from a pedestrian viewpoint closer to California Street rather than 200+ feet south of California as shown in [Figure 2-9](#).

The view going westbound (towards the left in the diagram) along California of the tallest part of Block B is much more impactful as a pedestrian closer to the corner than is depicted in the image in [Figure 2-10](#).





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**Figure 2-9**  
**View of Block C from**  
**Parker Avenue Looking North**



One story lower with stackers would lessen this impact from Parker & California where the low-density 40-X Height and Bulk buildings stand.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-18])

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“Page 3-10, “Open Space”: If the roof decks were to be installed, it is not clear where they will be. How will the heights with appurtenances to these decks be beyond the 80-X height or the 76 ft. or 96 ft. buildings proposed? Will the rooftop penthouses (stairwell accesses) be visible from the streets lower on California St.? Would they be put in the center so that they will be less impactful visually from the lower streets near California St.?

See also Page 3-10, “Rooftop Screening.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-25])

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## **RESPONSE PD-2: BUILDING HEIGHTS AND VIEWS**

The comments contain opinions regarding the proposed building heights and the viewpoints used in the draft EIR’s visual simulations. The commenter suggests using alternative parking strategies to lower building heights. The commenter also requests clarification regarding the proposed locations for roof decks, the heights of appurtenances, visibility from California Street, and rooftop screening.

As discussed on p. 8-9 of the initial study (Appendix B), the initial study and draft EIR do not consider aesthetic impacts because California Public Resources Code section 21099(d), effective January 1, 2014, provides that the “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” The commenter does not express any concern or provide any discussion about this approach to the analysis. The suggestion to reduce building heights to preserve views or for aesthetic compatibility with the project’s surroundings would not be necessary or required in order to reduce a significant impact. The comments that suggest lowering the heights of buildings have been noted; however pursuant to CEQA, as discussed above, lowering the heights of the buildings is not needed to address identified significant environmental impacts. The Planning Commission will consider these comments, the EIR, and other factors when deciding whether to approve or disapprove the proposed project.

The commenter questions the perspectives for the selected viewpoints of the proposed project, as shown in Chapter 2, *Project Description*, and suggests that the viewpoints should have been closer to depict how the buildings would look from a nearby pedestrian perspective. The draft EIR depicts the project from vantage points that are farther away to capture the entire height of the buildings in the frame and their visual relation to their surroundings. Because of the height of the buildings, simulations from closer vantage points would have shown large expanses of

the walls, which would not have been particularly informative to the viewer or representative of the project. Figures 2-7 through 2-12 illustrate how the proposed buildings might appear in the local streetscape. These graphics were created by a professional architect who (1) photographed the street and future building site from a pedestrian perspective; (2) took a sketch-up model of the proposed buildings and made it fit the scale, perspective, and building heights from the photograph; and (3) added building details by hand from the project's architectural design sets. These graphics are illustrations, not exact representations, of how the design, scale, and architecture of the new buildings might look in a streetscape that includes existing and new buildings side by side.

At the time of the draft EIR preparation, the specific locations for the proposed roof decks and the heights had not yet been identified. Since publication of the draft EIR, roof deck locations and heights have been identified for the following buildings:

- Building A7 (up to 81 feet),
- Building B7 (up to 96 feet),
- Building B8 (up to 82 feet),
- Building B9 (up to 82 feet),
- Building B10 (up to 96 feet), and
- Building C5 (up to 96 feet).

All of the proposed roof decks would provide common open space to project residents in multi-family buildings. The proposed roof decks would face California, Cherry, or Maple streets. Each roof deck would be accessible from access code-required stairs and elevators; however, the stair and elevator penthouses would be situated farther from the street façade to minimize their visibility from the street. The stair and elevator penthouses would not exceed 10 feet or 16 feet in height (above the building roof), respectively, as allowed by Planning Code section 260(b)(1)(B) as building features that are exempt from height limits under the code. The roof deck open spaces would total approximately 40,400 square feet in size, not including the footprint for the stair and elevator penthouses, or any planted, non-accessible areas. Refer to RTC Figure 2-16, p. 2-13 in Section 2, *Revisions and Clarifications to the Project Description*, of this RTC document, for the locations of the proposed roof decks.

The draft EIR identified maximum rooftop structure heights of 75 feet on Block A (p. 2-17) and 90 feet on Blocks B and C (pp. 2-24 and 2-25); however the draft EIR has been revised accordingly to reflect new maximum rooftop structure heights of 81 feet for Block A and 96 feet for Blocks B and C (see Table 2-2 in Section 2, *Revisions and Clarifications to the Project Description*, and Section 5, *DEIR Revisions*). These height changes are relatively minor, and the rooftop structure heights would remain in compliance with the City's height and bulk regulations. Please note also that some building roof heights (without appurtenances) have also been



changed in Table 2-2, Proposed Project Characteristics, in Section 2, *Revisions and Clarifications to the Project Description*. Also refer to Response SH-1 on p. 4-130, which discusses the effects of these project changes on the initial study's shadow analysis (Section 10, *Shadow*, pp. 54–56), determining that no new significant effects would occur.

Rooftop appurtenances associated with building systems are not necessarily associated with the location of open space on a roof deck. Rooftop appurtenances may include features that are necessary for the function and safety of the building, such as stairs, elevators, and mechanical penthouses that enclose equipment. Their additional heights are accounted for when assessing final building heights. As stated in draft EIR Chapter 3, *Plans and Policies*, p. 3-10, the project is expected to comply with Planning Code section 141, which specifies the City's rooftop screening requirements. The code states that mechanical equipment and appurtenances must not be visible from any point at or below the roof level of the proposed building. Planning Code section 141 further states, "The features so regulated shall in all cases be either enclosed by outer building walls or parapets, or grouped and screened in a suitable manner, or designed in themselves so that they are balanced and integrated with respect to the design of the building. Minor features not exceeding 1 foot in height shall be exempted from this regulation."<sup>3</sup> The proposed minor changes to the heights of the rooftop appurtenances since publication of the draft EIR discussed above are compliant with section 141 of the planning code and would not require recirculation of the draft EIR per CEQA Guidelines section 15088.5.

Table 2-2, Proposed Project Characteristics, in Section 2, *Revisions and Clarifications to the Project Description*, shows the proposed building roof heights (without appurtenances) in the draft EIR and the changes to those building roof heights since the draft EIR publication. As shown, there are no proposed changes to the building roof heights (without appurtenances) in Block A. Since the draft EIR publication, building roof heights (without appurtenances) that have increased (subject to a PUD exception to the way in which height is measured under section 261(b)(2)) are as follows:

- Building B3 (from 40 feet to up to 48 feet),
- Building B4 (from 40 feet to up to 47 feet),
- Building B5 (from 40 feet to up to 46 feet),
- Building B6 (from 40 feet to up to 48 feet),
- Building C2 (from 36 feet to up to 37 feet), and
- Building C8 (from 38 feet to up to 45 feet).

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<sup>3</sup> San Francisco Planning Code, section 141, *Screening of Rooftop Features in R, NC, C, M, WMUG, WMUO, RED, RED-MX, SALI, and Mixed-Use Districts*.

Since the draft EIR publication, building roof heights (without appurtenances) that have decreased are as follows:

- Building B8 (from 66 feet to up to 65 feet),
- Building B9 (from 66 feet to up to 62 feet),
- Building B18 (from 40 feet to up to 36 feet)
- Building C1 (from 38 feet to up to 37 feet),
- Building C3 (from 42 feet to up to 40 feet), and
- Building C4 (from 58 feet to up to 57 feet).

#### **COMMENT PD-3: HOUSING**

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“2. Housing: Overall Project does a wonderful job with the different type of housing units. Would it be possible to show a figure/chart how the new/proposed units will have on the overall current housing program.” (*Dennis Hong, Email, July 31, 2019 [I-Hong-4]*)

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#### **RESPONSE PD-3: HOUSING**

The commenter expresses a favorable opinion of the types of housing proposed by the project and requests a “figure/chart explaining how the new/proposed units will have on the overall current housing program.” Although it is unclear what type of figure or chart the commenter requests, it is noted that the proposed project’s impacts with regard to housing projections in the Bay Area and housing policies in the city, are discussed in the draft EIR’s initial study (Appendix B) under *Population and Housing* (p. 16) and in draft EIR Chapter 3, *Plans and Policies*. Page 22 of the initial study states that “According to the San Francisco Planning Department’s Housing Development Pipeline, there are 70,960 net new residential units currently in the pipeline, including the proposed project.” The project would comply with Inclusionary Affordable Housing Program requirements under Planning Code section 415 (Chapter 3, *Plans and Policies*, p. 3-4). As discussed, “the proposed project implements various policies of the general plan, particularly those related to infill development and residential housing production close to transit” (p. 3-19). “The staff report for the Planning Commission will evaluate the consistency of the proposed project with general plan policies and applicable planning code regulations, and the Planning Commission will make a consistency determination as part of the project approval process, separate from the environmental review” (p. 3-19).

The Planning Commission will consider these comments, the EIR, and other factors when deciding whether to approve or disapprove the proposed project.



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**COMMENT PD-4: APPROVALS**

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“Thank you for letting us know that the Planning Department has published a notice of preparation of an environmental impact report for the project at 3700 California Street. Page 16 of the notice on “Actions by other City Departments: Department of Building Inspection

- Review and approval of demolition, grading, and building permits
- Night noise permit for work performed outside the normal 7 a.m. to 8 p.m. construction hours, if necessary.”

These are consistent with DBI procedures.” (*Department of Building Inspection, Email, September 19, 2019 [A-DBI-1]*)

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**RESPONSE PD-4: APPROVALS**

The commenter states which discretionary approvals would be required from the Department of Building Inspection (DBI), as listed in the NOP, p. 16, and confirms that they are consistent with DBI procedures.

Subsequent to circulation of the NOP, the night construction noise permit was removed from the draft EIR’s list of discretionary approvals (Chapter 2, *Project Description*, p. 2-35). As stated in the draft EIR, Chapter 2, *Project Description*, p. 2-34, “Construction would generally occur between the hours of 7:00 a.m. and 8:00 p.m. up to seven days a week. The project does not propose nighttime construction work. However, the City may determine that it is necessary to conduct nighttime construction work for activities within the public right-of-way. In the event that nighttime construction work is necessary, it would be for only minimal short-term activities, such as utility installation or roadway repaving.” Because the project sponsor is not proposing nighttime construction work, the night noise permit was removed from the draft EIR’s list of requested discretionary approvals. However, should the City later require nighttime construction work, a night noise permit would be required.

## C. PLANS AND POLICIES

The comments in this section are related to the topic of plans and policies, as evaluated in draft EIR Chapter 3, *Plans and Policies*, and initial study Section C, *Compatibility with Existing Zoning and Plans*.

- PP-1, Residential Design Guidelines

A corresponding response follows each grouping of comments.

### COMMENT PP-1: RESIDENTIAL DESIGN GUIDELINES

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"Page 3-9: I agree that the Spanish-Mediterranean design which works most harmoniously to the design of buildings in this older part of SF in the neighborhoods of Jordan Park and Presidio Heights that A.M. Stern designed "enhances the unique setting and character of the city and its residential neighborhoods." Too often developers come into an existing older neighborhood and try to impose other designs upon the residents who have come to enjoy this Spanish-Mediterranean design and have therefore decided to purchase in this area as a neighborhood with this ambiance than other parts of the Richmond District to the west but especially in contrast to the designs used on office buildings Downtown of late.

I want to thank A.M. Stern and the developers for taking the time to "hear" and actually incorporate a truly fantastic design for this fairly large parcel in the JPIA area of SF. The design is complementary to the neighborhood and it is obviously so. This building shows an example of the application of the Residential Design Guidelines that is more appropriate than the design used as depicted in the "Urban Design Guidelines" (UDGs)." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-24])

### RESPONSE PP-1: RESIDENTIAL DESIGN GUIDELINES

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The commenter expresses a positive opinion of the design for the proposed project. This comment has been noted. Opinions expressed concerning the merits of a project are not related to the adequacy or accuracy of the environmental analysis and, therefore, do not require a response in this RTC document pursuant to CEQA Guidelines section 15088. The Planning Commission will consider this comment, the EIR, and other factors when deciding whether to approve or disapprove the proposed project. Also refer to Response ME-1 on p. 4-160.

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## D. ENVIRONMENTAL SETTING AND IMPACTS

The comments and corresponding responses in this section relate to topics addressed in Section 4, *Environmental Setting and Impacts*, of the draft EIR. These topics include the draft EIR's relationship to the CPMC Long Range Development Plan EIR (LRDP EIR),<sup>4</sup> the draft EIR's baseline conditions, and the approach used to account for the existing hospital use at the project site. Because of the interconnected nature of these comments, there is some topic crossover within these responses; please refer to both responses ESI-1 and ESI-2 for a complete response to the comments in this section:

- ESI-1, Relationship to LRDP EIR
- ESI-2, Baseline Conditions

Please note that this response provides a general overview of the relationship between the LRDP EIR and the draft EIR, the methodology behind establishing the draft EIR's baseline condition, and the methodology for accounting for the existing hospital use. Other comments were received in the context of the draft EIR's transportation analysis that reiterate these general themes and segue into detailed and technical questions related to the transportation analysis. These transportation-focused comments are addressed below under Responses TR-1 through TR-4 (pp. 4-31 - 4-93).

For Comments ESI-1 and ESI-2, a corresponding response follows each grouping of comments.

### COMMENT ESI-1: RELATIONSHIP TO LRDP EIR

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"Page 2-11: Reference is made to Section 2.4 of Chapter 2 re "2.4 Development Agreement Background." The first paragraph states:

"In August 2013, the City and Sutter West Bay Hospitals (doing business as CPMC), entered into a development agreement regarding redevelopment of some of CPMC's existing facilities that were no longer needed by CPMC when its new hospital campus at Geary Street and Van Ness Avenue became operational in the spring of 2019. The development agreement did not include a project description or development controls for the 3700 California Street site <emphasis added> (known as the California Campus in the development agreement)." (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-6]*)

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<sup>4</sup> San Francisco Planning Department, *California Pacific Medical Center (CPMC) Long Range Development Plan Environmental Impact Report*, Planning Department Case No. 2005.0555E, State Clearinghouse No. 2006062157, certified April 26, 2012, <https://sfplanning.org/california-pacific-medical-center-cpmc#info>, accessed October 21, 2019.

"Initial Study, in the DEIR, Appendix B, Page 9, "Approach to Analysis":

This section states that there was a checklist used to determine levels of impact (LTS, NI, or NA) for 3700 California St. Nowhere does it state in clear terms or even in vague terms that this "Initial Study" would use the old prior CPMC EIR (which described a project to vacate certain buildings to various other locations) to evaluate the CEQA impacts for the 3700 California DEIR." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-8])

"I looked at CEQA Guidelines which states this and I am unclear if this has been met with the 3700 California St. DEIR:

- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
  - (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
    - (A) The general environmental setting of the project,
    - (B) The significant environmental impacts of the project, and
    - (C) Alternatives and mitigation measures related to each significant effect.
  - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. The notice shall include as a minimum:
    - (A) An identification of the project with a brief description;
    - (B) A statement that the agency plans to use a certain EIR prepared for a previous project as the EIR for this project;
    - (C) A listing of places where copies of the EIR may be examined; and
    - (D) A statement that the key issues involving the EIR are whether the EIR should be used for this project and whether there are any additional, reasonable alternatives or mitigation measures that should be considered as ways of avoiding or reducing the significant effects of the project.

" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-11])

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#### **RESPONSE ESI-1: RELATIONSHIP TO LRDP EIR**

The comments request clarification regarding how the CPMC Long Range Development Plan (LRDP) EIR relates to the draft EIR and whether the lead agency is proposing to use the LRDP EIR to provide CEQA clearance for the project, pursuant to CEQA Guidelines section 15153, which is cited in the comment. Some comments claim that the draft EIR does not clearly describe how the LRDP EIR is "used" in the draft EIR analysis. One comment notes that the CPMC's August 2013 development agreement for the project site did not include a project description or development controls for the site, implying that information was not available at the time to allow the LRDP EIR to evaluate the currently proposed project.



The relationship between the LRDP EIR and the draft EIR is discussed in Chapter 4. *Environmental Setting and Impacts*, of the draft EIR (Section 4.1.7, *Relationship to CPMC Long-Range Development Plan EIR*, pp. 4.1-8–4.1-10), the initial study (pp. 10 and 11), and the *Recommendation for Accounting for Existing Hospital Use*<sup>5</sup> memo, which can be viewed on the San Francisco Property Information Map, accessed at <https://sfplanninggis.org/PIM/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the “More Details” link under the project’s environmental record number 2017-003559ENV, and then clicking on the “Related Documents” link. The 3700 California Street draft EIR states that “the new hospital at Geary Street and Van Ness Avenue and the proposed 3700 California Street residential project are separate projects that are independently analyzed under CEQA” (p. 4.1-8). The draft EIR provides a standalone analysis of the environmental impacts of the proposed project; it is not subsequent analysis with respect to the LRDP EIR. The lead agency is not proposing to use the LRDP EIR to provide CEQA clearance for the current 3700 California Street project under CEQA Guidelines section 15153, nor would it be able to do so because the LRDP EIR did not evaluate demolition of the hospital or redevelopment of the site. This is stated on p. 4.1-10 of the draft EIR and p. 11 of the initial study.

The LRDP EIR’s relationship to the draft EIR analysis is twofold. First, as further discussed in Response TR-1 on p. 4-31, the transportation analysis in the current 3700 California Street Draft EIR relies on travel behavior information (including total number of am peak hour, pm peak hour, and daily trips associated with the existing hospital) from the CPMC California Campus Transportation Impact Study, as used in the LRDP EIR transportation analysis. The City’s transportation consultant independently verified that employee and visitor travel behavior associated with the hospital did not change substantially between publication of the LRDP EIR and issuance of the project NOP (see Response ESI-2); therefore, this is an appropriate use of the data. (Comparison of LRDP EIR travel data to more recent parking counts and travel surveys of hospital staff and visitors are presented in draft EIR Appendix F.6.) It is common practice for a jurisdiction to use selected travel behavior information and traffic count data from an earlier published EIR to establish the existing travel behavior at a project site, and the use of such data should not be confused with the still completely independent transportation analyses in the current draft EIR.

Second, the City’s CEQA consultant reviewed the LRDP EIR to determine whether the environmental impacts of the existing hospital were “netted out” of the LRDP EIR impact analysis. This review was conducted because the City would be double counting the effects of removing the hospital if the impacts of the existing hospital were to be netted out from both EIRs, which would underestimate the overall environmental impact of the 3700 California Street

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<sup>5</sup> ICF, *Recommendation for Accounting for Existing Hospital Use in 3700 California Street EIR Analysis*, February 28, 2019, memorandum to San Francisco Planning Department.

project. As discussed in the *Recommendation for Accounting for Existing Hospital Use* memo, the review determined that the majority of the LRDP EIR analysis did not net out the impacts of the existing hospital. Therefore, for those topics it is appropriate to net out the impacts of the existing hospital from the current analysis because those physical conditions constitute the baseline conditions by which to evaluate the 3700 California Street project's impact on the environment. Physical environmental impacts from the new CPMC campus at Van Ness Avenue were already captured in the LRDP EIR analysis. However, the LRDP EIR did take a credit for removal of the existing hospital in the water and solid waste analyses; therefore, the 3700 California Street Draft EIR does not net out solid waste or water impacts to ensure that environmental impacts of the currently proposed project are not underestimated.

#### **COMMENT ESI-2: BASELINE CONDITIONS**

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"Page 4.4-40: "As discussed in Approach to Analysis, p. 4.4-30, the CPMC LRDP EIR's air quality analysis assumed that the hospital uses at 3700 California Street would remain in operation." The 3700 California St. hospital use had ceased and although the site is being repurposed to residential, the base physical environment is not the same today in terms of pollution level.

The 3700 California St. DEIR continues the above statement with, "Therefore, it is appropriate in this analysis to subtract emissions from existing hospital uses when determining the net impact of the proposed project on air quality." It does not make logical sense from a vacant use to high-unit residential use with many vehicle parking spaces but maybe logic is thrown out the window for CEQA.

Page 4.4-42, Table 4.4-6, "Emissions from the Proposed Project During Construction and Operations": All the numbers for the 3700 California St. Project show as negative with "credits" from the old hospital use. While it may or may not be illegal to do an environmental impact report like this to show very little or no impact, this does not help the air quality in the area for the health of the young children and elderly residents. People living on the transit corridors will get more of the pollution and a lot of it will flow eastward to other "sensitive receptors". While the DEIR may conclude that there is no impact on the whole, I think the sensitive receptor group will have a lower quality of life. So much for livability?

If the hospital emissions were not used to negate the actual calculated measurements \*without\* offsets used from assuming the hospital is still in use, what would those be? Please provide impact on the JPIA streets (California to Geary, between Palm and Parker Avenues).



TABLE 4.4-6. EMISSIONS FROM THE PROPOSED PROJECT DURING CONSTRUCTION AND OPERATIONS

Year	Average Daily Emissions from Operation and Construction (lb/day) <sup>a, b, c</sup>			
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2021</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	2.5	25	1.3	1.0
Year 2021 Net Emissions	-30	-24	-27	-8.0
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2022</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	2.0	14	1.0	0.59
Year 2022 Net Emissions	-30	-34	-27	-8.4
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2023</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	40	9.1	0.71	0.41
Project Operations	5.1	1.2	1.2	0.38
Year 2023 Net Emissions	13	-38	-26	-8.2
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2024</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	0.20	2.2	0.11	0.072
Project Operations	18	3.8	4.23	1.3
Year 2024 Net Emissions	-14	-42	-24	-7.6
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No

Source: Ramboll, 2018; Table 8 and Table 13 in EIR Appendix H.

Notes:

- <sup>a</sup> Operational criteria air pollutant emissions were estimated for Block C operation in 2023 and full project buildout in 2024. Average daily operational emissions were calculated from values listed in EIR Appendix H, Table 13. Emissions from the existing hospital and medical uses were subtracted from the project's emissions for each year, starting at the beginning of construction.
- <sup>b</sup> Average daily construction emissions were calculated from values listed in EIR Appendix H, Table 8, by summing all emissions in a given phase of the construction program and dividing by 250 construction days in a year.
- <sup>c</sup> Average daily construction emissions were added together with average daily operational emissions.

(Rose Hillson, Email, September 11, 2019 [I-Hillson1-72])

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“The net numbers used via the reliance on CPMC Hospital data is not environmentally friendly. Prior CPMC EIR hospital stats would be used to analyze this 3700 project. Not clearly stated, nor prior noticed.” (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-4]*)

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## **RESPONSE ESI-2: BASELINE CONDITIONS**

Some comments assert that the approach taken in the draft EIR to “net out” certain environmental impacts of the existing hospital at 3700 California Street, including air quality and traffic impacts, “does not make logical sense” and “may or may not be illegal” and that the baseline analysis should be conditioned on the project site being vacant. The commenter states a belief that regardless of the EIR findings, air quality impacts in the project area will lead to a lower quality of life and livability for sensitive receptor groups. The comments request an air quality emissions analysis that assumes baseline conditions are a vacant project site, and an air quality analysis focused on the Jordan Park neighborhood (California to Geary, between Palm and Parker Avenues) under that assumption. The comments express a general implication that project environmental impacts are undercounted in the draft EIR analysis because the existing hospital impacts are netted out. The comment also questions the draft EIR’s “reliance on CPMC Hospital data,” which is addressed above under Response ESI-1.

Section 15125 of the CEQA Guidelines establishes that an EIR must describe existing environmental conditions in the vicinity of a proposed project, which is referred to as the “environmental setting” for the project. This description of existing environmental conditions serves as the “baseline” for measuring the changes to the environment that would result from the project and for determining whether those environmental effects are significant. The CEQA Guidelines call for the environmental baseline to reflect conditions as they exist early in the CEQA process. They specify that the physical environmental conditions at the time the notice of preparation is published or, if there is no notice of preparation, at the time environmental review begins “will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant” (CEQA Guidelines section 15125(a)).

As stated on p. 4.1-4 of the draft EIR, the environmental setting for the draft EIR analysis is defined as physical conditions on the project site and in the surroundings at the time of issuance of the notice of preparation, which occurred on September 19, 2018. Data and observations used to establish the existing transportation setting at the project site and in the project vicinity were collected in spring 2018. The CPMC hospital at 3700 California Street was fully operational at that time, and remained so until CPMC began relocating to its new hospital campus at Van Ness Avenue and Geary Boulevard in March 2019. This is stated in the draft EIR: “As discussed in Chapter 2, *Project Description*, the project site is occupied by CPMC, an acute-care hospital located at 3700 California Street. In March 2019, CPMC began relocating to a new hospital



campus at Geary Street and Van Ness Avenue; the California Campus will close by the end of 2019” (p. 4.1-8). Thus, establishing the baseline condition on the project site as an operational hospital is consistent with Section 15125 of the CEQA Guidelines and CEQA case law.

Furthermore, the project proposes to demolish the existing hospital building. If the project does not proceed and the existing building is not removed, it is reasonably foreseeable that the existing hospital would be reused as a non-acute medical care facility or medical office uses rather than sitting vacant, as described in the No Project Alternative analysis in draft EIR Chapter 6, *Alternatives* (pp. 6–8). Therefore, it would not be accurate to base the draft EIR analysis on the baseline condition that the project site is currently vacant or could be so in the foreseeable future. Because the project’s proposal to demolish the existing building eliminates the potential for the building to be reused, it is appropriate (and consistent with the CEQA Guidelines) to “net out” the impacts of the existing hospital when evaluating the project’s incremental effect on the environment. The draft EIR takes this approach (with the exceptions of solid waste and water impacts for the reasons described above under Response ESI-1).

The comment’s suggestion that air quality impacts are undercounted as a result of netting out existing hospital emissions is not correct. As discussed above under Response ESI-1, the City’s CEQA consultant reviewed the LRDP EIR to ensure that the methodologies in the LRDP EIR and the current draft EIR are internally consistent. The results of this review are summarized in the *Recommendation for Accounting for Existing Hospital Use* memo and restated throughout Section 4.4, *Air Quality*, of the draft EIR (e.g., p. 4.4-40). As discussed therein, the LRDP’s analysis of regional air emissions (e.g., mobile emissions from vehicle trips) did not take into account any reduction associated with the removal of the California Campus because the LRDP EIR assumed that the existing hospital would remain in operation. Therefore, it is appropriate and consistent with the LRDP EIR to subtract the existing hospital’s regional emissions from the draft EIR analysis, and this approach does not under-represent regional air quality impacts. Localized emissions associated with the hospital would no longer occur under the project because, as noted above, the project would demolish the existing building and eliminate the potential for the building to be reused as another medical facility. Instead localized emission impacts would occur at the new hospital campus at Van Ness Avenue and Geary Boulevard, which is evaluated in the LRDP EIR as part of that separate project. Therefore, the draft EIR analysis accurately represents localized air quality impacts, and an analysis of localized air quality impacts on the Jordan Park neighborhood under a vacant hospital baseline condition is not required. Regarding impacts on sensitive air quality receptors, please refer to Responses AQ-1 on p. 4-113, AQ-2 on p. 4-116, and AQ-3 on pp. 4-117. Regarding traffic impacts on streets south of California Street, refer to Responses TR-1 on p. 4-36, TR-2 on p. 4-36, and TR-4 on p. 4-94.

The commenter’s statement regarding quality of life and livability is a matter of opinion and has been noted. Opinions expressed concerning the merits of a project are not related to the

adequacy or accuracy of the environmental analysis and, therefore, do not require a response in this RTC document pursuant to CEQA Guidelines section 15088. The Planning Commission will consider this comment, the EIR, and other factors, when deciding whether to approve or disapprove the proposed project.

## **E. TRANSPORTATION AND CIRCULATION**

The comments and corresponding responses in this section relate to the topic of transportation and circulation, as evaluated in draft EIR Section 4.2, *Transportation and Circulation*. The comments are further grouped according to the following transportation-related issues that the comments raise:

- TR-1, Transportation Setting and Existing Conditions
- TR-2, Project Travel Demand
- TR-3, Construction
- TR-4, Operational Impacts

A corresponding response follows each grouping of comments.

### **COMMENT TR-1: TRANSPORTATION SETTING AND EXISTING CONDITIONS**

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“In addition, whether or not one was required legally, I did not receive any Planning Department notice or have I seen any document stating clearly that the old CPMC DIR will be used for this 3700 California St. DEIR. The hospital use was being vacated so there was no real analysis in the CPMC EIR for traffic impact from the then unknown 3700 California proposal except for a very small traffic analysis for the small garage building on Cherry St. to remain. Not much of the 2010 traffic data contained any traffic of vehicles out of the Block B proposed location because there was only a small drop-off parking area for Block B near Sacramento and the hospital itself had NO UNDERGROUND PARKING at the Block B site. There was a truck LOADING bay outside on Maple St. The big impact would be the quantity of vehicles that would be a source potentially for 24-hour use from the Block B underground parking proposed. The 3700 California St. DEIR relying on prior surveys from prior hospital patients and visitors for a NEW construction of a residential Block B building does not paint the same picture as, again, the use is potentially also 24-hour use rather than during business hours/hospital visitors’ hours only. A cursory survey of current traffic along the street with the Cherry St. garage also will not indicate the traffic patterns nor resulting volumes in great accuracy after Blocks A, B, and C are completed. As discussed later, the traffic count at the intersections are mostly lumped with multiple streets together rather than counts for each street block. Also, the data is given as



“net” results taking a “credit” in vehicular counts from the old hospital site use. Not sure this gives an accurate impact analysis, or if even legally allowed under CEQA.

Again, while a tad more traffic analysis was done for incorporating the visitors at the Cherry St. garage that will be kept, I still think using statistics from an old hospital use which is traffic data that is not the same as for residential use. While surveys were used in the CPMC hospital site, they were employees and patients and visitors for the hospital, not permanent residents who have a different pattern for transportation and parking impacts and are potentially 24-hour uses vs. business-hour uses as in the hospital/office setting of Blocks B & C. I think the analysis for the traffic and volumes was inadequate for traffic from Maple St. that feeds into Parker Avenue to the south.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-9])

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“The 3700 California St. DEIR admits Maple St. will have the largest increase in traffic – about 1-2 vehicles coming out of the driveways per minute. It also elsewhere states Parker Avenue increase in traffic as 38% more (See [Page 4.3-46](#)). Yet the conclusion is no significant impact as the other streets (other than Parker Avenue) will be less.

See [Page 4.2-57](#) about this impact from Maple St.

Again, the significant environmental impacts of the proposed 3700 California Project were \*NOT\* known (see above comment [Page S-27 – S-28, Page 2-11, 1<sup>st</sup> Paragraph](#)) to be included in the old CPMC EIR now used for this 3700 California St. DEIR so hardly any of the CPMC EIR statistics for the transportation impact should have been used for a residential project. There should have been a wider look and a more in-depth look at traffic volumes on \*each\* block as opposed to a combination of street counts (e.g. Maple-California-Parker). Just data for Parker, Palm, Jordan, Commonwealth and Euclid between Palm and Spruce would help clarify and make residents aware of the true impact coming. Please provide new statistics.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-10])

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“[Page 3-5, “Environmental Protection Element”](#): “The proposed project would be generally consistent with the objectives and policies of the environmental protection element regarding reduced automobile traffic at the project site and related noise and air quality effects in the project area because, with the removal of the existing hospital, the proposed project would result in a net reduction in vehicle trips and resulting air and noise effects (refer to Sections 4.2...”

Please see my comments about using prior high automobile traffic numbers to offset via “trip credits” the rationale to say that with a “net reduction” that the higher automobile traffic that will emanate from the proposed project will impact the already jammed streets south of California and especially on Parker which will get the traffic dumped on from the Maple driveway statistics shown. See my other comments related to [Section 4.2](#) about the “trip credits” being used to

validate the potential significant impact on Parker with no mitigation specifically stated for it. While other streets are not impacted, the residents of Parker will not be able to safely leave and enter their homes with the increase in traffic especially during the AM and PM peak commute hours. Truck trips should be monitored to not use Parker Avenue as a weight-restricted street with 2 speed humps per each Parker block south of California. More mitigation measure needed.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-22])

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“Page 3-6: “The project is expected to reduce traffic at the project site and in the vicinity, compared with existing conditions with the hospital use.” This statement further continues the idea I brought up earlier in this comments document (e.g. related to Section 4.2) that the developers continue to emphasize “hospital use” as if the hospital is still fully functioning and that is the current environment when it has been known since at least 2015 from neighborhood meetings that the site will be mostly vacated of hospital use. When traffic affects one street over nearly all others, a mitigation measure is needed and that would be for Parker Avenue south of California. Pedestrian countdown lights would help at Parker and California going east-west. Additional humps for speeding vehicles down Parker Avenue would be another suggestion.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-23])

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#### **RESPONSE TR-1: TRANSPORTATION SETTING AND EXISTING CONDITIONS**

This comment questions the use of data from the CPMC Long Range Development Plan EIR (LRDP EIR) for establishing the existing setting and baseline transportation conditions at the site. The comment suggests that the presentation of the existing setting in the draft EIR is inadequate, and that a revised analysis should be conducted that assumes no active land use at the project site.

This response provides information and clarification regarding the existing transportation setting and transportation study area, and documents why the approach used for the project EIR is appropriate. General information on the baseline condition assessed in the EIR, and how information from the LRDP EIR was used in this analysis, is discussed in Responses ESI-1 on p. 4-23 and ESI-2 on p. 4-27. Please also refer to the following responses, which are relevant to the transportation setting and should be considered in conjunction with this response: Response TR-2, Project Travel Demand, on p. 4-36; Response TR-4, Operational Impacts, on p. 4-93 (both TR-2 and TR-4 discuss traffic impacts on streets south of the study area, including Maple Street and Parker Avenue, including cumulative traffic volumes referenced in this comment).

As discussed in Response ESI-1 and presented on p. 4.2-44 of the draft EIR, the transportation analysis in the draft EIR relies on travel behavior information from the LRDP EIR for the existing hospital use, not the proposed residential uses. Furthermore, the draft EIR relies on



traffic counts collected in 2018 to establish the existing baseline condition, not traffic counts from the LRDP EIR. Therefore, the comments stating that the draft EIR used transportation data from the LRDP EIR to estimate traffic associated with the proposed residential project or to establish the existing baseline traffic levels on the surrounding roadways are incorrect. Additionally, the City's transportation consultant determined that transportation data from the LRDP EIR used to estimate the existing hospital travel patterns for the "trip credit" is valid based on the comparison of more recent parking counts and travel surveys of hospital staff and visitors presented in Appendix F.6 of the draft EIR.

As discussed in ESI-2, establishing the baseline condition on the project site as an operational hospital is appropriate to reflect the physical environmental conditions at the time of issuance of the notice of preparation. Therefore, existing conditions include travel demand and vehicle trips associated with the active use of the hospital, and existing-plus-project conditions include both the addition of project trips estimated based on the 2002 San Francisco Guidelines for Transportation Impact Analysis<sup>6</sup> (SF Guidelines) and the removal of hospital-related trips ("trip credit").

The comment requests that traffic volumes are provided for each block as opposed to a combination of street counts (e.g. Maple-California-Parker). Appendix F.3 of the draft EIR presents the traffic volumes for each leg approaching the study intersections, including the traffic counts on the blocks of Parker, Palm, Jordan, and Commonwealth avenues south of California Street. Therefore, the draft EIR presents an appropriate level of information about the traffic volume changes on these streets.

The comment requests additional transportation analysis on a wider study area. The transportation study area was defined to account for transportation impacts, in accordance with the SF Guidelines. As a result of replacement of the hospital with residential land uses, the project would reduce the number of vehicle trips on the surrounding roadway network, as described in Responses TR-2 on p. 4-36, and TR-4 on p. 4-93. Therefore, the transportation study area focused on intersections and roadways directly adjacent to the project site that would be affected if traffic were to increase for any one movement, even if total traffic volumes were to decrease. The transportation-related impacts of the project would decrease farther from the site because vehicle trips would disperse across the roadway network. As described in Response TR-4 on p. 4-93, the proposed project would not increase peak-hour traffic volumes on Parker Avenue. In addition, no operational impacts were identified at the intersection of California and

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<sup>6</sup> San Francisco Planning Department, *Transportation Impact Analysis Guidelines*, 2002, [https://default.sfplanning.org/publications\\_reports/Transportation\\_Impact\\_Analysis\\_Guidelines.pdf](https://default.sfplanning.org/publications_reports/Transportation_Impact_Analysis_Guidelines.pdf), accessed December 26, 2019. As presented on p. 4.2-1 of the draft EIR, in February 2019, the planning department published an update to the 2002 *Transportation Impact Analysis Guidelines for Environmental Review*. The update, which generally clarified prior evaluation criteria and methodology, does not change the impact conclusions in this document.

Parker Avenue; therefore, no operational impacts would be expected in areas farther away from the project site, which would have lower project-generated traffic volumes, as described further in the Response TR-4. Therefore, the transportation study area, setting, and existing conditions are adequate for this EIR.

## COMMENT TR-2: PROJECT TRAVEL DEMAND

“Page 4.2-45, Table 4.2-6, “Project Trip Generation”: Why is the “Person Trips per Vehicle” (PTV) different than the “Vehicle Trips” (VT)? What does the PTV include that is not in VT? Please clarify. Table 4.2-6 shows VT as 1,389 vehicle trips every day. How many PTVs would that be for each data point? Is the amount of PTV more or less than the commercial CPMC hospital use that existed in 2010? By how much?”

June 2019

Environmental Setting and Impacts  
Transportation and Circulation

TABLE 4.2-6. PROJECT TRIP GENERATION

Land Use	Daily Trips			AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out	Total	In	Out
<b>Vehicle Trips</b>									
Proposed Project	1,389	694	694	198	40	158	240	160	80
CPMC Trip Credit <sup>a</sup>	-6,262	-3,131	-3,131	-516	-324	-192	-607	-219	-388
<b>Net New Trips</b>	<b>-4,873</b>	<b>-2,437</b>	<b>-2,437</b>	<b>-318</b>	<b>-284</b>	<b>-34</b>	<b>-367</b>	<b>-59</b>	<b>-308</b>
<b>Transit Trips</b>									
Proposed Project	732	366	366	104	21	83	126	84	42
CPMC Trip Credit	-1,494	-747	-747	-121	-78	-43	-140	-50	-90
<b>Net Trips</b>	<b>-762</b>	<b>-381</b>	<b>-381</b>	<b>-17</b>	<b>-57</b>	<b>40</b>	<b>-14</b>	<b>34</b>	<b>-48</b>
<b>Walking Trips</b>									
Proposed Project	108	54	54	15	3	12	18	12	6
CPMC Trip Credit	- <sup>b</sup>	- <sup>b</sup>	- <sup>b</sup>	-7	-6	-1	-12	-2	-9
<b>Net New Trips</b>	<b>108</b>	<b>54</b>	<b>54</b>	<b>8</b>	<b>-3</b>	<b>11</b>	<b>6</b>	<b>10</b>	<b>-3</b>
<b>Other Trips</b>									
Proposed Project	272	136	136	39	8	31	47	31	16
CPMC Trip Credit	-455	-228	-227	-32	-26	-5	-41	-6	-35
<b>Net New Trips</b>	<b>-183</b>	<b>-92</b>	<b>-91</b>	<b>7</b>	<b>-18</b>	<b>26</b>	<b>6</b>	<b>25</b>	<b>-19</b>

Source: Fehr & Peers, 2018; Adavant Consulting, CPMC EIR, 2010.

Notes: Totals may not sum precisely because of rounding.

<sup>a</sup> Transit, Walking, and Other categories show person trips, while Vehicle Trips represents the number of vehicles.

<sup>b</sup> Daily external walk trips are not available from the 2010 CPMC EIR, therefore, no credit taken; peak-hour credits are based on travel survey data and the corresponding mode share.



Page 4.2-48, “Table 4.2-8. Proposed Project Driveway Volumes”: This table shows only driveway counts on Cherry, Maple Sacramento and California. All show “trip credits” from the prior hospital use vehicle counts.

TABLE 4.2-8. PROPOSED PROJECT DRIVEWAY VOLUMES

Driveway Location (side of street)	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
<b>Cherry Street</b>				
Block B Garage/Single-Family homes (east)	13	47	47	23
CPMC Trips Removed (both) <sup>a, b</sup>	-66	-38	-44	-77
<b>Net Trips</b>	<b>-53</b>	<b>9</b>	<b>3</b>	<b>-54</b>
<b>Maple Street</b>				
Block B Garage (west)	11	39	40	20
Block C Garage (east)	9	45	48	24
CPMC Trips Removed (both)	-40	-24	-28	-48
<b>Net Trips</b>	<b>-20</b>	<b>60</b>	<b>60</b>	<b>-4</b>
<b>Sacramento Street</b>				
Single-Family Homes (south)	0	4	4	0
CPMC Trips Removed	-13	-8	-9	-16
<b>Net Trips</b>	<b>-13</b>	<b>-4</b>	<b>-5</b>	<b>-16</b>
<b>California Street<sup>c</sup></b>				
Block A Garage	6	23	23	11
CPMC Trips Removed (Block A)	-171	-103	-117	-206
CPMC Trips Removed (Block C)	-33	-19	-23	-39
<b>Net Trips</b>	<b>-198</b>	<b>-99</b>	<b>-117</b>	<b>-234</b>
<b>Total Net Trips</b>	<b>-284</b>	<b>-34</b>	<b>-59</b>	<b>-308</b>

## Notes:

<sup>a</sup> Existing CPMC driveway vehicle trips are estimated based on the trip distribution and assignment of trips from the 2010 CPMC EIR.

<sup>b</sup> Cherry Street volumes represent the net decrease in CPMC vehicle trips. The easement to the 3838 California garage will remain.

<sup>c</sup> Vehicle trips to the loading-only entrance on California Street east of Maple Street would be infrequent; less than one trip would occur on average during peak hours.

Source: Fehr & Peers, 2018; Adavant Consulting, CPMC Long-Range Development Plan EIR, 2010.

It is unclear of where this data is broken down by trip counts and VMT for not only California St., but also on each Jordan Park Improvement Association (JPIA) area street – Palm, Jordan, Commonwealth and Parker -- \*without\* the “trip credits”. It appears the traffic counts are lumped with California St. so it is difficult to say how many vehicles for each of JPIA’s streets.

Table 4.2-8 shows for Cherry St., WITHOUT the “trip credits,” the “OUT” traffic during “AM Peak Hour” is more than the prior CPMC Hospital use – 47 vs. prior 38 – this is about a 24% INCREASE. The “IN” traffic during “PM Peak Hour” is also more than prior CPMC Hospital use – 47 vs. 44 – this is about a 7% INCREASE.

For Maple St., without the “trip credits,” the “OUT” traffic during “AM Peak Hour” for \*both\* Block B \*and\* Block C is 84 vs. 24 – this is about a 250% INCREASE. The “IN traffic during “PM Peak Hour” for both Blocks is 88 vs. 28 – this is about a 214% INCREASE. Again, if one takes out the “trip credits,” the straight-forward calculations show a much greater percentage of potential significant impact.

The vehicle counts for these 2 streets – Cherry and Maple – are for the 2 proposed driveways only. The Maple Street driveway has the most increase by 250% / 214% for the peak hours. This is a tremendous increase to what exists. Such a large increase to dump the cars out on Maple Street without the cars going out at least 1 more alternate driveway as there used to be offloading of vehicles out of a southern California St. driveway when the hospital was there to not overburden Maple St. which had mainly outdoor LOADING bays. The residents near Maple and Parker might have trouble getting in and out safely from their homes with the additional volume and cause more pedestrian-vehicle conflict even farther south towards Euclid and Parker.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-46])

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“Page 4.2-69: “...the SF-CHAMP 2040 cumulative model runs assume continued medical land uses at the project site under the 2020 cumulative scenario without the project.” Using the 2040 cumulative model seems to be flawed when the residential project and the access to traffic through the fewer openings to a higher vehicles presence building is replacing one that was not – such as Block B. I think that the 2040 cumulative model needs to be using the existing vacant use to proposed residential use with no “net trips” or “trip credits” or the full brunt of the proposed project is hidden or at least obscured. Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-59])

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“Appendix F, Page 88, Table 11, “Other Trip Generation”: What are these trips? From where to where? What blocks adjacent and in JPIA would carry these trips? Where is this broken down? Please provide.



**Table 11: Other Trip Generation**

Land Use	Daily Trips	AM Peak Hour	PM Peak Hour
Proposed Project	272	39	47
CPMC Trip Credit	-455	-32	-41
<b>Net Trips</b>	<b>-183</b>	<b>7</b>	<b>6</b>

Source: *Transportation Impact Analysis Guidelines for Environmental Review*, 2002, SF Planning Department; *CPMC Long Range Development Plan EIR*, 2010. Adavant Consulting, 2010; *ITE Trip Generation*, 9th Edition; Fehr & Peers, 2018.

“ (Rose Hillson, Email, September 11, 2019 [I-Hillson1-65])

#### **RESPONSE TR-2: PROJECT TRAVEL DEMAND**

Comment TR-2 raises questions about the travel demand methodology and requests clarification regarding how person trips and vehicle trips were calculated and distributed across the roadway network for the existing on-site land use and the proposed project. The comment suggests that traffic generated by the project would represent a substantial increase in traffic on the surrounding roadway network, which would affect the impact determinations presented in the draft EIR.

The commenter requests clarification regarding how person trips differ from the vehicle trips associated with the project. In accordance with the SF Guidelines, the draft EIR presents trip generation as both person trips and vehicle trips. Person trips refers to trips made by a person across all modes of travel including transit, walking, biking, driving, and other means. Auto person trips refers to the people who travel by auto. The number of vehicle trips is less than the number of auto person trips because some vehicles carry more than one passenger. For instance, if two people drive together to the project site, they represent two auto person trips but only one vehicle trip. The average vehicle occupancy rate used in this analysis is from the SF Guidelines and based on census data for the project location.

The comment also requests clarification regarding the nature of trips by “other” modes, as reported in Table 11. As explained on draft EIR p. 4.2-43, “other” modes include bicycling, motorcycling, and additional modes. These additional modes include non-motorized scooters, taxis, and transportation network companies (TNCs), although a portion of the reported vehicle trips may also be made by TNCs. As presented in Appendix F.6, the proposed project would reduce the total number of “other” person trips compared with the existing hospital use, similar to the project’s effect on vehicle trips.

One comment states that the estimated travel demand for the proposed project should not rely on travel data for CPMC employees and visitors, including trip credits for purposes of analysis, because the hospital use is no longer active. A similar comment notes that the 2040 SF-CHAMP

model was inadequate for forecasting cumulative conditions because 2040 conditions should include no land use at the project site. As noted in Response TR-1 on p. 4-31 and Response ESI-2 on p. 4-27, the hospital was operating at the time when the existing setting discussion and notice of preparation of an EIR for the 3700 California Street project were prepared. The hospital was fully operational until March 2019 when the uses at the CPMC California Campus began relocating to the new campus at Geary and Van Ness avenues. Therefore, the analysis appropriately removes those vehicle trips from the surrounding roadway network before adding vehicle trips generated by the proposed project.

The transportation analysis compares the CPMC employee and visitor trip rates from the 2010 LRDP EIR to data provided by CPMC for more recent years and finds travel patterns to be substantially the same, as documented in Appendix F.6. As noted in Response ESI-1, p. 4-23, a medical use would most likely remain at this location under cumulative conditions if not for the proposed project. Therefore, the travel demand and cumulative conditions approach in the EIR, which assumes that medical uses would remain at this site under existing and cumulative no-project conditions, is appropriate.

The commenter requests clarification on how vehicle trips were distributed throughout the roadway network for both the existing hospital use and the proposed project, with a focus on streets south of California Street in the Jordan Park area. As noted on p. 4.2-46 and shown in Table 4.2-7, the distribution of traffic generated by the existing hospital use was based on information in the LRDP EIR; the distribution of traffic generated by the proposed project was based on the SF Guidelines for residential land uses at this location. The vehicle trips generated by each land use were assigned separately to the surrounding roadway network, based on the locations of the driveways and loading areas for each land use. The analysis therefore accounts for both the removal of traffic generated by the existing land use and the addition of traffic generated by the proposed project. This is necessary to determine the net incremental impact of the project on the environment. Tables 4.2-6 and 4.2-8 present the change in person and vehicle trips between the existing and proposed land uses. Figure 4.2-8 presents the net change in peak-hour vehicle trips on study area roadways, including the north end of the Jordan Park area.

Several comments note how the proposed project, on a percentage basis, would generate more traffic from driveways on Maple Street than the existing hospital land use. The comments suggest that this increased traffic would have a significant impact on residents on Parker Street. The potential for physical environmental impacts arising from changes in traffic circulation patterns is addressed in Response TR-4, on p. 4-93.

Therefore, the analysis presented in the EIR is adequate and supported by substantial evidence, and no changes are necessary.



**COMMENT TR-3: CONSTRUCTION**

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“Second, I’m concerned about losing parking spaces during construction and after because of the configuration of the new buildings. Traffic flow might be forever adversely affected.” (*Marie Laidas Sullivan, Email, September 21, 2019 [I-Sullivan1-4]*)

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“8. Will there be traffic control officers to control vehicle, pedestrian traffic to and from the hospital along California Street during Construction?” (*Dennis Hong, Email, July 31, 2019 [I-Hong-10]*)

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“Page 4.2-20: “At intersections along California Street, occasional vehicular queues were observed in the eastbound direction during the AM peak hour and in the westbound direction during the PM peak hour.” Whether the queues cleared up swiftly or not, there was a queue and there is not a hospital use physical environment there anymore. When the new residential project is completed in phases, Block C vehicular traffic will cause a burden onto the queueing onto California. As Block B is completed, even more vehicles in greater numbers than from Block C enter the picture to impact a further snarling up and queuing of that intersection. While the construction is occurring, when there is queuing, there needs to be mitigation to have someone monitor and orchestrate this area so that it does not occur as there will end up being a lot of cut-through traffic down all the other JPIA streets. Mitigation is stated as unnecessary but as a good-neighbor gesture, there might be more features to be implemented not listed in the mitigation measures.

See Page 6.25 which states such mitigation measure will \*NOT\* be implemented.

If the intersections become blocked DURING CONSTRUCTION, what are the PROPOSED DETOUR ROUTES? Sample of construction detour map for CPMC LRDP EIR Addendum, Page 4 here:



\*Multiple detour options available. For the purpose of this TMP, these are the recommended routes.

“May 3700 California have such a plan? Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-35])



“Page 4.2-53: “Construction-related trucks would access the project site from major arterials such as California Street and enter and exit the site primarily via Maple and Cherry Streets.” It would be better if these construction-related trucks use California directly rather than go up Parker from Geary or Euclid or Commonwealth, Jordan or Palm. Request they stick to Arguello also to minimize the CONSTRUCTION DUST carried on the trucks in front of 150 Parker School – mid-block on Parker between Euclid and Geary. Request mitigation through a hotline to call in rogue construction-related trucks when there is no major blockage of traffic in the area.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-57])

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### **CUMULATIVE CONSTRUCTION**

**Impact C-TR-1:** The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative construction-related transportation impacts. (*Less than Significant*)

Construction of the proposed project may overlap with the construction of other nearby projects, including projects at 3641 California Street, 3637–3657 Sacramento Street, and 3333 California Street. Development at 3641 California Street would be directly across from Block C of the proposed project, while the projects at 3637–3657 Sacramento Street and 3333 California Street would be approximately 0.2 and 0.25 mile east of the project site, respectively. The timing for construction of the 3641 California Street and 3637–3657 Sacramento Street developments is currently unknown; however, because construction of the proposed project would extend until 2024, it is likely that the 3641 California Street and 3637–3657 Sacramento Street developments could receive approval and start construction during that time. Construction of the 3333 California Street project is expected to commence around the same time as the proposed project and last 7 to 15 years. Therefore, it is likely that construction of the proposed project and the three reasonably foreseeable projects could run concurrently for several years. Construction impacts from nearby planned development projects would not combine with construction impacts from the proposed project.

It is anticipated that construction of the proposed project would occur over a period of approximately 40 months, concluding by 2024. Construction of the reasonably foreseeable future projects in the vicinity of the project site could temporarily increase traffic at the same time as the proposed project and on the same roads (e.g., California Street and Sacramento Street). Although the 3641 California Street and 3637–3657 Sacramento Street projects would be directly across the street or one block away from the proposed project, given the smaller scale of these projects (i.e., demolition and construction of one building), a construction-related cumulative impact would not be expected. As part of the construction permitting process, similar to the requirements for the proposed project, each development project would be required to work with various City departments to develop detailed and coordinated construction logistics and contractor parking plans to address issues related to construction vehicle routing, traffic control, transit vehicles, and accessibility plans for people walking and biking adjacent to the construction area. Overall, because construction activities associated with the proposed project and other projects would be temporary and limited in duration, and conducted in accordance with City requirements, the

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“Impact C-TR-1” discusses the 3641 California St. Project. However, just 2 blocks to the south, less than ¼-mile, is a project at 3330 Geary proposing 41 units and 41 parking spaces which is \*NOT\*



listed in the text at all. 3330 Geary lies within the “modeling extent” of 3,000 ft. The vehicle circulation pattern of 3700 California St. may have to be analyzed with this 3330 Geary Project as it will likely be built along with 3700 California’s 40-month construction period. In addition, 3700 California St. traffic volume will have to contend with the Geary Bus Rapid Transit (BRT) project that will impact JPIA streets running north-south -- Palm, Jordan, Commonwealth & Parker Avenues. I do not believe the 3700 California DEIR traffic analysis has incorporated all of these into the analysis and is incomplete without it and inadequate as to analysis.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-60])

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“Appendix G, Construction Data, “Construction Schedule and Equipment List”: With Blocks B & C having the highest total “Hauling Trips” at  $1,696 + 1,088 = 2,784$  trips for demolition alone. Excavation & Shoring adds another 1,328 hauling trips for these blocks. “Sitework” for these blocks adds another 880 trips for a total for Blocks B & C to be 4,992 trips. The chart does not show a GRAND TOTAL to reflect the LARGE VOLUME overall.

The LARGE VOLUME OF TRIPS for this rather low-density family-oriented neighborhood to absorb in terms of impact and potential contamination is a concern especially when the vehicles go by “Sensitive Receptors.”

To MITIGATE the effects of large quantity of trips, the developers of 3700 California should provide a “CONTRACTOR TRANSPORTATION PARKING PLAN” like the one used for the CPMC Hospital Project. Worker trips should be minimized by having them meet at a parking area to leave their vehicles and take passenger vans to work. There are parking passes for the parking lots and specific details of how the parking plan is to work along with forms for information on contractor’s personal vehicles that will be parked in the off-site locations. Not sure how the garages would impact the other neighborhood demand for parking but this is needed for the number of worker trips to this California St. area.

Please add this as a MITIGATION MEASURE.”

See attached “CONTRACTOR TRANSPORTATION PARKING PLAN”.

Another MITIGATION MEASURE that would assist the neighbors would be to provide a “CONSTRUCTION MANAGEMENT PLAN”.

Below is the text of the “CPMC Cathedral Hill Hospital Construction Management Plan, Updated: 09/11/2013”. Replace “Cathedral Hill” with “3700 California St. Project” to help allay neighborhood residents’ concerns:

### **1. General Operating Principles**

- a) Public Safety / Site Security
- b) Operating Hours, Noise and Vibration Controls
- c) Air Quality Management

- d) Storm Water Pollution Prevention Plan (SWPPP)
- e) Waste and Material Reuse f) Traffic and Parking Management

## **2. Phasing of Work: implementation of operating principles during specific phases**

Hospital Construction:

- a) Abatement and Demolition (Months 1 to 8)
- b) Shoring and Excavation (Months 9 to 14)
- c) Foundation and Concrete Walls (Months 15 to 30)
- d) Steel Erection and Concrete Decks (Months 18 to 34)
- e) Exterior Enclosure (Months 28 to 39)
- f) Interior Build-out and Final Site work (Months 26 to 59)

Tunnel Construction and coordination with Medical Office Building, other projects:

- a) Overview

## **3. Neighborhood Liaison / Communications with neighborhood**

### **1. General Operating Principles and Commitments:**

These principles and commitments apply to all aspects and phases of the work related to the construction of the CPMC Cathedral Hill Hospital at Van Ness Avenue. The Contractor and CPMC shall continue to meet with SFMTA, DBI, DPW, the Fire Department, Planning Department, Police Department, CalTrans, MUNI and other appropriate City agencies to determine feasible traffic and pedestrian improvement measures for the duration of the construction period, and shall maintain an overall construction management plan as described herein. This plan shall be shared with neighborhood representatives and interested neighbors.

#### ***a. Public Safety / Site Security***

- The project site will be made secure and sufficiently lit for safety and security purposes. 24 hour security will be provided.
- The area of the new hospital shall be fully fenced using a combination of temporary fencing and pedestrian and traffic barricades. The fence panels and mesh covering shall be maintained in a like-new condition at all times. Approved traffic barriers will be used as required around the site. Where sidewalks are impacted, temporary ramps and barriers will be erected in compliance with city standards to maintain pedestrian safety. Appropriate way-finding signage shall be provided. All sidewalk/on-street parking relocation or rerouting plans are subject to review and approval by DPW, SFMTA, DBI, CalTrans, and/or other agencies having jurisdiction.
- Open excavations, trenches, and the like shall be protected with fences, covers and railings to maintain safe pedestrian and vehicular traffic passage at all times.
- Any construction debris in service access ways and streets shall be cleaned up promptly, but no less frequently than on a daily basis. A once-weekly survey of an extended area, including



across the street from the project area will be made, and any trash and debris resulting from the project will be cleaned up.

- The Contractor shall implement a Site Safety and Health Plan that fulfills the requirements set forth in the California Code of Regulations (CCR) Title 8 Section 3203 Injury and Illness Prevention Plan (Cal/OSHA General Industry Standard) and CCR Title 8 Section 1509.
- The archaeological consultant shall prepare and submit to the Environmental Review Officer for review and approval archaeological monitoring, testing and reporting plans. The ERO shall determine what project activities shall be archaeologically monitored. Should evidence of cultural or historic artifacts of significance be found during project excavation, any excavation which could damage such artifacts shall be halted, and the appropriate agencies and persons shall be notified. The City of San Francisco (through its Environmental Review Officer) shall then review and if

**CPMC CATHEDRAL HILL HOSPITAL  
CONSTRUCTION MANAGEMENT PLAN  
FINAL 09/11/2013**

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necessary, recommend specific mitigation measures to be implemented. Copies of reports prepared according to any implemented mitigation measures shall be sent to the Planning Department and to the California Archeological Site Survey Office at Sonoma State University.

**b. Operating Hours, Noise and Vibration Management**

- **Working Hours:** Typical work hours will be between 7am and 7pm, Monday through Friday with some Saturday work (generally, 8am to 5pm during the demolition phase and 7am to 5pm thereafter). In the case of special conditions any work outside these hours will be handled through special permits if necessary and notice to the neighborhood if possible. Per the SF Noise Ordinance, work is allowed around the clock, but the Ordinance prohibits work exceeding 5 decibels above ambient levels between 8pm and 7am as measured at the nearest property plane.
- Powered construction equipment is required by the SF Noise Ordinance to meet a noise level standard of 80 dBA at a distance of 100 feet. Impact tools and equipment are exempt from the 80 dBA standard but are required to be equipped with mufflers that are approved by DPW or DBI.
- The Contractor shall make reasonable efforts to have the noisiest activities not commence until 8am or after. Noisy equipment will be kept as far from site boundaries as possible, and portable noise barriers may be used on an as-needed basis.
- The project will not require any pile driving. All shoring beams shall be placed in drilled soil mixed holes.
- To the extent practical, the demolition will begin near the center of the site and proceed to the edges. This will allow the remaining structures to act as noise barriers for a portion of the

demolition phase. The use of impact hammers (hoe rams) and jackhammers during demolition will generally be limited to the concrete foundations which are at or below ground level, further minimizing noise.

- The tower cranes and manhoists will be located near the center of the site, away from the edges of the site. The tower cranes will be electrically powered and not include diesel engines.
- The Contractor shall maintain regular communication with affected neighbors regarding construction activities. The Contractor shall make all reasonable efforts to provide notice of construction-related activities via phone, e-mail, and/or U.S. Mail to neighborhood representatives to apprise them of upcoming operations, street closures (if any), required after-hours disturbances, etc.

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- **Standard Noise measures:** CPMC shall minimize the impacts of construction noise where feasible by implementing the measures listed below in accordance with the San Francisco Noise Control Ordinance. These measures shall be required in each contract agreed to between CPMC and a contractor.
- Construction equipment shall be properly maintained in accordance with manufacturers' specifications and shall be fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All hand-operated impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.
- Construction equipment shall not idle for extended periods (no more than 5 minutes) of time near noise-sensitive receptors.
- Stationary equipment (compressors, generators, and cement mixers) shall be located as far from sensitive receptors as feasible. Sound attenuating devices shall be placed adjacent to individual pieces of stationary source equipment located within 100 feet of sensitive receptors during noisy operations to prevent line-of-sight to such receptors, where feasible.
- Temporary barriers (noise blankets or wood paneling) shall be placed around the construction site parcels and, to the extent feasible, they should break the line of sight from noise sensitive receptors to construction activities. If the use of heavy construction equipment is occurring on-site within 110 feet of an adjacent sensitive receptor, the temporary barrier located between source and sensitive receptor shall be no less than 10 feet in height. For all other distances greater than 110 feet from source to receptor, the temporary noise barrier shall be no less than 8 feet in height. For temporary sound blankets, the material shall be weather and abuse resistant, and shall exhibit superior hanging and tear strength with a surface weight of at least 1 pound per square foot.



- When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that would completely close the gaps, and would be dense enough to attenuate noise.
- **Noise Monitoring:** Long-term (24-hour) and short-term (15-minute) noise measurements shall be conducted at ground level and elevated locations to represent the noise exposure of noise-sensitive receptors adjacent to the construction area. The measurements shall be conducted for at least 1 week during the onset of each of the following major phases of construction: demolition, excavation, and structural steel erection. Measurements shall be conducted during both daytime and nighttime hours of construction, with observations and recordings to document combined noise sources and maximum noise levels of individual pieces of equipment. If noise levels

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from construction activities are found to exceed City standards (daytime [80 dB at a distance of 100 feet] or nighttime [5 dB over ambient]) and result in complaints that are lodged with the community liaison, additional noise mitigation measures shall be identified. These measures shall be prepared by the qualified acoustical consultant. These measures shall identify the noise level exceedance created by construction activities and identify the anticipated noise level reduction with implementation of mitigation. These measures may include, among other things, additional temporary noise barriers at either the source or the receptor; operational restrictions on construction hours or on heavy construction equipment where feasible; temporary enclosures to shield receptors from the continuous engine noise of delivery trucks during offloads (e.g., concrete pump trucks during foundation work); or lining temporary noise barriers with sound absorbing materials.

- **Vibration control and monitoring:** CPMC shall minimize the impacts of construction noise and vibration where feasible by implementing the measures listed below. These measures shall be required in each contract agreed to between CPMC and a contractor.
- Construction equipment generating the highest noise and vibration levels (vibratory rollers) shall operate at the maximum distance feasible from sensitive receptors.
- Vibratory rollers shall operate during the daytime hours only to ensure that sleep is not disrupted at sensitive receptors near the construction area.
- A community liaison shall be available to respond to vibration complaints from nearby sensitive receptors. A community liaison shall be designated. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to the nearby receptors most likely to be disturbed. The community liaison shall manage complaints

resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified acoustical consultant to ensure compliance with applicable standards. The community liaison shall contact nearby noise-sensitive receptors and shall advise them of the construction schedule.

- The preexisting condition of all buildings within a 50-foot radius and historical buildings within the immediate vicinity of proposed construction activities shall be recorded in the form of a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins and shall be used to evaluate damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) before construction. All buildings damaged shall be repaired to their preexisting conditions.

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- As part of the vibration management plan, vibration levels shall be monitored at the nearest interior location of adjacent uses, including Daniel Burnham Court, containing vibration sensitive equipment to monitor potential impacts from the project site. In the event that measured vibration levels exceed 65 VdB and disturb the operation of sensitive medical equipment, additional measures shall be implemented to the extent necessary and feasible, including restriction of construction activities, coordination with equipment operators, and/or installation of isolation equipment.
- A final noise/vibration monitoring report will be submitted to the Planning Department at completion of construction.

**c. Air Quality Management**

- The Contractor will create and implement a site-specific dust minimization and control plan, as required by the San Francisco Department of Public Health. Examples of dust control practices included are street sweeping; water spraying of paved and unpaved areas; covering soil and other material when kept in stockpiles and during truck hauling; and/or the use of portable dust barriers. Dust control activities will be increased during windy periods.
- The following mitigation measures shall be implemented during construction activities to avoid short-term significant impacts to air quality:

**BAAQMD Basic Control Measures**

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water three times daily, or apply (nontoxic) soil stabilizer on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at



construction sites.

- Sweep street daily (with water sweepers) if visible soil material is carried into adjacent public streets.

#### Additional Construction Mitigation Measures

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered twice daily.

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- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 2 minutes, to the extent feasible, or 5 minutes maximum (as required by the California airborne toxics control measures, Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations. Emission-generating equipment will be kept as far from site boundaries as possible.
- To the extent practicable the Contractor will ensure that haul trucks are fully loaded, to reduce the number of trucks entering and leaving the site.
- To the extent practicable, truck egress and ingress routes will be as far from neighboring residents as possible.
- Site construction activities shall be optimized to minimize the hours of equipment operation, and equipment size.
- To reduce risk associated with exhaust emissions of DPM by construction equipment during construction of the Cathedral Hill Campus CPMC and its construction contractor shall implement the following BAAQMD-recommended control measures during construction:
  - Where sufficient electricity is available from the PG&E power grid, electric power shall be supplied by a temporary power connection to the grid, provided by PG&E. Where sufficient

electricity to meet short-term electrical power needs for

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specialized equipment is not available from the PG&E power grid, non-diesel or diesel generators with Tier 4 engines (or equivalent) shall be used.

- At least half of each of the following equipment types shall be equipped with Level 3-verified diesel emission controls (VDECs): backhoes, concrete boom pumps, concrete trailer pumps, concrete placing booms, dozers, excavators, shoring drill rigs, soil mix drill rigs, and soldier pile rigs. If only one unit of the above equipment types is required, that unit shall have Level 3 VDECs retrofits.

**d. Storm Water Pollution Prevention Plan**

- The contract drawings will include an erosion control plan for implementation on the Project site. The rainy season is from October 15 to April 15; this is when erosion control must be in place.
- The project erosion and sediment control measures shall meet or exceed the requirements of ABAG (Association of Bay Area Governments, the governing agency) and applicable City, County, and State Requirements.
- The site shall be maintained to prevent sediment-laden run-off from entering the storm drain system during construction. The actual mitigation measures that will be implemented are dependent upon the time of year the site work is occurring. Measures that the Contractor may apply include:
  - o Covering soil stockpiles with tarps.
  - o Installing silt bags at all impacted existing drainage structures.
  - o Placing fiber rolls, and/or velocity dams on all exposed slopes (bare soil) to trap sediment on the site.
  - o Establishing entrances/exits with stabilized tracking mats.

**e. Waste and Material Re-use**

- The Contractor shall remove all surplus soil, unsuitable top soil, obstructions, waste materials and demolished materials from project site and legally dispose of them. All hazardous materials, if any, will go to an EPA approved landfill.
- The existing structures being removed are of concrete construction. The majority of the structures shall be recycled.
- A waste and material reuse plan shall be developed with the Demolition Contractor as those documents are developed. A concerted effort will be made to divert construction waste from landfills by recycling or by returning unused material for use on other projects. When feasible, demolished materials will be salvaged and



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reused or repurposed for other projects. Additional material will be recycled as allowed.

**f. Traffic and Parking Management**

- The Contractor shall prepare a Construction Transportation Management Plan (CTMP) to reduce traffic and congestion from construction workers around the job site on Geary and Van Ness and to ensure access to parking for the local community. CTMP will be submitted to the City (DPW/MTA) for review and approval.
- The project will encourage construction workers to use public transportation, bike, or walk to work if possible.
- There will also be project-wide programs to encourage car pooling for those who find it necessary to ride in a vehicle. A shuttle service shall be provided, as needed, to offsite parking areas that have been identified as satellite parking available to the project.
- The anticipated truck route for deliveries and excavation off-haul, subject to approval by the San Francisco Metropolitan Transportation Agency (SFMTA). Prior to construction, the Contractor shall meet with SFMTA to review sidewalk and parking requirements and construction material staging for each phase of the work.
- The Contractor shall provide the city with anticipated truck routes to and from site for the various stages of construction. These routes may change in order to minimize traffic impacts.
- The Contractor shall make reasonable efforts to limit large truck movements to before 3:30 PM to avoid impeding traffic flow at the PM peak period.
- Operations that result in potential queuing or staging of vehicles (e.g. concrete pumping, import/off-haul, material delivery) shall not occur on Post Street from 6:00 a.m. to 8:00 a.m. or after 5:00 p.m.
- The Contractor will utilize proper signage and traffic control for deliveries to and from site.
- All sidewalk/on-street parking relocation or rerouting plans are subject to review and approval by DPW / SFMTA. The Contractor anticipates that parking lanes and sidewalks on the four sides of the project will be required for project use for most of the duration of construction. With the review and approval of DPW/SFMTA, the parking lane on Van Ness between Post and Geary is anticipated to be used for pedestrian traffic traveling under a covered and protected walkway. On other frontages pedestrian traffic will either be rerouted to avoid the closed sidewalks or walkways provided in the parking lanes, similar to Van Ness Avenue. At different times during the construction,

**NOTE →\*Change “Van Ness between Post and Geary” to “California between Palm and Spruce” and “Sacramento between Arguello and Spruce” or the “boundaries of the 3700 California St. Construction Site”. Change other street names to be those of the 3700 California**

**St. construction project streets going forward. Change construction period timeframes to match 3700 California St. project going forward.**

**Change Community Liaison contact name/number and website URL for neighbors' information. Fix spelling errors in original document where found.**

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parking lanes and sidewalks will be needed for: staging for concrete pours, staging for erection of steel and erection of curtain-wall and glazing, staging for roofing, and installation of utilities. Sidewalks will ultimately be removed and replaced as part of the project. Additionally, the Contractor may need to use some additional portions of the parking / bus lanes as needed for safety and logistics. See also Public Safety / Site Security section.

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**2. Phasing of Work: Implementation of operating principles during specific phases (Note: Phases will overlap during transition to subsequent phase.)**

**HOSPITAL CONSTRUCTION:**

**1. Mobilization, Abatement, and Demolition (Months 1 to 8):**

**a. Property surveys, baseline noise and vibration readings** – Within 60 days of the start of abatement and demolition, inspections of the existing buildings including written reports, photographs and/or video recordings shall be completed. This documentation shall serve as record to assess any actual or perceived damage during or immediately after construction. Similarly, within 60 days of the start of any construction, Contractor shall determine the appropriate locations for vibration monitoring equipment on sensitive neighboring properties and shall install. The monitoring equipment shall include both crack monitors and vibration monitors. Once construction begins, baseline noise and vibration readings shall be taken at selected points around the project site, at representative times of day and thereafter monitored at key periods when high-vibration producing equipment is used.

During the first part of this phase, the existing buildings will be abated of any hazardous material using specific methods for this type of work and will be under the supervision of qualified personnel. Also at this time the Contractor shall make safe all utilities and begin setting up temporary facilities for operation of the project. The buildings are of concrete construction and will be demolished using a long reach excavator with a hydraulic processor. This machine uses a



large set of hydraulic jaws to crush the concrete and reduce it to rubble that can be loaded and hauled away. The rubble will kept large for quick removal from the site for recycling.

**b. Public Safety / Site Security:** Before the structural demolition starts, the area of the new hospital will be fully fenced using a combination of temporary fencing and traffic/pedestrian barricades in accordance with the approved traffic plan.

**c. Hours, Noise and Vibration:** Excavators with hydraulic processors, loaders, and trucking will be used during this phase and this is generally the noisiest portion of the project. The noise will be a mix of continuous sources such as engines and intermittent impact sounds such as concrete rubble dropping into truck beds. To the extent practical, the demolition will begin near the center of the site and proceed to the edges. This will allow the remaining structures to act as noise barriers for a portion of the demolition phase. Vibration is likely to occur during removal of the perimeter building foundation. The use of impact hammers (hoe rams) and jackhammers will generally be limited to the concrete foundations which are at or below ground level. Extended hours may be needed to offhaul material.

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**d. Air Quality:** Demolition will begin at the center of the site and progress outwards, such that the building structures along Geary and Post Streets will remain intact until the latter stages of this phase. While they remain standing, these buildings will provide some shielding from emissions to areas along these streets. Such activities shall be increased during windy periods. Stockpiling of excavated material will be performed as far from the site boundaries as possible. To the extent practicable, the Contractor will ensure that haul trucks are fully loaded to reduce the number of truck trips, and trucking ingress and egress shall be away from residential areas. In addition, truck and equipment idling will be limited to two minutes where practicable, or five minutes maximum.

**e. Storm Water:** Erosion control measures will be established during this phase.

**f. Waste:** Proper disposal / recycling of off-hauled materials shall be as described above in the general operating principals.

**g. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

This first stage of the project will generate the highest flow of truck traffic due to the amount of material removed from the site in the shortest time frame. We will be implementing the traffic plan as approved by appropriate agencies and augment our work to create the most efficient flow for the varying conditions.

**h. Nesting Bird Surveys:** It is not expected that any demolition or construction activities will occur during the nesting season (January 15 through August 15) involving removal of trees or shrubs. But if so, a contractor shall conduct a preconstruction survey for nesting birds. The surveys shall be conducted by a qualified wildlife biologist no sooner than 14 days before the start of removal of trees and shrubs. If no nests are present, tree removal and construction may commence. If active nests are located during the preconstruction bird nesting survey, the contractor shall contact Dept. of Fish and Game for guidance.

**2. Shoring and Excavation (Months 9 to 14):** Shoring of the excavation will be conventional using soldier beams and lagging with tiebacks. The soldier beam holes are drilled with a soil mixing machine creating a mixture that the beam will be pushed down into. The excavation of material will be done with excavators, trucks, and smaller equipment to move material. The excavation varies from 20ft to 60ft in depth.

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**a. Public Safety / Site Security:** same as above.

**b. Hours, Noise and Vibration:** Noise will primarily come from engines of the equipment. The shoring method will help reduce maximum noise levels since impact driven piles will not be used.

**c. Air Quality:** The Site will conduct dust control activities such as regular street cleaning and dust suppression by watering, covering or applying non-toxic soil stabilizers. Dust control activities will be increased during windy periods. To the extent practicable, equipment operation such as truck loading and stockpiling of excavated material will be performed in areas away from the site perimeter. Also, to the extent practicable the site will ensure that haul trucks are fully loaded to reduce the number of trucks entering and leaving the site, and that trucking ingress and egress will be away from residential areas. In addition, truck and equipment idling will be limited to two minutes if practicable, or five minutes maximum.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** Some small amount of debris will be generated.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to



flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project. Trucks will be driven in and out of the excavation to off-haul material using a dirt ramp. This process will continue until the ramp sections of the excavation are reached, at which point, the ramp will be removed as the equipment works its way out of the excavation site.

**3. Foundation / Concrete Walls (Months 15 to 30):** This phase consists of pumping and placing concrete spread footings and poured in place concrete walls. The concrete walls will be constructed after the start of steel erection as the two are tied together. The two tower cranes will be erected during this phase.

**a. Public Safety / Site Security:** same as above.

**b. Hours, Noise and Vibration:** Noise will primarily come from engines of the concrete trucks, pumps and placing equipment.

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**c. Air Quality:** Early in this phase the soil exposed by the excavation will be covered by concrete and base rock. The potential for dust emissions from soil will be greatly reduced, and will be minimized further by measures listed above. Usage of emission-generating equipment will be minimized to the extent practicable, and conducted as far from site boundaries as possible.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

**4. Steel Erection/Concrete Decks (Months 18 to 34):** During this phase, the Contractor will be delivering and erecting structural steel, setting metal decking, delivering and placing reinforcement steel then pouring the floor and roof decks. Tower cranes are the primary method of handling material. Concrete pumps and trucks will be used.

**a. Public Safety / Site Security:** Fencing will be maintained

**b. Hours, Noise and Vibration:** Tower cranes will be the primary means of setting steel. Most noise will still be from engines. The tower cranes and manhoists will be located near the center of the site, away from the edges of the site. The tower cranes will be electrically powered and not include diesel engines.

**c. Air Quality:** To the extent possible, emission-generating equipment will be operated away from the site perimeter (Note, though, that the concrete pumping equipment must be operated outside the building perimeter).

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream.

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**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

**5. Exterior Enclosure (Months 28 to 39):** During this phase the Contractor will be erecting the curtainwall and metal panel system. We will begin installing Mechanical, Electrical, and Plumbing (MEP) systems at this stage.

**a. Public Safety / Site Security:** same as above

**b. Hours, Noise and Vibration:** Noise will be limited to moving personnel and materials around the site and construction equipment such as screw guns and nail guns.

**c. Air Quality:** same as above.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream. Multiple boxes will be used to allow for onsite separation of recyclable materials (metals, etc...)

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable,



including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

**6. Interior Buildout and Final Sitework (Months 26 to 59):** In this phase, the Contractor will begin the interior finish work such as electrical and mechanical fixtures, sheetrock and other finishes. The Contractor will complete the connection of the building to major utilities (sewer, water, electricity) and perform all testing of systems. Also during the final phase, the Contractor will remove and replace the sidewalk. After the hardscape is installed, the landscaping will be installed. The final months of this phase will include move-in of equipment.

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**a. Public Safety / Site Security:** Fencing will be maintained for protection of the public.

**b. Hours, Noise and vibration:** The interior finish work will occur within the building shell and noise levels will be significantly reduced by the exterior skin of the building. Removal and replacement of existing sidewalk surfaces will be similar to normal street work in San Francisco involving excavators, jack hammers, backhoes, and concrete pumps and trucks.

**c. Air Quality:** Dust emissions from activities such as the installation of utilities, sidewalks and landscaping will be managed as outlined in the Dust Control Plan. To the extent practicable, usage of emission-generating equipment will be minimized and performed away from the site boundaries. Truck and equipment idling will be limited to two minutes if practicable, or five minutes maximum.

**d. Storm Water:** Erosion control measures shall be maintained as needed during this phase.

**e. Waste:** The Contractor shall use debris boxes that will be delivered and removed (daily to weekly) as required by waste stream. Multiple boxes will be used to allow for on-site separation of recyclable materials.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

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**TUNNEL CONSTRUCTION AND COORDINATION WITH MEDICAL OFFICE BUILDING,  
OTHER PROJECTS**

**Tunnel:** The tunnel connecting the new hospital and the MOB will be constructed during the shoring/excavation and foundation phases of the hospital project. A majority of the work will happen during the standard working hours for the project. The exception will be the first stage prep work as described below and the resurfacing stage upon completion of the tunnel, both of which will occur at night to reduce impacts on traffic along Van Ness.

**Tunnel Construction Phasing (Months 12 to 20)** - The new hospital and medical office building are located across from each other separated by Van Ness Avenue. A pedestrian tunnel is to be constructed between them running under Van Ness Avenue. The first stage of the tunnel construction will be to provide a steel roadcover that will bridge over the future tunnel excavation. This work consists of placing posts into drilled holes drilled in a regular pattern across the width of Van Ness Avenue. Concrete planks are then placed across the posts to provide a solid surface for the roadway. This surface work will be done outside of normal hours due to the traffic flow on Van Ness Avenue. The tunnel will then be excavated and constructed from below ground with no surface impact, starting at the Hospital site and working toward the MOB site. The final portion of the excavation and structural work will be to restore the roadway. Interior completion of the tunnel shall occur during the final months of construction of the hospital.

**Medical Office Building:** The Medical Office Building project is not anticipated to start within the first three months of the Hospital Project. When that project is ready to start, a similar Construction Management Plan will be prepared, and the construction activities of that project will be coordinated with the Hospital project to minimize overall disruption to the neighborhood.

**Other Projects:** Similarly, should other projects occur proximate to the Hospital project site (such as the proposed Van Ness Bus Rapid Transit project), the Construction Management Plan will be reviewed and modified if necessary to minimize overall disruption.

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**3. Neighborhood Liaison / Communications with neighborhood**

A website shall be maintained by the Contractor and the Construction & Community Liaison that will provide up-to-date information about project construction activities, potential traffic impacts,



contact information, etc. The website address is [www.rebuildcpmc.org](http://www.rebuildcpmc.org). To submit a written question or comment please visit <http://rebuildcpmc.org/contact/> For questions or comments related to items on the construction activity logs please reference the contact information below;

**Construction Coordination Hotline:**

415 517 3578

**Construction & Community Liaison:**

Paul Klemish  
1200 Van Ness,  
San Francisco, CA 94109  
Office - 415 415 762 7435, Mobile - 415 517 3578

In addition, a newsletter shall be prepared and distributed to affected neighbors. Community meetings to present and discuss ongoing project issues will occur no less than quarterly, with locations to be determined.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-66]*)

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“While the “Contractor Transportation Parking Plan” is an attachment here, I want it included as part of my comments of this document because I could not technically (computer-related issue) embed it within this document of comments. Thank you.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-81]*)

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“61,800 cubic yards of soil movement. Phase workers, 738 trips. Material, 30. Hauling, 6,552 trips. Total, 7320 trips. Need for construction transportation management plan, contractor parking plan, and future delivery routes.” (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-6]*)

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**RESPONSE TR-3: CONSTRUCTION**

These comments concern the construction phase of the project—specifically, impacts resulting from truck trips, detour routes, traffic patterns, transportation network changes, and vehicle queuing due to construction activity, and construction management plan requirements. The comments also raise concerns related to the effects of construction on air quality for sensitive receptors near the project site; the topic of air quality impacts due to construction activity is addressed in Response AQ-1 on p. 4-113 and Response AQ-2 on p. 4-116.

The comments request that the project provide traffic control plans during the construction phase, and that those plans should include details on lane closures; provision of traffic control officers; routing plans for construction trucks during construction; the total volume of vehicles for hauling; and provision of a hotline for construction-related issues. The comments include an

example of a construction management plan for the CPMC Van Ness Campus construction. The comments also request additional information on parking conditions during construction as well as analysis of cumulative construction impacts related to the possibility of this project overlapping with projects on Geary Boulevard.

The project's construction-related transportation impacts are presented in Impact TR-3 of the draft EIR, pp. 4.2-51–4.2-56. For the reasons explained in the draft EIR, construction activities would be conducted in compliance with City requirements and would not interfere substantially with accessibility to adjacent areas or result in hazardous conditions. Therefore, construction transportation impacts would be less than significant and no additional analysis or mitigation measures are required. In addition, many of the suggestions to control traffic during construction, such as flaggers and traffic control officers, would be required by city codes and regulations, and are expected to occur as needed during the construction phase of the project.

As described on p. 4.2-51, construction activities at the site would be subject to the San Francisco Metropolitan Transportation Agency's (SFMTA's) *San Francisco Regulations for Working in San Francisco Streets*, also known as the Blue Book. It establishes rules for working, in a manner that results in the least possible interference with people walking, bicycling, taking transit, and driving. This includes requirements for flaggers and traffic control officers who control vehicle and pedestrian traffic during construction. Should project construction activities not comply with regulations in the Blue Book, the contractor would need to apply for a special traffic permit from SFMTA, which would specify conditions for travel modes in and around the project site.

The staging of construction equipment would occur within the project site during each phase of construction. Phasing by block would allow staging within an adjacent block if other project blocks are available. Due to construction staging occurring outside of the public right-of-way, there are no planned travel lane closures or temporary parking restrictions. Therefore, construction of the project is not expected to result in a substantial reduction of roadway capacity or increase in vehicle queues on roadways surrounding the project site. This is in contrast to the construction of the CPMC Van Ness campus, which involved substantial closures of Van Ness Avenue and resulted in removal of neighborhood parking for an extended period of time. Therefore, the construction management plan that was required for the CPMC Van Ness campus and noted by the commenter is not applicable for the 3700 California Street project. If construction activities require travel lane closures (e.g., for staging vehicles or equipment during constrained construction periods or construction of the streetscape improvements), they would be subject to the Blue Book regulations noted in Section 3, *Lane Closure Requirements*, and coordinated with City agencies to minimize impacts on traffic and other modes of travel.

Page 4.2-54 includes a discussion of how construction-related activity would affect the parking supply during construction; it discusses both the effects of parking demand generated by construction workers and potential temporary decreases in on-street parking supply.



Construction workers who drive to the site would generate substantially less parking demand than the active hospital under existing conditions, and would be directed to the 460 Cherry Street garage, which would have available capacity because of the hospital closure. Alternatively, construction workers may be directed to park at an offsite location from which they would be transported by bus to the project site. Construction workers who park on the street would be subject to parking restrictions on the surrounding streets, including time limits and residential parking permit restrictions. Due to the available parking in off-street facilities, construction workers traveling to the project site by vehicle are not anticipated to lead to an increase in on-street parking demand relative to the baseline condition.

The construction phase would include some potential, temporary parking restrictions along the building's frontage; these restrictions would cause a temporary decrease in parking supply. Excavation activity for the proposed project is anticipated to exceed 30 days; therefore, as required by Public Works Code section 2.4.20, the project would be required to prepare a contractor parking plan that addresses changes in parking supply. Overall, parking shortfalls would be temporary, and would occur alongside a decrease in parking demand relative to the active hospital or future residential uses. Therefore, the temporary decrease in parking supply would not be expected to affect transit, pedestrian, or bicycle conditions.

The comment requests additional information related to truck traffic during construction, particularly potential traffic impacts on residential streets south of California Street. As noted on p. 4.2-54 of the draft EIR, construction-related trucks would use California Street to reach the primary access points, Maple and Cherry streets, to avoid blocking transit service on California Street. Trucks are generally restricted from travelling on residential streets south of California Street because of existing weight restrictions, which would remain in the future.<sup>7</sup> Specifically, San Francisco Transportation Code section 501(b) limits the operation of a vehicle with gross weight in excess of 6,000 pounds (3 tons) on Palm Avenue, Jordan Avenue, Commonwealth Avenue, and Parker Avenue. Therefore, vehicles exceeding the weight limit would be restricted from traveling on those streets into or out of the project site, similar to existing conditions.<sup>8</sup> These vehicles are expected to access the project site using roadways such as Arguello Boulevard, California Street, Masonic Avenue, and Presidio Avenue. Residents may use the 311 system to alert SFMTA if construction trucks violate the existing vehicle weight restrictions on these roadways.

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<sup>7</sup> San Francisco Municipal Transportation Agency, *San Francisco Street Restrictions*, effective December 2017, [https://www.sfmta.com/sites/default/files/pdf\\_map/2017/12/streetrestrictions.pdf](https://www.sfmta.com/sites/default/files/pdf_map/2017/12/streetrestrictions.pdf), accessed October 14, 2019.

<sup>8</sup> Exemptions to San Francisco Transportation Code section 501(b) apply for vehicles such as emergency vehicles and commercial vehicles making deliveries by direct route to and from that portion of the restricted streets; that is, trucks may still use those streets if performing work on those street segments. However, the project is not expected to result in construction activity occurring on those roadways.

The commenter requests that the draft EIR assess the combined construction impacts of the project along with another project at 3330 Geary Boulevard. The 3330 Geary Boulevard project is one-third of a mile from the project site, which is outside the 0.25-mile radius for projects considered in the cumulative construction assessment. Construction impacts are localized; therefore, the 3330 Geary Boulevard project would not generate construction activity that would conflict with activity at the 3700 California Street project site. The comment expresses concern that both projects would lead to increased truck traffic on residential streets. As discussed above, trucks are generally restricted from using Spruce Street or Parker, Commonwealth, Jordan, or Palm avenues; therefore, construction truck traffic from the 3330 Geary Boulevard project would be expected to travel primarily on Geary Boulevard, Arguello Boulevard, Masonic Avenue, and Presidio Avenue. Thus, construction vehicles associated with the 3330 Geary Boulevard project are unlikely to combine with truck traffic generated by the proposed project to create a cumulative construction impact.

The commenter also requests additional information on traffic related to excavation activity. As stated in draft EIR Chapter 2, *Project Description*, p. 2-34, the project would excavate approximately 61,800 cubic yards of soil across Blocks A, B, and C, which would be hauled off site by trucks. The total number of haul trips shown in Appendix F.7, *Construction Information*, of the draft EIR is 6,472 over the construction period. Appendix F.7 also shows the temporal distribution of haul trips, with a peak of approximately 50 daily haul trips and an average of 25 daily haul trips. As discussed in the draft EIR on p. 4.2-54, this level of hauling and excavation activity would be temporary and limited in duration, conducted in compliance with City requirements, and would not interfere with access to adjacent areas or result in potentially hazardous conditions for people walking, bicycling, riding transit or driving.

With respect to the comment for a hotline about construction activities, Improvement Measure I-TR-A states that 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 through a newsletter and/or website.

Based on the analysis presented in Impact TR-1 of the draft EIR, pp. 4.2-51–4.2-56, there would be less than significant transportation impacts due to construction activity. As discussed above, analysis of these potential impacts was complete and adequate, and no changes to the draft EIR are necessary.

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**COMMENT TR-4: OPERATIONAL IMPACTS**

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“4. What type of Commuter shuttle buses will be used, (bio-fuel or electric)? If these shuttle buses use the existing Muni Stops how will this impact the Muni bus schedules and keeping Muni on time? All too often these shuttle buses delay the Muni service.” (*Dennis Hong, Email, July 31, 2019 [I-Hong-6]*)

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“Perhaps a more detailed traffic study is needed for a residential population as opposed to the visitors who frequented the old CPMC hospital buildings. It is also deficient in analyzing the traffic impact at the Euclid and Parker intersection one block south of the site. I think the traffic will be greater than the 38% increase (See Page 4.3-46) predicted for Parker Ave.

Please provide a traffic count for the two blocks of Parker between Geary and California after the project is built. If the increase is such that it causes impacts to the 38-Geary and 1-California bus lines from vehicles blocking intersections due to people not being able to get out, further traffic mitigation would be requested.

3700 California St. DEIR states that Maple St. will have the highest increase. Maple St. feeds into Parker Avenue directly so that is why the request to see the impacts to the residents on the 2 blocks of Parker south of California. It is most important because at Parker & Euclid, a student at the One Fifty Parker Avenue School (between Euclid and Geary) was hit. In addition to the pedestrian-vehicle collision, there were still an overly burdened Parker Avenue that necessitated a traffic circle with a 4-way STOP that was ineffective with drivers using the “tap and zoom through” technique of driving. In fact, this and other driver behavior initiated more traffic calming features on Parker Avenue through the Jordan Park-Laurel Heights Traffic Calming Project with humps as well, with 2 each on the 000- & 100-blocks of Parker. With a 38% increase in traffic volume, more safety measures will be needed as much as another hump each on Parker and even “Your Speed Is” flashing speed signs. The 100-block has a “School” sign but drivers tend to keep going fast on this block as I have witnessed. In addition, the parents often jaywalk with small children to the One Fifty Parker Avenue School so the potential with 38% more traffic will increase the likelihood of more pedestrian-vehicle collisions without further safety improvements as well as having these improvements maintained from wear and tear (e.g. speed humps crumbling). If more volume of traffic is diverted down Parker Avenue, besides pedestrians being delayed further as vehicles do not allow them to cross, there could be another statistic to add to the pedestrian-vehicle conflict totals and this will not be helpful to attain the goal of “Vision Zero.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-7]*)

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“For Block B the driveway exits will be on Cherry and Maple only – 2 points of entry/exit. This will be a reduction from the 4 driveways that used to service almost as many vehicles from the old CPMC hospital use. There will be conflicts and queuing that is likely to increase and would need mitigation for pedestrian safety.

To MITIGATE the high number of vehicles that will be using only the Cherry and Maple driveways, have a driveway or alternate “out” on another street or the queuing will become worse as traffic volumes increase cumulatively to 2040. See my comments on traffic on the Maple and Cherry driveways and impacts to residents south of California under Page 4.2-48 on driveway volumes (as above) which is a huge increase from current use and already impactful on Cherry, Maple/Parker.

See Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6” for additional parking space comments.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-14])

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“Page 3-12, “Vehicular Parking, Bicycle Parking, and Loading”: The project will have 416 parking spaces that includes 392 subterranean and 24 at-grade for the 12 single-family residences. While parking may be required for the future residents of this building, the problem becomes more apparent when the vehicles are funneled in and out of fewer driveways and forcing them out onto one street more than others. The old CPMC Hospital had curb cuts on California, and although the idea is to not impact transit corridors, with a light on California and Maple and at Cherry, cars would not necessarily impact the Muni lines when the signal is red for California traffic and vehicles can leave out the California driveways. The new configuration proposed for the residential project has no curb cuts for the large Block B building on the California street side which would lessen the impact of all the vehicles going in and out of Cherry and Maple, the latter of which might impact Parker, the street that runs from Maple south of California. MITIGATION via another curb cut on California might lessen the intensification of vehicles trapped in the Cherry/California and Maple/Parker/California intersections. Traffic dispersed for the CPMC Hospital when it utilized the California St. curb cuts for vehicles to relieve Cherry and also Maple driveways as the count of the vehicles at the Block B site during hospital use was relegated to only a small drop-off area where maybe a handful of vehicles could park for short duration and an outside truck loading area on Maple.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-29])

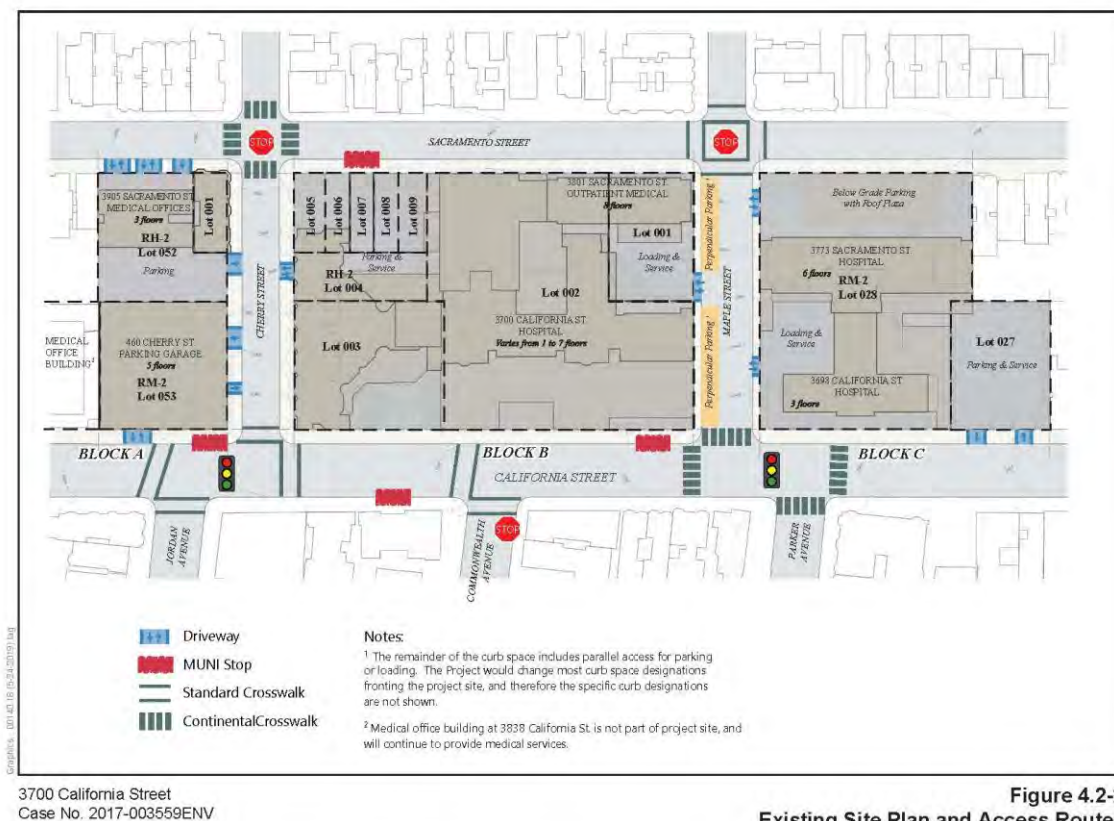
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“Page 3-17, “Vision Zero”: In 2014, the City “adopted a resolution to implement an action plan to reduce traffic fatalities to zero by 2024.” Not sure that funneling and increasing the vehicular ingress/egress at the Cherry and Maple driveways by over 200% (see later my traffic comments) is the way to lessen the chances of vehicle-pedestrian conflicts, hazards (even with the proposal of “a new crosswalk with flashing lights across California Street from west of Commonwealth



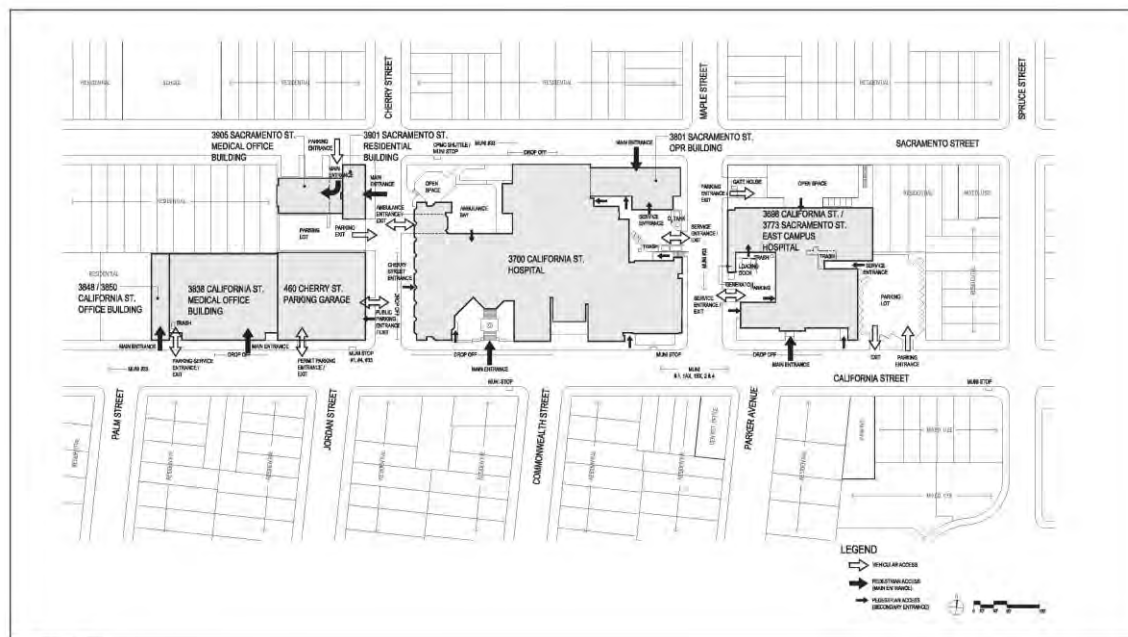
Avenue to east of Maple Street.” (Page 3-17, “San Francisco Better Streets Plan”). The need for such a flashing light suggests that there could be a potential problem near the Cherry and Maple area.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-30])

“Page 4.2-3, Figure 4.2-2,<sup>9</sup> “Existing Site Plan and Access Routes”: There were 4 existing CPMC driveways For the Block A portion. Vehicles could use Cherry, Sacramento and California for relief from all the traffic. Cherry St. had 4 driveways for Block A and Block B location hospital use visitors and employees to park their vehicles. There were 3 driveways on Maple for vehicles but 2 of the driveways were for \*only\* LOADING vehicle purposes. See below Page 4.2-37 for comments that relate to Figure 4.2-2 (hospital use driveways that were there) and Figure 4.2-5 (proposed residential driveways).



<sup>9</sup> The figure included in the original comment letter has been reproduced herein with a more legible version of the same image.

The CPMC LRDP EIR shows what exists at the old site in this Figure below:" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-31])



Source: SmithGroup 2010

California Campus—Existing Site Plan

Figure 2-42

"Block B (middle building location) which will have most of the parking spaces had no parking in the hospital building proper and parking for only a few cars to drop off patients near Sacramento and Cherry. The difference with the new proposal is that the vehicles remain in the neighborhood for a potential 24 hours a day vs. during office / hospital hour use. The VMTs would likely increase for the longer available use of vehicles for the residence units and with the 7 carshare spaces."<sup>10</sup> (Rose Hillson, Email, September 11, 2019 [I-Hillson1-32])

"Page 4.2-6: With Parker Avenue having a bike connection along Euclid from the 3700 California St. site, the safety could be compromised with the additional projected "38%" increase (See Page 4.3-46) in volume on Parker south of California.

One mitigation measure would be installation of an additional 3rd street hump for the speeders still running between the 2 existing humps on both the 000-block and the 100-block of Parker

<sup>10</sup> The figure included in the original comment letter has been reproduced herein with a more legible version of the same image.



which are unusually long (at least 1000 ft.). Drivers then accelerate between the humps (over 25 mph) as the spacing is so far apart that it is dangerous for the residents to even try to enter or leave their homes.

Some kind of slowing traffic measures like a “Your Speed Is” electronic flashing sign on poles is needed to slow traffic on Parker.

The additional conflicts at the already high-volume intersection of California/Parker to Geary across Euclid would need mitigation as today there are still many speeders over the humps (not bumps) even with 2 humps per Parker block (000-block & 100-block). Neighbors will need more SFPD traffic officers in the area and there is apparently no City funding for this so even with a pedestrian hit at Parker & Euclid, there is still no traffic officers available to help mitigate the high volume of vehicles that fail to observe the “basic speed law” or the traffic signs. Bicyclists can be challenged at Parker and Euclid with the additional 38% (See [Page 4.3-46](#)) traffic volumes on Parker.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-33])

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“[Page 4.2-16, “Bicycle Conditions”](#): The “Euclid Avenue Bicycle Lane” could be impacted from the funneling of the vehicles ingress/egress from Maple St. driveways that feed into Parker Avenue in the north and south directions. The “Euclid Avenue Bicycle Lane” crosses Parker. This may be significant because the proposed scenario changes from mostly freight LOADING on Maple St. which turns into Parker Ave. to having ALL vehicles in addition to the vehicles from Blocks B and C.

Parker Avenue has the highest volume of traffic over all the JPIA streets (Palm, Jordan, Commonwealth & Parker) and is at a disadvantage over the next street to the east, Commonwealth, in that it is about 6 feet narrower. It does not make sense to keep putting more cars down the narrowest street at such volume.

People at the ends of the blocks cannot get in and out of their driveways safely. There is not an in-depth analysis of the intersection at Euclid & Parker, a block south of the proposed project. Counting cars without having the scenario of 2 driveways on Maple St. does not give a real life result and I think it will be worse than projected. What is the volume of traffic after many vehicles in addition to only the LOADING vehicles use the Maple St. to Parker Avenue driveways? Please provide as they were not in the body of the DEIR nor in the [Appendix F](#). Data for Parker/Maple/California was lumped with other streets to get a clear picture of each street’s volumes before and after as well to make the presentation of the data very confusing, at least to me. The one data for the vehicles on Parker did not say at what cross street(s). It is unclear and not totally analyzed as to what the neighbors on Parker would expect as a huge increase over the other adjacent streets. One can design in a more equitable traffic distribution.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-34])

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“Page 4.2-30, “Intersection Operating Conditions”: “At intersections along California Street, occasional vehicular queues were observed in the eastbound direction during the AM peak hour and in the westbound direction during the PM peak hour. The queues typically cleared within one signal cycle, indicating that reoccurring vehicle queues that would block downstream intersections would be unlikely.”

While the intersections being \*blocked\* would be unlikely based on the CURRENT CPMC Hospital driveway configuration (INCLUDING the driveways being used on the California St. side to disperse vehicle volume traffic which will be ELIMINATED), this test for queuing is flawed. One must test the queueing problem based on the proposed much more significant INCREASE in traffic volume out of the Maple and Cherry driveways from the Block B and C buildings proposed.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-36])

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“In addition, on Page 4.2-21, there are observations documented of taxis, Lyfts, Ubers doing pick-ups and drop-offs and these also will add to the proposed INCREASE in traffic volume concentrated now at Maple St. more than on Cherry St.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-37])

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“Page 4.2-30: What is the total truck and service vehicle count to the proposed project? Will they be serviced by taking the larger non-weight-restricted streets such as Arguello, Masonic, Presidio, California? How many Recology truck trips to the proposed project is estimated? Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-38])

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“Page 4.2-37, “Figure 2.4-5, “Multi-Family Parking Garage and Onsite Loading Access”: As you can see, the Block B building is going to have 147 residential units the highest number of parking spaces at 223. Block A will have 67 parking spaces for 43 units. Block C will have 126 parking spaces with 83 units.

Seems like a lot of vehicles considering the mantra at City Hall that the younger folks do not drive. Elderly people will eventually not drive. What segment of the population was being targeted to build units for Block B with the number of parking spaces proposed?

See Page 2-14, Table 2-2, “Proposed Project Characteristics”:



TABLE 2-2. PROPOSED PROJECT CHARACTERISTICS

Building <sup>1</sup>	Lot Area	Floors	Roof Height	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space <sup>3</sup>
<b>Block A</b>								
A1 (SFR)	2,500	3	40	5,200	1	2	1,100	n/a
A2 (SFR)	2,500	3	40	4,800	1	2	1,100	n/a
A3 (SFR)	2,500	3	40	4,800	1	2	1,300	n/a
A4 (SFR)	2,500	3	40	4,600	1	2	1,200	n/a
A5 (MF, existing)	2,800	4	40	7,000	9	in podium	n/a <sup>2</sup>	0
A6 (SFR)	5,000	3	40	5,900	1	2	2,900	n/a
A7 (MF)	17,600	5	65	61,200	29	57	4,600	2,900
<b>Block A Total</b>	<b>35,400</b>			<b>93,500</b>	<b>43</b>	<b>67</b>	<b>12,200</b>	<b>2,900</b>
<b>Block B</b>								
B3 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B4 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B5 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B6 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B1 (SFRH)	99,400	3	40	4,900	1	215	1,400	11,500
B2 (SFRH)		3	40	5,800	1		1,300	
B7 (MF)		7	80	48,200	26		2,200	
B8 (MF)		5	66	35,900	17		2,700	
B9 (MF)		5	66	35,000	14		3,500	
B10 (MF)		7	80	44,000	16		900	
B11 (MF)		5	58	21,200	10		700	
B12 (MF)		7	80	66,000	34		3,000	
B13 (MF)		3	40	10,400	4		1,000	
B14 (MF)		3	40	11,600	4		1,000	
B15 (MF)		3	40	11,600	4		1,000	
B16 (MF)		3	40	11,600	4		1,000	
B17 (MF)		3	40	11,600	4		1,000	
B18 (MF)		3	40	10,400	4		1,000	
<b>Block B Total</b>	<b>109,400</b>			<b>346,200</b>	<b>147</b>	<b>223</b>	<b>26,100</b>	<b>11,500</b>
<b>Block C</b>								
C1 (SFR)	3,400	3	38	5,500	1	2	1,500	n/a
C2 (SFR)	3,400	3	36	5,700	1	2	1,400	n/a
C3 (SFR)	3,100	3	42	5,700	1	2	1,100	n/a
C4 (MF)	59,100	5	58	50,400	22	120	4,000	19,000
C5 (MF)		7	80	59,200	27		5,700	
C6 (MF)		3	36	18,800	24		900	
C7 (Amenity/MF)		3	50	28,700	4		n/a	
C8 (MF)		3	38	4,200	3			
<b>Block C Total</b>	<b>69,000</b>			<b>178,200</b>	<b>83</b>	<b>126</b>	<b>14,500</b>	<b>19,000</b>
<b>Proposed Project Total</b>	<b>213,800</b>			<b>618,200</b>	<b>273</b>	<b>416</b>	<b>52,800</b>	<b>33,400</b>

Notes: Numbers may not sum due to rounding.

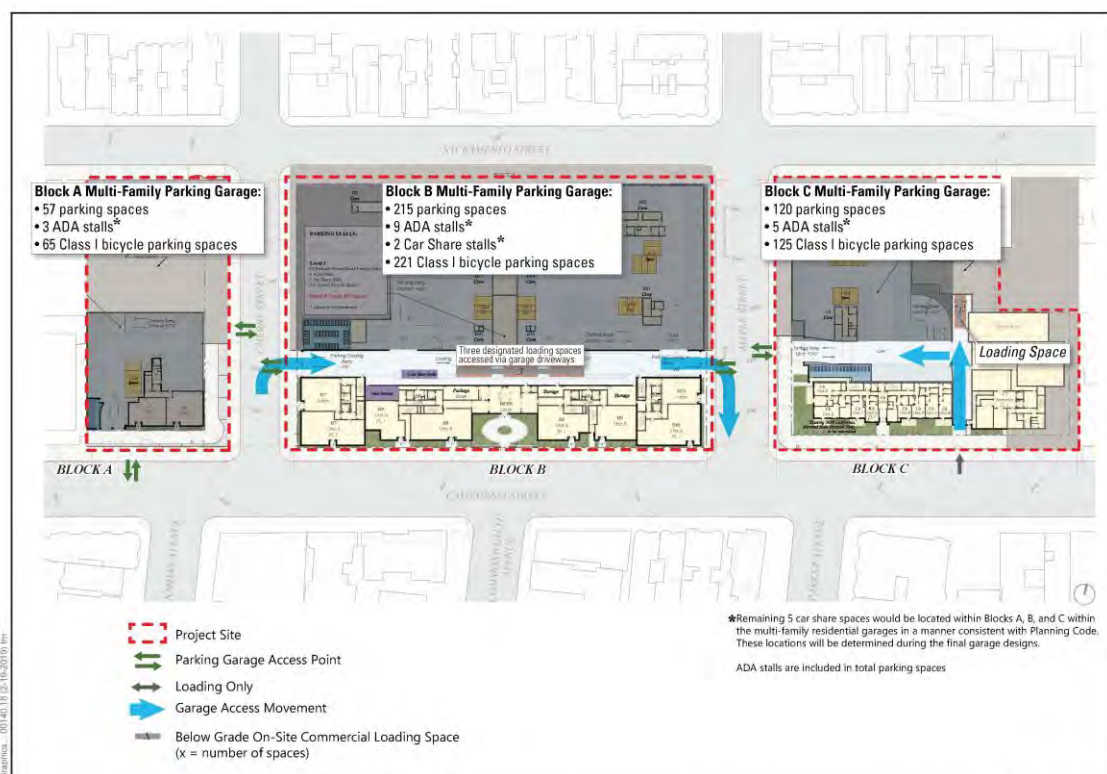
SFR = single family residence, MF = multi-family, SFRH = single-family rowhouse (on podium).

<sup>1</sup> Refer to Figure 2-5, p. 2-13, for building locations.

<sup>2</sup> Building A5 is an existing legal nonconforming use.

<sup>3</sup> In addition to the common spaces included in this table, some buildings may have common roof deck areas.

The former CPMC Hospital building here did not have visitor or regular passenger vehicle parking even close to 223 spaces. In fact, here. With the increased use of vehicles at this site compared to the prior use, the Cherry and Maple St. driveway cuts are not enough as they will force all the vehicles to go out mostly Maple St. and downstream to Parker Avenue south of California. Compared to when the CPMC Hospital was there, the number of vehicles will be huge when taken in isolation from the project as a whole and even as a whole there appears to be a good probability that many vehicles will emanate from the parking spaces (416) allowed for this project. See prior comment on [Page 4.2-3, Figure 4.2-2<sup>11</sup>](#) to show how the lack of driveways in the proposed project might cause queuing downstream (south).



3700 California Street  
Case No. 2017-003559ENV

**Figure 4.2-5**  
**Multi-Family Parking Garage and Onsite Loading Access**

“ (Rose Hillson, Email, September 11, 2019 [I-Hillson1-40])

<sup>11</sup> The figure included in the original comment letter has been reproduced herein with a more legible version of the same image.



“The prior hospital Block B did not have as many parking spaces for vehicles that will be emanating from it when the residential project is built there. Having all the vehicles come out of the 2 driveways – 1 at Cherry St. and 1 at Maple St. and so close to California intersection will cause queuing, if not on the street, within the path of the 2 driveway entrances that also \*share\* the path with LOADING vehicles.

One mitigation measure may be to have the driveways farther up north rather than so close to the heavier traffic street or people will get stuck in a queue.

It is difficult to tell from Page 2-10 of the number of parking spaces that used to service the hospital site at Block A, B and C separately. The data is lumped so that 333 parking spaces are at 3905 Sacramento + 460 Cherry. In total with another building on Block B & C, there appear to be 439 parking spaces.

The old hospital had few parking spaces where the proposed Block B residential parking will be located. Block B had 2 exterior LOADING spaces for hospital use.

Page 2-27 states that the new multi-residential and single-family buildings proposed for Block B will have 215 parking spaces multi-residential lot and 24 spaces for the single-family residences. This is a total of 239 parking spaces (assume all are going to be used by vehicles).

With 439 parking spaces at the old hospital use, there were 4 driveways. The scenario proposed for 239 parking spaces at the new use there are only 2 driveways but they share the loading vehicle use so this might get traffic backed up with people not being able to have an “out” south or north.

Mitigation may be to have special directional signs for IN and OUT instead of all turning onto California such that AM traffic goes north out via Sacramento and PM traffic goes south to lessen the impact of 38% increase (See Page 4.3-46) downstream on Parker Avenue near California St.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-41]*)

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“While parking is not discussed in the EIR per se as being impactful, the parking occupancy rate will create an impact to the surrounding neighborhood or cause more traffic volumes from carshares. More volumes of any vehicles increases the chances of pedestrian-vehicle conflict and the prior impact measurements of LOS (though no longer used), showed all 14 intersections around CPMC hospital at a LOS of D back in 2010 in the CPMC LRDP EIR, Page 4.5-16:

- **California Campus**—All 14 study intersections currently operate at LOS D or better during the p.m. peak hour. Table 4.5-37, “Levels of Service at California Campus Study Intersections—P.M. Peak-Hour Conditions” (page 4.5-180), presents the intersection LOS operating conditions during the p.m. peak hour for the California Campus study intersections.

Pedestrians may soon be affected at a significant level as the carshares are more numerous today and with the potential 24-hour use of vehicles afforded to the residents of 3700 California St. project, there may be more pedestrian delays. With traffic and pedestrian delays, the Muni service may also be impacted with other projects nearby coming online (3333 California, 3300 Geary, prior “Lucky Penny” site at Geary-Masonic). If people without vehicles are not taking Muni to work more than a mile away, they are probably using carshare – drivers often also take up residential parking waiting for their next customers. The impact of rideshares to the JPIA area and adjacent Laurel Village Shopping area and the Geary Blvd. merchants are not shown in the 3700 California St. DEIR and needs further analysis as it is inadequate. Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-42])

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“On Page 4.5-50 of the CPMC LRDP EIR, the parking occupancy rate for the streets south of California and especially between Geary and California – the blocks of JPIA – are already high without 44 public parking spaces being deleted from the proposed project and having the number of parking spaces within the project at a 1.5 per unit level. There is no guarantee that the people with the parking spaces inside the residential project would necessarily park their vehicle in their spots. As the parking spaces can be rented out, some of the vehicles may be out on the street to further exacerbate the already high occupancy of public on-street parking near the California St. merchants and impact them. Most people buying groceries for families do not take Muni. While one market on California does delivery, not everyone uses it. Even so, that adds more VMTs to the area as a service to residents in the area.

Here is the text:



## 4.5 Transportation and Circulation

July 21, 2010

these, about 1,577 are 2-hour and 3-hour RPP spaces, about 184 are metered spaces (15-minute, 1-hour, and 2-hour spaces), 121 are unrestricted spaces, and the remainder comprise commercial-vehicle spaces and passenger loading zones. During the 1 p.m. to 8 p.m. survey period, on-street parking occupancy was observed to range between 65 and 86 percent. The blocks closest to California Street and Geary Street had the highest observed occupancy throughout the day, with average occupancy 75 percent or greater throughout the survey period.

Most blocks immediately adjacent to the California Campus had a parking occupancy of at least 70 percent during the 1 to 8 p.m. survey period, and several blocks had an occupancy greater than 85 percent during the peak 1 p.m. to 3 p.m. period.

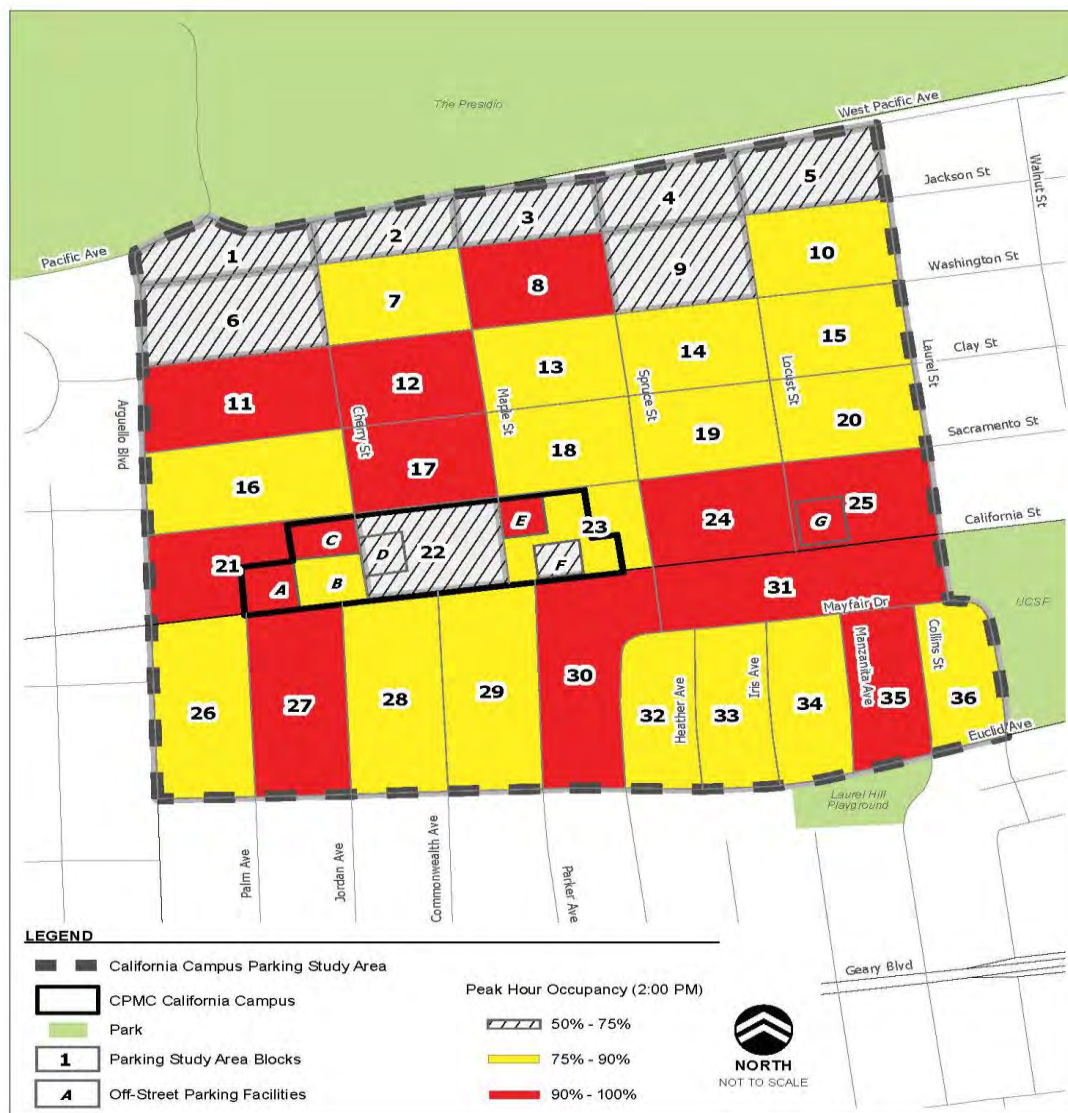
There are eight off-street parking facilities (five garages and three surface lots) in the California Campus study area providing both permit and public parking spaces, and containing a total of 698 parking spaces. Six of the eight facilities are managed by CPMC. Of the 698 off-street spaces, 31 are dedicated to CPMC employees and physicians, and the remainders are available to the general public, including CPMC patients and visitors. CPMC also leases 700 parking spaces at the Geary Mall garage located on Geary Street at 17th Avenue, which could be accessed via the CPMC shuttle system.

Parking occupancy at the off-street facilities averages about 83 percent occupied between 1 and 5 p.m., with a peak in the midday hours between 1 and 3 p.m. Parking occupancy between 5 and 8 p.m. drops to about 40 percent.

If the 3700 California St. DEIR uses the prior CPMC transportation or traffic and parking conditions as a net negative impact overall without incorporating the potential trips that the 44 less on-street parking spaces afforded. This will impact residents as one straight calculation below assumes use every 2 hours in the RPP area.

With more vehicles (within an 8-hour day with a 2-hour parking maximum in the RPP area), this could be 4x44 vehicles or 176 vehicles that can no longer park. Pedestrians may have to stop for these circling the area or because they cause queuing of vehicles at the existing Cherry St. garages or they cannot clear the sidewalks at the only 2 driveways on Maple. Some vehicles double-park on the 000-block of Parker when there is 90-degree parking on the opposite side and cannot pass safely for cars trying to back out of the perpendicular parking or cause pedestrians going to their cars to get hit. There are also garage entrances close to the ends of the blocks on the residential streets so when the 176 vehicles who are circling for parking decide to double-park near the ends of the streets, the hazard of pedestrian-vehicle conflict increases.

Appendix A, Page 57: This shows the already high capacity parking on the streets of the JPIA area, some areas being 90-100% occupied in the peak hour at 2PM:



Hash area = 50-75% (Occupancy Per Hour)

Yellow area = 75-90%

Red area = 90-100%

From the prior CPMC EIR stating the high occupancy rate of a mostly business hour use from the hospital use and the reduction in on-street parking spaces around the area for an all residential use with the number of trips predicted to emanate from the project at completion, the streets south of California will be impacted significantly.

Vehicles will just stop in the middle of the road, double-park or block sidewalks, leading to increased pedestrian-vehicle conflict. I see this behavior already on my block and the project has not even started yet. Parking is like gold for this area. Illegally parked vehicles block the line of sight for pedestrians to cause hazards. So it is not just about parking spaces being reduced but the



unintended consequences of not having an amount that would be sufficient for the new changes for the number of units proposed.

One mitigation measure could be to put back the perpendicular or 45-degree parking on Sacramento St. from the Block A building location to the Block C building location as that is a flat street. While perpendicular parking could be reinstated on Maple, In the CPMC “Preliminary Project Assessment” (PPA), 2017-003559PPA, the SDAT recommended widening Maple St. sidewalk so that with that change, perpendicular parking would no longer be feasible on Maple St. If not all of the spaces on Sacramento converting to diagonal parking, perhaps some.

To add to the issue with parking spaces being removed, it is not only the reduction of 44 parking spaces just at the proposed project site location but also the more recent reductions to parking along the south side of California for a bus bulb-out and other “Better Streets” modifications that are \*NOT\* mentioned at in the 3700 California St. DEIR. This part has not been analyzed adequately nor on a cumulative basis.

Would request to include a chart to show the number of parking spaces that have been removed from the south side of California St. between Palm and Spruce Avenues since the CPMC LRDP EIR. As the conditions were for CPMC, and as stated earlier, the southern streets from the proposed project site already had a higher usage capacity for parking even without the new “Better Streets” changes on the south side of California. This may further impact pedestrian walkability.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-44])

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“Page 4.2-44, Table 4.2-5 “Person and Vehicle Trip Generation by Mode”:

This Table shows total during AM Peak Hour – which is only a few hours of a day – to be 205 vehicles out of the 1,448 person trips in vehicles generated. The PM Peak Hour shows 250 vehicles.

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Environmental Setting and Impacts  
Transportation and Circulation**TABLE 4.2-5. PERSON AND VEHICLE TRIP GENERATION BY MODE**

Trip Mode	Daily Trips			AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out	Total	In	Out
Person Trips in Vehicles	1,448	724	724	205	41	164	250	166	84
Other Trips	272	136	136	39	8	31	47	31	16
Transit Trips	732	366	366	104	21	83	126	84	42
Walk Trips	108	54	54	15	3	12	18	12	6
<b>Total Person Trips</b>	<b>2,560</b>	<b>1,280</b>	<b>1,280</b>	<b>363</b>	<b>73</b>	<b>290</b>	<b>442</b>	<b>294</b>	<b>148</b>
Vehicle Trips	1,389	694	694	198	40	158	240	160	80

Source: San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, 2002; Fehr & Peers, 2018.

Note: Trips by mode may not sum to total person trips because of rounding.

How many vehicles would get through the light at California St. each cycle with the 1,448 vehicle trips generated? How long is the California St. cycle? Where is this analysis before concluding based only on EXISTING queuing of an environment that is not going to be in the PROPOSED configuration with 44 fewer on-street parking spaces which could service up to 176 vehicles in an 8-hour timeframe within a 2-hour RPP zone?

Is there modeling of the traffic flow for the PROPOSED configuration and impacts to the downstream streets of JPIA? Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-45])

“With a 250% and 214% increase for these 2 driveways, it is going to be significant for the residents south of California on to get some if not most of this traffic causing safety on both these streets for pedestrians and even bicyclists using the Euclid Bike Lane that crosses the JPIA blocks. After decades on Parker, I have seen how traffic is diverted down Parker over other streets in JPIA. Without further mitigation of perhaps an additional hump on both 000-Parker and 100-Parker blocks, the traffic will just be sitting and while there will be fewer VMTs this way with nobody moving, the NOISE & AIR QUALITY on these 2 blocks will increase to affect small children and the elderly on the blocks. While masks can be worn, perhaps as a MITIGATION measure, more greenery could be provided on these blocks to offset the loss of GHGs to a street that will be the most impacted in terms of vehicle VOLUME.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-47])



“Again, Parker Avenue already had a small child get hit by a vehicle because there is a lot of parents and children going to and from the One Fifty Parker Avenue School located south of the project site about mid-block on Parker between Euclid and Geary, less than 2 blocks away. More analysis for this area of Maple St. to Parker Avenue and mitigation needs to be done so that most of the vehicles from the Block B and Block C buildings are not driven as a cut-through for the neighborhood down Parker Avenue where the school is located and where my neighbors with children and the elderly live. People speed down Parker Avenue even with the humps as they are too far apart. Mitigation may be to put one more hump in between as the block is 1,000 feet long on each. 2 driveways on Maple St. may be insufficient especially with shared LOADING vehicles.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-48])

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“Vehicles will be funneled to the Cherry and Maple/Parker area with Maple taking the LARGEST INCREASE of vehicles compared to existing. The residents of Parker pitched in to pay for the speed humps. With the increase of vehicle volume, there will be a more frequent increase in the NOISE and VIBRATIONS over the humps. Another mitigation would be to open up a driveway to let the vehicles out of Building B and C north or south rather than dump all onto Cherry St. and Maple St.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-49])

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With a **250% and 214% increase in driveway traffic on Maple**, the residents on Parker may likely get much of this traffic with California having queues from the traffic lane that will squeeze into one lane after the bus and “Better Streets” reconfiguration east of Parker and Maple. There will be queueing on California after these cars cannot go anywhere fast. This will cause cut-through traffic in the area.

See also under Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6”<sup>12</sup> for impact of potentially 176 more vehicles that cannot park due to a 44 parking space reduction at the project site.

Page 4.2-48, Table 4.2-8, “Proposed Project Driveway Volumes”: See earlier comments above. These “Existing ‘Peak Hour’ Traffic Volumes” are from the Appendix on Page 15, Figure E-1:

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<sup>12</sup> The figures included in the original comment letter have been reproduced herein with more legible versions of the same image.

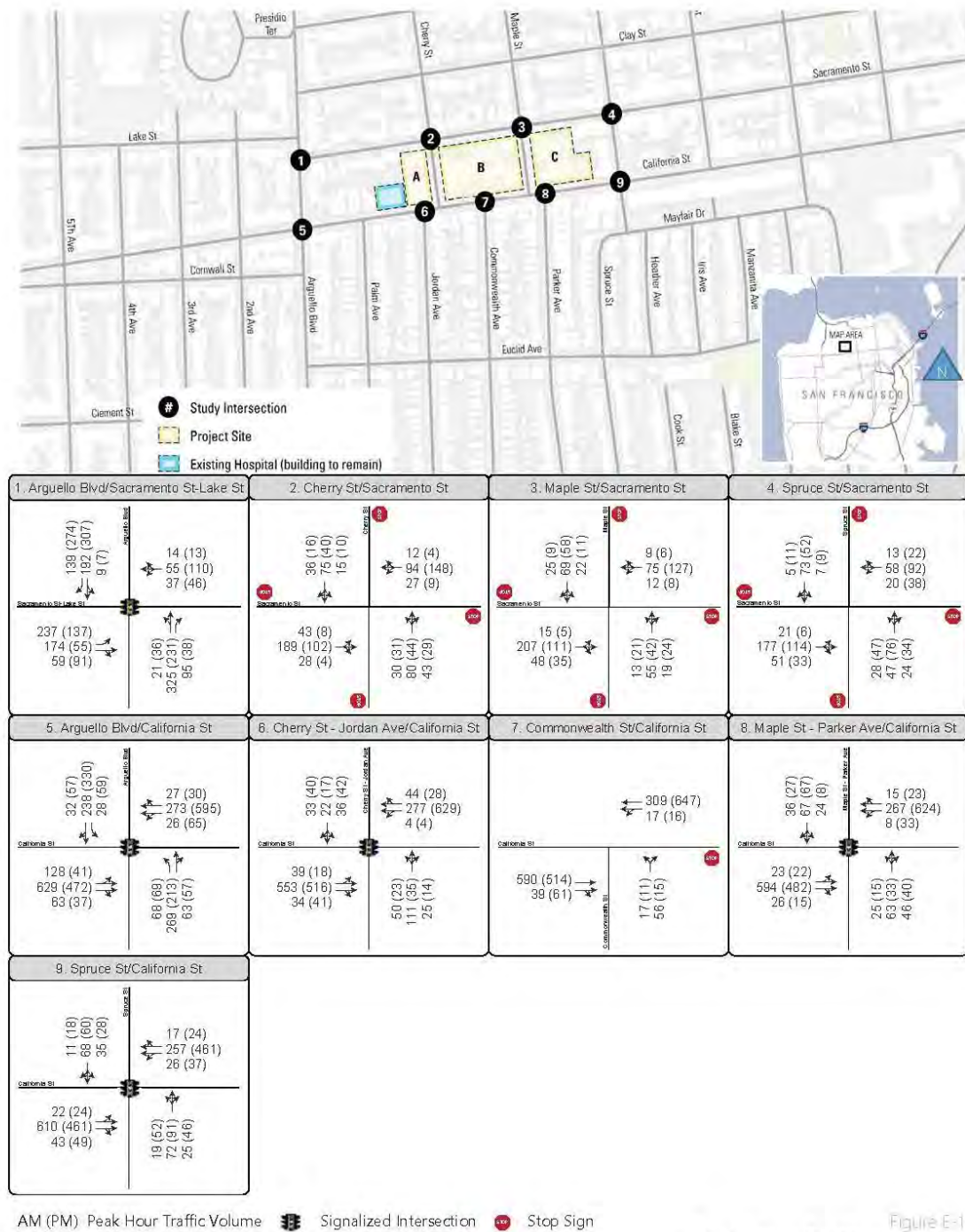


Figure E-1  
Peak Hour Traffic Volumes  
Existing Conditions

The peak-hour counts for “Existing Plus Project” are in the Appendix in Figure E-2 below:



Figure E-2  
 Peak Hour Traffic Volumes  
 Existing Plus Project



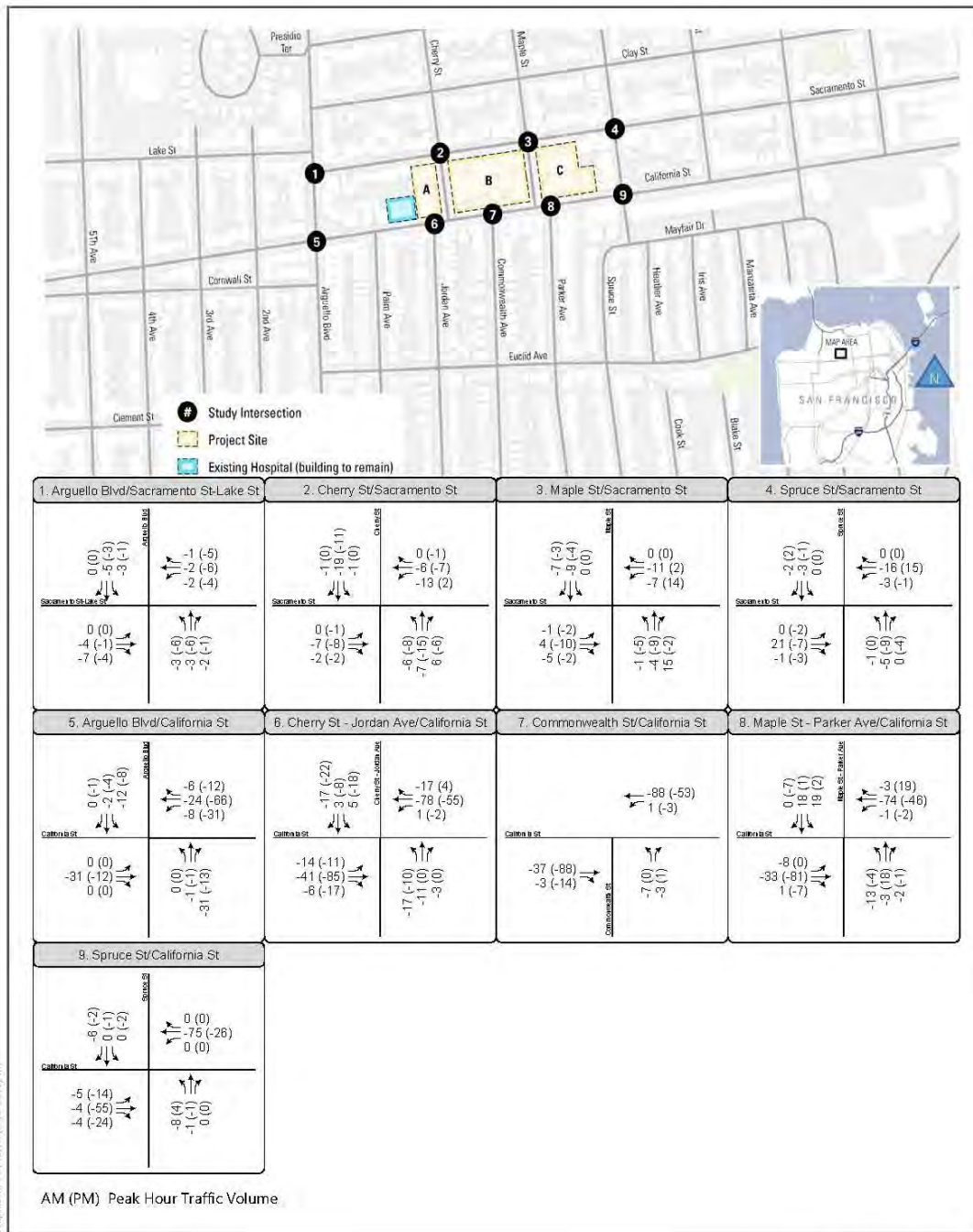
If one looks at the Maple-Parker-California traffic volumes, there is not much improvement from “Existing” intense hospital use which is being converted to residential use, a supposedly less traffic-inducing use.

The hospital use had 67(67) going to 85(68) which is a total of 134 vs. 153, a **~14% increase** (19 vehicles increase) of a less intense residential use. Also, 63(33) is going to 60(51) which is a total of 96 vs. 111, a **~16% increase** (15 vehicles increase). This is an increase only during the peak hour and what is not shown are the total counts daily on each street separately. Please provide the new data for each separate street block south of California 000-blocks of Palm, Jordan, Commonwealth & Parker; and 100-blocks of Palm, Jordan, Commonwealth & Parker *during a time when the full University of San Francisco student body is in active session* because they park on the JPIA streets from my observations over the decades. This is also not taken into account in the DEIR.

Page 4.2-49, Figure 4.2-8, “Peak Hour Traffic Volumes, Net Change in Project Trips” (aka “Appendix F, Page 48”): This below Figure 4.2-8 shows like there is very little traffic volume but one must look at Figure E-2 above found in the Appendix to see that there will be a lot of traffic at the intersections and turning south onto JPIA streets. Use of “trip credits” from the old CPMC Project as if that still existed which has been vacant for a while now rather than exact numbers for the PROPOSED scenario once the residential project is built is like using a bad driving scenario to justify the number of vehicles on-site without, I believe, enough driveways for the vehicles to eek out to other areas north and south where there are NO DRIVEWAYS. How does one account for the psychology or the verified potential employment locations or habits of the NEW RESIDENTS to determine which direction they will drive to conclude that the impacts to the neighborhood streets downstream (south of the site) is NI or LTS? Please explain.

This Figure 4.2-8 shows “Peak Hour” Traffic Volumes as “Net Change” for the counts for Maple St/Parker Ave – California St. These are counts after the hospital has moved out and still there are 322 vehicles at this location.

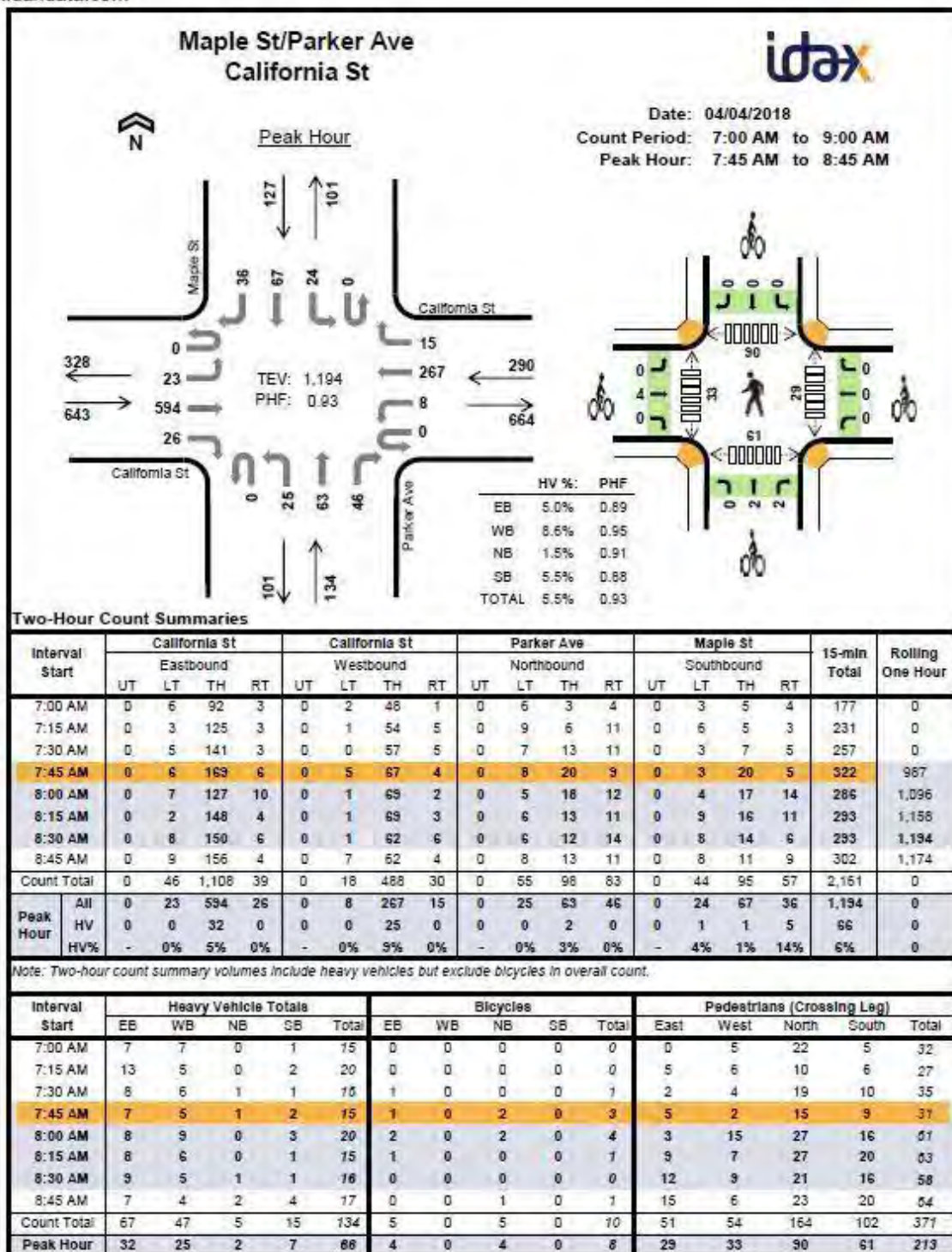
How many vehicles are expected down each of the streets south of California without “netting out”? Please provide.



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**Figure 4.2-8**  
**Peak Hour Traffic Volumes**  
**Net Change in Project Trips**

www.idaxdata.com





How many **vehicles TOTAL** during the hours of 7AM to 7PM daily for each of the above streets?" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-50])

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"The 3700 California DEIR also neglects to count the number of carshare vehicles that will be frequenting the site and the nearby residences and businesses. The data was not in the old CPMC EIR because the carsharing transportation mode was not fully matured as it is today. Here is an anecdotal report from The Chronicle on carshares impact in the City:

Uber, Lyft account for two-thirds of traffic increase in SF over six years, study shows Rachel Swan May 8, 2019 Updated: May 8, 2019 7:19 p.m.

Uber and Lyft accounted for two-thirds of a 62% rise <emphasis added> in congestion in San Francisco over six years, according to a report published on the day of a coordinated protest by drivers.

The figures "are eye-popping," said Joe Castiglione, deputy director for technology, data and analysis at the San Francisco County Transportation Authority. He co-authored the study with researchers from the University of Kentucky.

It shows that hours of vehicle delays increased by 62% throughout the city from 2010 to 2016, the period when ride-hailing services began proliferating on the streets. Traffic models that exclude Uber and Lyft cars show that hours of delay would have gone up 22% in their absence.

Extrapolating from those numbers, the study's authors concluded that on-demand ride services — or transportation network companies, as they're known in academic patois — are clogging roads and siphoning people from mass transit, going against the companies' stated mission to wean people off of private cars. The authors laid out their findings in the scholarly journal *Science Advances*, providing fodder for policymakers seeking to regulate these companies.

Among the measures being considered in San Francisco are a proposal to tax Uber's and Lyft's net fares, as well as congestion pricing — a road-toll intervention that aims to unclog busy streets.

A similar study that the Transportation Authority published last year looked more broadly at swelling traffic from 2010 to 2016, and found that transportation network companies comprised about half of it, with the other half stemming from job and population growth. Wednesday's study narrowly measured the correlation between ride-hailing services and increased congestion.

Uber and Lyft contested the data Transportation Authority officials released in October, saying that it didn't account for the growth in tourism, freight or delivery services that increased with the economic recovery. Both companies support congestion pricing, and both say their on-demand services help bolster mass transit, claims that the researchers dispute.

"While studies disagree on causes for congestion, almost everyone agrees on the solution," an Uber spokesperson said in a statement Wednesday. "We need tools that help ensure sustainable

travel modes like public transportation are prioritized over single occupant vehicles. That's one reason we believe in comprehensive congestion pricing, which would provide millions to invest in cities' public transportation systems."

To Castiglione, though, the report's findings "are pretty clear."

"Many factors contribute to congestion — including population growth," he said. "But the addition of TNCs (such as Uber and Lyft) is greater than all of them.

He cautioned that the story isn't quite the same across the city. Although transportation network companies had a deep impact downtown and in North Beach, they barely made a blip in peripheral neighborhoods like the Outer Sunset.

While for-hire vehicles abound in urban areas throughout the globe, they're especially popular in Uber's birthplace, next to Silicon Valley. And maybe that's not a bad thing, said Randy Rentschler, legislative director of the Metropolitan Transportation Commission.

"If Uber and Lyft are creating more traffic, maybe it's because people want to be in the city now," Rentschler said. "Maybe it's a sign of economic vitality. One of the things that the Bay Area has a hard time struggling with is that traffic is not universally bad."

Yet the problem with transportation network companies isn't just volume. It's also the drivers' behavior, said Gregory Erhardt, an assistant professor of civil engineering at the University of Kentucky and co-author of the study.

"When you look at pickup and drop-off behavior, the drivers stop in turn lanes, travel lanes or bicycle lanes," Erhardt said. Each time that happens in a major arterial, it blocks the flow of traffic for 140 seconds — more than two minutes of dead time, the researchers found.

Several other features of for-hire cars add to traffic misery in San Francisco. Most Uber and Lyft drivers — some 70% — come in from other cities, including a substantial labor force from as far away as the Central Valley. **They spend 20 to 30% of the day trawling for passengers** *<emphasis added>*, mostly in downtown areas where public transit options are plentiful.

Nationally, buses and rail systems saw a precipitous decline over the past four years, because they're competing for the same customers as the transportation network companies, Erhardt said. BART is fighting to keep night and weekend riders who have peeled off to Uber and Lyft, and Muni, while growing, is scrambling to improve service.

There is an optimal way to fit these companies into a complex transportation puzzle, if people use them to travel from a transit hub to a specific Point B that's not served by mass transit. But a growing body of evidence suggests that's not what's happening.

**"Between 43 and 61% of TNC trips substitute for transit, walk or bike travel or would not have been made at all, adding traffic to the road that otherwise would not have been there," the report said.** *<emphasis added>*

Erhardt said it may be hard for other researchers to replicate those findings because Uber and Lyft keep such a tight lid on their trip data. Officials at the California Public Utilities Commission — the public agency that regulates transportation companies — are also reluctant to turn over numbers.

When Erhardt approached Uber for records two years ago, the company only offered to provide data on trips from rail stations, which show how Uber supports mass transit.

“That only tells the positive part of the story,” Castiglione said. He and Erhardt ultimately teamed up with computer scientists at Northeastern University to mine the data themselves.

The report came as Uber approaches its initial public offering of shares, scheduled for Friday. In San Francisco, Uber and Lyft drivers blocked off Market Street in protest of what they call unfair working conditions. It’s unclear how that action affected traffic.

Rachel Swan is a San Francisco Chronicle staff writer. Email: [rswan@sfchronicle.com](mailto:rswan@sfchronicle.com) Twitter: @rachelswan

<https://www.sfchronicle.com/bayarea/article/Uber-Lyft-account-for-of-traffic-increase-in-13830608.php>

Suggest MITIGATION that 3700 California proposed project reduce the 7 carshares to 2 because the residents will already have vehicles based on the count being provided in the subterranean garages. Some folks commenting on the known-future-project called “3333 California” project that more people would generate more VMTs with carshare availability because they would not want to drive themselves even if they had vehicles. More VMTs driven can lead to more pedestrian-vehicle conflicts.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-51])

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“Page 4.2-50, “Freight Delivery and Service Vehicle Demand”: Why is the prior hospital use employee and patient surveys being used for the future residential project buildings in Blocks A, B, and C? Would not the new residential project residents be different from the hospital use survey respondents to determine freight delivery and service vehicle demand? With residential service delivery, would there not also be more hours of use in the building as opposed to medical offices that close at night? It would seem like the figure of 19 daily truck trips is low considering that a 12-unit apartment building in San Francisco gets 2 garbage / recycling pickups PER WEEK but if a larger garbage truck is used, there will be more impactful noise and vibrations if the JPIA streets with humps are used. Also, more recently, Recology has started to use 3 trucks – 1 each for the black, blue and green bins. I still think 19 DAILY TRUCK TRIPS is low. What makes it so low? Are other service vehicles for dry cleaning pickups, water deliveries, plant deliveries, mail-order package deliveries, food deliveries, janitorial and maintenance worker vehicle trips included? Would there need to be an upward revision to the truck number?

See also Page 4.2-30.



“Table 12” from the Appendix shows the 19 truck trips (This is the same table as Table 4.2-9, “Freight Delivery and Service Vehicle Loading Demand” on Page 4.2-50 of the DEIR).

## Freight Delivery and Service Vehicle Demand

Freight delivery and service vehicle loading demand was estimated in terms of daily total trips and number of required loading spaces during peak hour truck trip generation (which typically occurs between 10:00 A.M. and 1:00 P.M., unrelated to PM peak hour for other transportation analyses).

Freight delivery and service vehicle demand was not analyzed in the 2010 CPMC EIR; thus, the methodology from the Guidelines to estimate the level of daily and peak hour truck trip generation was used to estimate them for the existing condition for comparison purposes. As noted above, travel behavior has not changed substantially since the 2010 CPMC EIR. Therefore, the information presented in the Guidelines remains valid for the purposes of this study.

The freight delivery and service vehicle loading demand is presented in **Table 12**. The Proposed Project would generate approximately 55 fewer truck trips than existing conditions each day and would require three fewer loading spaces to accommodate peak hour truck loading demand.

**Table 12: Freight Delivery and Service Vehicle Loading Demand**

Land Use	Daily Truck Trips	Peak Hour Loading Demand (Spaces) <sup>1</sup>
<i>Proposed Project<sup>2</sup></i>	19	1
<i>CPMC Trip Credit</i>	-73	-4
<b>Net Loading Demand</b>	<b>-54</b>	<b>-3</b>

Notes:

1. Peak hour of truck trip generation generally occurs between 10:00 A.M. and 1:00 P.M. and is unrelated to P.M. peak hour used in other transportation analyses.
2. Includes 476,088 gross square feet of residential space per June 1, 2018 project application.

Source: *Transportation Impact Analysis Guidelines for Environmental Review*, 2002, SF Planning Department; Fehr & Peers, 2018.

Analysis of new truck traffic south of California along Maple St. to Parker Avenue is not thoroughly analyzed. Is the truck traffic count for all of Maple St. going to Parker only or that also going along California?

I am unclear about only 19 trucks predicted for 3700 California at full buildout. Is this one-way so the figure is 38 truck trips? What kind of trucks are included in this count? Only construction-related trucks or trucks that will eventually service 3700 California residents?

What is the truck trip count at south of California from Maple/Parker?" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-52])

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"Please provide specifically the total number of vehicles that are expected to use the new \*shared\* driveway out of Maple St. EAST and separately out of Maple St. WEST that would be going down Parker Avenue south of the site and have the Euclid/Parker intersection 1 block away analyzed. Please.

The current setup of the old CPMC Maple St. driveway was for external LOADING trucks only with no passenger vehicles except for the 90-degree parking spots on the Maple St. hill.

The proposed driveway setup for Block B will combine all passenger vehicles and loading trucks rather than how the vehicles function today with a "loading dock only" driveway to avoid conflicts out on the street from the large trucks turning and / or with waiting for the vehicle queue to die down.

Mitigation of this one driveway allowing many vehicles from Block B to ingress and egress from it could be made by a path north to the Sacramento St. side. Another mitigation of future blockage of traffic due to queueing at the Maple-Parker-California intersection is to have the driveway higher up the street rather than so close to California street to allow for the linear street footage to stage vehicles travelling south onto and downstream (south) of California St. Another mitigation of the potential snarling up of traffic due to both Maple St. driveways facing opposite each other is to have the driveways separated much more than is shown – a larger stagger – so that vehicles are not going to be waiting for the vehicle across from them to leave/enter as that would add to time and potential further queuing or blocking of the sidewalks for pedestrians near the driveways. Yet another mitigation measure may be to implement "Right Turn Only" or "Left Turn Only" from the driveways so traffic is not all funneled south down Maple-Parker.

While there was a short queue seen which cleared after a signal cycle, there could be problems with so much traffic out of the Maple Street garage entries. Cherry will also have a fairly high traffic due to the 3838 California St. Garage that is to remain so perhaps the Cherry St. driveway should be reconfigured as well so as not to have a queue of vehicles trying to get in or out of the driveway so close to California St. Maple and Cherry driveways should funnel the vehicles onto Sacramento to not block Muni on California St. nor block the 33-Stanyan's route down Maple St.

There needs to be more specific traffic mitigation for the vehicles out of Block B and Block C not stated in the DEIR. This is needing more specific mitigation measures than is written about in the DEIR." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-53])

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“For the record, in relation to the 38% increase (See Page 4.3-46) in traffic down Parker Avenue south of the 3700 California site, the 100-block of Parker Avenue residents pitched in to pay for speed humps for traffic calming to prevent further incidents of pedestrian-vehicle conflict from a prior event when a child from the 150 Parker School got hit. These traffic calming features help to reach the goal of “Vision Zero”. The street is also a weight-restricted street of “No Trucks Over 3 Tons”. I and my neighbors would appreciate the management or operations crew at the future 3700 California St. project to have an agreement with their delivery trucks to not cut through the JPIA streets with the humps.” *(Rose Hillson, Email, September 11, 2019 [I-Hillson1-54])*

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“When the additional traffic goes down Parker Avenue, the humps will also be subjected to more wear and tear and may fail prematurely. Would the 3700 California Project sponsors be agreeable to pay for maintenance of the further increase of traffic over the humps? If 3700 California had a list of truck plates and can prove they are not sending their trucks over the humps, they do not have to pay for the wear and tear. Or would the City have enough funding to replace them in future? What could be the solution?” *(Rose Hillson, Email, September 11, 2019 [I-Hillson1-55])*

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“Page 4.2-57: This text states how much more the traffic volume will be at the driveways on Maple St. Having 1-2 more vehicles per minutes is a lot of vehicles. It reminds me of the cars at the airport garages. While traffic operations on Maple, California and Sacramento will not be affected, these vehicles may be headed southbound and northbound on Parker that Maple turns into to get to work in the South Bay in Silicon Valley. I think the traffic on Parker Ave. downstream (south) of California will be impacted to a significant level. It may be unavoidable but when 200 vehicles are generated at the intersection per peak hour, it is not trivial. A study needs to be performed as to impacts to Parker south of California as this street is omitted from further analysis. Please provide analysis of north and southbound traffic with the 1-2 vehicles per minute of vehicles being generated. The statement here says, “The proposed project would reduce the amount of traffic on other streets in the study area following the removal of the existing CPMC hospital.” And while it may be true for many of the streets, the DEIR already stated that Parker would have at least a 38% increase (See Page 4.3-46 & elsewhere in this document) so it is ignoring the impact on Parker Avenue and is inadequate.



Maple Street is a local neighborhood street with lower traffic volumes compared with Sacramento or California streets (approximately 200 total vehicles per peak hour). The proposed project would add 40 to 50 net new vehicle trips to Maple Street during the AM and PM peak hours, representing a new vehicle traveling on Maple Street every 1 to 2 minutes during these hours. These additional vehicles would not substantially affect traffic operations on Maple

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<sup>45</sup> Block B also provides parking for two of the single-family homes.

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4.2-57

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Street or at the adjacent intersections at Sacramento and California streets. The proposed project would reduce the amount of traffic on other streets in the study area following the removal of the existing CPMC hospital.

*“ (Rose Hillson, Email, September 11, 2019 [I-Hillson1-58])*

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*“Page 4.2-72, “Cumulative Traffic Hazards,” Impact C-TR-2:...(Less than Significant)”: “Traffic volumes are expected to increase in the future on California Street <emphasis added> and other streets under 2040 cumulative conditions because of the 3333 California Street project.” The 3700 California DEIR stated that there is no queueing using a prior CPMC Hospital as the existing scenario but that is going to occur when California St. traffic is not moving very much. This might lead to MORE vehicles from the proposed residential project to go downstream south of California out of the Maple and Cherry St. driveways to Parker Avenue and impact the Euclid Bike Lane and also safety for the Parker blocks when there was already a pedestrian-vehicle conflict and knowing that there is the small children’s 150 Parker School mid-block. There must be mitigation to relieve the traffic by allowing traffic from the underground garages to go north as an exit as well as even south onto California or higher up on Maple to the north so that traffic does not get bogged down south of California St. from the proposed 273-unit residential development.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-61])*

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“Page 4.2-73, “Cumulative Transit Impacts,” Impact C-TR-3:...(Less than Significant)”: “The proposed project would reduce the number of trips on regional transit slightly through replacement of the existing CPMC hospital with residential land uses at the site.” If the trips on regional transit is reduced, how will the regional transit be impacted with more vehicles being used to make the regional trips? Is this analyzed? Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-62])

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“Page 4.3-46, “Average Daily Traffic Volumes,” Table 4.3-16 “Cumulative 2040 Traffic Volume Increases”: As stated earlier in relation to the driveway and Building B and Building C vehicle volume, Parker Avenue south of California will see a 38% increase (See Page 4.3-46) in DAILY traffic volume and is burdened further compared to adjacent north-south streets. This is already on a street that has the most vehicles and besides not spreading the traffic out, it is being funneled down this street through the design of the proposed Block B building which does not have an “out” for most of the vehicles to go north or south at a driveway. Commonwealth is expected to have a REDUCTION of traffic volume from its ALREADY LOW vehicle volume compared to other JPIA streets of “-13%”.

As shown in the “Average Daily Traffic Volumes” Table, Parker Avenue south of California street will have an almost 40% increase in traffic volume – projected to be 38%.

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Roadway Segment	Average Daily Traffic Volumes <sup>a</sup>		
	Existing Daily Volumes	Cumulative 2040 Daily Volume Increases <sup>b</sup>	Percentage Increase Relative to Existing Conditions
<b>Maple Street</b>			
north of California	1,800	500	28%
north of Sacramento	1,980	490	25%
south of Sacramento	2,480	520	21%
<b>Parker Avenue</b>			
south of California	2,030	770	38%
<b>Spruce Street</b>			
north of California	2,450	750	31%
south of California	3,350	1,150	34%
north of Sacramento	2,300	440	19%
south of Sacramento	3,580	600	17%

Source: Goynes, Matt. Associate, Fehr and Peers. August 31, 2018—email to Heidi Mekkelson of ICF regarding peak-hour intersection volumes and the “hourly to daily” calculation method.

Notes:

See Appendix G for data.

<sup>a</sup> Daily traffic volumes have been calculated by multiplying the PM peak hour by a factor of 10, based on the guidance of the traffic engineer evaluating the proposed project.

<sup>b</sup> The volume increases include the proposed project trips and non-project trips from background growth in the city.

While Page 4.3-46, “Table 4.3-16, “Cumulative 2040 Traffic Volume Increases” was found only under the NOISE impact section & \*NOT\* in the TRANSPORTATION impact section, the notable TRAFFIC VOLUME INCREASE on Parker Street to 38% above all other streets will not make it a family-friendly environment for the families with children and the elderly who live on this street. The projected almost 40% increase in traffic volume on this street will make it more difficult for family members to get in and out of their residential driveways with an almost constant flow of traffic from such a large increase in volume. This increase has the potential to lead to more pedestrian-vehicle conflict on this street. More pedestrian delays from waiting for vehicles to get in and out of residences contending with the almost constant stream of traffic from this volume increase is another potential impact. MITIGATION might be to put up new speed signs to reduce to 20 MPH and to put up “YOUR SPEED” to get the speeders who presently speed over the humps on this street as no traffic enforcement officers are available.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-63])



“Ensure that the service and freight trucks related to the 3700 California Project over 3 tons go along the California St. transit corridor to the maximum extent possible and especially to avoid blocks with “Sensitive Receptors” like the One Fifty Parker Avenue School as the trucks hauling dirt will have the most potential of impacting them and the other residents who include small children and the elderly.

Another MITIGATION might be to install another speed hump between the 2 humps on the 100-block of Parker as vehicles today are not deterred from speeding between the double humps on a block that is 1,000 ft. long even with a small children’s school located at the One Fifty Parker Avenue School. While the 000-block of Parker provides a bit more speed attenuation because drivers have to be careful of the 90-degree parked vehicles on the east side coming at them, there is no potential hit from the sides of the road on the 100-block of Parker so the drivers speed and large trucks not delivering within the 1 block cut through to service commercial area of California St.

MITIGATION measure to add would be to put up no deliveries except for 1 block as they have in the Marina District.

A mitigation measure would be to install signs on Parker and blocks south of California from 3700 California for delivery vehicles only within 1 block so that heavier and larger 16- and 18-wheeler trucks should be dissuaded from going down JPIA streets as that will be more than 2 blocks from Geary and from California. If the drivers are not scofflaws, they would also take the transit corridors of California and the main feed at Arguello or Masonic or Presidio to service 3700 California.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-64])

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“Page 4.4-53: “Parking would be provided for the proposed project’s residences in accordance with the parking requirements in the planning code (1.5 to 2.0 stalls per unit).” The Planning Code changed so that the City has no minimum parking requirements. With the increase in traffic down Parker Avenue, I now question the vehicle numbers and parking spaces for this project. Is it too much and causing more traffic or even if reduced, the streets south of California on Parker, etc. would still get the traffic? With all the traffic in the area that appears to be headed for the streets south of California on Parker Avenue, how will the walkability of the area be impacted? How many people cross Euclid and Parker Avenue daily? Where is the data to analyze impact in this area which is still within the “modeling extent” referred to in the DEIR? Please provide.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-74])

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“Page 6-25, Impacts, “Transportation and Circulation”: “...Improvement Measure 1-TR-B, Monitoring and Abatement of Queues, would not be recommended for this alternative because there are no existing queuing concerns in the area, and the same general driveway configurations would be maintained.”

It is untrue that the same driveway configurations are maintained because the driveways on Maple were staggered rather than nearly opposite each other and the driveways were not used in the hospital use on Maple for vehicles out of the building on that block to go out Maple. In addition, the SHARED use by BOTH LOADING and PASSENGER VEHICLES would potentially cause the queuing with the number of vehicle parking spaces in Blocks B and C. Today the queues may not exist, but the proposed project configuration with all the parking at Blocks B and C are not used in the analysis but rather an old CPMC Hospital Use with no passenger vehicles going out onto Maple from the "Block B" location existed. When something does not sound logical, it cannot be true. I think that when the queues start up, which I think would occur, there needs to be this MITIGATION MEASURE TO STILL BE PUT IN PLACE, please. See also Page 4.2-20 earlier." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-75])

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"Appendix F, Page 90:

I believe the impact of **69% increase over the neighborhood baseline for VMTs**, while not determined in this DEIR as "SIGNIFICANT," is high for a residential project on a transit corridor."

The first check involves using auto availability per household as a proxy for the VMT per capita. **Table 14** shows that if auto availability and VMT per capita were correlated, the expected increase in VMT per capita would be around 69 percent above the neighborhood baseline. While this would represent a substantial increase in VMT per capita above the neighborhood baseline, it would not reach the established threshold for a significant VMT impact.

(10)

Potential MITIGATION might be to have zero to 1 parking space for smaller units like studio and 1-BR & have the 2-BR+ "family friendly" units be recalculated to 1.5 parking spaces. Would that bring the count and the increase in VMTs in the neighborhood down lower and potentially have less impact on the surrounding streets and to help with the goal for safety in "Vision Zero"? (Rose Hillson, Email, September 11, 2019 [I-Hillson1-76])

“And I am concerned that the high number of parking spaces for each of these projects -- and I'm addressing now, at this moment, 3700 California -- has an impact that cannot be fully evaluated, particularly that saddled constantly shifting overlay of Uber and Lyft.” (*San Francisco Planning Commission, Public Hearing, September 19, 2019 [A-SFPC-3]*)

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“May I have the overhead, please. So I submitted this 100-plus document of comments. And within it, because I didn't want to go over it too much, here has showing a bunch of things that I wrote in kind of summary. I'll read it.

There's a reduction of on-street parking. And although we don't talk about level of service anymore, I just want to make this point. Reduction of on-street parking in the high-occupancy level of service D, which was some years ago at CPMC -- this is a level of service D area -- drivers will circle in queue.

Maple driveway has been predicted to be 1 to 2 vehicles a minute. That's an increase, depending on the stats you use, of 250% and 214%. That's a 38% traffic increase on the south side of Parker. And that is going to conflict with the Parker/Euclid bike path.

The increase and probability of pedestrian vehicle/conflicts, VisionZero Failure, studied two blocks of Parker south, mitigation measures. Decreased the garage ceiling stackers to be used for the two tallest parts of blocks B and C so that you can decrease the California Street level impact.” (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-1]*)

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“Decrease the number of car shares from 7 to 2, a ratio used by 3333 California.” (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-10]*)

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#### **RESPONSE TR-4: OPERATIONAL IMPACTS**

These comments raise issues, questions, and concerns about several areas of the operational transportation impact analysis. The response has been further divided by topic, with a summary of comments addressed at the start of each response and a notation regarding which comments are summarized for each section, in the order presented in the draft EIR. These responses provide information and clarification regarding the methodology and results for the operational transportation impact analysis and document why the transportation analysis approach presented in the draft EIR is appropriate.



## VEHICLE MILES TRAVELED

This section addresses topics mentioned in comments: *I-Hillson1-32, I-Hillson1-44, I-Hillson1-51, I-Hillson1-74, I-Hillson1-76, I-Hillson2-10.*

Several comments indicate that the project's parking supply as well as the presence of carshare spaces, would increase vehicle miles traveled (VMT) per capita compared with conditions in the surrounding neighborhood and result in a significant VMT impact. One comment states that the change in land use from hospital to residential would result in a VMT impact.

The project supplies parking at a higher rate than household vehicle availability rates in the surrounding neighborhood, based on census data and transportation model data, as presented in draft EIR Appendix F.6 (consisting of the October 2, 2018, memorandum to the planning department titled *Memorandum #1: Final Travel Demand Estimates for 3700 California*). As discussed in Appendix F.6, due to the project's location near transit on an infill site, even when accounting for the potential effects of increased parking supply, the VMT generated by households would still be below the City's impact threshold of 14.6 VMT per capita under existing conditions, or 13.7 VMT per capita under cumulative conditions. Applying a multiplier to the project's expected household VMT (7.9 VMT per resident) based on the proposed parking rate (1.5 spaces per dwelling unit) relative to the neighborhood's average parking rate (0.9 spaces per household), the project would be expected to result in 13.4 VMT per capita under existing conditions and 12.7 VMT per capita under cumulative conditions, resulting in a less-than-significant impact related to VMT. Therefore, the proposed project, including the proposed parking supply, would not result in a significant impact on VMT, and mitigation measures such as reducing the amount of parking provided are not required.

The project would include seven dedicated carshare spaces pursuant to the transportation demand management plan, including two required spaces and five optional spaces (draft EIR, p. 2-27). Carshare spaces provide parking for community-shared vehicles that allow short-term rentals, such as ZipCar. Members of these services tend to own fewer vehicles and generate fewer VMT than non-members.<sup>13</sup> These spaces would not be used by transportation network companies (TNC) such as Lyft and Uber, despite those services sometimes being referred to as "carshare." Therefore, the provision of carshare parking is not expected to lead to an increase in VMT per capita or have a significant project impact on VMT.

The project's residential land uses were evaluated using the metric "VMT per resident," while non-residential projects, such as the existing hospital, were evaluated using the metric "VMT per employee." Therefore, the EIR does not take a VMT credit for the conversion from hospital

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<sup>13</sup> City of San Francisco, *Standards for the Transportation Demand Management Program*, [https://default.sfplanning.org/transportation/tdm/TDM\\_Program\\_Standards.pdf](https://default.sfplanning.org/transportation/tdm/TDM_Program_Standards.pdf), accessed October 14, 2019.

to residential land uses. As presented above, the proposed project would not result in a significant impact on VMT.

### POTENTIALLY HAZARDOUS CONDITIONS

This section addresses topics mentioned in comments: *I-Hillson1-7, I-Hillson1-14, I-Hillson1-29, I-Hillson1-30, I-Hillson1-31, I-Hillson1-32, I-Hillson1-33, I-Hillson1-34, I-Hillson1-36, I-Hillson1-40, I-Hillson1-41, I-Hillson1-42, I-Hillson1-45, I-Hillson1-47, I-Hillson1-48, I-Hillson1-49, I-Hillson1-50, I-Hillson1-53, I-Hillson1-54, I-Hillson1-55, I-Hillson1-58, I-Hillson1-61, I-Hillson1-63, I-Hillson1-75, I-Hillson2-1.*

The comment states that project-generated vehicles would affect vehicle circulation adjacent to the project driveways and create potentially hazardous conditions for pedestrians, bicyclists, and other drivers on streets within and outside the study area on Maple Street, Cherry Street, Parker Avenue, Commonwealth Avenue, Jordan Avenue, Palm Avenue, Geary Boulevard, and California Street, and at Laurel Village. A more detailed response to comments pertaining to the development of the project travel demand is presented in Response TR-2, starting on p. 4-36.

Vehicular queuing does not itself constitute a significant impact on transportation; rather, queues are assessed for whether they would lead to potentially hazardous conditions (e.g., by impeding sightlines, blocking pedestrian or bicycle facilities, or extending into a travel lane) or impede access for people walking, bicycling, or driving. Several of the comments focus on potential vehicular queuing at intersections and project driveways without discussing the expected hazardous conditions or transportation impacts that would arise from that queuing. These comments are addressed below as part of the explanation of whether queues would form and therefore create secondary impacts. However, these comments primarily pertain to the merits of the project, which are not addressed in this section.

Table 4.2-8, p. 4.2-48 of the draft EIR, presents vehicle trip generation on each block of the project site compared to existing vehicle trip generation at the existing hospital. The busiest driveway is expected to be at the proposed Block C garage during the p.m. peak hour, with 48 vehicles expected to enter per hour from Maple Street. This represents approximately one vehicle arriving every one minute and 15 seconds over the course of the peak hour. Typical gated garages can accommodate one vehicle every 30 seconds; therefore, the driveway could adequately accommodate the expected levels of traffic, and substantial queues that could lead to potentially hazardous conditions are not expected at the project driveways. In addition, the project driveways are designed to typical engineering standards with regards to sightlines and configuration, and would therefore not create potentially hazardous conditions at project driveways. Thus, the project is not expected to create potentially hazardous conditions due to placement of project driveways. Should vehicle queues occur at driveways, Improvement Measure I-TR-B would require the project sponsor to monitor and address recurring queues adjacent to the project site. One commenter indicates that the draft EIR does not include

Improvement Measure I-TR-B for the proposed project. This is incorrect; Improvement Measure I-TR-B would apply to the proposed project; the section referenced by the commenter (p. 6-25) refers to analysis of the Rehabilitation and Reuse alternative, which would not result in substantial changes from existing conditions.

The change in traffic volumes between existing and existing-plus-project conditions on Maple Street, Cherry Street, Jordan Avenue, Commonwealth Street, and Parker Avenue is shown in Figure 4.2-8 of the draft EIR, p. 4.2-49. On Maple Street, Cherry Street, Commonwealth Street, and Parker Avenue, total vehicle volumes (adding together both northbound and southbound vehicles) decrease in each peak hour. On Jordan Avenue, the project results in no net new vehicle trips in the AM peak hour (18 fewer vehicles northbound and 18 more vehicles southbound), and five net new vehicle trips in the PM peak hour (13 more vehicles northbound and eight fewer vehicles southbound). On Maple Street just north of California Street, there are 23 net new vehicles in the AM peak hour and 33 net new vehicles in the PM peak hour; these vehicle volumes include passenger and freight loading activity occurring during the peak hours.

As further discussed in Response TR-2 (p. 4-36), the assignment of traffic generated by the active hospital and proposed residential land uses to the surrounding roadway network was performed in accordance with the SF Guidelines and engineering judgment for an assignment of project trips, based on the expected distribution of trips (i.e., where trips are going to/arriving from) and the proportion of trips to and from each distribution that would use each feasible route. As noted in Responses ES-1 (p. 4-27) and TR-1 (p. 4-31), the transportation setting of the draft EIR reflects the presence of an active hospital use, and the removal of the vehicle trips generated by that use is appropriate for studying the project-related impacts on the environment, including whether the project would result in potentially hazardous conditions. This method for estimating project-related traffic volumes is standard and adequate for assessing potential environmental impacts; no additional analysis or changes to the draft EIR are required.

The draft EIR analyzed all intersections directly adjacent to the project site, and issues related to existing conflicts for pedestrians, bicyclists, and drivers are noted in Section 4.2.2 (p. 4.2-1) of the draft EIR. While new driveways may cause some increase to total vehicle volume at the driveway access and egress points, the project would result in a net decrease in total vehicle volumes at adjacent intersections during each peak hour, and over the course of a day, compared to existing conditions. The overall reduction in vehicle trips through each study intersection indicates that project-generated traffic would not worsen queues (in comparison to existing conditions) or create potentially hazardous conditions for pedestrians, bicyclists, or drivers.

Comments that requested additional analysis of potentially hazardous conditions for pedestrians, bicyclists, and drivers on Parker Avenue or other streets south of California Street



presumed that the proposed project would increase traffic on these streets compared to existing conditions. Health concerns that were brought up relevant to traffic, regarding noise and air quality, can be found in Response NO-2, starting on p. 4-107, and Response AQ-3, starting on p. 4-117. Similar comments were raised about the perceived hazardous conditions or modal conflicts posed by the addition of traffic generated by the proposed project to Laurel Village or Geary Boulevard. Because there would be no net new vehicle trips (over the course of a day) associated with the intersections nearest to the project site, and because traffic disperses onto the roadway network as it travels farther from the site, there is no reasonable expectation the project would create transportation-related impacts on roadways or at intersections farther from the project site and outside the transportation study area. With respect to traffic volumes on Parker Avenue, which were noted in several comments, the total peak-hour volume under the project would not increase as noted earlier in this response,. Therefore, the study area presented in the draft EIR adequately captures the extent of the potential impacts on the surrounding roadways.

Under cumulative conditions, average daily traffic volumes are expected to increase on Parker Avenue, from 2,030 trips to 2,800 trips. This increase in traffic volumes is not a result of the proposed project, but rather due to increases in traffic as a result of anticipated local and regional growth. The hourly traffic volume on the segment between Euclid Avenue and California Street is expected to increase from approximately 200 vehicle trips to 280 vehicle trips during the busiest period (p.m. peak hour) under cumulative conditions (see Appendix F.3 of the draft EIR). This change is equivalent to the increase from one car every 18 seconds to one car every 13 seconds during the busiest hours of the day. The presence of existing speed-reducing measures on Parker Avenue would continue to calm traffic speeds in the future. This traffic volume increase along Parker Avenue under cumulative conditions, to which the project would not contribute, is unlikely to impede access or result in potentially hazardous conditions for pedestrians, bicyclists, and drivers.

Some comments request mitigation measures to address potentially hazardous conditions at project driveways and nearby intersections under existing-plus-project and cumulative conditions. Because the project would result in a net decrease in the number of vehicle trips, the number of vehicles using each driveway or intersection is not expected to result in queuing or vehicle conflicts that would result in potentially hazardous conditions. Therefore, there would be no significant impacts related to potentially hazardous conditions, and no mitigation measures are required to address the project's vehicle trips or change in circulation patterns resulting from the garage design. The analysis presented in the draft EIR is therefore adequate and complete, and no changes to the draft EIR are required.

## **TRANSIT**

This section addresses topics mentioned in comments: *I-Hong-6, I-Hillson1-7, I-Hillson1-62*

The comment requests an assessment of the effects of commuter shuttle buses, including fuel sources for buses and potential impacts on San Francisco Municipal Railway (Muni) bus service, and clarification about how project-generated traffic would affect Muni or regional transit operations.

The proposed project does not include a commuter shuttle bus program. Given the small number of potential commuter shuttle bus riders (e.g., a total of 22 daily transit trips, or 11 transit round trips, between the site and the South Bay, as shown in Appendix F, p. 98), this project is unlikely to change operations for private commuter shuttle bus operators near the project site. All commuter shuttle buses within the city of San Francisco operate under the San Francisco Metropolitan Transportation Agency (SFMTA) Commuter Shuttle Program, which regulates operations of commuter shuttles in San Francisco and charges a per-stop fee, which would apply to any new service.

As noted above in this response and Response ESI-1 on p. 4-23, the proposed project would result in lower overall vehicle volumes on California Street and streets south of California Street through replacement of the existing hospital with the proposed project. Therefore, as noted on pp. 4.2-59–4.2-61 of the draft EIR, there would be fewer vehicles conflicting with Muni vehicles on California Street and Geary Boulevard than under existing conditions, and the proposed project would not create situations in which vehicles would block intersections and delay public transit vehicles. As noted under Impact C-TR-3 on p. 4.2-73 (*Cumulative Transit Impacts*), the proposed project would reduce the total number of regional transit and vehicle trips to and from the project site by replacing the existing hospital with residential uses. Therefore, the proposed project would not increase the number of vehicles making regional trips, as stated in the comment, and project-generated traffic would not affect regional transit operations.

#### **FREIGHT AND PASSENGER LOADING**

This section addresses topics mentioned in comments: *I-Hillson1-32, I-Hillson1-34, I-Hillson1-37, I-Hillson1-38, I-Hillson1-49, I-Hillson1-51, I-Hillson1-52, I-Hillson1-53, I-Hillson1-54, I-Hillson1-55, I-Hillson1-64, A-SFPC-3*

Several comments requested additional analysis concerning freight and passenger loading, including the effects of project-generated truck traffic on neighborhood streets south of California Street. Comments also requested an analysis of queuing behavior and potentially hazardous conditions resulting from both freight and passenger loading, including secondary impacts of TNC travel associated with the project.

Freight and service loading demand are presented on p. 4.2-50 of the draft EIR. The analysis uses the standard methodology outlined in the SF Guidelines for assessing the loading demand of development projects, which is based on surveys at existing buildings throughout San Francisco. The analysis does not use loading data from the existing hospital to estimate residential loading demand, as stated in one comment. In addition, the travel demand analysis

used to calculate the number of peak-hour vehicle trips associated with the project is inclusive of both passenger and freight loading activity.

The EIR determined that the project would generate 19 daily truck trips (e.g., waste collection, deliveries, service vehicles, move-in/move-out activities). Loading activity would require space for one or two trucks per hour, with demand for one truck at a time during the peak hour of loading activity. The proposed project's loading activity would occur primarily within the four off-street loading spaces in Blocks B and C of the proposed project (see Figure xx of the draft EIR for reference). Access to freight loading areas within the project garage is shown in Figure 4.2-5, p. 4.2-37. After making the turn into the garage, trucks would have a dedicated area for loading that would be separate from the primary vehicle circulation area. Because the supply of loading spaces would far exceed the expected loading demand and the project would provide adequate circulation for trucks throughout the site, it is unlikely that queues of trucks would occur within the designated loading areas and back up into the street while waiting to load.

Project-generated trucks would use streets without weight restrictions, such as California Street, to travel to and from the project site. Trucks are generally restricted from traveling on residential streets south of California Street because of existing vehicle weight restrictions on these roadways. The weight restrictions do not apply to commercial vehicles making deliveries on these streets. In addition, as shown in Table 4.2-9, p. 4.2-50, the proposed project's truck loading demand would be less than that of the existing hospital. Therefore, the proposed project would not generate additional truck traffic on streets surrounding the project site or create potentially hazardous conditions due to freight loading activity.

Increased use of app-based ride-hailing services, also known as TNCs, has been well documented since their emergence in 2012.<sup>14</sup> The most commonly used of these services are Lyft and Uber. SFMTA surveys show that around 4 percent of all trips made in the city of San Francisco are made by these services.<sup>15</sup>

Existing transportation demand methodologies and models do not separately account for TNC trips as a travel mode. However, the total number of trips to the site is expected to decrease by more than 77 percent compared to baseline conditions, from 6,262 daily vehicle trips to 1,389 daily vehicle trips, as shown in Table 4.2-6, p. 4.2-45. Thus, the number of trips by TNC vehicles would also be expected to decrease compared with existing conditions with the active hospital

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<sup>14</sup> One comment uses the term "carshare" to describe these services, which are referred to as "TNCs" in this document. The term "carshare" refers to services such as ZipCar, which allow drivers to rent a car for a limited period of time. The comment about TNCs continues with a request for a reduction in the number of carshare spaces, from seven to two, to reduce VMT impacts. See the discussion in the VMT section as to why the project would not result in a significant VMT impact.

<sup>15</sup> SFMTA "Travel Decision Survey, FY 2017 – Key Findings and Summary Report," October 2017, [https://www.sfmta.com/sites/default/files/reports/2017/Travel Decision Survey FY 2017 – Key Findings Summary Report.pdf](https://www.sfmta.com/sites/default/files/reports/2017/Travel%20Decision%20Survey%20FY%202017%20-%20Key%20Findings%20Summary%20Report.pdf); accessed January 22, 2020.



use. Therefore, because of the expected decrease in total TNC trips, the analysis presented in the EIR reflects a reasonable projection of total vehicle trips, regardless of whether they are made by TNC or private vehicle.

As noted on p. 4.2-65 of the draft EIR, TNC pickup and drop-off activity would be distributed throughout the project site. Passengers would be able to use the white zones provided on each block adjacent to the entrances to the main buildings. An existing location with high pickup and drop-off activity, 3838 California Street, would remain with the proposed project. However, the proposed project would not have main entrances next to this loading zone; therefore, pickup and drop-off activity would be expected to occur at other locations closer to building entrances. The proposed project would not concentrate pickup and drop-off activity on one street, as claimed by one comment, nor would it worsen conditions at existing over-capacity passenger loading zones.

As discussed above, the project would have a less-than-significant impact on potentially hazardous conditions due to freight or passenger loading, and the analysis presented in the draft EIR is adequate and complete.

## **PARKING**

This section addresses topics mentioned in comments: *Linn-2, I-Hillson1-40, I-Hillson1-44, and Hillson1-50, and Hillson1-74*

Several comments expressed concerns about the proposed project's parking demand exceeding the on- and off-street parking supply, leading to potential secondary impacts associated with drivers circling the block while looking for on-street parking and creating a disproportionate impact on households without dedicated parking. Comments also raised concerns that recent changes to the on-street parking supply were not accounted for in the draft EIR. Reduction of parking supply or imbalance between parking supply and demand does not itself constitute a potential transportation impact under CEQA; comments regarding the project's proposed parking supply and demand are thus addressed as part of the evaluation of whether parking conditions would lead to secondary impacts such as potentially hazardous conditions.

The draft EIR presents the project's potential parking demand on p. 4.2-51. As discussed in that section, the estimated peak parking demand under the project would require 382 spaces, based on the SF Guidelines. The parking demand rates in the SF Guidelines are higher than the neighborhood vehicle ownership rates presented in Appendix F of the draft EIR, indicating that the rates from the SF Guidelines do not underestimate parking demand for residential uses in this neighborhood. As discussed in the draft EIR and shown in Section 5, *DEIR Revisions*, the project would provide 416 off-street parking spaces (including 17 ADA-compliant spaces and seven carshare spaces), which is 34 more spaces than the estimated parking demand. Therefore, the project would not create a parking deficit that would lead to secondary circulation impacts associated with drivers circling for on-street parking.

As noted on p. 4.2-19 of the draft EIR, the existing environmental setting analyzed in the draft EIR included recent streetscape changes, such as the California Laurel Village Improvement, Laurel Heights/Jordan Park Traffic-Calming Plan, and Muni Forward. These projects included the removal of on-street parking spaces to create new sidewalk bulb-outs. Therefore, recent parking changes to the study area are reflected in the existing setting described in the draft EIR.

The project would result in the removal of 19 on-street parking spaces on Maple Street, as presented on p. 4.2-67, not the 44 on-street spaces noted in the above comment. As discussed in the transportation setting on pp. 4.2-22 and 4.2-23, the existing parking configuration is based on conditions in April 2018, which included removal of on-street parking spaces for recently completed projects (cited in the previous paragraph), while the information on the on-street parking presented in the above comment is based on the LRDP EIR. Based on site observations, the peak on-street parking demand occurred during a day when the hospital was active. During the evening hours, there was generally at least one unoccupied parking space per block. Although the proposed project would reduce the on-street parking supply, it would also not include the on-street parking demand associated with the hospital. Further, the project site's vehicle miles traveled is well below the regional average. Therefore, the proposed project would not cause a substantial parking deficit and thus, the project would not result in secondary impacts.

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## F. NOISE

The comments and corresponding responses in this section relate to the topic of noise and vibration evaluated in draft EIR Section 4.3, *Noise*. The comments are further grouped according to the following noise- and vibration-related issues that the comments raise:

- NO-1, Construction
- NO-2, Operation
- NO-3, Vibration

A corresponding response follows each grouping of comments.

### COMMENT NO-1: CONSTRUCTION

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“First, I’m concerned about the noise during the many years of demolition and construction and noise from trucks going up and down California Street.” (*Marie Laidas Sullivan, Email, September 21, 2019 [I-Sullivan1-2]*)

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"I own the ground floor condominium at 3925 Sacramento street. My property is directly adjacent to the 3700 California project. There is a proposed house being built right next door along with 3 or 4 other houses next to that. There will also be a new building behind and over from my property. I run a small business called the Liner Clinic in my condo and we're very concerned about the noise and dirt and parking issues that the new construction will create. At the clinic there are 2 acupuncturists and 3 body workers and our patients come to relax and de stress during their treatments. We are very concerned that the noise of construction is going to negatively impact us and my renters/practitioners are talking about needing to find a new office when the project commences. This is obviously very concerning to me as the business owner. If I have no renters I will lose over \$6000 a month. What can be done about this situation? Thank you for your time." (Marcy Liner, Email, September 5, 2019 [I-Liner1-1])

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"MITIGATION MEASURES additions to text proposed:

NOISE:

Page S-7, Mitigation Measure M-NO-1, "Construction Noise Control":

MITIGATE further with:

- \* The "Construction Management Plan" details (such as one from the CPMC Project) mentioned above.
- \* Change "A sign posted onsite describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction." To "Signs shall be posted around the construction site at major intersections for the duration of the project describing...."
- \* Change any other "A" sign to "Signs" to be posted around the construction site.
- \* Add "Signs posted around the construction site shall have the hours of construction clearly stated." (e.g. 7AM – 8PM)
- \* Add "Designation of an onsite construction complaint and enforcement manager for the project shall be <insert name> who may be reached at <insert phone number(s)." This information shall be visible on signs around the construction project for the duration of the project.
- \* Add "Onsite Construction Manager shall request night noise permits from 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."
- \* Add "Monitoring stations shall be required to be set up to provide continuous noise monitoring at the most-impacted receptors to the south (along California St.), Also Sacramento



St. nearest residential land use. See Page 4.3-14, Figure 4.3-2 “Sensitive Receptor Locations in the Immediate Vicinity of Project Site.” Alerts from the Onsite Construction Manager or other designated person(s) shall be given to Planning in the form of a report (see below) and exceedances shall be remedied with further portable barriers if the noise level exceeds allowable limits of 10dBA above established ambient levels. Faulty equipment shall be fixed or replaced.”

\* Add “Sponsor shall submit a Noise Control Plan to Planning Department and the Construction Manager or other designated person(s) shall on a weekly basis make available to the Planning Department a noise monitoring log report made available to the public. The log shall include any complaints in connection with an exceedance or not as well as calls to 311 and DBI. If there is any incident that exceeds allowed levels, the report shall be submitted to the Planning Department Development Performance Coordinator or his assignee within 3 business days following the week in which the exceedance occurred. The report shall list the corrective actions taken as well and all reports shall be submitted at the completion of each phase of the construction job. Reports shall be made accessible via a link on the Planning website.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-78]*)

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#### **RESPONSE NO-1: CONSTRUCTION**

The comments refer to concerns about noise from construction activities and truck trips (Comment I-Sullivan1-2, Comment I-Liner1-1). One comment requests text additions to Mitigation Measure NO-1 (Comment I-Hillson-78).

Construction noise impacts are discussed in Section 4.3, *Noise*, of the draft EIR. As discussed, demolition and construction of the proposed project is expected to last for approximately 40 months. The analysis under Impact NO-1 in the draft EIR (p. 4.3-30) found that construction of the proposed project could generate substantial temporary or periodic increases in ambient noise levels in the project vicinity, and this would be a significant noise impact. The significant noise impact would be reduced to a less-than-significant level with mitigation (see Mitigation Measure M-NO-1, Construction Noise Control, in the draft EIR, p. 4.3-33). Noise from construction traffic is included in the analysis under Impact NO-1. The analysis shows that the total number of construction vehicle and truck trips would be relatively small compared with existing traffic volumes (refer to draft EIR Table 4.3-15 for existing daily traffic volumes). Additionally, the existing vehicle volumes include vehicle trips associated with the current hospital uses, but those vehicle trips would stop occurring once construction on the project begins. In place of the trips from the hospital uses, the proposed construction vehicle and truck trips would occur. The number of temporary project construction trips is anticipated to be lower than the number of trips associated with the hospital uses, resulting in a net negative overall number of vehicle trips; therefore, there would be no substantial increase in noise from construction traffic as a result of project construction. These comments express concern about the noise that would be

generated by project construction and possible effects of construction noise on the commenter's business, but do not include a question or concern about the draft EIR's analysis of construction noise impacts. Mitigation Measure M-NO-1 would be required of the proposed project and would reduce construction noise impacts to all receptors in the project vicinity.

During the 3700 California Street construction, other construction projects may occur near 3925 Sacramento Street. The planning department has identified one project at 3941 Sacramento Street that involves expanding or changing a building's envelope. The project at 3941 Sacramento Street is still under construction and is located approximately 100 feet from Block A and 80 feet from 3925 Sacramento Street. Construction of the proposed Block A is expected to commence in mid-2022, and thus it would be unlikely that a currently active small residential construction project would still have active construction in approximately two and a half years from the time of the comment. There are currently no other known residential projects occurring near 3925 Sacramento Street that would result in changes to building envelopes. Any residential remodeling projects would not require substantial use of heavy-duty equipment like those projects included in the cumulative analysis. Additionally, any such projects would require a permit from the planning department, and it is speculative to presume that they would overlap with project construction.

One comment also refers to dust and parking impacts during construction. The commenter is referred to Response AQ-2, p. 4-116, regarding construction dust impacts and Response TR-3, p. 4-58, regarding parking impacts during project construction.

In response to Comment I-Hillson-78, the following text revisions to Mitigation Measure NO-1: Construction Noise Control, have been made in the draft EIR, p. 4.3-34, as shown in Section 5, *DEIR Revisions* (new text is double-underlined and deletions are shown in ~~strike through~~). The revisions add requirements for additional sign postings during construction and clarify the required contents for the signs. The revisions result in an equal and more effective mitigation measure; therefore, recirculation of the draft EIR is not required pursuant to CEQA Guidelines section 15088.5.<sup>16</sup> With respect to the construction management plan from the CPMC Cathedral Hill Project, that plan was finalized just prior to when construction began for that project. Thus, the level of detail in that plan is more precise than what can be currently developed for the proposed project. Nevertheless, Mitigation Measure M-NO-1 contains several of the practices

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<sup>16</sup> Section 15088.5(a) states the following: A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

from the CPMC Cathedral Hill construction management plan, such as the use of temporary barriers for stationary equipment, locating stationary equipment as far as possible from nearby receptors, and requirements for noise monitoring. The measures contained within Mitigation Measure M-NO-1 are sufficient to reduce construction noise impacts to a less-than-significant level and are at an appropriate level of specificity for the environmental review stage of project planning.

#### **Mitigation Measure M-NO-1: Construction Noise Control**

The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below.

- Require that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.
- Prohibit gasoline or diesel engines from having unmuffled exhaust systems.
- Ensure that equipment and trucks for project construction use the best available noise control techniques (e.g., improved mufflers, redesigned equipment, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible. According to the Federal Highway Administration, the use of shields or barriers around noise sources can reduce noise by 5 to 10 dBA, depending on the type of barrier used.
- Use “quiet” gasoline-powered or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.
- Locate stationary noise sources, such as temporary generators, concrete saws, and crushing/processing equipment, as far from nearby receptors as possible; muffle and enclose noise sources within temporary enclosures and shield with barriers, which could reduce construction noise by as much as 5 dB; or implement other measures, to the extent feasible.
- Undertake the noisiest activities during times of least disturbance to surrounding residents and occupants, such as midday or early afternoon when residents are more likely to be at work and less likely to be sleeping, as feasible.



- In response to noise complaints received from people in the project area, monitor the effectiveness of noise attenuation measures by taking noise measurements. A plan for noise monitoring shall be provided to the City for review prior to the commencement of each construction phase.

The construction noise control plan must include the following measures for responding to and tracking complaints pertaining to construction noise:

- A procedure and phone numbers for notifying the Department of Building Inspection, health department, or the police department of complaints (during regular construction hours and off hours).
- ~~A~~ Signs posted onsite and around the project site at major intersections immediately adjacent to the project site for the duration of project construction describing noise complaint procedures and providing a complaint hotline number that shall be answered at all times during construction. Signs shall include construction work hours.
- Designation of an onsite construction complaint and enforcement manager, with telephone contact information, for the project. This information shall be visible on all signs posted at and around the project site for the duration of project construction.
- A plan for notification of neighboring residents and nonresidential building managers within 300 feet of the project construction area at least 30 days in advance of activities that could increase daytime ambient noise levels at sensitive receptor locations by 10 dBA or more. The notification must include the associated control measures that will be implemented to reduce noise levels.

The lead agency has reviewed the comment and elected not to make the requested changes regarding DBI noise permits because regulations already exist (see draft EIR p. 4.3-24) in section 2908 of the noise ordinance that requires a project sponsor to seek nighttime construction noise permits. Including such provision as a CEQA mitigation measure would be redundant with existing regulations and is not required. Requested revisions to add continuous noise monitoring and weekly noise monitoring reports available to the public via a project website have not been specifically included, but could be part of the noise monitoring plan that the sponsor is required to submit to the planning department prior to each construction phase. At the very least, noise measurements will be required upon receipt of noise complaints. The commenter does not state any reason or methodology for the suggested changes or describe why they would be necessary to reduce any significant impact.

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#### COMMENT NO-2: OPERATION

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“Once the buildings are built there will be noise from Sanitation and Recology trucks and from service and delivery trucks.” (*Marie Laidas Sullivan, Email, September 21, 2019 [I-Sullivan1-3]*)

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#### **RESPONSE NO-2: OPERATION**

The comment expresses concern regarding operational noise from trucks used for garbage pickup, recycling collection, and deliveries associated with the project.

Operational noise from delivery trucks, including trucks for garbage pickup and recycling collection, is an existing noise source in the project area and would continue under the project, as discussed in Section 4.3, *Noise*, of the draft EIR. Freight delivery trucks, service vehicles, and garbage and recycling collection trucks associated with the project are included in the daily truck trip data in the *Transportation and Circulation* section of the draft EIR, p. 4.2-50, which states that “The proposed project would generate 54 fewer truck trips than existing conditions each day and require three fewer loading spaces to accommodate peak-hour truck loading demand.” Noise impacts from project-related trucks are evaluated on pp. 4.3-39 and 4.3-40, which state that “the proposed project would result in a decrease in traffic noise from existing traffic noise levels because there would be a net decrease in the number of vehicle trips to and from the project site with the proposed residential uses compared with the existing hospital uses.” Thus, noise generated by sanitation, service, and delivery trucks during operations can likewise be expected to decrease under the proposed project compared with baseline conditions.

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#### **COMMENT NO-3: VIBRATION**

“The NOISE and VIBRATION coverage in the DEIR omits the NOISE from the trucks and other vehicles projected to be increased in volume. This may create an almost constant noise all day with vibrations affecting the older homes of the early 19th and 20th centuries on the Parker Avenue block. Also, with the aging gas lines and water lines under Parker Avenue, the vibrations may be causing infrastructure damage as the gas pipes are not deep on this street. The February 6, 2019 gas line explosion at Parker and Geary is a telltale sign of how shallow the gas lines are and with too many heavy vehicles in the volumes projected with the other vehicles, the whole 2 blocks of Parker Avenue in JPIA may be another fiery explosion waiting to happen. There have also been PG&E in the area to fix gas leaks.

These impacts for each JPIA block south of the proposed site are not clear to me in this DEIR.

The homes of Jordan Park are older and some have brick foundations that are sensitive to additional vibrations from vehicles going over the humps and not driving slowly to \*not\* cause

banging noises during the wee hours of the night/day for deliveries. Perhaps trucks should be fitted with quiet gate devices so that the banging is not so loud but be told not to take the JPIA streets with the humps.

See also Page 4.2-63." (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-56]*)

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### **RESPONSE NO-3: VIBRATION**

The comment expresses concerns about vibration impacts from construction truck traffic associated with the proposed project, especially on the Jordan Park neighborhood.

Vibration as a result of the proposed project is discussed in Section 4.3, *Noise*, of the draft EIR. The approach used to assess vibration impacts on buildings, discussed on pp. 4.3-27 and 4.3-28, is based on Federal Transit Administration guidance. The project's impacts during construction concerning the generation of excessive ground-borne vibration and ground-borne noise, including impacts related to sleep disturbance and building damage, are evaluated under Impact NO-2 (pp. 4.3-36–4.3-39). The draft EIR found that vibration impacts from project construction that could interfere with vibration-sensitive medical equipment would be significant, and the EIR includes a construction-related vibration mitigation measure that would reduce to less than significant any vibration impacts on vibration-sensitive medical equipment at 3838 California Street.

The draft EIR vibration analysis does not identify significant impacts related to damage to utilities or buildings as a result of the proposed construction vibration. The construction vibration analysis in the draft EIR was based on operation of a large bulldozer at the project site; the bulldozer was determined to be the piece of equipment that would generate the highest vibration levels. That analysis found that vibration effects on adjacent buildings would be less than significant, meaning that no damage would be expected to occur. The vibration analysis did not evaluate vibration impacts from construction trucks traveling along roadways because that type of activity would generate vibration levels that would be much lower than the vibration levels from operation of a bulldozer. There is no indication that trucks traveling on roads would affect buried utilities, and the commenter's assertion about this is considered speculative, given that this type of activity is a common daily occurrence throughout the city. According to the San Francisco Fire Chief, Joanne Hayes-White, the cause of the February 6, 2019, gas line explosion at Parker Avenue and Geary Boulevard occurred when "workers with a private contractor were installing a fiber-optic cable line when they ripped into a gas line with



an excavator”<sup>17</sup> and it was not the result of vibration from vehicles. Therefore, for the reasons described above and in the EIR, construction trips generated by the proposed project would not result in damage to buried utilities.

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## G. AIR QUALITY

The comments and corresponding responses in this section relate to the topic of air quality evaluated in draft EIR Section 4.4, *Air Quality*. The comments are further grouped according to the following air quality issues that the comments raise:

- AQ-1, Methodology
- AQ-2, Construction
- AQ-3, Operation

A corresponding response follows each grouping of comments.

### COMMENT AQ-1: METHODOLOGY

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“Page 4.4-18, “Sensitive Receptors”: “the population subgroups that are sensitive to the health effects of air pollutants include the elderly and the young; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. The air district defines sensitive receptors as children, adults, and seniors who occupy or reside in residential dwellings, schools, daycare centers, hospitals, or senior-care facilities.” With this in mind, to MITIGATE as much as possible such exposure, request that construction-related trucks and equipment (bulldozers, etc.) \*NOT\* go down Parker Avenue in front of the 150 Parker School which caters to small children. Another MITIGATION measure would be to have a hotline 24-hours to report violators. An additional MITIGATION measure would be for the drivers to refrain from the primarily residential streets such as those south of California to get to and from the project site. Use of the main commercial streets such as Divisadero, California, Masonic, Arguello should be utilized over the smaller residential streets.

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<sup>17</sup> CBSN Bay Area, 2019, *Huge Gas Line Explosion Creates Inferno in San Francisco Neighborhood*, Online at: <https://sanfrancisco.cbslocal.com/2019/02/06/san-francisco-gas-explosion-fire-inferno-evacuations/>, Accessed January 13, 2020.

Page 4.4-19 (continuation of “Sensitive Receptors”): While the DEIR refers to some of the “Sensitive Receptors” and calls them out by name, the DEIR \*does not call out\* the “One Fifty Parker Avenue School” by name even if within the “Project Boundary and Modeling Extent”. It is just as far from the site as the Laurel Hill Nursery School depending on which Block one chooses to measure the distance of effect. The One Fifty Parker Avenue School is less than 2 blocks south of the site. Even the 3333 California DEIR revised the FEIR to include the One-Fifty Parker Avenue School to cover the pre-K children and potential exposure.

The One Fifty Parker School has an outside playground that is street-level beyond a low picket gate so the air flows freely through there. As the particulates get to the lungs of people lower to the ground than up high, it may be better to keep most if not all of the construction debris hauling trucks off this 100-block of Parker. There is also a disabled young child living as a resident near the school. Other residents include young children as well as the elderly. Here is the text on this page:

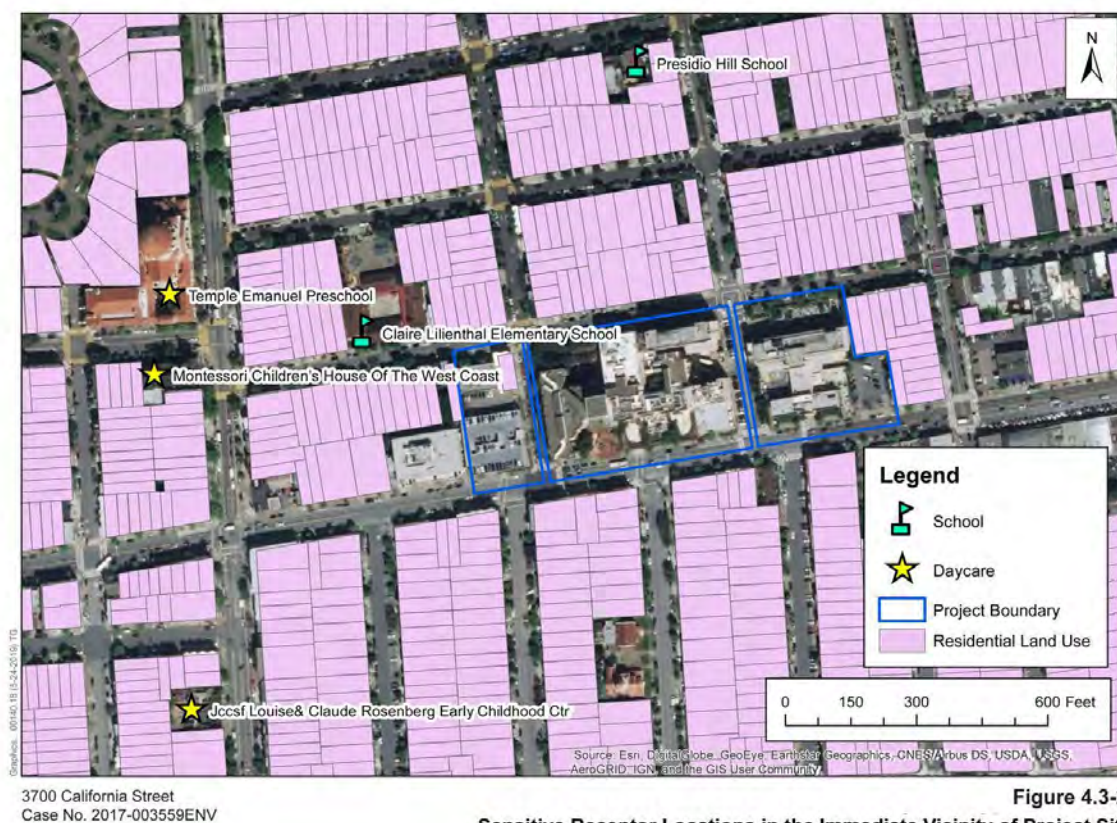
June 2019

Environmental Setting and Impacts  
Air Quality

Existing receptors evaluated in this analysis include a representative sample of known residents (children and adults) in the surrounding neighborhood and other sensitive receptors (school children, nursing home patients, etc.) located in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks. The project is adjacent to residential receptors in all directions. In addition to the residential receptors, other sensitive receptors were identified within 1,000 meters of the project site. The closest non-residential sensitive receptors include the Claire Lilienthal Elementary School Presidio Hill School, Temple Emanuel Preschool, Montessori Children’s House of the West Coast, JCCSF Louise and Claude Rosenberg Early Childhood Center, San Francisco Boys and Girls Home at the Euclid House, and the Laurel Hill Nursery School. Additionally, there are medical offices in the commercial zones on California Street located close to the project site. Medical office buildings are not considered to be sensitive receptors because the duration of time that visitors to these facilities spend onsite is typically limited to a few hours. The citywide modeling effort, discussed under *San Francisco Modeling of Air Pollution Exposure Zones*, p. 4.4-13, evaluated all sensitive receptors as residential receptors because they have longer exposure durations and are therefore expected to have greater health impacts. The locations of sensitive receptors surrounding the project site are presented in Figure 4.3-2, *Sensitive Receptor Locations in the Immediate Vicinity of Project Site*, in Section 4.3, *Noise*.

This page also refers back to Page 4.3-14, Figure 4.3-2,<sup>18</sup> “Sensitive Receptor Locations in the Immediate Vicinity of Project Site” but only goes out 600 feet in radius from the site. I believe that 2 blocks is not too far to explicitly mention the One Fifty Parker Avenue School as a “Sensitive Receptor” and to show it on a map that would be within ¼-mi. of the construction site.

Most recently, the “Comments and Responses” (C&Rs) document to the 3333 California St. EIR *was revised to \*include\* the One Fifty Parker Avenue School as a “sensitive receptor” and should be included in the 3700 California St. DEIR as being much closer to its project than 3333 California which is mentioned in it. The School is only less than 2 blocks away southward.*



Page 4.4-27, Figure 4.4-1, “Project Boundary and Modeling Extent”: This Figure shows the

<sup>18</sup> The figure included in the original comment letter has been reproduced herein with a more legible version of the same image.



extent of the impact and mitigation for the DEIR and shows an area of 3,000 feet. The DEIR does not mention the “One Fifty Parker Avenue School” even though part of the modeling extent. Please show & make clear reference to it in the FEIR.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-68])

“The 3330 Geary project was also a known project since 2017 that has not been called out in the June 13, 2019 release of the 3700 California St. DEIR. It proposes 41 units of housing with 41 vehicle parking spaces on the Geary Blvd. transit corridor between Parker and Commonwealth Avenues.

What is the determination to leave certain foreseeable projects off the list to be considered in an EIR? This might impact the additional vehicles coming to the streets queuing south of California St. onto the JPIA streets.



(This is the same picture as on [Page 4.4-27](#) – I used this from the Appendix so it says “Figure 2”. Ramboll’s scale is in meters but this is equivalent to the 3,000 feet shown in [Figure 4.4-1 on Page 4.4-27](#).)” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-69])

“\* Add “De-electrification of the 33-Stanyan line will be supplemented by a clean-air bus from <insert period date> to <insert period date> notices for the riders. Has the use of the bus diesel been calculated in the AIR QUALITY SECTION? If the 33-Stanyan line will not be replaced with a diesel bus, then this will not be an issue. The driver may have to stand in construction dust if he is only taking the poles off and on to operate the bus but that will expose the riders to the construction dust and its spread. How will this be handled?” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-79])

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“Explicitly list 150 Parker Avenue School as “Sensitive Receptor.” That is in the DEIR modeling extent shown. And also, it was already included in the 3333 California EIR.” (Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-9])

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#### **RESPONSE AQ-1: METHODOLOGY**

The comments identify mitigation measures to minimize the exposure of sensitive receptors to air pollutants. The comments also identify a sensitive receptor (One Fifty Parker Avenue School) that the commenter states should be included in the analysis. Comments also raise concerns about cumulative projects contributing to air emissions, including a project at 3330 Geary street and a project concerning the 33-Stanyan Muni line.

In the draft EIR, p. 4.4-19, the One Fifty Parker Avenue School was not identified as a sensitive receptor within 1,000 feet of the project site. The use of a 1,000-foot radius (i.e., zone of influence) from the property line of the project site to potential sensitive receptors is consistent with Bay Area Air Quality Management District (BAAQMD) CEQA guidance for assessing toxic air contaminant emissions and associated health impacts.<sup>19</sup> The modeling extents of the analysis, as shown in Section 4.4 in the draft EIR, Figure 4.4-1 p. 4.4-27, includes boundaries that are further than 1,000 feet from the project site, and these extents were conservatively chosen to comprehensively evaluate the exposure of all possible receptors that may be exposed to pollutant concentrations from project construction. A larger analysis area than recommended by BAAQMD guidance was thus established, to ensure that no potentially significant impacts are excluded by focusing on the 1,000-foot zone of influence. The project-level and cumulative air quality analyses of health risks in Section 4.4 in the draft EIR use the maximally exposed individual off-site receptor as a worst-case scenario, and that receptor is located adjacent to Block C. As such, the 1,000-foot zone of influence captures the worst-case scenario and is

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<sup>19</sup> 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](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en), accessed October 18, 2019.

consistent with BAAQMD guidance, and this is the reason that the 1,000-foot zone of influence is the primary focus of the draft EIR rather than the larger modeling extent area.

The One Fifty Parker Avenue School is more than 1,000 feet (approximately 1,270 feet) south of the project site; therefore, no revisions to the text or figures in the draft EIR are necessary. Although the One Fifty Parker Avenue School was included in the modeling extents of the analysis, as shown in Figure 4.4-1, the school was not explicitly mentioned in the draft EIR because it is more than 1,000 feet away. Health risk impacts from toxic air contaminant emissions are greatest near the emissions source (i.e., the project site) because pollutants disperse with distance, reducing pollutant concentrations and associated health risks farther from the emissions source. As discussed in the draft EIR, p. 4.4-19, all sensitive receptors, including schools, were evaluated as residential land uses, which is a conservative assumption. Residences have longer exposure durations compared with schools and other non-residential sensitive land uses and therefore would be expected to experience greater health impacts. When evaluating the health effects of the project's toxic air contaminant emissions on residents, the analysis is assuming a child resident exposed to emissions all day for the entire duration of construction activities. When evaluating health effects to school children, the analysis assumes exposure would occur only for the periods of time the child is in school. In this way, residences have a longer exposure duration than other non-residential land uses. The One Fifty Parker Avenue School is more than 1,000 feet south of the project site, much farther than the nearest residential receptor on which the impact assessment was based (i.e., the worst- toxic air contaminant concentrations). As such, impacts at the One Fifty Parker Avenue School would be less than the impacts at the maximally exposed residential receptor disclosed in the EIR.

The mitigation measures identified by the commenter include prohibiting construction equipment on residential streets, including Parker Avenue. The air quality impacts of the proposed project were found to be less than significant. Therefore, mitigation to prohibit construction equipment on residential streets south of California Street, including Parker Avenue, and establishing a hotline to report violators, is not required.

Other comments identify additional cumulative projects that should be considered in the analysis, including the 3330 Geary Boulevard Project and de-electrification of the 33-Stanyan line. As described in Response TR-3 on p. 4-58, the 3330 Geary Boulevard Project is one-third of a mile away from the project site, which is more than 1,000 feet from the project site and the project's maximally exposed on-site and off-site residential receptors. Therefore, because of the dispersing characteristics of pollutants, toxic air contaminant emissions from the 3330 Geary Boulevard Project would not combine with the proposed project to result in cumulative health risk impacts at sensitive receptors near the project site. The other comment appears to be referring to San Francisco Department of Public Works (DPW) paving project on Clayton Street, which is currently requiring the 33-Ashbury/18<sup>th</sup> line to temporarily use bio-diesel or diesel-powered buses instead of the typical electric trolley buses. The completion of the DPW paving



project is anticipated by March 31, 2020, at which time the electric trolley buses would return to the 33-Ashbury/18<sup>th</sup> line. Therefore, there would be no cumulative air quality impact from the proposed project and the DPW paving project as these construction activities are not going to overlap. With regards to concerns about the general public, including bus drivers, being exposed to construction dust, the project would be required to adhere to the San Francisco Dust Control Ordinance, which requires a number of fugitive dust control measures to ensure that the project would not result in visible dust at the property line. Therefore, construction dust impacts on bus drivers, riders of the 33-Ashbury/18<sup>th</sup> line, and others in the immediate vicinity would be less than significant. Additional information on the dust control ordinance is discussed in Section 4.4 of the draft EIR, p. 4.4-24-25, and specific measures that may be implemented during project construction to comply with the ordinance are discussed on p. 4.4-36-38.

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#### COMMENT AQ-2: CONSTRUCTION

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"Page 4.4-36, "Fugitive Dust": See also comments earlier from Pages 4.4-18 & -19 on "Sensitive Receptors" as the "fugitive dust" can be brought down with the hundreds of construction-related trucks and equipment with toxic and harmful dust from the site being carried down many of the nearby streets and especially in the areas of young school children as at 150 Parker Avenue School not mentioned in the DEIR but it's only 2 blocks away and in the "modeling extent" of 3,000 ft. but not shown on the 600-ft. modeling on Page 4.3-14, Figure 4.3-2.

See "Sensitive Receptors" Figure 4.3-2, Page 4.3-14 under Page 4.4-19 above.

Page 4.4-37: "...the site-specific dust control plan submitted to the Director of Public Health would be required to include a map showing the locations of sensitive receptors." Please provide this map not in the DEIR.

This page also states, "...as specified in section 106.3.3.6.3 of the building code: designate an individual who will be responsible for monitoring compliance with all active construction areas to prevent dust from becoming airborne...establish a hotline for surrounding community members who may be affected by project-related dust; limit the area subject to construction activities at any one time;; install dust curtains and windbreaks at the property lines, as necessary, limit the amount of soil in hauling trucks to the size of the truck bed and secure with a tarpaulin; enforce a 15-mile-per-hour speed limit for vehicles entering and exiting construction areas, sweep affected streets with water sweepers at the end of the day; install and use wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; and sweep off adjacent streets to reduce particulate emissions."

If the construction-related truck traffic and construction equipment traffic can carry particulates and potentially hazardous substances down the streets south of California which are within the 3,000-ft. "modeling extent." Should any of these streets be used for the construction-related truck traffic and construction equipment traffic, they need to be swept daily as the data shows HUNDREDS OF TRIPS. It is important to do the cleaning of the streets daily should the trucks use the streets south of California from the construction site so that the residents and visitors to the area do not carry the contaminants into their own homes or into the children's classrooms for the blocks that have the schools for young children. Yes, the hotline is a good idea, but there needs to be a constant pro-active cleaning measure as a MITIGATION measure documented so this is a request." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-70])

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"Page 4.4-39, "Criteria Air Pollutants":

Seems like a lot of construction-related equipment will be creating particulate matters that could lodge in people's lungs. Diesel is the worst so use of electric would be better. Maybe the rate of lung cancer and other cancers in the area that develop – especially in clusters -- could be a good study for medical students in the near future." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-71])

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## **RESPONSE AQ-2: CONSTRUCTION**

The comment expresses concern about potential impacts of fugitive dust on the One Fifty Parker Avenue School. The commenter also expresses concern about construction equipment using residential streets south of California Street and states that daily street sweeping should be conducted should construction equipment use the streets south of California Street. As discussed in Impact AQ-1, the proposed project's construction activities would generate fugitive dust. However, fugitive dust impacts would be less than significant because the project sponsor would be required to comply with the Construction Dust Control Ordinance. As discussed on EIR p. 4.4-25, the project site is greater than 0.5 acres and the project sponsor would be required to prepare and implement a site-specific dust control plan. Pursuant to the Construction Dust Control Ordinance (Ordinance 176-08), site-specific measures shall be included in the dust control plan to accomplish the goal of minimizing visible dust. Specific measures that would be included in the plan that relate to dust being tracked onto nearby surface streets, such as California Street, include limiting the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin, sweeping affected streets with water sweepers at the end of the day, installing and using wheel washers to clean truck tires, or equivalent measures. Therefore, daily street sweeping, as suggested by the commenter, is already required by the Construction Dust Control Ordinance. The dust control plan requires the project sponsor to implement additional measures to reduce construction dust, as detailed

in the EIR on p. 4.4-37. These measures, which are required to be implemented to comply with the Construction Dust Control Ordinance, would sufficiently control fugitive dust during construction and no further mitigation measures are required.

The commenter requests a map of the sensitive receptors within 1,000 feet of the project site. As described in Response AQ-1 on p. 4-113, the One Fifty Parker Avenue School is more than 1,000 feet away from the project site and would therefore not appear on such a map. The reader is directed to Figure 4.3-2, p. 4.3-14 of the EIR, which is a map of sensitive receptors in the immediate vicinity of the project site. Given the primarily residential nature of land uses surrounding the project site, it is anticipated that sensitive receptors extend beyond the extents of this figure. As noted on EIR p. 4.4-37, a map showing sensitive receptors within 1,000 feet of the project site would be required by the Department of Public Health when reviewing the project's site-specific dust control plan. As explained in Response AQ-1, on p. 4-113, the health risk impacts from exposure to construction-period emissions, including diesel particulate matter, resulting from the proposed project to children at the One Fifty Parker Avenue School would be much lower than the health impacts reported for the maximally exposed residential receptor. Because health risk impacts to the maximally exposed sensitive receptor were found to be less than significant, health risk impacts to children at the One Fifty Parker Avenue School, over 1,000 feet from the project site, would also be less than significant.

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#### **COMMENT AQ-3: OPERATION**

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"Page 4.4-46: "However, no health risk analysis was conducted for mobile sources related to operation of the proposed project because the project would result in an overall decrease in the amount of traffic on surrounding roadways." As commented earlier, the DEIR admits that traffic on California St. would increase. While there are some streets that will have a decrease in the amount of traffic, there are other streets like Parker Avenue which will increase in traffic by at minimum, 38% (See Page 4.3-46) per the DEIR. What is the health risk for Parker Avenue, with the children's school at 150 Parker Avenue?" [I-Hillson1-73])

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#### **RESPONSE AQ-3: OPERATION**

The commenter states that the project would result in an increase in traffic on certain streets and notes that a health risk analysis was not conducted for mobile sources operating at the project site. The commenter asks what the health risk from mobile sources is for Parker Avenue, including the One Fifty Parker Avenue School. The commenter is correct in that no health risk analysis was conducted for mobile sources because, overall, the proposed project would result in 4,900 fewer vehicle trips per day. In addition, there would be approximately 60 fewer



delivery truck trips to the project site. The commenter is also correct in that the increase in vehicle volumes on Parker Avenue south of California Street would be 38 percent, but this increase is for the cumulative scenario. As shown in Table 4.3-15 in the draft EIR, p. 4.3-35, the project-only increase on Parker Avenue south of California Street would be 2 percent. The cumulative increase of 38 percent is the result of the project's 2 percent contribution in addition to other anticipated development in the area. While there may be some streets, limited to Sacramento, Maple, and Parker streets, that experience an increase in daily traffic volume, daily traffic volumes along these streets would not increase to levels requiring a health risk assessment, based on screening criteria developed by BAAQMD.

The draft EIR, p. 4.14-4 (footnote number 28), references the BAAQMD's Recommended Methods for Screening and Modeling Local Risks and Hazards, which states that roads with fewer than 10,000 vehicles per day do not pose a significant health impact, even in combination with nearby sources. This determination by the BAAQMD was based on extensive modeling, source tests, and evaluation of toxic air contaminant emissions.<sup>20</sup> The data in Table 4.3-16 in the draft EIR, p. 4.3-45 show that total cumulative vehicle volumes on Parker Avenue south of California Street would be  $2,030 + 770 = 2,800$  vehicles per day, which is well below the 10,000 vehicles per day screening criteria for conducting a health risk assessment. This traffic volume value includes existing traffic, project traffic, and traffic from anticipated cumulative projects. Therefore, per the BAAQMD's screening criteria, the traffic volume increase on Parker Avenue due to the project and cumulative projects would not pose a significant health impact.

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## H. PUBLIC SERVICES

The comments and corresponding responses in this section relate to the topic of public services evaluated in initial study Section E.13, *Public Services*.

- PS-1, Fire

A corresponding response follows each grouping of comments.

### COMMENT PS-1: FIRE

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"Page 2-33, "Potable Water System": The last sentence of this section states, "Four new low-pressure fire hydrants would be installed along California and Sacramento Streets." Is there

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<sup>20</sup> Bay Area Air Quality Management District, *Recommended Methods for Screening and Modeling Local Risks and Hazards*, May 2011, p. 12.

enough water to fight any fire that erupts for all the residences being proposed with the underground parking? Low pressure hydrants run out of water after a spell. If the fire rages on, would that not be considered a potential hazard or safety issue? Would more Fire Department personnel be required? Will an additional ladder truck or engine be required? This is not analyzed in the DEIR and appears incomplete in analyzing the introduction of these 4 new hydrants. Where is this analyzed? I could not find it in the Appendices either.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-19])

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“New low-pressure fire hydrants. For safety, I think there should be high-pressure.” (Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-5])

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#### **RESPONSE PS-1: FIRE**

The comments request clarification regarding fire safety and the adequacy of the four proposed low-pressure hydrants on California and Sacramento streets that would be installed as part of the project as well as the capabilities of the fire department regarding personnel and equipment.

As stated in the draft EIR’s initial study, p. 78 (Appendix B), “the project would comply with all applicable fire and building code requirements.” The proposed fire hydrant layout has been designed to ensure compliance with fire code requirements. All portions of the frontage would be within 150 feet of a fire hydrant. If the fire department requires modifications to the hydrant layout or the number of hydrants during the project’s site permit and street improvement permit review processes, the hydrant layout plan would be updated accordingly. At this time, the City does not have any information to suggest that the proposed hydrants would be inadequate or that high-pressure hydrants would be required instead, nor does the comment provide such information. As stated in the draft EIR’s initial study, p. 78, “the fire department conducts ongoing assessments of its service capacity and response times to maintain acceptable service levels.” The initial study, p. 78, found that the proposed project would not result in substantial demand for fire department service or oversight and did not identify a need for additional fire department personnel or equipment to serve the project, nor does the comment provide information to suggest that there is a need. Therefore, any physical environmental impacts associated with providing adequate fire suppression service would be less than significant. No changes to the analysis or new mitigation measures are required.

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## I. CULTURAL RESOURCES

The comments and corresponding responses in this section relate to the topic of cultural resources evaluated in initial study Section E.3, *Cultural Resources*.

- CR-1, Mitigation Measures

A corresponding response follows each grouping of comments.

### COMMENT CR-1: MITIGATION MEASURES

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“If there are artifacts that are \*not\* tribal but of historic interest, one mitigation measure I suggest to be included in the DEIR would be to create a display and then a weblink for a movie showing what was found, the significance, etc. by a qualified paleontologist or historian. Have media also available at the Main San Francisco Public Library in the History Room.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-5]*)

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### RESPONSE CR-1: MITIGATION MEASURES

The commenter suggests inclusion of a new mitigation measure in the event archaeological resources are encountered.

The project’s potential impacts related to archaeological resources are discussed in the initial study, p. 32 (included as Appendix B to the draft EIR), under Impact CR-2. As discussed therein, because of proposed mass grading and other excavation throughout the project site, the potential exists for historic features, such as hospital features, features associated with previous residences and commercial operations, and mortuary furniture (e.g., headstones), and interments to be encountered during project construction. To reduce potential impacts on significant archaeological resources, Mitigation Measure M-CR-2 would require the project sponsor to retain the services of an archaeologist from the planning department’s qualified archaeological consultants list and develop and implement an archaeological testing program. The scope of the archaeological data recovery plan in Mitigation Measure M-CR-2 would include consideration of an onsite/offsite public interpretive program during the course of the archaeological data recovery program, similar to the mitigation measure suggested in the comment. Implementation of Mitigation Measure M-CR-2 would reduce impacts on archaeological resources to a less-than-significant level. Therefore, no revisions to Mitigation Measure M-CR-2 is required.

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## J. TRIBAL CULTURAL RESOURCES

The comments and corresponding responses in this section relate to the topic of tribal cultural resources evaluated in initial study Section E.4, *Tribal Cultural Resources*. The comments are further grouped according to the following tribal cultural resources-related issues that the comments raise:

- TCR-1, Mitigation Measures
- TCR-2, Assembly Bill 52

A corresponding response follows each grouping of comments.

### COMMENT TCR-1: MITIGATION MEASURES

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“The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the above referenced project. The review included the Executive Summary; the Project Description; and the Environmental Setting, Impacts and Mitigation, section 3.5, Cultural Resources and 3.18, Tribal Cultural Resources, prepared by David J. Powers & Associates, Inc. for the City of Redwood City. We have the following concern(s):

1. Mitigation Measure CR-2 states that the Archaeologist will retain Native American Human Remains until testing is complete. Only the Most Likely Descendant (MLD) can authorize testing on Native American Human Remains and the remains cannot be “retained” for testing if the MLD does not expressly authorize such activities. Please refer to Public Resources Code 5097.98 for the process of MLD recommendations for treatment and disposition of Native American Human Remains (see separate attachment).” (*Native American Heritage Commission, Email, July 2, 2019 [A-NAHC-1]*)

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“Also, re the TRIBAL RESOURCES... While the CPMC vacation of the hospital would not disturb them, the proposed 3700 California St. Project will be digging subterranean garages to there may be much more significant impact. MITIGATION measures appear OK so long as the tribal leaders and City Planning agree.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-4]*)

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“Greater garage depth increases the impact on archeological and tribal resources. Increase the radius, depending on tribal desires.” (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-3]*)

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**RESPONSE TCR-1: MITIGATION MEASURES**

The comments request changes to Mitigation Measure M-CR-2 in Section 3, *Cultural Resources*, of the initial study (draft EIR Appendix B). One comment states that the project should “increase the radius, depending on tribal desires.”

Mitigation Measure M-CR-2 includes requirements to mitigate impacts on cultural and tribal cultural resources in the event that archaeological resources and/or human remains are encountered during project construction. Mitigation Measure CR-2 does not specify a specific stop-work radius for unanticipated finds. In response to the Native American Heritage Commission’s comments, the human remains portion of Mitigation Measure M-CR-2, Archaeological Testing, has been revised in the draft EIR, pp. S-14 and S-15, and in the initial study, p. 38 and pp. 151 and 152 (draft EIR Appendix B), as shown in Section 5, *DEIR Revisions* (new text is double-underlined and deletions are shown in ~~striketrough~~). The revisions clarify the role of the Most Likely Descendant (MLD) in the event that human remains and/or associated or unassociated funerary objects are found during project construction. The revisions result in an equal and more effective mitigation measure; as such, recirculation of the draft EIR is not required pursuant to CEQA Guidelines section 15088.5.

*Human Remains, and Associated or Unassociated Funerary Objects.* ~~If~~The treatment of human remains and of associated or unassociated funerary objects ~~are~~ discovered during any soil-disturbing activity, shall comply with all applicable state and federal laws. ~~This shall be followed, including~~include immediate notification of the ~~coroner~~ Medical Examiner of the City and County of San Francisco; and, in the event ~~that~~of the ~~coroner determines~~Medical Examiner’s determination that the human remains are Native American remains, notification of the Native American Heritage Commission (NAHC) ~~shall be notified. The NAHC, which~~ shall appoint a ~~most likely descendant~~Most Likely Descendant (MLD). The MLD shall complete his or her inspection and make recommendations or indicate preferences for treatment and disposition within 48 hours of granted access to the site (Public Resources Code section 5097.98). The Environment Review Officer (ERO) shall also be notified immediately ~~notified~~ upon discovery of human remains.

The ~~archaeological consultant~~, project sponsor, ~~ERO~~, and ~~MLD~~the ERO shall make all reasonable efforts to develop ~~an agreement~~a Burial Agreement (“Agreement”) with the MLD, as expeditiously as possible, for the treatment of human remains and associated or unassociated funerary objects ~~disposition,~~ with appropriate dignity, of the human remains and associated or unassociated funerary objects (as detailed in (CEQA Guidelines section 15064.5(d)) ~~within six days of the discovery of the human remains. This proposed timing shall not preclude the Public Resources Code section 5097.98 requirement that descendants make recommendations or preferences for treatment within 48 hours of being granted access to the project site. The agreement should. The~~

Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. ~~The archaeological consultant shall retain possession of any Native American human~~ However, if the ERO, project sponsor, and MLD are unable to reach an agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, in cooperation with the project sponsor, shall ensure that the remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or funerary objects, as specified in the treatment agreement if such an agreement has been made or, otherwise, as determined by the archaeological consultant and the ERO. If no agreement is reached, state regulations shall be followed, including the reinternment of the human remains and associated burial objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity on the property, in a location not subject to further or future subsurface disturbance (Public Resources Code section 5097.98).

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during soil-disturbing activity additionally shall follow protocols laid out in the archaeological testing program and any agreement established between the project sponsor, the Medical Examiner, and the ERO.

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#### **COMMENT TCR-2: ASSEMBLY BILL 52**

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“Agencies should be aware that AB 52 does not preclude them 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](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalePAPDF.pdf), entitled “Tribal Consultation Under AB 52: Requirements and Best Practices”.

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 assessments is also attached." (*Native American Heritage Commission, Email, July 2, 2019 [A-NAHC-2]*)

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#### **RESPONSE TCR-2: ASSEMBLY BILL 52**

The comment describes tribal consultation requirements under Assembly Bill 52.

As stated in the initial study, p. 41 (draft EIR Appendix B), the planning department contacted Native American individuals and organizations in the San Francisco area on July 5, 2018, to provide them with a description of the project and request comments regarding the identification, presence, and significance of tribal cultural resources in the project vicinity. During the 30-day comment period, no Native American tribal representatives contacted the planning department to request consultation, suggesting that there are no known tribal cultural resources in the project area. As disclosed on initial study p. 39, if any unknown tribal cultural resources are discovered during construction, this would be considered a significant impact. Mitigation Measure M-CR-2, Archaeological Testing, as described in the initial study, p. 42, would be required to mitigate impacts to a less-than-significant level. Thus, by requiring implementation of Mitigation Measure M-CR-2, the draft EIR demonstrates that the project would comply with Assembly Bill 52.

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## **K. GREENHOUSE GAS EMISSIONS**

The comments and corresponding responses in this section relate to the topic of GHG emissions evaluated in initial study Section E.8, *Greenhouse Gas Emissions*.

- GHG-1, Trees

A corresponding response follows each grouping of comments.

#### **COMMENT GHG-1: TREES**

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**"Mature versus young trees:** Multiple studies indicate that trees are one of our greatest allies in the fight against irreversible climate change. Multiple studies also indicate that mature, established trees are far more effective in this fight than young trees. As San Francisco's climate changes and average temperatures rise, it becomes increasingly difficult for young trees to establish and survive. So, while an increase in net trees sounds like a good idea on paper, the reality is that it is ultimately a very risky gamble at best, and a massive loss in climate and ecological benefits at worst.

**Environmental benefits:**

Going now to the direct, measurable benefits of just some of the trees that will be removed. Using i-tree tools, I calculated the benefits of the 42 trees listed above in terms of their environmental benefits to date, this year, over the course of the next 20 years, and in the year 2039. Here are the results of that report. Remember, these are just the 42 trees that I could measure. The impact of these trees on one single city block is remarkable. In a city with the worst urban canopy of any major city in the United States, this is practically a collection of groves. These trees are mature, established and healthy - an exceedingly rare feature of any area in the city. In terms of their benefits, not only are these trees productive in sequestering CO<sub>2</sub>, but they divert thousands of gallons of stormwater away from San Francisco's combined sewer system, and prevent tons of pollution from reaching our ocean and our Bay. Here are the numbers according to i-tree.

To date, these trees have:

- intercepted 373,328 gallons of stormwater.
- reduced atmospheric carbon dioxide (CO<sub>2</sub>) by 95,470 pounds.

This year, these trees will:

- intercept 59,054 gallons of stormwater this year.
- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by 13,127 pounds.

In the year 2039, these trees will:

- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by 20,198 pounds that year.
- intercept 141,591 gallons of stormwater that year.

Over the next 20 years, these trees will:

- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by a total amount of 330,648 pounds.
- intercept a total of 2,060,778 gallons of stormwater." (*Joshua Klipp, Email, September 24, 2019 [I-Klipp2-4]*)

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"The project would not include publicly accessible open space, and none is required by the planning code." While this is true, the impact of reducing open space and those with trees or other greenery helps to soften all the hardscape and building materials. The existing CPMC open space of about 1,000 square ft. at Sacramento and Cherry has mature native redwood trees that are working to mitigate GHGs. So also for global warming concerns, the more all can do no matter if it does not trigger a CEQA threshold, should strive to ensure that the workhorses such as the redwood trees would be incorporated as well. No species list was made available as to the landscaping so this is yet unknown and unstudied.

What is the calculated loss of GHG mitigation done by these redwood trees to have the same or more GHG reduction in this new project? To MITIGATE the loss of the redwood trees the prior Open Space area at Sacramento and Cherry St., perhaps need more street trees and/or have a community plan to plant and pay Public Works donation to keep up the tree plantings in this area. (Rose Hillson, Email, September 11, 2019 [I-Hillson1-26])

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#### RESPONSE GHG-1: TREES

The comments state that the existing trees on the project site are more effective at sequestering carbon dioxide (CO<sub>2</sub>) and diverting stormwater than the proposed trees would be because the existing trees are mature and established and the proposed trees would be younger. One comment requests the “calculated loss of GHG mitigation” from the proposed removal of onsite redwood trees.

As discussed in Section 2, *Revisions and Clarifications to the Project Description*, changes have been made to the existing and proposed tree counts presented in draft EIR Chapter 2, *Project Description*, p. 2-26, Table 2-3. These changes include retaining eight Coast redwoods at the corner of Sacramento and Cherry streets that were previously identified for removal. The changes to the existing and proposed tree counts presented in the draft EIR do not change the analysis of the draft EIR or the initial study. Refer to Response PD-1, p. 4-5, for a discussion of the proposed tree removals and plantings. As discussed in Response PD-1, the project would increase the total number of trees onsite from 173 to 271 when considering both street trees and onsite trees. This is a net increase of 98 trees on the project site and surrounding sidewalks.<sup>21</sup>

The Intergovernmental Panel on Climate Change (IPCC), an expert scientific body on climate change, notes that there is no further net carbon sequestration when trees and vegetation reach maturity (i.e., are full grown) because the carbon released from the 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.”<sup>22</sup> Therefore, planting new trees on the project site would increase the carbon sequestration rate (not total carbon sequestered) compared with existing conditions until the new trees reach maturity. In addition, cutting down a tree does not immediately “release” its

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<sup>21</sup> The project sponsor has added 2 additional street trees. This change does not impact the analysis or the significance conclusion.

<sup>22</sup> Intergovernmental Panel on Climate Change, *Good Practice Guidance for Land Use, Land-Use Change, and Forestry*, 2003, Appendix 3a.4, p. 3.298, [http://www.ipccnggip.iges.or.jp/public/gpglulucf/gpglulucf\\_files/Chp3/App\\_3a4\\_Settlements.pdf](http://www.ipccnggip.iges.or.jp/public/gpglulucf/gpglulucf_files/Chp3/App_3a4_Settlements.pdf), accessed October 9, 2019.



carbon; rather, that carbon would remain sequestered from the atmosphere unless the tree burns or decomposes.

Although the proposed tree removals are relevant to GHG emissions, mobile sources are the primary emitters of GHG emissions. For example, the state's Climate Change Scoping Plan, which is an outline for state GHG reduction efforts, includes an inventory of GHG emissions for year 1990 (the baseline year by which progress towards statewide GHG reduction goals are measured against) and identifies scoping plan measures to reduce GHG emissions in order to meet California's GHG emissions reduction targets. The state's 1990 GHG inventory show 152 million metric tons of CO<sub>2</sub>e<sup>23</sup> from the transportation sector, while the natural and working lands sector was estimated to provide a carbon sink (reduction in GHGs) of only 7 million metric tons of CO<sub>2</sub>e. <sup>24</sup>

According to the San Francisco Urban Forest Plan, there are approximately 669,000 trees in San Francisco and these trees sequester 196,000 tons of CO<sub>2</sub>/year, or an average of 0.3 tons of CO<sub>2</sub>/year.<sup>25</sup> In contrast, the average passenger car will emit about 4.6 tons of CO<sub>2</sub>/year.<sup>26</sup> Therefore, taking one car off the road or locating development in VMT efficient areas with viable alternative transportation options that reduce overall vehicle miles traveled, is likely more effective at reducing GHG emissions than tree planting. As described in Section 4.2, *Transportation and Circulation*, of the draft EIR, the project would result in an estimated net reduction in the number of daily vehicle trips at the project site amounting to approximately 5,000 vehicle trips per day. Further, as discussed on draft EIR p. 4.2-55, the project site is located in a transportation analysis zone where VMT/capita is approximately 50 percent below the regional average. Therefore, development at the project site would promote lower VMT per capita compared to the regional average, promoting lower GHG/capita.

The project's impacts on GHG emissions are analyzed in Section 8, *Greenhouse Gas Emissions*, of the initial study (Appendix B). The initial study's analysis for determining the significance of GHG impacts is based on the consistency of the proposed project with San Francisco's qualified Greenhouse Gas Reduction Strategy. This approach is consistent with the CEQA Guidelines and CEQA case law. 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

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<sup>23</sup> CO<sub>2</sub>e, stands for "carbon dioxide equivalent", and is a term used to describe different greenhouse gases in one common unit as a measure of global warming impact.

<sup>24</sup> California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, 2017, p. 31, [https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf), accessed December 3, 2019.

<sup>25</sup> San Francisco Planning Department, *San Francisco Urban Forest Plan*, p. 6, [https://icfonline.sharepoint.com/sites/EP/00140.18/Shared Documents/03\\_Reports-Analyses/Admin Record/3. Reference Materials/FEIR](https://icfonline.sharepoint.com/sites/EP/00140.18/Shared Documents/03_Reports-Analyses/Admin Record/3. Reference Materials/FEIR), accessed December 3, 2019.

<sup>26</sup> United States Environmental Protection Agency, *Greenhouse Gas Emissions from a Typical Passenger Vehicle*, 2018, p. 2, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100U8YT.pdf>, accessed December 3, 2019.

Strategy necessarily demonstrates consistency with the state's GHG regulations, the governor's executive orders, and the Bay Area 2017 Clean Air Plan. As described in Impact C-GG-1 (initial study, pp. 47–49), the project would be consistent with the City's Greenhouse Gas Reduction Strategy, as documented in the Greenhouse Gas Analysis: Compliance Checklist for 3700 California. This document is available in the project's case file. The compliance checklist does not require a calculation of CO<sub>2</sub> sequestration for individual trees, nor is such a calculation required to determine significance with respect to the City's Greenhouse Gas Reduction Strategy.

The project would comply with the City's transportation management programs, transportation sustainability fees, bicycle parking requirements, low-emission car parking requirements, and car-sharing requirements, which would reduce the proposed project's transportation-related emissions. The proposed project would be required to comply with the energy efficiency requirements of the City's Green Building Code; alternative water sources for non-potable applications; Stormwater Management Ordinance; Water Use Reduction, Water Conservation, and Efficient Irrigation ordinances; and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions. For these reasons, the initial study determined that the project would be consistent with the City's Greenhouse Gas Reduction Strategy, and GHG impacts would be less than significant. No changes to the initial study analysis are required.

Lastly, the EIR also evaluated the Alternative C: Rehabilitation/Reuse Alternative which would maintain the existing landscaping and trees (see draft EIR pp. 6-22–6-28).

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## L. SHADOW

The comments and corresponding responses in this section relate to the topic of shadow evaluated in initial study Section E.10, *Shadow*. The comments are further grouped according to the following shadow-related issues that the comments raise:

- SH-1, Methodology
- SH-2, Shadow Impacts on Nearby Properties

A corresponding response follows each grouping of comments.

### COMMENT SH-1: METHODOLOGY

"Rooftop appurtenances are not in the shadow study." (*Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-7]*)

“Initial Study, in the DEIR Appendix, Page 55: Concludes impact of SHADOW from the proposed 3700 California St. Project will not affect the places as determined under CEQA.:

*Conclusion*

As discussed above, the proposed project would not create new shadow that substantially affects existing outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation is necessary. This topic will not be discussed in the EIR.

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3700 California Street  
Initial Study

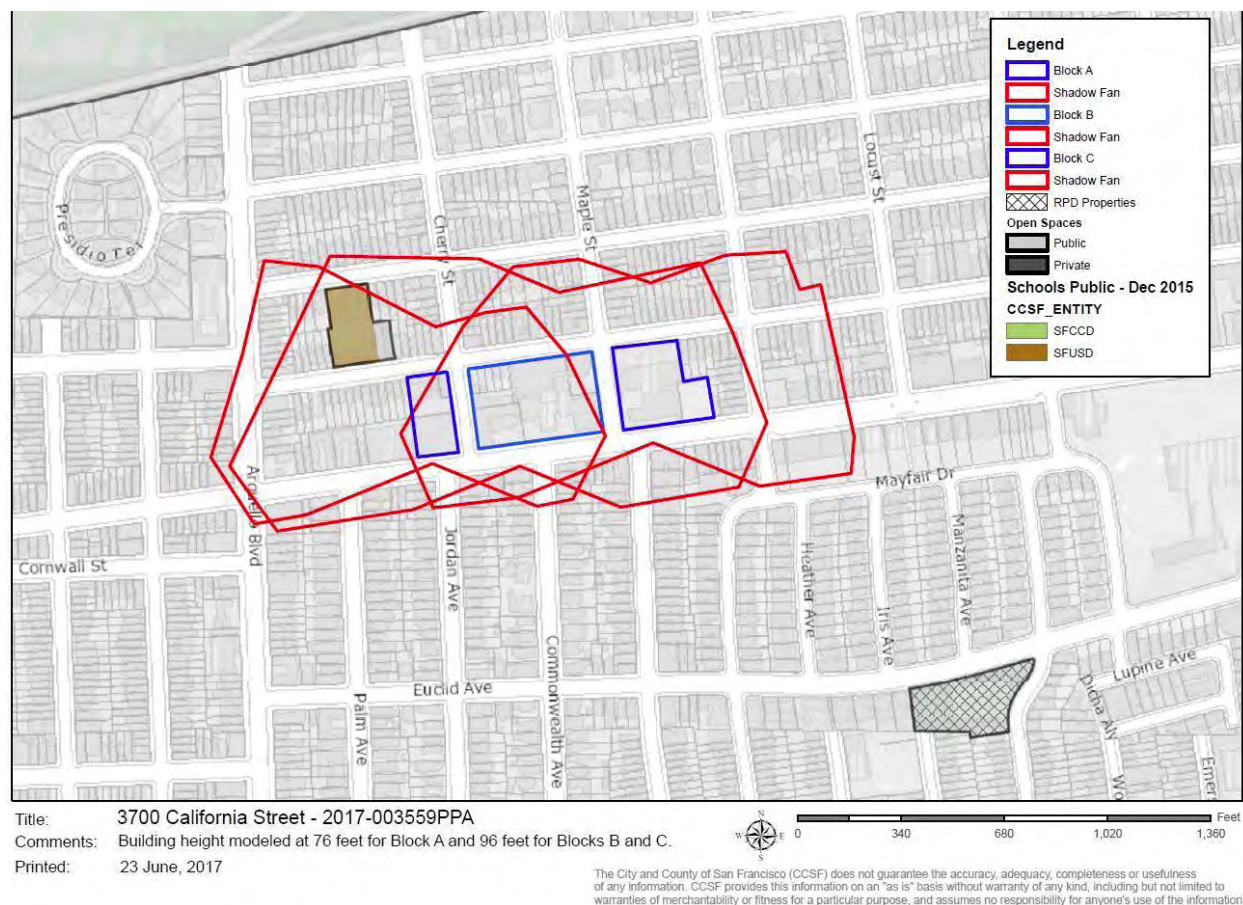
While the DEIR concludes that “This topic will not be discussed in the EIR,” and though CEQA addresses shadows only in a narrow application (e.g. on outdoor recreation areas or on public parks), I request the Planning Department to consider all neighborhood impacts prior to approval of the project. This 3700 California St. Project covers about 4.9 acres or about half the size of the eastward project at the UCSF Laurel Heights (prior Firemen’s Fund Insurance site) at 3333 California on about 10 acres.

The “Shadow Study” in the 3700 California St. Project’s Preliminary Project Assessment (PPA) – 2017-003558PPA -- only considers 80-92 ft. tall buildings. Again, I request a shadow map of how the building would cast shadows with the “rooftop appurtenances” on the proposed “80-92 ft.” tall buildings.

The DEIR rates the SHADOW impact at NI for CEQA purposes and lists “Mitigation Measure M-CR-1” to take steps to ensure protection for the Marshall Hale building but NOT related to SHADOW.

Below is the “Shadow Study” in the 3700 California St. PPA showing shadows falling on the California eligible Jordan Park Historic District. It is unclear 1) for what time of year this shadow fan map is for, 2) if this is the best-case or worst-case scenario for the shadow impact, and 3) if the shadow fan shows the shadows with the “rooftop appurtenances” added in for the buildings on Blocks B & C.





" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-77])

## RESPONSE SH-1: METHODOLOGY

The comments request clarification regarding the methodology for the shadow study, including 1) the time of year the shadow fan map covers, 2) whether a best-case or worst-case scenario is reflected in the shadow study, and 3) if the shadow fan accounts for "rooftop appurtenances" added to buildings on Blocks B & C. A broader shadow study that considers shadow on areas not addressed under CEQA "to consider all neighborhood impacts" is requested.

A preliminary shadow fan was completed to evaluate the impact of the proposed project on outdoor public areas, as required under the City's CEQA checklist. The preliminary shadow fan was prepared using a three-dimensional computer model of the proposed project to simulate levels of shading. Refer to Figures 2-5 and 2-6 in Chapter 2, *Project Description*, of the draft EIR, pp. 2-13–2-15) for the layout and elevations of the proposed project, respectively. The initial study, p. 54 (Appendix B), states that "Planning Code section 295 generally prohibits new structures over 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after

sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.” The analysis states that “Laurel Hill Playground and the Presidio Heights Playground are the nearest San Francisco Recreation and Park Commission properties to the project site” and that “the proposed project would not create any new shadow on either of these parks at any time throughout the year” (p. 54). Because the project would not create new shadow that would affect existing outdoor recreation facilities or other public areas substantially, shadow impacts would be less than significant.

The shadow fan encompasses the entire project, including the range of heights for the rooftop appurtenances, and the entire year. The shadow fan also does not account for shadows caused by existing buildings. Therefore, the draft EIR’s shadow analysis considered the worst-case scenario. The heights for the rooftop appurtenances have been updated, as shown below and in Section 5, *DEIR Revisions*. They are as follows:

Draft EIR page 2-17:

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~75~~ 81 feet.

Draft EIR page 2-24:

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~90~~ 96 feet.

Draft EIR page 2-25:

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 38 to ~~90~~ 96 feet.

The shadow fan for the proposed project modeled up to 76 feet for Block A and up to 96 feet for Blocks B and C. Therefore, the shadow fan completed on Blocks B and C remains accurate, even with the updated (increased) heights for the rooftop appurtenances described in Section 2, *Revisions and Clarifications to the Project Description*. However, there is one building on Block A that would now reach up to 81 feet: Building A7 (see Figure 2-5 in the draft EIR). As discussed in Section 2, *Revisions and Clarifications to the Project Description*, a new shadow fan has been completed, and is included in the administrative record for the project. The results show that the increased heights for the rooftop appurtenances on Block A would have a relatively minor effect on the creation of new shadow, and no new impacts would occur. Also, all proposed building height changes would still be in compliance with the City’s zoning code, with planning commission approval.

As discussed above, the draft EIR found that the proposed project would not create new shadow that would substantially affect existing outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation is necessary. Although the heights for the rooftop appurtenances have slightly increased, as shown above, the project’s impacts related to the creation of shadow would not change substantially. The proposed project

would not create new shadow that would affect existing outdoor recreation facilities or other public areas.

With regard to the request to provide a broader shadow study that considers shadow on areas not addressed under CEQA “to consider all neighborhood impacts,” refer to Response SH-2, p. 4-133.

Also refer to comments related to the height of rooftop appurtenances under Response PD-2, p. 4-5, and in Section 2, *Revisions and Clarifications to the Project Description*.

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## COMMENT SH-2: SHADOW IMPACTS ON NEARBY PROPERTIES

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“Third, I’m concerned that the heights of the roofs on the new buildings will cast a shadow on my building on the corner of Palm and California. It would be so depressing to lose sunlight.”  
(Marie Laidas Sullivan, Email, September 21, 2019 [I-Sullivan1-5])

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“We cannot make the Public Hearing, tomorrow, but it is important that we receive copies of plans for the project. We are particularly concerned about what effect the project will have, when the building at 3698 California St is renovated. Our property is at 439/441 Spruce St, and we need to be assured that our privacy and natural light will not be compromised, if the present car park of 3698 California St is built upon.” (Dennis Parks, Email, September 18, 2019 [I-Parks-1])

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“Page 2-35, 2.6.1 “Planning Commission”: “Conditional use authorization to permit development of buildings with heights in excess of 50 feet in an RM district and in excess of 40 feet in an RH district, all within the 80-E height and bulk district, as well as planned unit development approval of rear yard modifications (Planning Code section 134), building front moderations (sic? – modifications?) (section 144.1), minor deviation from height measurement (sections 261 and 304(d)(6)), projections over streets (section 136), and dwelling unit exposure (section 140)”

The buildings are much taller on the east side and leaves a 96-foot tall building for Blocks B and C. The shadows from a 96-foot tall building will cast a shadow on the historic Marshall Hale Hospital Building and impact some homes in the surrounding potential historic district of the Jordan Park Improvement Association (JPIA) neighborhood & possibly other southside buildings on California which are yet to be determined as to historic status. Perhaps lower the finished height of the floors to end up with what would be a 1-2 floor reduction overall on the higher areas of Block C and Block B buildings as one sees the impact from California St.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-21])



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“Page 3-10, “Rooftop Screening”: The statement, “The project’s rooftop configurations – including mechanical equipment, potential solar and living roof areas, and potential open space areas – *have not yet been fully determined* <emphasis added>; however, the project is expected to comply with rooftop screening requirements. The roof coverage of the project would incorporate 15 percent solar or 30 percent living roof, or a combination of the two.” still leaves unanswered the question about shadow onto other neighboring properties.

Also, while this project could use solar panels because no other building is as tall in the immediate vicinity to cast shadows on it, how would neighbor’s properties be affected so that they would be deprived of the same opportunity if their properties are put in shade?

If the additional roof screening is 10 ft. in height, that would likely extend the 76 ft. building to 86 ft. and the 96 ft. tall building to 106 ft. How much more shadow would be cast from this, and where would those shadows appear? The 2017-003559PPA shadow study from June 23, 2017 that shows certain JPIA buildings affected but not with the potential roof deck features. Please provide what the shadows would be at 106 ft.” (Rose Hillson, Email, September 11, 2019 [I-Hillson1-27])

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## **RESPONSE SH-2: SHADOW IMPACTS ON NEARBY PROPERTIES**

The comments express concern that the project may cast shadow on the Marshal Hale Building, some private homes in the Jordan Park neighborhood, California Street, and the commenters’ own properties (Comments I-Sullivan1-5, I-Parks-1). The commenter suggests lowering building heights by one or two floors on Blocks B and C. Other comments concern potential shadows from rooftop appurtenances (rooftop screening) on nearby private properties.

The shadow analysis for the proposed project begins on p. 54 of the initial study (Appendix B). The City’s criterion for determining the significance of shadow impacts is “whether the proposed project would create new shadow in a manner that substantially affects the use and enjoyment of outdoor recreation facilities or other public areas” (p. 54). Using this criterion, the draft EIR found no shadow impacts on public outdoor recreational facilities as a result of the project. The analysis acknowledges that shadow would occur on public streets and sidewalks, but that such shadow would not be in excess of what is commonly expected in an urban environment. An analysis of shadow impacts on historic buildings, private homes, and private outdoor space is not required under the City’s shadow criterion because these spaces are not public open spaces. Further, it is not anticipated that shade would materially impair the Marshal Hale Hospital Building as the level of shade cast on this building is not a character-defining feature of this resource. Therefore, no additional shadow studies are necessary. Please refer to Comment SH-1, above, regarding the shadow study methodology and Section 5, *DEIR*

*Revisions*, which shows changes to the text of the project description (e.g., the heights of the rooftop appurtenances increased slightly but did not change the findings of the project's shadow study). Comments related to building heights are discussed under Response PD-2 on p. 4-16.

The Planning Commission will consider these comments, the EIR, and other factors when deciding whether to approve or disapprove the proposed project. The commenter is correct in saying that the project is asking the Planning Commission to approve a conditional use authorization. Such authorization would permit development of buildings with heights in excess of 50 feet in an RM district and in excess of 40 feet in an RH district, all within the 80-E height and bulk district, and planned unit development approval of rear-yard modifications (Planning Code section 134), building-front moderations (section 144.1), minor deviation from height measurements (sections 261 and 304(d)(6)), projections over streets (section 136), and dwelling unit exposure (section 140) (draft EIR, p. 2-35).

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## M. UTILITIES AND SERVICE SYSTEMS

The comments and corresponding responses in this section relate to the topic of utilities and service systems evaluated in initial study Section E.12, *Utilities and Service Systems*.

- UT-1, Solid Waste

A corresponding response follows each grouping of comments.

### COMMENT UT-1: SOLID WASTE

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"Page 2-34, 2.5.10 "Construction Activities and Schedule": "The project would excavate a total of approximately 61,800 cubic yards of soil across Blocks A, B, and C, which would be hauled off-site." Where is this dumped? Are the dump sites capable of taking this much debris? Would the City need to buy more land to dump the materials or cause another jurisdiction to provide the dump site or acquire more land for the waste?" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-20])

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"Would *Recology* need to buy more trucks? Would there be an increase in garbage and recycling materials over what the prior CPMC Hospital Use generated? What impact, if any, would there be to the volume of materials to the local landfill and recycling facility capacity? Since China and other countries have refused recyclables from the United States, where is this going? Where is this in the DEIR? Please provide.

See also under Page 4.2-50." (Rose Hillson, Email, September 11, 2019 [I-Hillson1-39])

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#### **RESPONSE UT-1: SOLID WASTE**

The comment requests clarification regarding soil removal as well as offsite dump locations and capacity.

The comment correctly notes the estimated amount of soil export for the project (i.e., 61,800 cubic yards), as stated on p. 2-12 of the draft EIR. The analysis on pp. 73 and 74 of the initial study (Appendix B) addresses impacts on solid waste disposal capacity from construction activities. As stated, "Excavated soil and demolition debris that is contaminated (e.g., with asbestos, PCBs, or lead-based paint) and classified as a hazardous waste would be taken to a *class I* facility for disposal in accordance with applicable hazardous waste laws and regulations." Based on the estimated waste generation and remaining capacities of the landfills, the analysis concludes that "the proposed project would be served by regional landfills with sufficient permitted capacity to accommodate its solid waste disposal needs." The analysis goes on to state that "Soils not classified as hazardous waste would be transported to local disposal and reuse sites such as Treasure Island, Bay Meadows, or other available sites." The ultimate disposal site would be identified by the City and construction contractor, based on the availability of the site to accept the export. Therefore, the analysis of construction solid waste presented in the initial study adequately addresses project impacts, finding this impact to be less than significant and therefore no mitigation is required.

The commenter asks questions about the project's operational solid waste generation estimates compared to the existing hospital use and local landfill and recycling center capacities and locations. This topic is analyzed in the initial study (Appendix B, pp. 72-74) under Impact UT-3. The proposed project would not generate solid waste in excess of applicable standards or local infrastructure capacity or otherwise impair attainment of solid waste reduction goals. Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste. The analysis found that the proposed project would generate approximately 1,640,000 pounds (819 tons) of solid waste annually. This equates to 0.9 percent of the Recology Hay Road Landfill's permitted maximum daily disposal capacity of 2,400 tons per day. Given the City's progress to date on diversion and waste reduction, and given the existing future long-term capacity available at the Recology Hay Road Landfill and other area landfills, the proposed project would be served by regional landfills with adequate permitted capacity to accommodate its solid waste disposal needs. The proposed project would also comply with all applicable statutes and regulations related to solid waste (initial study, p. 74 [Appendix B]). Impact UT-3 was found to be less than significant.

As discussed in initial study Section D, *Summary of Environmental Effects*, p. 7 (Appendix B), the existing hospital's solid waste generation rates were not subtracted, or "netted out," from the



estimates of the proposed project's solid waste generation (Impact UT-3). This approach ensures that environmental impacts resulting from relocation of the hospital are not under counted with respect to the LRDP EIR analysis, which analyzed the environmental impacts of the CPMC's new hospital site at Geary Street and Van Ness Avenue. The relationship between the LRDP EIR and the draft EIR is further discussed in Response ESI-1, p. 4-23.

The commenter asks for a comparison of the project's solid waste generation to the hospital's solid waste generation. LRDP EIR Table 4.12-4, Existing Solid Waste/Recycling Demands at Each CPMC Campus (2006), p. 4.12-39, displays the level of waste generated at the current (2006) CPMC campus. It states that, in 2006, the California Campus generated 3,302,000 pounds of solid waste and 271,000 pounds of solid waste recycling. In contrast, the proposed project would generate an estimated 1,640,000 pounds of solid waste annually, which is almost 50 percent less than the hospital uses. Although the initial study does not state the exact anticipated annual solid waste recycling generation rates for the proposed project, it can be expected that the rates would be similarly lower than the hospital uses. The project would comply with San Francisco's Mandatory Recycling and Composting Ordinance (San Francisco Ordinance No. 100-09) and all other applicable statutes and regulations related to solid waste recycling. The initial study, p. 72 (Appendix B), states that "Recyclable materials are taken to Recology's Pier 96 facility, where they are separated into commodities (e.g., aluminum, glass, and paper) and transported to other users for reprocessing."

Regarding freight delivery and service vehicle loading, garbage and recycling collection trucks are included in the "daily truck trip" data shown in the draft EIR, p. 4.2-50, which states that "The proposed project would generate 54 fewer truck trips than existing conditions each day and require three fewer loading spaces to accommodate peak-hour truck loading demand." Also, because solid waste and recycling generation rates are expected to be substantially less than those of the hospital uses, as stated above, it can be expected that the necessary truck trips for garbage and recycling collection would be less than the hospital uses as well.

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## **N. GEOLOGY AND SOILS**

The comments and corresponding responses in this section relate to the topic of paleontology evaluated in initial study Section E.15, *Geology and Soils*.

- GEO-1, Paleontological Resources

A corresponding response follows each grouping of comments.

**COMMENT GEO-1: PALEONTOLOGICAL RESOURCES**

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**GEOLOGY:**

Page S-19, Mitigation Measure M-GE-4, “Inadvertent Discovery of Paleontological Resources”: MITIGATE further with “...should fossils be encountered, and the laws and regulations protecting paleontological resources.” Change “within 25 feet of the find” to “within 50 feet of the find”.

Paleontological finds are not restricted to being found only within 25 feet of an initial find. A broader radius would ensure that any resources are not compromised nor overlooked.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-80]*)

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**RESPONSE GEO-1: PALEONTOLOGICAL RESOURCES**

The comment suggests revising Mitigation Measure M-GE-4 to increase the no work ground disturbance radius from 25 feet to 50 feet in the event paleontological resources are discovered during construction. The project’s potential impacts related to paleontological resources are discussed under Impact GE-4 on p. 103 of the initial study (Appendix B to the draft EIR). As discussed therein, implementation of Mitigation Measure M-GE-4, which would require the project sponsor to hire a qualified paleontologist to monitor earth moving activities in areas of high paleontological sensitivity, evaluate any found resources, and prepare and follow a recovery plan for found resources, would reduce the likelihood that significant paleontological resources would be destroyed or lost. With implementation of this mitigation measure, the impact would be considered to be less than significant. Therefore, the paleontological resources analysis presented in the initial study adequately addresses project impacts. Increasing the radius for no earthwork or other types of ground disturbance around potential discoveries as part of Mitigation Measure M-GE-4 is not required. The comment did not include any substantial evidence that a 50-foot radius would be necessary to ensure the effectiveness of the mitigation measure. Furthermore, under the mitigation measure’s specification for a recovery plan pertaining to found resources, the paleontologist may identify measures, such as field surveys, sampling, construction monitoring, and data recovery, to determine if there are other resources on the site. In this event, as part of a recovery plan, it is possible that a determination could be made by the qualified paleontologist to extend the no work zone beyond the 25-foot radius, if necessary. No changes to Mitigation Measure M-GE-4 are required.

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## O. HYDROLOGY AND WATER QUALITY

The comments and corresponding responses in this section relate to the topic of hydrology and water quality evaluated in initial study Section E.16, *Hydrology and Water Quality*.

- HWQ-1, Runoff

A corresponding response follows each grouping of comments.

### COMMENT HWQ-1: RUNOFF

“

Construction Schedule and Equipment List  
3700 California  
San Francisco, California

Hauling Trips	Block A			Block B			Block C		
	Average	Average	Total	Average	Average	Total	Average	Average	Total
	Worker Trips	Material Trips	Hauling Trips	Worker Trips	Material Trips	Hauling Trips	Worker Trips	Material Trips	Hauling Trips
Phase Name	trips/day	trips/day	total trips	trips/day	trips/day	total trips	trips/day	trips/day	total trips
Demolition	48	0	832	48	0	1,696	48	0	1,088
Site Preparation & Grading	38	0	0	38	0	0	38	0	0
Excavation & Shoring	28	0	448	28	0	832	28	0	496
Drainage/Utilities/ Subgrade	38	0	0	38		0	38	0	0
Building Construction (New Construction)	29	5	0	104	16	0	59	9	0
Sitework	30	0	280	30	0	480	30	0	400

With all 3 blocks totaling to a LARGE VOLUME of 6,552 trips, of which many are for hauling trucks, it is likely potential of loose dirt to adhere to the vehicle tires and the residue left on the surface streets that will eventually be washed into the storm drains. There needs to be MITIGATION MEASURE for

### HYDROLOGY & WATER QUALITY – not analyzed in DEIR:

Add: All excavated dirt left in piles shall be covered so as not to let any of it run off through wind and rain or watering down into the storm drains. Tires of construction-activity-related vehicles shall be washed off prior to leaving the site so as not to contaminate nearby residences and merchants. Some merchants sell groceries and other materials out on the sidewalk that will end up in people's homes and the contamination could become a health and safety issue.

See MITIGATION via “Construction Management Plan”. This project will be one of the largest projects under construction to ensure that the City is taking all impacts with an abundance of caution. Should biological species get affected from the water and other contaminants, while not necessarily a CEQA requirement, all mitigation measures including those related to “good



neighbor” gestures would be appreciated by keeping in mind the City’s officially adopted “Precautionary Principle”.<sup>27</sup> (Rose Hillson, Email, September 11, 2019 [I-Hillson1-67])

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#### **RESPONSE HWQ-1: RUNOFF**

The topic of hydrology and water quality is evaluated in the initial study (Appendix B) beginning on p. 108. The analysis found that the proposed project would have a less-than-significant impact regarding Impact HY-1 and that it would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or conflict with or obstruct implementation of a water quality control plan (Impact HY-1, p. 109). Construction-related stormwater runoff is addressed on pp. 110 and 111 of the initial study (Appendix B), which states that “Excavation, earthmoving, and grading would expose soil and could result in erosion and excess sediment in stormwater runoff being carried to the combined sewer system. In addition, stormwater runoff from demolition debris, soil stockpiles, temporary onsite use and storage of vehicles, fuels, wastes, or other hazardous materials could carry pollutants to the combined sewer system if proper handling methods are not employed. Runoff from the project site would drain into the city’s combined sewer system, ensuring that such runoff is properly treated to meet the city’s Westside NPDES Permit and the U.S. Environmental Protection Agency’s Combined Sewer Overflow Control Policy. Construction site runoff from projects that drain to the combined sewer system is regulated under Public Works Code section 146. These projects must prepare an erosion and sediment control plan or a stormwater pollution prevention plan and are required to submit a construction site runoff control permit application to the San Francisco Public Utilities Commission (SFPUC) prior to any land-disturbing activities. An erosion and sediment control plan would specify best management practices (BMPs) and erosion and sedimentation control measures to prevent sediment from entering the city’s combined sewer system. The construction BMPs that would most likely be implemented as part of the proposed project would address inspection and maintenance, water conservation, spill prevention and control, street cleaning, and prevention of illicit connection and discharge. These BMPs would minimize disturbance to the project site, adjacent areas, and storm drains and would retain sediment. The SFPUC’s Construction Runoff Control Program staff enforces this requirement through periodic and unplanned site inspections. In addition, prior to the commencement of any land-disturbing activities, a construction site runoff control permit would be obtained.”

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<sup>27</sup> The table included in the original comment letter has been reproduced herein with a more legible version of the same image.

The project would follow the SFPUC's best management practices, which are detailed in the Construction Best Practices Handbook, August 2013, available at <http://sfwater.org/modules/showdocument.aspx?documentid=4282>. In addition, as stated in the draft EIR, p. 2-36, the project would require review and approval from the SFPUC for its Erosion and Sediment Control Plan (per Public Works Code article 4.1) and Post-construction Stormwater Design Guidelines, including a Stormwater Control Plan, in accordance with City's 2016 Stormwater Management Requirements and Design Guidelines. The San Francisco Department of Public Health would also require review and approval of the project's site mitigation plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance) and a Construction Dust Control Plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance).

As detailed in draft EIR p. 4.4-37 and Response AQ-1 p. 4-113, many of the measure suggested by the commenter, such as covering of soil piles and washing soil from truck tires, would be required through compliance with the Construction Dust Control Ordinance. Therefore, the commenters concern regarding soil runoff are adequately addressed through the regulations discussed above.

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## P. HAZARDS AND HAZARDOUS MATERIALS

The comments and corresponding response in this section relate to the topic of hazards and hazardous materials evaluated in initial study Section E.17, *Hazards and Hazardous Materials*.

- HZ-1, Marshal Hale Building

A corresponding response follows each grouping of comments.

### COMMENT HZ-1: MARSHAL HALE BUILDING

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"It says that there are no hazards impacts in the DEIR. The French Laundry use on Sacramento and Maple could have dry cleaning chemicals that seeped downhill to the historic Marshall Hale Building which is being repurposed. What have the soils samples shown for the Marshall Hale Building? Please provide. What if such chemicals are found to have leached into the soil under and around this building? Which Mitigation step addresses this in the DEIR?" (Rose Hillson, Email, September 11, 2019 [I-Hillson1-3])

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"French Laundry chemicals is still a concern." (Rose Hillson, Public Hearing, September 19, 2019 [I-Hillson2-2])

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**RESPONSE HZ-1: MARSHAL HALE BUILDING**

The comments express concern regarding the potential for French Laundry to generate hazardous materials that could affect the project site, particularly the Marshal Hale Building. It is assumed that the commenter is referring to a business called Peninou French Laundry (formerly Spruce Cleaners), in operation at 3707 Sacramento Street from 1953 to the present, located approximately 60 feet east-northeast of the eastern portion of the project site. The project's potential impacts related to hazards and hazardous materials are discussed under Impact HZ-2 on p. 123 of the initial study (Appendix B) to the draft EIR. A *Phase I environmental site assessment* was conducted for the project, which included reconnaissance of the surrounding area on October 7, 2015, "to assess whether neighboring sites represent a potential environmental condition that could affect the subject site" (p. 6). The environmental site assessment (p. 20) identifies the Peninou French Laundry at 3707 Sacramento Street and notes that the site does not currently conduct dry cleaning and is a transfer station for dry cleaning conducted off site. The environmental site assessment concludes that "A nearby dry cleaners, identified at 3707 Sacramento Street, was determined to be cross-gradient to the property, with no hazardous material use and/or storage concerns; as such, the off-site dry cleaner was not identified as a potential environmental concern." The environmental site assessment identifies two recognized environmental conditions, discussed on p. 119 of the initial study (Appendix B). Additionally, the analysis on initial study pp. 118 and 119 notes that multiple commercial cleaners are adjacent to the project site and, as a result, the project site, which includes the Marshal Hale Building, is likely to contain hazardous substances in the soil or groundwater. Therefore, before the proposed project can obtain a building permit, the project sponsor must comply with the requirements of San Francisco Health Code article 22A, which the health department administers and the project sponsor has enrolled in. Pursuant to this regulation, the project sponsor is required to remediate potential soil or groundwater contamination at the project site. The health department has requested a phase II work plan for the project site, based on the results of the phase I environmental site assessment. The work plan request concluded that, in addition to remediating the potential soil or groundwater contamination from the two recognized environmental conditions identified by the environmental site assessment, the following should be implemented:

- Prior to any substantial renovation or demolition at the project site, any building materials to be disturbed should be tested for asbestos-containing materials so that presently unknown asbestos-containing materials at the site can be properly managed. In addition, an asbestos operations and maintenance plan should be developed, as necessary, based on testing at the project site.



- Prior to any significant renovation or demolition at the project site, any building materials to be disturbed should be tested for lead-based paint so that presently unknown lead-based paint at the site can be properly managed.
- Groundwater monitoring wells installed for the purpose of monitoring groundwater associated with the recognized environmental condition from the former 3773 Sacramento Street underground storage tank, as discussed in the environmental site assessment, should be decommissioned in accordance with California Department of Water Resources Well Standards 74-81 and 74-90.
- Groundwater monitoring wells installed for the purpose of monitoring groundwater for geotechnical investigations at 3905 Sacramento Street, 3773 Sacramento Street, and 3700 California Street should be decommissioned in accordance with California Department of Water Resources Well Standards 74-81 and 74-90.

The health department would oversee the above process, and various regulations would apply to any disturbance of contaminants in soil or groundwater that would be encountered during construction to ensure that no unacceptable public exposure would occur. On May 9, 2019, the health department reviewed and confirmed the findings of the phase I environmental site assessment and approved the project's phase II work plan.<sup>28</sup> Therefore, with required compliance with article 22A of the San Francisco Health Code, the proposed project would not result in a significant hazard for the public or environment from the disturbance or release of contaminated soil or groundwater. The proposed project would result in a less-than-significant impact, and no mitigation measures would be required.

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## Q. BIOLOGICAL RESOURCES

The comment and corresponding response in this section relates to the topic of biological resources evaluated in initial study Section E.14, *Biological Resources*.

- BIO-1, Bees

A corresponding response follows each grouping of comments.

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<sup>28</sup> City and County of San Francisco, Department of Public Health, *Phase II Work Plan Approval, 3700 California Street*, EHB-SAM NO. SMED: 1759, May 9, 2019.

**COMMENT BIO-1: BEES**


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**“Bees:** With regard to the last tree, species unknown, I was not able to measure its trunk but it looked to be at least 20” dbh, and covered in flowers that were visited by bees. I saw at least 100 bees at this tree. Please note that multiple scientific studies have concluded that bees are one of the most crucial species for the survival of humans in the face of climate change. Accordingly, any EIR should consider this - and any other applicable planned project features - that remove ecologically (and specifically bee) sustaining flora.” (Joshua Klipp, Email, September 24, 2019 [I-Klipp2-2])

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**RESPONSE BIO-1: BEES**

The comment expresses concern about the proposed removal of bee-sustaining flora as part of the proposed project. Currently, four bumble bee species qualify as candidate, sensitive, or special-status species, all of which are candidates for state listing as endangered under the California Endangered Species Act: Crotch bumble bee (*Bombus crotchii*), Franklin’s bumble bee (*B. franklini*), western bumble bee (*B. occidentalis occidentalis*), and Suckley cuckoo bumble bee (*B. suckleyi*). Of these, only the western bumble bee has a habitat range that could include the project site. However, its current distribution in California is restricted to populations at high-elevation sites in the Sierra Nevada and a few areas on the Northern California coast.<sup>29</sup> Absent additional evidence, there is no indication that the bees observed by the commenter were western bumble bees. There are no San Francisco observations of this species in *iNaturalist* (2019).<sup>30</sup> The species is not expected to occur because of its current association with higher elevations in the Sierra Nevada and Northern California coastal mountains. CEQA does not require analysis of potential impacts on species that are not listed as candidate, sensitive, or special-status species. However, there is a growing concern within the scientific community about declining bee populations. Therefore, in response to this comment, Improvement Measure I-BI-A has been added to the draft EIR, p. S-18 as well as the initial study, p. 90 and p. 153 (draft EIR Appendix B), as shown in Section 5, *DEIR Revisions* (new text is double-underlined and deletions are shown in ~~strike through~~). The new improvement measure requires

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<sup>29</sup> Xerces Society for Invertebrate Conservation, Defenders of Wildlife, and Center for Food Safety, *A Petition to the State of California Fish and Game Commission to List the Crotch Bumble Bee (Bombus crotchii), Franklin’s Bumble Bee (Bombus franklini), Suckley Cuckoo Bumble Bee (Bombus suckleyi), and Western Bumble Bee (Bombus occidentalis occidentalis) as Endangered under the California Endangered Species Act*, 2018. The Xerces Society, Portland, OR. Prepared for California Fish and Game Commission, Sacramento, CA. October 16.

<sup>30</sup> *iNaturalist, Query for Western Bumblebee Occurrences in San Francisco, CA*, 2019, [https://www.inaturalist.org/observations?place\\_id=854&taxon\\_id=82371](https://www.inaturalist.org/observations?place_id=854&taxon_id=82371), accessed: October 10, 2019.

a preconstruction survey for bee populations. The new improvement measure does not require recirculation of the draft EIR under CEQA Guidelines section 15088.5.

Although candidate, sensitive, or special-status bee species are not known to occur in San Francisco, the sponsor should implement **Improvement Measure I-BI-A** to avoid impacts on potential declining bee populations.

**Improvement Measure I-BI-A: Preconstruction Survey for Bee Populations**

Prior to construction and tree removal, personnel should check trees to verify there are no active swarms or colonies present. If found, personnel should report the findings to the San Francisco Beekeepers Association or other agency/organization approved by the planning department and either wait for the bees to depart or work with the agency/organization to move the bees to safety.

## R. CEQA PROCESS

The comments and corresponding responses in this section relate to the CEQA process.

- CEQA-1, Public Outreach

A corresponding response follows each grouping of comments.

### COMMENT CEQA-1: PUBLIC OUTREACH

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“Looks like you are covering for Jeanie Poling. So I am forwarding you a copy of the email that I sent her that bounced back today. When I first called her in July about the planned July 11 EIR meeting she discovered that our address (and our whole area) had never been on the ‘contact list’ for the project so she postponed the EIR from July to September 19<sup>th</sup>.” (Sara Alexander, Email, September 4, 2019 [I-Alexander1-1])

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“As you may remember we have never received a neighbor survey. Ever. Or an invite to a neighbor meeting. Although our building is directly next door to one of the construction sites (3905 Sacramento site). We have never heard of a single (there were 35????) neighbor meeting. So we have none of the information or understanding that we would have been able to get if we had been informed/ invited into that process. We did meet once, several years ago, with Matt Fields but have not had any other interaction with the planning process.” (Sara Alexander, Email, September 4, 2019 [I-Alexander1-3])

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"I was informed recently that there have been over 35 neighbor meetings and several neighbor surveys that were sent out and never received any of these. I just learned of the meetings a few days ago. We almost missed the hearing that is coming up because it was scheduled for June and we were never sent notification. We found out about it and when we called the city they said they made a mistake and only sent notices to people a certain number of feet from 3700 California st and not the whole perimeter of the whole building site. I'm assuming that that is why we never were notified about neighbor meetings. I feel very uninformed about the project because of this and I'm finding the EIR very confusing and long. Our building is one of the most effected properties because it is directly adjacent to new buildings. I'm not sure what can be done about this at this point." (*Marcy Liner, Email, September 5, 2019 [I-Liner2-1]*)

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"1. The draft EIR referenced requesting a copy via a postcard, but the draft EIR itself was a pdf. How would I request a copy of the final EIR?" (*Joshua Klipp, Email, September 20, 2019 [I-Klipp1-1]*)

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#### **RESPONSE CEQA-1: PUBLIC OUTREACH**

The comments refer to distribution of the draft EIR and the outreach that was conducted as part of the community vision planning process. One comment mentions the extension of the draft EIR comment period. Other comments state that they did not receive notification of meetings associated with the community vision planning process. One comment states that the draft EIR is "long and confusing." One comment asks how to request a copy of the final EIR.

The draft EIR was noticed and circulated in accordance with the CEQA Guidelines and City's administrative code. The reader is referred to the discussion on p. 1-1 of Section 1, *Introduction to Responses and Comments*, which describes the environmental review process conducted for the project. As discussed therein, because of an error in the original distribution of the notice of public hearing and availability of the EIR on June 13, 2019, a revised notice was distributed to the corrected distribution list on July 10, 2019, the draft EIR comment period was extended to September 24, 2019, and the public hearing date was changed to September 19, 2019.

As discussed in draft EIR Chapter 1, *Introduction* (p. 1-4), and Chapter 2, *Project Description* (p. 2-11), the project sponsor engaged in a two-year community outreach process to solicit input regarding the neighborhood's vision for redevelopment of the project site, pursuant to the requirements set forth in the development agreement for the project site between the City and CPMC. The community outreach process, led by a designated Visioning Advisory Committee (VAC), was not part of the environmental review process required by CEQA, nor was it subject to CEQA's public noticing requirements. The community vision plan developed by the VAC was the basis of the proposed project.

The following list summarizes the neighborhood outreach meetings that were conducted as part of the community outreach process and the methods under which they were noticed. The comments about the community outreach meeting are not comments on the draft EIR because they do not relate to the public review processes required by CEQA.

- A pre-application meeting was held at the Jewish Community Center on Monday April 4, 2016. Notice was provided within a 300-foot radius of the project site; 500 recipients were notified. VAC members were notified and asked to invite members of their organizations.
- Ten VAC meetings were held between the fall of 2014 and fall of 2016. Additional meetings were held on a periodic basis between 2016 and the present. The CPMC provided email notices to neighborhood associations, as required under the development agreement. Members of the public, the City's planning staff, and representatives of the district supervisor who were not members of the VAC attended.
- Several regular meetings were held among neighborhood associations that belong to the VAC, including the Presidio Heights Association of Neighbors and the JPIA. These meetings were noticed by the neighborhood associations to their members.
- Dozens of informal in-home meetings were hosted by residents who reside close to the project site; neighbors were invited to be guests.
- Several community stakeholder meetings were held near the project site at local schools, the Jewish Community Center, and Temple Emanu-El. The notification methods for these meetings varied.
- The project sponsor conducted a community survey using the online tool Survey Monkey. The survey was sent to names on the lists of neighborhood association members provided by members of the VAC and CPMC. Five hundred surveys were distributed; 298 responses were provided online. Some responses were submitted and processed by hand.

The comment that the draft EIR is "long and confusing" does not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA. The draft EIR was prepared in accordance with the requirements of CEQA, the CEQA guidelines, San Francisco Administrative Code Chapter 31 and the planning department's environmental review guidelines. The comment may be considered and weighed by the decision makers prior to rendering a final decision to certify the EIR.

This RTC document is available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/PIM/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number 2017-003559ENV, and then clicking on the "Related Documents"

link. Hard copies of this RTC document are available at the Planning Information Center counter on the first floor of 1660 Mission Street, San Francisco.

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## S. GENERAL ENVIRONMENTAL COMMENTS

The comments and corresponding responses in this section relate to general environmental comments on the draft EIR. The general comments are grouped according to the following issues they raise:

- GE-1, Disclosure of Impacts and Mitigation Measures/Adequacy of EIR Analysis
- GE-2, General Construction Comments
- GE-3, Cumulative Analysis
- GE-4, Tree Removal

A corresponding response follows each grouping of comments.

### COMMENT GE-1: DISCLOSURE OF IMPACTS AND MITIGATION MEASURES/ADEQUACY OF EIR ANALYSIS

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“Our concerns - so far, until we understand better - are the loss of open space and trees, the allocation for light and air at our property line, the relocation of the bus routes, and traffic/parking stress during construction.” (*Sara Alexander, Email, September 4, 2019 [I-Alexander1-4]*)

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“After attending the meeting at the Planning Commission on September 19, I would like to voice some more concerns, specifically noise, traffic, parking, and heights of roof lines casting shadow on my property on the corner of Palm and California. My family has owned 3845 California since appropriately 1964.” (*Marie Laidas Sullivan, Email, September 21, 2019 [I-Sullivan1-1]*)

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“Page S-27 - S-28: “Environmental topics raised during this process included traffic, parking, noise, walkability, and consistency with the quality and character of existing neighborhood architecture. ... Although the community outreach process is separate from the NOP scoping effort and not part of the environmental review process required by CEQA, the planning department considered each of these topics in preparing the EIR for the proposed project. ...As noted in Section 4.1, Introduction, the proposed project is subject to California Public Resources Code section 21099(d), which eliminates consideration of impacts related to aesthetics and parking in determining the significance of physical environmental impacts under CEQA for



residential, mixed-use residential, or employment-center projects on infill sites within transit priority areas. Accordingly, this EIR does not contain a separate discussion of impacts related to aesthetics or parking. ...”

See Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6”.

Page S-27, “S.5 Areas of Known Controversy and Issues to Be Resolved”:

See Page 2-11 that refers to a “Development Agreement”.

Page 1-2, 1.2 “Purpose of This EIR”: States the meaning of “significant effect on the environment” under CEQA Guidelines Section 15382:

“...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.”

Some of the MITIGATION measures are not detailed enough and need to be added to. See within this document. *“(Rose Hillson, Email, September 11, 2019 [I-Hillson1-1])*

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“Page 1-5: It states that the Initial Study determined that the impacts on Cultural Resources, Biological Resources, and Geology and Soils as \*not\* significant but the DEIR shows them as “significant impact” on Pages S-1 – S-19, Table S-1, “Summary of Impacts of Proposed Project Identified in EIR”. The impacts appear to be on birds and on tribal resources.” *(Rose Hillson, Email, September 11, 2019 [I-Hillson1-2])*

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“I have a few questions. Generally, I think the draft EIR is very well set up, very well drafted and very clear. I appreciate that.” *(San Francisco Planning Commission, Public Hearing, September 19, 2019 [A-SFPC-1])*

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“Hi. I'm Marie Sullivan. And I am a property owner across the street from 3838, actually, since 1968. My parents bought the place. I certainly support new housing and jobs for people. But I'm very concerned about the -- with how this is going to affect the environment and parking. And so that's why I'm here, to say that -- speak my concerns.” *(Marie Sullivan, Public Hearing, September 19, 2019 [I-Sullivan2-1])*

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**RESPONSE GE-1: DISCLOSURE OF IMPACTS AND MITIGATION MEASURES/ADEQUACY OF EIR ANALYSIS**

The comments express concern regarding noise, traffic, parking, shadow, open space, air quality, loss of trees, and climate change as a result of the proposed project. These comments do not specifically point to any deficiency in the analysis or conclusions of the draft EIR. Therefore, no changes to the draft EIR are required in response to these comments.

Potential impacts related to noise are addressed in draft EIR Section 4.3, *Noise*. Potential impacts related to traffic and parking are addressed in draft EIR Section 4.2, *Transportation and Circulation*. Potential impacts related to shadow are addressed in the initial study under Impact SH-1, starting on p. 54. In addition, please refer to Response SH-2 on p. 4-133 for a discussion of shadow impacts on nearby properties. Potential impacts related to air quality are addressed in draft EIR Section 4.4, *Air Quality*. Potential impacts related to climate change and GHG emissions are addressed in Section E.8 of the initial study. Please refer to Response PD-1 on p. 4-5, Response GE-4 on p. 4-155, and Response GHG-1 on p. 4-126 regarding proposed tree removal.

One commenter discussed the adequacy of the mitigation measures and noted particular text that will need to be corrected in the final EIR. The commenter states that the mitigation measures are not detailed enough but does not specify any specific deficiencies in information. The commenter also states there is an inconsistency between the level of impact identified for cultural resources, biological resources, and geology and soils on draft EIR p. 1-5 and in draft EIR Table S-1, starting on p. S-4. To clarify, draft EIR Table S-1 includes a column that identifies the level of significance before mitigation (significant [S]) and a column that identifies the level of significance after mitigation (less than significant [LTS]) for impacts related to cultural resources, biological resources, and geology and soils. This table clarifies that with mitigation measures identified in the initial study, impacts related to these topics would be less than significant. Therefore, there is no inconsistency between the summary tables and the analysis contained in the EIR or the initial study.

Regarding the concern for loss of open space, open space is discussed and analyzed throughout the draft EIR and initial study. As discussed on draft EIR p. 2-11, existing open space at the project site is limited because of the densely developed nature of the site. The only existing publicly accessible privately (CPMC) owned open spaces are an outdoor plaza with hardscape features, trees, and seating areas; a pedestrian access route to the plaza; and a plaza with eight stone columns. Although these spaces may have been used and accessed as public open spaces in the past, they are on private land and would no longer be accessible to the public with the proposed project. As shown on draft EIR Table 2-2, p. 2-14, the proposed project would add 33,400 square feet of common open space that would be accessible to residents of the project site only. This number has been increased and updated in Table 2-2, Proposed Project

Characteristics, and is shown in Section 5, DEIR Revisions. The updated open space characteristics include a total of 47,700 square feet of private open space and 40,400 square feet of common open space (which would only be accessible to project residents). This update is a 5,100 sf decrease in private open space and a 7,000 sf increase in common open space compared to the square footages in the draft EIR. These changes do not alter the findings of the draft EIR. The proposed project would comply with Planning Code section 135 and general plan policies regarding open space. In addition, refer to Response PD-1 on p. 4-5 regarding open space.

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#### **COMMENT GE-2: GENERAL CONSTRUCTION COMMENTS**

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“1. Construction work and phasing needs be be addressed especially with the Traffic, Noise, vibration, dust during construction, working hours, parking for construction workers as it impacts the residents and business'. I know that some of this is covered in the DEIR, but I did not want to miss these issues.” (*Dennis Hong, Email, July 31, 2019 [I-Hong-3]*)

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“6. How will this Project's construction work i.e., noise, dust, traffic, parking, vibration impact the local residents and the Laurel Village business's as they continue to thrive? Only because too often the best practices and mitigation does not work?” (*Dennis Hong, Email, July 31, 2019 [I-Hong-8]*)

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#### **RESPONSE GE-2: GENERAL CONSTRUCTION COMMENTS**

The comments express concern regarding potential traffic, noise and vibration, and air quality impacts during project construction. These are analyzed in draft EIR Section 4.2, *Transportation and Circulation*; Section 4.3, *Noise*; and Section 4.4, *Air Quality*. These comments do not point specifically to any deficiency in the analysis or conclusions of the draft EIR. Therefore, no changes to the draft EIR are required in response to these comments.

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#### **COMMENT GE-3: CUMULATIVE ANALYSIS**

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“5. Cumulative projects: How will the CPMC project impact or overlap with UCSF proposed 3333 California Street Project a few blocks away; mostly in the Phasing of the construction periods?” (*Dennis Hong, Email, July 31, 2019 [I-Hong-7]*)



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“However, I'm concerned that the cumulative impact of the two large projects, where we have change land use, 333 California and 3700 California have cumulative impacts, which reminds me of creating something which is slightly too far center.” (*San Francisco Planning Commission, Public Hearing, September 19, 2019 [A-SFPC-2]*)

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### **RESPONSE GE-3: CUMULATIVE ANALYSIS**

The comments express concern about the cumulative impacts of the proposed project and a mixed-use development proposed at 3333 California Street (Case No: 2015-014028ENV). As stated in draft EIR Chapter 4, *Environmental Setting and Impacts*, p. 4.1-6, the analysis of the potential cumulative impacts in the draft EIR, including the potential for the proposed project's incremental effects to be cumulatively considerable, employs a list-based approach and a projections-based approach, depending on which approach best suits the individual resource topic being analyzed. The list-based approach considers a list of foreseeable future projects (e.g., the mixed-use development proposed at 3333 California Street) that could produce closely related impacts and combine with those of the proposed project. The projections-based approach considers a summary of projections contained in a general plan or related planning document that can be used to determine cumulative impacts.

The mixed-use development proposed at 3333 California Street is considered in the analyses of cumulative impacts throughout the draft EIR and initial study. The draft EIR considered the cumulative construction impacts related to transportation and circulation, noise, and air quality, as discussed below.

Cumulative construction impacts related to transportation and circulation are discussed under Impact C-TR-1 in draft EIR Section 4.2, *Transportation and Circulation*, p. 4.2-71. As discussed therein, construction of the reasonably foreseeable future projects in the vicinity of the project site could temporarily increase traffic at the same time as the proposed project and on the same roads (e.g., California Street and Sacramento Street). As part of the construction permitting process, similar to the requirements for the proposed project, each development project would be required to work with various City departments to develop detailed and coordinated construction logistics and contractor parking plans to address issues related to construction vehicle routing, traffic control, transit vehicles, and accessibility for people walking and biking adjacent to the construction area. Overall, because construction activities associated with the proposed project and other projects would be temporary, limited in duration, and conducted in accordance with City requirements, the proposed project, in combination with reasonably foreseeable developments in the general area, would result in less-than-significant cumulative construction-related transportation impacts, and no mitigation measures are necessary. In addition, the proposed project would implement Improvement Measure I-TR-A, Project

Construction Updates (draft EIR p. 4.2-54), which requires the project sponsor to provide nearby residences and adjacent businesses with regularly updated information regarding construction, including construction activities, peak construction vehicle activities, travel or parking lane closures, and sidewalk closures through a newsletter and/or website. This would further reduce the less-than-significant construction-related impact related to transportation and circulation.

Cumulative construction impacts related to noise are discussed under Impact C-NO-1 in draft EIR Section 4.3, *Noise*, p. 4.1-8. As discussed therein, construction activities for the proposed project, in combination with reasonably foreseeable projects, could result in a substantial temporary increase in noise because three reasonably foreseeable projects could overlap with construction noise from the proposed project, one of which is the mixed-use development proposed at 3333 California Street. Because the 3333 California Street project site would be more than 1,000 feet from the proposed project, construction noise at one site would not be readily detectable at the other site. However, the many residences between Spruce Street and Laurel Street could detect noise from both projects. The draft EIR found that construction noise from the proposed project in combination with construction noise from the mixed-use development proposed at 3333 California Street would be significant. However, with implementation of Mitigation Measure M-NO-1, which requires the project sponsor to develop a set of site-specific noise attenuation measures, the proposed project would result in a less-than-significant cumulative construction noise impact. In addition, the proposed project and the reasonably foreseeable future projects would be required to comply with the noise ordinance requirements, which limit noise levels from individual pieces of equipment.

Because of the distance between the project site and the 3333 California Street project site, which is more than 1,000 feet, significant cumulative construction-related ground-borne vibration impacts are not expected, as discussed in draft EIR Section 4.3, *Noise*, under Impact C-NO-2, p. 4.3-43. There would be no appreciable potential for ground-borne vibration from the proposed project to combine with that of reasonably foreseeable projects to result in a significant cumulative vibration impact.

Cumulative construction impacts related to air quality are discussed under Impact C-AQ-1 in draft EIR Section 4.4, *Air Quality*, p. 4.4-55. As discussed therein, the proposed project, in combination with reasonably foreseeable future cumulative projects, would not result in significant criteria air pollutant or health risk impacts on sensitive receptors. This impact would be less than significant. Of the identified cumulative projects, the mixed-use development proposed at 3333 California Street would contribute marginally (e.g., an excess cancer risk of less than one per one million people exposed) to health risks at the project's maximally exposed individual receptor because it is more than 1,000 feet away.

In addition to the construction-related cumulative impacts discussed above, draft EIR Section 4.2, *Transportation and Circulation*, considered the operational cumulative impacts associated with the mixed-use development proposed at 3333 California Street. As discussed under Impact C-TR-2

on draft EIR p. 4.2-72, the proposed project, in combination with reasonably foreseeable future projects, would not cause potentially hazardous traffic conditions. The analysis discusses 3333 California Street specifically because of the increased traffic volumes from that project, which could lead to an increase in conflicts between people driving. However, most of the additional vehicle trips under 2040 cumulative conditions would be traveling on California Street through the study area to citywide or regional destinations, as opposed to local destinations. Therefore, this increase in vehicle traffic on California Street would not substantially increase traffic volumes or turning movements onto other local streets that are adjacent to the 3700 California Street project site, such as Cherry, Maple, or Sacramento streets because this traffic would primarily stay on California Street. Overall, the increased potential for conflicts would be small and would not be considered a new hazard. In addition, the proposed project would result in a reduction of the overall amount of traffic on other streets throughout the study area following the closure of the existing CPMC hospital. The project vehicle traffic in combination with other projects would not result in significant cumulative impacts related to potentially hazardous conditions, and no mitigation measures are necessary. Therefore, the proposed project, in combination with reasonably foreseeable development projects, would result in a less-than-significant cumulative traffic hazard impact.

As discussed in the draft EIR under Impact C-TR-3, p. 4.2-73, the proposed project would not combine with other projects to result in cumulative impacts on regional transit capacity. This is partially because the proposed project would reduce the number of trips on regional transit only slightly through replacement of the existing CPMC hospital with residential land uses at the project site. No mitigation measures are necessary.

The cumulative analysis in the draft EIR is comprehensive; these comments do not question the accuracy of the cumulative analysis presented in the draft EIR. No changes to the draft EIR are required in response to these comments.

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#### **COMMENT GE-4: TREE REMOVAL**

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“3. I also work closely with the Bureau of Urban Forestry on initiatives to change canopy management. One issue that comes up a lot is BUF not being brought in on proposed developments with street tree removals until it's much too late in the game to change anything. Would you be up for an introduction to the BUF inspector assigned to the area covering 3700 California so that they can be involved earlier on with regard to proposed tree removals?” (*Joshua Klipp, Email, September 20, 2019 [I-Klipp1-3]*)



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“Please see my objection(s), below, to the EIR for 3700 California Street. As you will see, my objections are primarily based on the tree removals. According to the Draft EIR, the project site currently contains 163 trees: 91 are regulated trees (77 street trees and 14 significant trees) and 72 are non-regulated trees. The proposed project would remove 42 of the 77 existing street trees and plant 68 new street trees, for a total of 103 street trees. Nine of the 14 significant trees would be removed due to conflicts with the proposed buildings. Of the other 72 non-regulated trees on-site, 70 would be removed and would be replaced with 146 new trees.

Although the EIR doesn’t specify which trees it proposes to remove and/or plant (or their species), a map provided by the project sponsor gave some guidance. I visited the site today and measured some of the trees that were easily accessible (i.e. along the public rights of way, easily accessed on the property). Specifically, I looked at the 28 trees in the grove at Cherry and Sacramento, the 4 redwoods along California, the 8 trees in the small grove off Maple (at the loading dock) and the one large flowering tree on California directly across from the end of Commonwealth.” (*Joshua Klipp, Email, September 24, 2019 [I-Klipp2-1]*)

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“**Public health crisis:** Research indicates that San Francisco is getting hotter, and this is not only a climate crisis, but a public health crisis as well. Warmer days and warmer nights mean that the most vulnerable among us - seniors, youth - are more susceptible to dehydration, heat stroke, and heat exhaustion. This project proposes, essentially, residential housing. Yet it does this while simultaneously removing the large natural assets already on site that would sustain healthy human life. Additionally, while on site I noticed several people sitting in the shade of these trees. Not only would their removal impact the viability of humans who ultimately would live in the project, it impacts the health of every person in the immediate neighborhood.” (*Joshua Klipp, Email, September 24, 2019 [I-Klipp2-3]*)

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“As I sit here typing up this email, it is 100 degrees outside (on September 25). I would respectfully submit that our city and our world literally cannot survive if we continue to do business as usual, i.e. cut down dozens of healthy trees for convenience sake and simply promise to plant more later. According to San Francisco’s own Department of the Environment, we have ten years to act before climate change becomes irreversible. This project, as proposed, would reduce the city’s climate resilience, and then try to compensate for that after it’s too late. We must do better than this project proposes, and this project must go back to the drawing board to determine how to avoid these losses that contribute to our climate catastrophe.

Thank you for your attention to this objection to the Draft EIR for 3700 California Street. Please let me know what are the next steps here. Thank you again, Josh” (*Joshua Klipp, Email, September 24, 2019 [I-Klipp2-5]*)

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**RESPONSE GE-4: TREE REMOVAL**

The comments express concern regarding the general loss of trees and the relationship between tree loss and climate change. These comments do not specifically point to any deficiency in the analysis or conclusions of the draft EIR. Therefore, no changes to the draft EIR are required in response to these comments.

As discussed in Section 2, *Revisions and Clarifications to the Project Description*, changes have been made to the existing and proposed tree counts presented in draft EIR Chapter 2, *Project Description*, p. 2-26, Table 2-3. These changes include retaining eight Coast redwoods at the corner of Sacramento and Cherry streets that were previously identified for removal. The changes to the existing and proposed tree counts presented in draft EIR do not change the analysis of the draft EIR or the initial study. Please refer to Response PD-1, p. 4-5, for a discussion of the proposed tree removals and plantings. Please refer to Response GHG-1, p. 4-126, for a discussion of the impact of the proposed project, including proposed tree removals, on GHGs. The commenter expresses concern regarding the removal of significant trees. The proposed project 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. 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. However, the EIR does include Alternative C, Rehabilitation/Reuse Alternative (draft EIR pp. 6-5 and 6-22, which would maintain the existing landscaping and trees on the project site.

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**T. MERITS OF THE PROJECT**

The comments and corresponding response in this section relate to the merits of the proposed project.

- ME-1, Support and General Comments on the Project
- ME-2, Opposition to the Project

A corresponding response follows each grouping of comments.

**COMMENT ME-1: SUPPORT AND GENERAL COMMENTS ON THE PROJECT**

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“Good afternoon Miss. Jeanie Poling and everyone. Jeanie as a follow up, as promised please find my comments for the above project. I received this DEIR on July 26, I'm sorry for the lateness and hope it makes it in on time.

First of all I fully support this project. This DEIR is very comprehensive and covers just about all the issues and has done an excellent job. Here are my rambling thoughts and comments.

Thank you for the opportunity to submit my comments on this CPMC Project. CPMC in the past has done an excellent job especially with their construction work. For example, the all to massive CPMC Build out on Van Ness Ave. Considering how large this project was.

CPMC has done a nice job with this 3700 California (proposed) project and it looks like it fits well with their Long Range Plan.

My Name is Dennis Hong, I have been a resident of San Francisco for seventy plus years, a retired construction project manager. I live in District 7. My family, many friends including myself use CPMC's services. Including this site. CPMC offers a great benefit to the city.” (Dennis Hong, Email, July 31, 2019 [I-Hong-1])

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“We need this Project. I can only hope the City can expedite this project.

**But better yet it is producing so many much needed new housing units.**

As I mention above, I fully support this project. With CPMC's community out reach with the Van Ness Ave project they have proven they can work with this Community too.” (Dennis Hong, Email, July 31, 2019 [I-Hong-2])

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“3. Project Characteristics: Does a nice job with the Master Plan and the architectural appeal, traffic, loading/unloading and the open space.” (Dennis Hong, Email, July 31, 2019 [I-Hong-5])

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“Good afternoon, President Melgar and fellow Commissioners. My name is Victor Hargett. And I have been a journeyman carpenter for 34 years. I live here in San Francisco. And I am speaking in support of the 3700 California Street project. This project will allow a carpenter like me to continue living in the City of San Francisco. This project will help me continue my career as a carpenter moving toward retirement. This project will provide me with the necessary income to provide for my family. This project will bring much-needed housing to the area. I am in full support of this project and ask that you move to forward this project.” (Victor Hargett, Public Hearing, September 19, 2019 [I-Hargett-1])



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“Yes. Good afternoon, President Melgar, fellow commissioners. Name's Leonard Basoco. I am field representative Carpenters Local 22, here in the City. I'm here today to ask that you guys accept the EIR and move this project on. TMP Partners is committed to using a signatory and general contractor that will provide numerous individuals with the opportunity to earn a good wage; provide both health, retirement benefits to our members. This project will also offer training and educational opportunities for those entering the carpentry trade through apprenticeship. This includes women, minorities, veterans. This project will also bring much-needed housing to the area. We already heard, you know, over 30 people that just said how much we need housing. This is part of it. So like to thank you for the opportunity to speak and urge you to accept the EIR.” (*Leonard Basoco, Public Hearing, September 19, 2019 [I-Basoco-1]*)

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“And there is another challenge I'd like to pose. And that's probably not within the traditional structure of how we do EIRs. I'd like to start to address what we do after cars diminish. In our agenda today are two other projects where we're seeing the reinterpretation of parking. And if we're talking about higher and better uses of parking -- we have a project just coming up in a few minutes -- then I would like this project, as it is providing massive below-grade parking, to be able to already anticipate that change to a higher and better use. Those are my comments. And they're a little bit looking into some future interpretations. But I believe they're important to address.” (*San Francisco Planning Commission, Public Hearing, September 19, 2019 [A-SFPC-5]*)

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“I am all in support of density. However, the massive excavation that both projects are trying to undertake in order to achieve this very car-centric outcome is of great concern to me, particularly because I believe the infrastructure of public transportation, should be increased prior to either of these two projects starting in that area. And that is not just the linear expansion and higher loading of the 1-California and a couple of other buses that are in that corridor, but cross-connections, which really kind of weave this particular large development, focused into the larger project and larger destinations throughout the City. I would like the EIR to address that.” (*San Francisco Planning Commission, Public Hearing, September 19, 2019 [A-SFPC-4]*)

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“Page 2-17: For the 273 residential units (Page 2-12)”...at a rate of 1.5 parking spaces per unit. Overall, the project site would include 416 parking spaces, which would be located primarily in below-grade parking podiums. Four off-street loading zones would also be provided. ...”

The City Planning Department came out with a memorandum regarding a new change to Planning Code in January 2019 of \*no\* minimum parking requirements. If some projects are forced on the transit corridors to have no parking while others are not, what factors go into

consideration for allowing parking or not allowing a certain number of parking spaces for projects? Please provide how these decisions are made and specific criteria used to determine final allocation.

Page 2-17, 2.5.1 “Block A”: Block A would have 57 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 13-ft deep, 2-level, underground parking area.

Page 2-24, 2.5.2 “Block B”: Block B would have 215 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 75-ft deep, 2-level, underground parking area.

Page 2-25, 2.5.3 “Block C”: Block C would have 120 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 17-ft deep, 2-level, underground parking area.

With the above parking space information for the 3 blocks, over half – about 52% -- of the parking spaces will be in Block B.” (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-13]*)

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“On Page 4.5-49 in the old CPMC LRDP EIR, below were/are the existing counts of parking. There are a total of 98 public parking spaces on-street:

On-street parking regulations on the streets adjacent to the California Campus are as follows:

- ▶ On the south side of Sacramento Street between Cherry and Spruce Streets, there are 17 RPP spaces, four 10-minute spaces, eight 2-hour time-limited spaces, and a shuttle zone and a passenger loading/unloading zone.
- ▶ On the north side of California Street between Palm and Spruce Streets, there are 24 metered spaces, one handicapped-accessible space, and a passenger loading/unloading zone.
- ▶ On the west side of Cherry Street between California and Sacramento Streets, there are 11 unrestricted parking spaces.
- ▶ On the east side of Cherry Street between California and Sacramento Streets, there are 10 unrestricted spaces and a passenger loading/unloading zone.
- ▶ On the west side of Maple Street between California and Sacramento Streets, there are 25 RPP parking spaces.
- ▶ On the east side of Maple Street between California and Sacramento Streets, there are 11 RPP parking spaces.

Page 4.2-39, "Proposed Project Curb Colors and Street Parking, Figure 4.2-6": Now, if you compare the above CPMC LRDP EIR parking counts to the proposed parking scheme for the new 3700 California project & based on this Figure 4.2-6<sup>31</sup>...



3700 California Street  
Case No. 2017-003559ENV

**Figure 4.2-6**  
**Proposed Project Curb Colors and Street Parking**

The result of comparing for on-street parking availability for the proposal as compared to the old CPMC parking on-street spaces is as follows:

Sacramento St. (South side, between Cherry & Spruce) 0 change  
California St. (North side, between Palm & Spruce) minus 7 spaces  
Cherry St. (West side, between Sacramento & Calif.) minus 6 spaces  
Cherry St. (East side, between Sacramento & Calif.) minus 4 spaces  
Maple St. (West side, between Sacramento & Calif.) minus 22 spaces  
Maple St. (East side, between Sacramento & Calif.) minus 5 spaces

<sup>31</sup> The figure included in the original comment letter has been reproduced herein with a more legible version of the same image.



**NET NUMBER OF ON-STREET PARKING SPACES MINUS 44 spaces**

When one is stating that this area has a lot of families and they need car parking, and those who may be renters or lower socio-economic persons who cannot afford the parking, the 44 spaces taken away will make those people's lives a bit more challenging especially as they rely on vehicles over Muni or other public transit. Not sure how that will make this area livable for these folks. Maybe it is an "equity" issue & while not part of CEQA impacts or DEIR, that may force more people to take less-than-robust alternatives to transportation. I see my neighbors drive 2 – 3 blocks to pick up their morning coffee at Starbuck's rather than walking and they are not elderly or disabled. It appears to be a lifestyle choice." (*Rose Hillson, Email, September 11, 2019 [I-Hillson1-43]*)

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"It would appear that the dwelling would incorporate 273 residential units, but only 416 parking units. I would encourage you and the developer to do further work to make sure this is an appropriate number of spots. Given the likely cost of the new dwellings, its very likely that the residents in these units will have multiple cars per dwelling, as the residents will have high disposal income and economic means. They will also likely create additional demand for spots during the week with various service providers - nannies, cleaning services, cooks, etc. I would encourage the developer to incorporate this into the math behind the number of parking spots so that parking availability isn't made considerably more difficult for the existing neighbors and commercial interests. Please keep in mind that there are always several building projects (home remodels) ongoing in the surrounding neighborhood which also consume parking spots, its incredible to me as a 10 year resident how often houses consume 2-3 spots for 6 month periods." (*Michael Linn, Email, June 14, 2019 [I-Linn-2]*)

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**RESPONSE ME-1: SUPPORT AND GENERAL COMMENTS ON THE PROJECT**

Comments express support for the proposed project, based on its merits, or are general in nature. Many comments also express support for the project sponsor's outreach efforts and the draft EIR in general.

The majority of these comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft 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 draft EIR, all comments provided to the planning department on the proposed project through the CEQA process, whether on the EIR analysis or the merits of the proposed project,

are included in their entirety in this RTC document. Although general comments in support of the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA, such comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

One comment expresses a desire to expand public transportation infrastructure to serve the project and nearby related projects. The project's effects on transit are discussed on pp. 4.2-59–4.2-61 of the draft EIR. As discussed above and in the draft EIR, the proposed project would reduce the total number of transit trips to and from the project, and therefore would not have an appreciable effect on transit delay or transit crowding. Thus, no additional analysis is needed.

One comment expresses a desire to anticipate a “higher and better use” of parking in the event that less parking is needed in the future. This comment is related to both the merits of the project and the amount of excavation proposed to accommodate the below-grade parking. During the two-year community outreach process for the project (see draft EIR p. S-27), certain members of the community expressed a preference for underground parking. The proposed parking garages would comprise open-air spaces that could be reconfigured in the future to accommodate alternatives to private residential parking, parking for autonomous or TNC vehicles, and storage. The EIR includes evaluation of Alternative B: Reduced Construction Alternative. This alternative was specifically included in the EIR because it would result in less mass grading and excavation to create the below-grade parking, loading and access. As discussed in the draft EIR Chapter 6, *Alternatives*, pp. 6-13 through 6-22, while this alternative would reduce environmental impacts related to mass grading and excavation, it would result in the same overall significance conclusions as the proposed project and the same mitigation measures would apply to this alternative.

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#### **COMMENT ME-2: OPPOSITION TO THE PROJECT**

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“2. I'm an avid advocate for San Francisco's urban forest, and particularly focused on changing the way development approaches canopy. How do I submit an objection to the current EIR and plan (which includes large scale tree removal)?” (*Joshua Klipp, Email, September 20, 2019 [I-Klipp1-2]*)

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#### **RESPONSE ME-2: OPPOSITION TO THE PROJECT**

The comment expresses opposition to the proposed project, based on its merits (related primarily to the proposed tree removal). Please refer to Response PD-1, p. 4-5, and Response GE-4, p. 4-155, regarding tree removal. This comment, in and of itself, does not raise specific environmental issues about the adequacy or accuracy of the draft 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 draft EIR, all comments provided to the planning department on the proposed project through the CEQA process, whether on the EIR analysis or the merits of the proposed project, are included in their entirety in this RTC document. Although general comments in opposition to the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA, such comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

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## U. 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, General Comments
- GC-2, Provisions for Displaced Businesses and Residents

A corresponding response follows each grouping of comments.

### COMMENT GC-1: GENERAL COMMENTS

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“I just went to read it over the weekend and realized the EIR is very long and also pretty hard to understand. So I sent her the email below on behalf of myself and the owner of one of the other units in our 3 unit building. I have not heard back from the third member of our HOA as to their concerns so this letter just mentions the concerns of the two of us.” (*Sara Alexander, Email, September 4, 2019 [I-Alexander1-2]*)

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“Let me know if we could talk, or if there is a more appropriate format to address our concerns. (This is a 3 unit building; 3 owners in the HOA, one commercial and 2 residential units.)” (*Sara Alexander, Email, September 4, 2019 [I-Alexander1-5]*)

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"I live with my wife and family at 16 Commonwealth Avenue. We have lived in the neighborhood for almost 10 years. We have received Notice of Public Hearing with respect to a project at 3700 California Street, the case number is cited in my email title. Thank you in advance for all your efforts running a process to get to the right answer on this project for both the developer, City of SF and surrounding neighborhoods." (*Michael Linn, Email, June 14, 2019 [I-Linn-1]*)

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"Finally, thanks again for the opportunity to review and comment on this most exciting & needed project and trust I have met this deadline. Please add my comments to this DEIR and please send me a hard copy of the RTC when finished. If anyone has any questions to my email, please reach out to me for any additional information to my comments." (*Dennis Hong, Email, July 31, 2019 [I-Hong-11]*)

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#### **RESPONSE GC-1: GENERAL COMMENTS**

Comments were received that were general in nature and did not address a specific environmental issue in the draft EIR. One commenter states that the draft EIR is long and difficult to read. One commenter requests an opportunity to discuss her concerns. One commenter confirms receipt of the notice of public hearing and expresses appreciation for the environmental review process that is currently under way. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the draft EIR. No changes to the draft EIR are required in response to these comments.

One comment expresses appreciation for the opportunity to review the draft EIR and requests a hard copy of the RTC document. In response to Comment I-Hong-11, a hard copy of the RTC document will be mailed to the commenter once it is ready for public distribution.

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#### **COMMENT GC-2: PROVISIONS FOR DISPLACED BUSINESSES AND RESIDENTS**

"7. What provisions if any will there be for any displaced business and or residents impacted by this project?." (*Dennis Hong, Email, July 31, 2019 [I-Hong-9]*)

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**RESPONSE GC-2: PROVISIONS FOR DISPLACED BUSINESSES AND RESIDENTS**

The comment expresses concern regarding provisions for displaced residents and businesses. As stated in the initial study, p. 5-1 (Appendix B of the draft EIR), the project would not displace existing housing units at the project site; rather, it would retain and renovate the existing nine units in Block A. The project also would not directly displace any businesses since the CPMC operations will be moving to other campuses.

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## 5. DEIR REVISIONS

### A. INTRODUCTION

This section presents text changes for the 3700 California Street Project Draft Environmental Impact Report initiated by planning department staff. Some of these changes are specific revisions identified in the responses in Section 4, *Comments and Responses*. The remainder are staff-initiated text changes that add information or clarification related to the proposed project or the environmental setting 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 a substantial increase in the severity of an impact identified in the EIR and initial study that cannot be mitigated to less than significant with implementation of mitigation measures agreed to by the project sponsor.<sup>1</sup> Thus, none of the text revisions would require recirculation pursuant to CEQA Guidelines section 15088.5. The draft EIR and this Response to Comments document together constitute the final EIR for the proposed project.

In the revisions shown below, new text is double-underlined and deletions are shown in ~~striketrough~~. 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 TABLE OF CONTENTS, SUMMARY, AND INTRODUCTION CHAPTER

To reflect the addition of Appendix I, p. iv of the Table of Contents has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

#### Appendix I Mitigated Construction Health Risk Analysis Memorandum

The new Appendix I is provided at the end of this section.

Revisions to the Summary Chapter are based on revisions to the entire draft EIR because they reflect a summary of the draft EIR. Please refer to the subsequent sections of this document for explanations for each revision.

- \* To update the project open space characteristics, the text on p. S-2 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

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<sup>1</sup> Agreement to Implement Mitigation and Improvement Measures for the 3700 California Street Project, February 6, 2020.



The proposed project would include shared onsite amenity space, comprised of a resident fitness facility, and approximately ~~86,200~~88,100 square feet of private and common open space areas for residents, ~~which may include common roof deck areas for some of the buildings.~~

In Table S-1, Mitigation Measure M-NO-1: Construction Noise Control has been revised on pp. S-6 to S-7, new air quality impacts AQ-3 and C-AQ-1 have been added, and new Mitigation Measure M-AQ-3: Construction Emissions Minimization has been added as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

**(REVISED) TABLE 5-1. SUMMARY OF SIGNIFICANT IMPACTS OF PROPOSED PROJECT IDENTIFIED IN EIR [EXCERPT]**

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
<b><u>Air Quality</u></b>			
<u>Impact AQ-3: Construction and operation of the proposed project would not generate toxic air contaminants, including DPM, at levels that would expose sensitive receptors to substantial pollutant concentrations.</u>	<u>S</u>	<p><b><u>Mitigation Measure M-AQ-3: Construction Emissions Minimization</u></b></p> <p><u>The project sponsor shall comply with all of the following:</u></p> <p>A. <u>Engine Requirements.</u></p> <ol style="list-style-type: none"> <li><u>All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either: (1) U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 and be equipped with a Level 3 Verified Diesel Emissions Control Strategies (VDECS) or (2) Tier 4 Interim or Tier 4 Final off-road emission standards.<sup>2</sup></u></li> <li><u>Where grid power is available, portable diesel engines shall be prohibited.</u></li> <li><u>All diesel engines, whether for off-road or on-road equipment or vehicles, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The project sponsor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.</u></li> <li><u>The project sponsor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.</u></li> </ol>	<u>LTS</u>

<sup>2</sup> See 40 CFR Part 1039 and Title 13 CCR Sections 2403 to 2784.

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation												
		<p>B. <u>Waivers.</u></p> <p>1. <u>The Environmental Review Officer (ERO) or their designee may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment is not available or technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; or use of the equipment would create a safety hazard or impaired visibility for the operator. If seeking a waiver, the project sponsor shall demonstrate that with approval of the waiver, the project would not exceed a cancer risk of 7.0 in 1 million at sensitive receptor locations. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to Table AQ-1, below. Emerging technologies with verifiable emissions reductions supported by substantial evidence may also be employed in lieu of the step-down schedule below.</u></p> <p>2. <u>The ERO may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).</u></p> <p><b><u>Table AQ-1 – Off-Road Equipment Compliance Step-down Schedule</u></b></p> <table><tr><th><b><u>Compliance Alternative</u></b></th><th><b><u>Engine Emission Standard</u></b></th><th><b><u>Emissions Control</u></b></th></tr><tr><td><u>1</u></td><td><u>Tier 2</u></td><td><u>ARB Level 2 VDECS<sup>1</sup></u></td></tr><tr><td><u>2</u></td><td><u>Tier 2</u></td><td><u>ARB Level 1 VDECS</u></td></tr><tr><td><u>3</u></td><td><u>Tier 2</u></td><td><u>Alternative Fuels</u></td></tr></table>	<b><u>Compliance Alternative</u></b>	<b><u>Engine Emission Standard</u></b>	<b><u>Emissions Control</u></b>	<u>1</u>	<u>Tier 2</u>	<u>ARB Level 2 VDECS<sup>1</sup></u>	<u>2</u>	<u>Tier 2</u>	<u>ARB Level 1 VDECS</u>	<u>3</u>	<u>Tier 2</u>	<u>Alternative Fuels</u>	
<b><u>Compliance Alternative</u></b>	<b><u>Engine Emission Standard</u></b>	<b><u>Emissions Control</u></b>													
<u>1</u>	<u>Tier 2</u>	<u>ARB Level 2 VDECS<sup>1</sup></u>													
<u>2</u>	<u>Tier 2</u>	<u>ARB Level 1 VDECS</u>													
<u>3</u>	<u>Tier 2</u>	<u>Alternative Fuels</u>													



Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<p><u>How to use the table: If the ERO determines that the equipment requirements listed in Section A.1, above, cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.</u></p> <p><u><sup>1</sup> VDECS are a Verifiable Diesel Emissions Control Strategy</u></p> <p>C. <u>Construction Emissions Minimization Plan. Before starting on-site activities requiring the use of off-road equipment, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the project sponsor will meet the requirements of Section A.</u></p> <ol style="list-style-type: none"> <li>1. <u>The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date.</u></li> <li>2. <u>The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the project sponsor agrees to comply fully with the Plan. A signed certification statement shall be submitted to the planning department before starting on-site construction activities requiring off-road equipment.</u></li> </ol>	

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<p>3. <u>The project sponsor shall make the Plan available to the public for review on-site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.</u></p> <p>D. <u>Monitoring. After start of construction activities, the project sponsor shall submit reports every six months to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.</u></p>	
<u>Impact C-AQ-1. The proposed project, in combination with reasonably foreseeable future cumulative projects, would result in significant health risk impacts on sensitive receptors.</u>	<u>S</u>	<u>See Mitigation Measure M-AQ-3.</u>	<u>LTS</u>
<b>Noise</b>			
Impact NO-1: Construction of the proposed project could generate substantial temporary or periodic increases in ambient noise levels in the project vicinity.	S	<p><b>Mitigation Measure M-NO-1: Construction Noise Control</b></p> <p>The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below.</p> <ul style="list-style-type: none"> <li>Require that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally</li> </ul>	LTS

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<p>provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.</p> <ul style="list-style-type: none"> <li>Prohibit gasoline or diesel engines from having unmuffled exhaust systems.</li> <li>Ensure that equipment and trucks for project construction use the best available noise control techniques (e.g., improved mufflers, redesigned equipment, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible. According to the Federal Highway Administration, the use of shields or barriers around noise sources can reduce noise by 5 to 10 dBA, depending on the type of barrier used.</li> <li>Use “quiet” gasoline-powered or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.</li> <li>Locate stationary noise sources, such as temporary generators, concrete saws, and crushing/processing equipment, as far from nearby receptors as possible; muffle and enclose noise sources within temporary enclosures and shield with barriers, which could reduce construction noise by as much as 5 dB; or implement other measures, to the extent feasible.</li> <li>Undertake the noisiest activities during times of least disturbance to surrounding residents and occupants, such as midday or early afternoon when residents are more likely to be at work and less likely to be sleeping, as feasible.</li> <li>In response to noise complaints received from people in the project area, monitor the effectiveness of noise attenuation measures by taking noise measurements. A plan for noise monitoring shall be provided to the City for review prior to the commencement of each construction phase.</li> </ul> <p>The construction noise control plan must include the following measures for responding to and tracking complaints pertaining to construction noise:</p> <ul style="list-style-type: none"> <li>A procedure and phone numbers for notifying the Department of Building Inspection, health department, or the police department of complaints (during regular construction hours and off hours).</li> <li><u>Signs posted onsite and around the project site at major intersections immediately adjacent to the project site for the duration of project construction</u> describing noise complaint procedures and <u>providing</u> a complaint hotline number that shall be answered at all times during construction. <u>Signs shall include construction work hours.</u></li> <li>Designation of an onsite construction complaint and enforcement manager, <u>with telephone contact information</u>, for the project. <u>This information shall be visible on all signs posted at and around the project site for the duration of project construction.</u></li> </ul>	



Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<ul style="list-style-type: none"><li>A plan for notification of neighboring residents and nonresidential building managers within 300 feet of the project construction area at least 30 days in advance of activities that could increase daytime ambient noise levels at sensitive receptor locations by 10 dBA or more. The notification must include the associated control measures that will be implemented to reduce noise levels.</li></ul>	

In Table S-2, a new improvement measure (Improvement Measure I-BI-A) was added on p. S-18 as follows (new text is double-underlined):

**(REVISED) TABLE 5-1. SUMMARY OF SIGNIFICANT IMPACTS OF PROPOSED PROJECT IDENTIFIED IN THE INITIAL STUDY (EIR APPENDIX B) [EXCERPT]**

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
<b>Biological Resources</b>			
Impact BI-1: The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on 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.	S	<p><b>Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas</b></p> <p>Nesting birds and their nests shall be protected during construction by implementation of the following measures for each construction phase:</p> <ol style="list-style-type: none"> <li>To the extent feasible, the project sponsor shall conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15).</li> <li>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. 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 in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall be performed in publicly accessible areas within 100 feet of the project site in order to locate any active nests of common bird species and within 250 feet of the project site to locate any active raptor (birds of prey) nests.</li> <li>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; if so, the following measures shall apply, as determined by the biologist: <ol style="list-style-type: none"> <li>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 that 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.</li> <li>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 within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for</li> </ol> </li> </ol>	LTS



Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<p>passerines and 250 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.</p> <p>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 the California Department of Fish and Wildlife (CDFW). Necessary actions to remove or relocate an active nest(s) shall be coordinated with the planning department and approved by CDFW.</p> <p>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.</p> <p>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 affected.</p> <p>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.</p> <p><b><u>Improvement Measure I-BI-A: Preconstruction Survey for Bee Populations</u></b>  <u>Prior to construction and tree removal, personnel should check trees to verify there are no active swarms or colonies present. If found, personnel should report the findings to the San Francisco Beekeepers Association or other agency/organization approved by the Planning Department, and either wait for the bees to depart or work with the agency/organization to move the bees to safety.</u></p>	

In Table S-2, Mitigation Measure M-CR-2: Archaeological testing has been revised on pp. S-11 to S-15 as follows (new text is double-underlined and deletions are shown in ~~striethrough~~):

**(REVISED) TABLE 5-2. SUMMARY OF SIGNIFICANT IMPACTS OF PROPOSED PROJECT IDENTIFIED IN THE INITIAL STUDY (EIR APPENDIX B) [EXCERPT]**



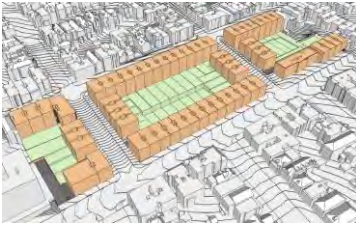

Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
<b>Cultural Resources</b>			
Impact CR-2: Project-related activities could cause a substantial adverse change in the significance of an archaeological resource, pursuant to section 15064.5.	S	<p><b>Mitigation Measure M-CR-2: Archaeological Testing [Excerpt]</b></p> <p><i>Human Remains, and Associated or Unassociated Funerary Objects.</i> <del>If</del><u>The treatment of</u> human remains and <u>of</u> associated or unassociated funerary objects <del>are</del> discovered during any soil-disturbing activity, <u>shall comply with</u> all applicable state and federal laws. <u>This shall be followed, including</u><del>include</del> immediate notification of the <del>coroner</del> <u>Medical Examiner</u> of the City and County of San Francisco; <u>and</u>, in the event <del>that of the coroner determines</del><u>Medical Examiner's determination</u> that the human remains are Native American remains, <u>notification of</u> the Native American Heritage Commission (NAHC) <del>shall be notified. The NAHC, which</del> shall appoint a <del>most likely descendant</del> <u>Most Likely Descendant (MLD)</u>. <u>The MLD shall complete his or her inspection and make recommendations or preferences for treatment and disposition within 48 hours of granted access to the site</u> (Public Resources Code section 5097.98). The <u>Environment Review Officer (ERO)</u> shall also be <u>notified</u> immediately <del>notified</del> upon discovery of human remains.</p> <p>The <del>archaeological consultant</del>, project sponsor, <del>ERO</del>, and <del>MLD</del><u>the ERO</u> shall make all reasonable efforts to develop <del>an agreement</del> <u>a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment of human remains and associated or unassociated funerary objects</u> <u>disposition, with appropriate dignity of the human remains and associated or unassociated funerary objects (as detailed in</u> (CEQA Guidelines section 15064.5(d)) <u>within six days of the discovery of the human remains. This proposed timing shall not preclude the Public Resources Code section 5097.98 requirement that descendants make recommendations or preferences for treatment within 48 hours of being granted access to the project site. The agreement should. The Agreement shall</u> take into consideration the appropriate excavation, removal, recordation, <u>scientific</u> analysis, <u>custodianship</u>, curation, <del>possession</del>, and final disposition of the human remains and associated or unassociated funerary objects.</p> <p>Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. <del>The archaeological consultant shall retain possession of any Native American human</del> <u>However, if the ERO, project sponsor, and MLD are unable to reach an agreement on scientific treatment of the remains</u></p>	LTS



Environmental Impacts	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
		<p><u>and associated or unassociated funerary objects, the ERO, in cooperation with the project sponsor, shall ensure that the remains and associated or unassociated</u><del>unassociated burial</del><u>objects until completion of any scientific analyses of the human remains or funerary objects, as specified in the treatment agreement if such an agreement has been made or, otherwise, as determined by the archaeological consultant and the ERO. If no agreement is reached, state regulations shall be followed, including the reinterment of the human remains and associated burial objects, are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity on the property, in a location not subject to further or future subsurface disturbance (Public Resources Code section 5097.98).</u></p> <p><u>Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during soil-disturbing activity additionally shall follow protocols laid out in the archaeological testing program and any agreement established between the project sponsor, the Medical Examiner, and the ERO.</u></p>	

In Table S-3, Comparison of Proposed Project and Alternatives: the building heights, residential square footage, and open space square footage for the proposed project have been revised on pp. S-22 and S-23 as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

**(REVISED) TABLE 5-3. COMPARISON OF PROPOSED PROJECT AND ALTERNATIVES**

	Proposed Project	No Project Alternative	Reduced Construction Alternative	Rehabilitation/Reuse Alternative
				
<b>Building Heights</b>	36' - 89' <del>96'</del>	25'–112'	36'–40' <sup>a</sup>	25'–112'
<b>No. of Stories</b>	3–7	3–8	3	3–8
<b>Total No. Units</b>	273	9	141	258
<b>Studio</b>	<del>13</del> 16: <del>5</del> 6%	0: 0%	0: 0%	8: 3%
<b>1 Bedroom</b>	<del>56</del> 67: <del>21</del> 23%	9: 100%	13: 9%	65: 25%
<b>2 Bedroom</b>	<del>88</del> 91: <del>32</del> 33%	0: 0%	42: 30%	84: 33%
<b>3 Bedroom</b>	<del>96</del> 79: <del>35</del> 29%	0: 0%	86: 61%	91: 35%
<b>4 Bedroom</b>	20: 7% <sup>b</sup>	0: 0%	0: 0%	10: 4%
<b>Square Footage (sf) by Use</b>	<del>603,200</del> 627,200 sf residential; 15,000 sf amenity	7,000 sf residential (401 Cherry); 622,000 sf medical office	235,000 sf residential	462,000 sf residential; 25,000 sf amenity; 142,000 sf storage/unusable (subgrade)
<b>Open Space</b>	<del>86,200</del> 88,100 sf (common and private)	25,000 sf (common)	82,600 sf (common) <sup>d</sup>	88,200 sf (common) <sup>d</sup>
<b>Parking</b>	416 spaces; 221,000 sf	439 spaces; 105,000 sf	132 spaces; 52,000 sf <sup>e</sup>	354 spaces; 105,000 sf
<b>Bike Stalls</b>	411 class 1 22 class 2	16	212 class 1 21 class 2	387 class 1 39 class 2
<b>No. of Lots (lot size)</b>	16 (2,500–99,400 sf)	14 (approx. 2,000–59,000 sf)	+/- 60 (+/- 3,000 sf)	Not determined – potentially same/less than existing
<b>Entitlements</b>	CU/PUD	None	Potential PUD	CU/PUD
<b>Excavation Depth</b>	13'–75' below grade; <sup>c</sup> 61,800 cubic yards (cy)	None	Up to 10' below grade; approx. 6,600 cy	Approx. 8' below grade; approx. 1,200 cy



Proposed Project	No Project Alternative	Reduced Construction Alternative	Rehabilitation/Reuse Alternative
Source: TMG Partners 2018.			
a. Forty feet for all new buildings, 40 feet for existing 401 Cherry Street, and 36 feet for existing 3698 California Street (Marshal Hale hospital building).			
b. 12 single-family residential (SFR) units on separate lots and two SFR units on podium lots are included in four-bedroom count; exact bedroom count not yet be determined.			
c. Maximum depths of 13 feet on Block A, 75 feet on Block B, and 17 feet on Block C.			
d. Some portion of open space could be made private.			
e. Accounts for one space per unit, except 401 Cherry Street.			
Notes: Amenity = common areas, fitness facility, recreation space; CU/PUD = conditional use/planned unit development.			

To reflect the addition of Appendix I, the text on p. 1-8 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Appendix I Mitigated Construction Health Risk Analysis Memorandum

## C. REVISIONS TO CHAPTER 2, PROJECT DESCRIPTION

- \* To update the project's open space characteristics since the draft EIR publication, the text near the bottom of the first paragraph on p. 2-1 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would include shared onsite amenity space and approximately ~~86,200~~ 88,100 square feet of private and common open space<sup>1</sup> areas for residents, which may include common roof decks for some of the buildings.

- \* To update the project's existing and proposed trees, the text in the second paragraph on p. 2-11 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The project site currently contains ~~163~~173 trees; ~~94~~79 of the trees are regulated trees (i.e., ~~77~~65 street trees and 14 significant trees)<sup>3</sup> and ~~72~~94 are non-regulated trees.<sup>4</sup>

- \* To update the project's existing and proposed trees, the text in the fourth paragraph on p. 2-11 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

There are ~~77~~65 street trees along Sacramento Street, California Street, Cherry Street, and Maple Street project frontages, which together comprise approximately 2,700 feet of street frontage.

- \* To update the project's configuration of residential units (the total of which has not changed) the text in the second paragraph of p. 2-12 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The project's 273 residential units would include 14 single-family homes and 19 multi-family residential buildings with ~~69~~ 83 studios and one-bedroom units, ~~88~~ 91 two-bedroom units, ~~96~~ 79 three-bedroom units, and 20 four-bedroom units. Approximately ~~75~~ 70 percent of the residential units would contain two or more bedrooms.

- \* In Table 2-2, Proposed Project Characteristics, the proposed roof height, building area, and open space information has been revised on p. 2-14 as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

**(REVISED) TABLE 2-2. PROPOSED PROJECT CHARACTERISTICS**

Building <sup>1</sup>	Lot Area	Floors	Roof Height without Appurtenances	Roof Height with Appurtenances	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space
<b>Block A</b>									
A1 (SFR)	2,500	3	40	<u>n/a</u>	5,200	1	2	1,100	n/a
A2 (SFR)	2,500	3	40	<u>n/a</u>	4,800	1	2	<del>1,100</del> <u>1,000</u>	n/a
A3 (SFR)	2,500	3	40	<u>n/a</u>	4,800	1	2	<del>1,300</del> <u>1,000</u>	n/a
A4 (SFR)	2,500	3	40	<u>n/a</u>	4,600	1	2	<del>1,200</del> <u>1,000</u>	n/a
A5 (MF, existing)	2,800	4	40	<u>n/a</u>	7,000	9	in podium	n/a <sup>2</sup>	0
A6 (SFR)	5,000	3	40	<u>n/a</u>	5,900	1	2	<del>2,900</del> <u>2,700</u>	n/a
A7 (MF)	17,600	5	65	<u>81</u>	<del>61,200</del> <u>63,000</u>	29	57	<del>4,600</del> <u>4,400</u>	<del>2,900</del> <u>3,900</u>
<b>Block A Total</b>	<b>35,400</b>				<del>93,500</del> <u>95,300</u>	<b>43</b>	<b>67</b>	<del>12,200</del> <u>11,200</u>	<del>2,900</del> <u>3,900</u>
<b>Block B</b>									
B3 (SFR)	2,500	3	<del>40</del> <u>48<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B4 (SFR)	2,500	3	<del>40</del> <u>47<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B5 (SFR)	2,500	3	<del>40</del> <u>46<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B6 (SFR)	2,500	3	<del>40</del> <u>48<sup>3</sup></u>	<u>n/a</u>	4,500	1	2	1,100	n/a
B1 (SFRH)	99,400	3	40	<u>n/a</u>	4,900	1	215	<del>1,400</del> <u>1,300</u>	<del>11,500</del> <u>15,900</u>
B2 (SFRH)		3	40	<u>n/a</u>	5,800	1		<del>1,300</del> <u>1,000</u>	
B7 (MF)		7	80	<u>96</u>	<del>48,200</del> <u>47,300</u>	<del>26</del> 25		<del>2,200</del> <u>1,800</u>	
B8 (MF)		5	<del>66</del> <u>65</u>	<u>82</u>	<del>35,900</del> <u>36,000</u>	<del>17</del> 16		<del>2,700</del> <u>2,500</u>	
B9 (MF)		5	<del>66</del> <u>62</u>	<u>82</u>	<del>35,000</del> <u>33,600</u>	<del>14</del> 15		<del>3,500</del> <u>3,100</u>	
B10 (MF)		7	80	<u>96</u>	<del>44,000</del> <u>43,800</u>	<del>16</del> 17		<del>900</del> <u>1,000</u>	
B11 (MF)		5	58	<u>n/a</u>	<del>21,200</del> <u>23,200</u>	10		<del>700</del> <u>300</u>	
B12 (MF)		7	80	<u>n/a</u>	<del>66,000</del> <u>66,800</u>	34		<del>3,000</del> <u>2,600</u>	
B13 (MF)		3	40	<u>n/a</u>	<del>10,400</del> <u>11,600</u>	4		<del>1,000</del> <u>900</u>	
B14 (MF)		3	40	<u>n/a</u>	<del>11,600</del> <u>11,700</u>	4		1,000	
B15 (MF)		3	40	<u>n/a</u>	<del>11,600</del>	4		1,000	



Building <sup>1</sup>	Lot Area	Floors	Roof Height without Appurtenances	Roof Height with Appurtenances	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space
B16 (MF)	109,400	3	40	<u>n/a</u>	<del>11,900</del> <del>11,600</del> 11,000	4	223	1,000	11,500
B17 (MF)		3	40	<u>n/a</u>	<del>11,600</del> <del>11,000</del> 11,000	4		1,000	
B18 (MF)		3	<del>40</del> <u>36</u>	<u>n/a</u>	<del>10,400</del> <del>11,300</del> 11,300	4		<del>1,000</del> <u>900</u>	
<b>Block B Total</b>	<b>109,400</b>				<b><del>346,200</del> <u>347,900</u></b>	<b>147</b>	<b>223</b>	<b><del>26,100</del> <u>23,800</u></b>	<b><del>11,500</del> <u>15,900</u></b>
<b>Block C</b>									
C1 (SFR)	3,400	3	<del>38</del> <u>37</u>	<u>n/a</u>	5,500	1	2	1,500	n/a
C2 (SFR)	3,400	3	<del>36</del> <u>37</u>	<u>n/a</u>	5,700	1	2	<del>1,400</del> <u>1,500</u>	n/a
C3 (SFR)	3,100	3	<del>42</del> <u>40</u>	<u>n/a</u>	5,700	1	2	<del>1,100</del> <u>1,000</u>	n/a
C4 (MF)	59,100	5	<del>58</del> <u>57</u>	<u>n/a</u>	<del>50,400</del> <u>50,600</u>	22	120	<del>4,000</del> <u>2,600</u>	<del>19,000</del> <u>20,600</u>
C5 (MF)		7	80	<u>96</u>	<del>59,200</del> <u>58,200</u>	<del>27</del> 28		<del>5,700</del> <u>5,100</u>	
C6 (MF)		3	36	<u>n/a</u>	<del>18,800</del> <u>18,500</u>	<del>24</del> 23		900	
C7(Amenity/MF)		3	50	<u>n/a</u>	<del>28,700</del> <u>35,900</u>	4		n/a	
C8 (MF)		3	<del>38</del> <u>45</u>	<u>n/a</u>	<del>4,200</del> <u>3,900</u>	3		<del>0</del> <u>100</u>	
<b>Block C Total</b>	<b>69,000</b>				<b><del>178,200</del> <u>184,000</u></b>	<b>83</b>	<b>126</b>	<b><del>14,500</del> <u>12,700</u></b>	<b><del>19,000</del> <u>20,600</u></b>
<b>Proposed Project Total</b>	<b>213,800</b>				<b><del>618,200</del> <u>627,200</u></b>	<b>273</b>	<b>416</b>	<b><del>52,800</del> <u>47,700</u></b>	<b><del>33,400</del> <u>40,400</u></b>

Notes: Numbers may not sum due to rounding.

SFR = single family residence. MF = multi-family. SFRH = single-family rowhouse (on podium).

<sup>1</sup> Refer to Figure 5 for building locations.

<sup>2</sup> Building A5 is an existing legal nonconforming use.

<sup>3</sup> ~~In addition to the common spaces included in this table, some buildings may have common roof deck areas.~~ Subject to a PUD exception to the way in which height is measured under Sec. 261(b)(2).

- \* To update the project's total building square footage the text in two places of the first paragraph of p. 2-12 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The proposed project would construct or renovate approximately ~~618,200~~ 627,200 square feet of residential uses and accessory amenity space on Blocks A, B, and C and excavate approximately 61,800 cubic yards for below-grade parking podiums totaling approximately 221,000 square feet of parking area.

Overall, the project proposes to reduce the approximately 629,000 square feet of existing hospital/residential uses and 439 parking stalls to approximately ~~618,200~~ 627,200 square feet of residential use with 416 parking stalls.

- \* To update the height of the rooftop appurtenances on Block A, the text in the third paragraph on p. 2-17 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~75~~ 81 feet.

- \* To update the height of the rooftop appurtenances on Block B, the text in the second paragraph on p. 2-24 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 42 to ~~90~~ 96 feet.

- \* To update the project's open space characteristics since the draft EIR publication, the text near the top of p. 2-24, and the text near the bottom of paragraph two on p. 2-24 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Approximately ~~12,200~~ 11,200 square feet of private open space and ~~2,900~~ 3,900 square feet of common open space for residents would be provided on Block A.

Approximately ~~26,100~~ 23,800 square feet of private open space and ~~11,500~~ 15,900 square feet of common open space for residents would be provided on Block B.

- \* To update the height of the rooftop appurtenances on Block C, the text near the top of p. 2-25 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

When accounting for rooftop appurtenances (e.g., stair, elevator, or mechanical penthouses), building heights would range from 38 to ~~90~~ 96 feet.

- \* To update the project's open space characteristics since the draft EIR publication, the text near the bottom of the first paragraph on p. 2-25 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Approximately ~~14,500~~ 12,700 square feet of private open space and ~~19,000~~ 20,600 square feet of common open space would be provided for residents on Block C.

- \* To update the project's existing and proposed trees, the text in the second paragraph on p. 2-26 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would lead to a net increase of trees at the project site. As shown in Table 2-3, the project site currently contains ~~163~~ 173 trees: ~~91~~ 79 are regulated trees (~~77~~ 65 street trees and 14 significant trees) and ~~72~~ 94 are non-regulated trees. The proposed

project would remove ~~4233~~ of the ~~7765~~ existing street trees and plant ~~6876~~ new street trees, for a total of ~~103108~~ street trees. Nine of the 14 significant trees would be removed due to conflicts with the proposed buildings. Of the other ~~7294~~ non-regulated trees on-site, ~~7084~~ would be removed and would be replaced with ~~146148~~ new trees.<sup>11</sup> Overall, the project would increase the total number of trees onsite from ~~163173~~ to ~~256271~~ due to the planting of ~~214224~~ new trees.

- \* To update the project's total open space characteristics since the draft EIR publication, the text in the first paragraph on p. 2-27 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

In total, the project would provide approximately ~~86,200~~ 80,100 square feet of open space comprised of ~~52,800~~ 47,700 square feet of private open space and ~~33,400~~ 40,400 square feet of common open space.

- \* In Table 2-3, Existing and Proposed Trees, the existing trees, trees to be removed, new trees, and total trees have been revised on p. 2-26 as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**(REVISED) TABLE 2-3. EXISTING AND PROPOSED TREES**

Type of Tree	Existing Trees	Trees to Be Removed	New Trees	Total Trees
Unregulated Trees	<del>7294</del>	<del>-70-84</del>	<del>146148</del>	<del>148158</del>
Street Trees	<del>7765</del>	<del>-42-33</del>	<del>6876</del>	<del>103108</del>
Significant Trees	14	-9	--	5
<b>Total</b>	<del>163173</del>	<del>-121-126</del>	<del>214224</del>	<del>256271</del>

Sources: TMG Partners, 3700 California Street, Tree Planting & Removal Summary. ~~December 2018~~ December 2019 Revision.

- \* To clarify the description of the proposed operator restroom, the text in the first paragraph and footnote 10 on p. 2-26 have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The ~~San Francisco Municipal Railway's (Muni's)~~ SFMTA's 33-Ashbury/18<sup>th</sup> Muni line terminates at Sacramento and Cherry streets, and Muni operators use the existing CPMC restroom facilities. The proposed project would change transit amenities in areas surrounding the project site in several ways. First, subject to the project retaining the Block A driveway on California Street in its current location, the proposed project would replace the existing Muni driver layover bathroom for the 33-Ashbury/18<sup>th</sup> route in the hospital at Sacramento and Cherry streets with a new driver bathroom at 401 Cherry Street (Building A5 at the northwest corner of Sacramento and Cherry streets).<sup>10</sup> This bathroom would be closer to the layover stop than the existing bathroom. Second, the proposed



project would shift the Muni overhead wires for the 33-Ashbury/18<sup>th</sup> line at Sacramento and Maple streets to allow Muni vehicles to make a tighter turn onto Maple Street, given the new corner bulb-out at the southeast corner of this intersection and the changes to the Maple Street sidewalk widths and right-of-way/parking configuration. Overhead wire and streetlight poles may be shifted on Sacramento, Maple and California streets to accommodate the overhead wires or to allow for new driveways to access the project site. The project does not propose any new bus stops or changes to existing bus stops.

<sup>10</sup> Should the ~~project sponsor be required to move the~~ proposed driveway for Block A ~~be moved~~ to another location, no bathroom would be provided. In addition, per the March 14, 2019, agreement between CPMC and ~~Muni~~ the SFMTA, the current owner has authorized the SFMTA to install a portable restroom unit ~~would be provided~~ at 401 Cherry Street during project construction.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees since the draft EIR publication, the text on the bottom of p. 2-35 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Approval of a permit to remove and plant street trees and partial waiver from Public Works Code section 806(d) to provide ~~31~~ 26 fewer street trees than required.

- \* To show the revised proposed elevations, Figure 2-6 on p. 2-15 has been replaced with (Revised) RTC Figure 2-6a and (Revised) RTC Figure 2-6b. These figures are shown on the following pages.
- \* (New) RTC Figure 2-16 has been added to the draft EIR to show the locations of the proposed roof decks. This figure is shown on the following pages.

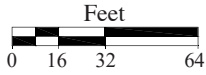
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CALIFORNIA STREET



SACRAMENTO STREET



SOURCE: RAMSA 2019. 3700 California Street, San Francisco, CA. Street Elevations. December 20.





CHERRY STREET - BLOCK A



CHERRY STREET - BLOCK B



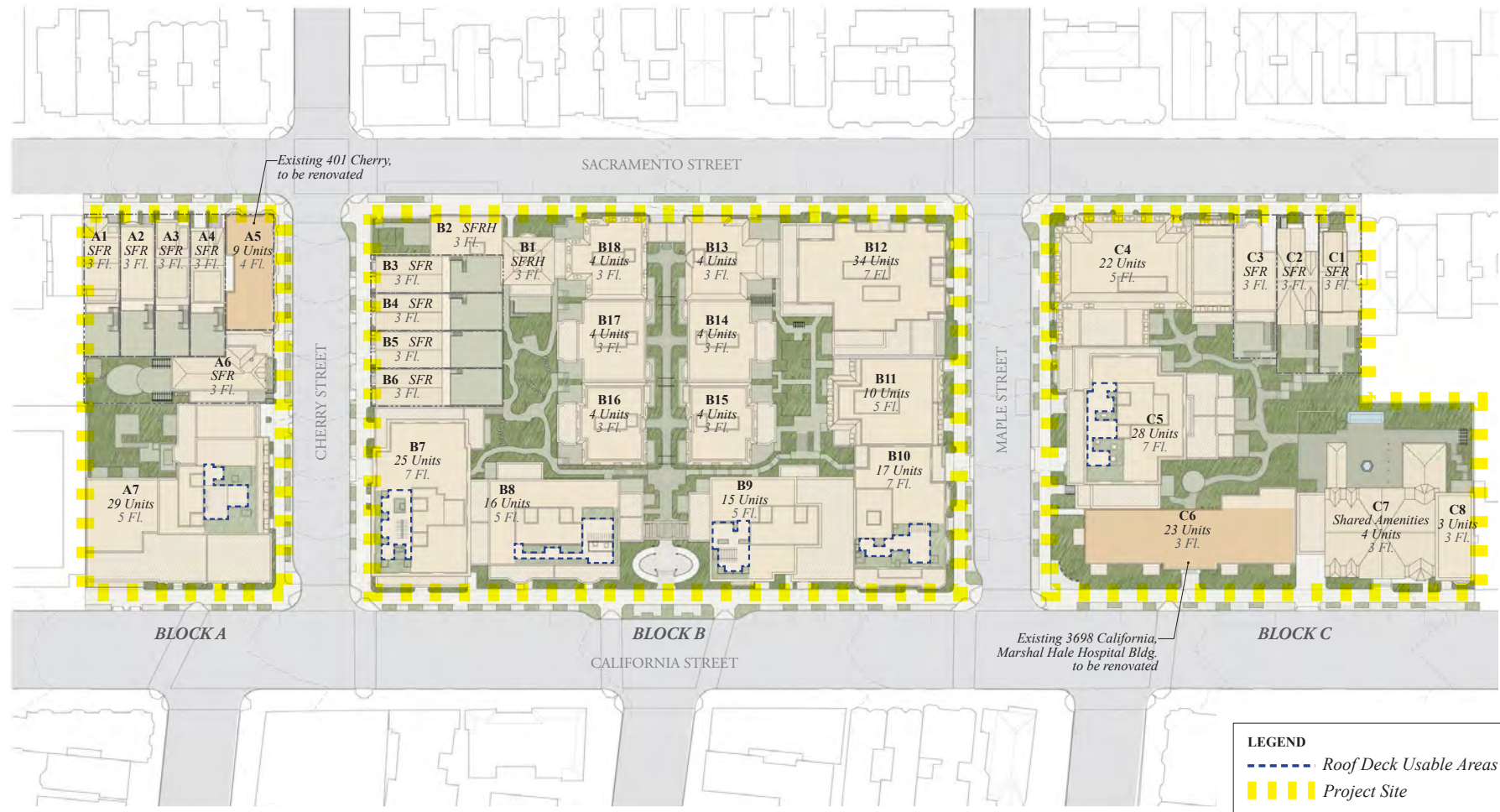
MAPLE STREET - BLOCK B



MAPLE STREET - BLOCK C

SOURCE: RAMSA 2019. 3700 California Street, San Francisco, CA. Street Elevations. December 20.





SOURCE: RAMSA. 2019. 3700 California Street, San Francisco, CA.

3700 California Street  
Case No. 2017-003559ENV

(New) RTC Figure 2-16  
Proposed Roof Plan



## D. REVISIONS TO CHAPTER 3, PLANS AND POLICIES

- \* Footnote 4 on p. 3-1 has been revised as follows to correct an editorial error (new text is double-underlined and deletions are shown in ~~striketrough~~):

City of San Francisco Planning Department. ~~2009~~2013. San Francisco Bicycle Plan.

- \* To clarify the project's residential square footage, the text in the second paragraph on p. 3-8 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would construct or renovate a total of 273 residential units, providing approximately ~~618,200~~ 627,200 square feet of residential space. The single-family and multi-family units, as well as accessory amenity space, are permitted uses in the district. The project proposes an amenity building on Block C, with a ~~14,787~~19,279-square-foot recreational and amenity facility for project residents, which would occupy ~~less than 2.5~~approximately 3 percent of the primary residential floor area and would therefore comply with allowable accessory uses.

- \* To clarify the project's open space square footage, the text in the second paragraph on p. 3-10 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would include shared onsite amenity space and approximately ~~86,200~~ 88,100 square feet of private and common open space areas for residents only. Approximately ~~33,363~~ 40,400 square feet of the total would be common open space, ~~not including possible roof top areas, distributed throughout all three blocks.~~

- \* To clarify the project's street tree requirements, the text in the first paragraph on p. 3-11 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would remove ~~42~~ 45 of the 77 existing street trees and plant ~~68~~ 73 new street trees, for a total of ~~103~~ 105 street trees (~~26~~28 net new street trees). Project landscaping plans have been developed to comply with the San Francisco Better Streets Plan (as discussed below). According to the required ratio, the project site would require 134 street trees. The proposed project would seek a partial waiver for ~~31~~ 29 street trees.

## E. REVISIONS TO CHAPTER 4, ENVIRONMENTAL SETTING AND IMPACTS

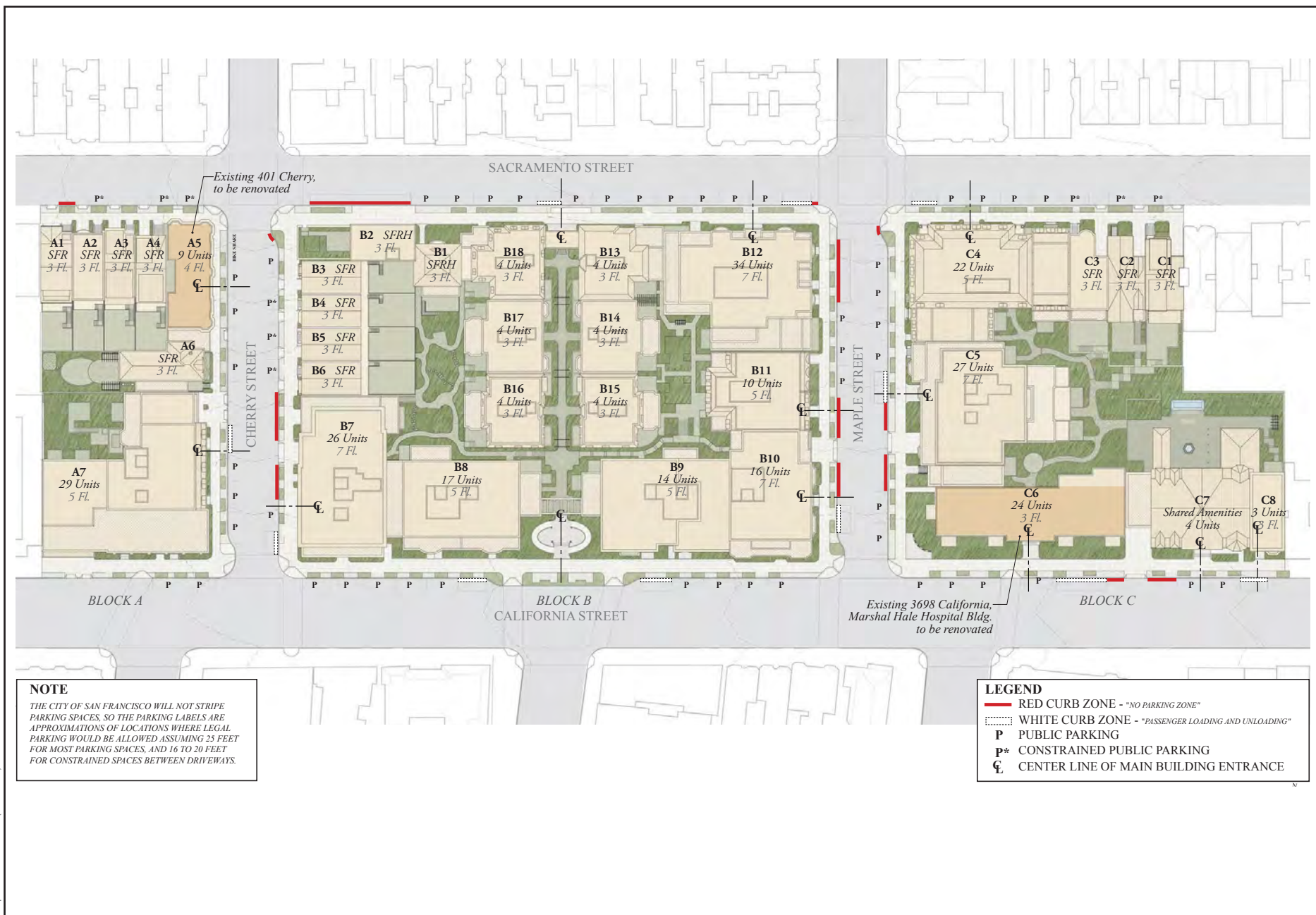
### SECTION 4.2, TRANSPORTATION

- \* To clarify the number of proposed single-family homes, the text in the first paragraph on p. 4.2-36 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):



The proposed project would construct 31 new buildings, including 12 separate single-family homes (for a total of 14 single-family homes when including the two single-family homes on the Block B parking podium) and 19 multi-family buildings containing studios and one-, two-, three-, and four-bedroom units (including two additional single-family row homes).

- \* To update the proposed curb cuts and curb colors, Figure 4.2-6 on p. 4.2-39 has been replaced with (Revised) RTC Figure 4.2-6, and (New) RTC Figure 4.2-6.1 has been added. These figures are shown on the following pages.







- \* The following typo at the beginning of paragraph two on p. 4.2-67 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The proposed project would provide 1.5 parking spaces per dwelling unit for multi-family units and two parking spaces per unit for detached single-family residences, yielding a total of 423 parking spaces for residential use, including ~~404~~ 416 vehicle parking spaces, 17 ADA-compliant accessible spaces, and ~~two~~ seven car-share spaces.

## SECTION 4.3, NOISE

- \* To correct the citation date for the San Francisco General Plan, the citation in Table 4.3-11 on p. 4.3-22 has been revised as follows (new text is double-underlined):

**(REVISED) TABLE 4.3-11. SAN FRANCISCO GENERAL PLAN LAND USE COMPATIBILITY GUIDELINES**

Land Use Category	Sound Levels and Land Use Consequences (L <sub>dn</sub> Values in dBA)							
	55	60	65	70	75	80	85	
GENERAL PLAN LAND USE COMPATIBILITY CHART FOR COMMUNITY NOISE								
Residential – All Dwellings, Group Quarters								
Transient Lodging – Motels, Hotels								
School Classrooms, Libraries, Churches, Hospitals, Nursing Homes, etc.								
Auditoriums, Concert Halls, Amphitheaters, Music Shells								
Sports Arenas, Outdoor Spectator Sports								
Playgrounds, Parks								
Golf Courses, Riding Stables, Water-based Recreation Areas, Cemeteries								
Office Buildings – Personal, Business, and Professional Services								
Commercial – Wholesale and Some Retail, Industrial/ Manufacturing, Transportation, Communication, and Utilities								
Manufacturing – Noise-Sensitive Communications – Noise-Sensitive								

Source: San Francisco Planning Department, *San Francisco General Plan*, adopted on June 27, 1996 (updated in 2004), [http://generalplan.sfplanning.org/I6\\_Environmental\\_Protection.htm#ENV\\_TRA\\_11](http://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_TRA_11), accessed April 17, 2019.

Satisfactory, with no special noise insulation requirements. Noise levels in this range are considered “Acceptable.”

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Noise levels in this range are considered “Conditionally Acceptable.”

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. Noise levels in this range are considered “Conditionally Unacceptable.”

New construction or development should generally not be undertaken. Noise levels in this range are considered “Unacceptable.”

In response to Comment I-Hillson-78, Mitigation Measure NO-1: Construction Noise Control on p. 4.3-34 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

### **Mitigation Measure M-NO-1: Construction Noise Control**

The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below.

- Require that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.
- Prohibit gasoline or diesel engines from having unmuffled exhaust systems.
- Ensure that equipment and trucks for project construction use the best available noise control techniques (e.g., improved mufflers, redesigned equipment, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible. According to the Federal Highway Administration, the use of shields or barriers around noise sources can reduce noise by 5 to 10 dBA, depending on the type of barrier used.
- Use “quiet” gasoline-powered or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.

- Locate stationary noise sources, such as temporary generators, concrete saws, and crushing/processing equipment, as far from nearby receptors as possible; muffle and enclose noise sources within temporary enclosures and shield with barriers, which could reduce construction noise by as much as 5 dB; or implement other measures, to the extent feasible.
- Undertake the noisiest activities during times of least disturbance to surrounding residents and occupants, such as midday or early afternoon when residents are more likely to be at work and less likely to be sleeping, as feasible.
- In response to noise complaints received from people in the project area, monitor the effectiveness of noise attenuation measures by taking noise measurements. A plan for noise monitoring shall be provided to the City for review prior to the commencement of each construction phase.

The construction noise control plan must include the following measures for responding to and tracking complaints pertaining to construction noise:

- A procedure and phone numbers for notifying the Department of Building Inspection, health department, or the police department of complaints (during regular construction hours and off hours).
- Signs posted onsite and around the project site immediately adjacent to the project site at major intersections for the duration of project construction describing noise complaint procedures and providing a complaint hotline number that shall be answered at all times during construction. Signs shall include construction work hours.
- Designation of an onsite construction complaint and enforcement manager, with telephone contact information for the project. This information shall be visible on all signs posted at and around the project site for the duration of project construction.
- A plan for notification of neighboring residents and nonresidential building managers within 300 feet of the project construction area at least 30 days in advance of activities that could increase daytime ambient noise levels at sensitive receptor locations by 10 dBA or more. The notification must include the associated control measures that will be implemented to reduce noise levels.

## SECTION 4.2, AIR QUALITY

The existing and cumulative baseline cancer risk and PM<sub>2.5</sub> concentrations presented in the EIR were based on the most recent San Francisco Citywide Health Risk Assessment database available at the time the notice of preparation (NOP) and draft EIR were released. This assessment was



conducted in 2012 and indicates that the project site is not located within an air pollutant exposure zone (APEZ). In February 2020, the city, in collaboration with the regional air district, completed a draft update to the Citywide Health Risk Assessment database in order to update the APEZ map, as required by Health Code article 38. The draft 2020 Citywide Health Risk Assessment database includes the following updates compared to the prior Citywide Health Risk Assessment database:

- Vehicle activity is based on an updated San Francisco Chained Activity Modeling Process (SF-CHAMP) model run for year 2020
- Vehicle emissions are updated for year 2020
- Vehicle emissions include resuspended road dust, which was not included in the prior citywide health risk assessment
- Maritime emissions now also account for ferry emissions (emissions that were not included in the prior Citywide Health Risk Assessment database due to lack of available information at that time)
- Caltrain emissions have been updated
- Stationary source emissions permitted by the air district have been updated
- Updated citywide air dispersion modeling was conducted
- Cancer risk estimates have been updated based on updated methodologies from the Office of Environmental Health Hazard Assessment.

Based on this draft updated database, the San Francisco Department of Public Health issued a draft updated APEZ map, issued a draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, and initiated a 30-day public review period.<sup>3</sup> The updated APEZ map shows that the project site is located within an APEZ. Therefore, the following text in the EIR has been revised to: identify the applicable significance thresholds for projects within an APEZ, update the existing and cumulative background cancer risk and PM<sub>2.5</sub> concentrations based on the draft 2020 Citywide Health Risk Assessment database, and update the associated health risk analysis presented in the EIR.

The updated analysis shows that under both the existing-plus-project and cumulative-plus-project conditions the project would result in a significant health risk impact to on- and off-site sensitive receptors during the project's construction activities. Therefore, Mitigation Measure M-AQ-3 has been added to the EIR. Mitigation Measure M-AQ-3 requires the project sponsor to use construction equipment with lower diesel particulate matter emissions. This mitigation measure is the City's commonly applied mitigation measure to address construction air quality

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<sup>3</sup> Air District, San Francisco Department of Public Health, and San Francisco Planning Department, draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020.

in an APEZ. The updated analysis shows that implementation of Mitigation Measure M-AQ-3 would reduce the project and cumulative impacts to less-than-significant levels.

The following text revisions clarify, expand, or update the health risk 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 or a substantial increase in the severity of an impact identified in the EIR that cannot be mitigated to less than significant level with implementation of mitigation measure(s) agreed to by the project sponsor. Mitigation Measure M-AQ-3 would not result in a new significant impact, and the project sponsor has agreed to adopt it. Therefore, recirculation pursuant to CEQA guidelines section 15088.5 is not required.

- \* To reflect the updated health risk analysis, footnote 2 on p. 4.4-1 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>2</sup> Changes to the methodology made since the scope of work was approved include 1) the use of a newer version of AERMOD (version 18081), released after the scope of work was approved; 2) the addition of an exposure scenario for the health risk assessment to ensure the maximally exposed receptor was identified; 3) the removal of the effects of the existing generators from the existing baseline conditions; and 4) an evaluation of project and cumulative health impacts based on the updated draft San Francisco Citywide Health Risk Assessment ~~a more explicit quantitative evaluation of cumulative 2040 conditions rather than a qualitative discussion~~. Updated methodologies for these items are discussed in this environmental impact report section and supersede the methodologies described in the scope of work.

- \* To provide the correct hyperlink, footnote 9 on p. 4.4-6 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>9</sup> Air District, *PM Box Scores*, ~~<http://www.sparetheair.org/stay-informed/particulate-matter/pm-box-scores>~~  
<http://www.baaqmd.gov/sitecore/content/sparetheair/home/stay-informed/particulate-matter/pm-box-scores>, accessed December 31, 2018.

- \* To provide the correct hyperlink, footnote 10 on p. 4.4-6 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>10</sup> Air District, *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](http://www.sparetheair.org/~media/files/communications-and-outreach/publications/news-releases/2018/2018_096_voluntarythanksgiving_111918-pdf.pdf?la=en)~~  
<http://www.baaqmd.gov/news-and-events/page-resources/2018-news/112118-voluntary-no-burn>.

- \* To provide the correct hyperlink, footnote 16 on p. 4.4-11 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>16</sup> Air District, *Spare the Air*, ~~<http://sparetheair.org/Stay-Informed/Todays-Air-Quality/Air-Quality-Index.aspx>~~ <http://sta.local/stay-informed/todays-air-quality/air-quality-index>, accessed January 25, 2019.

- \* To reflect the updated health risk analysis, p. 4.4-13 to 4.4-14, and footnote 23, have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to inventory and assess air pollution and exposures from vehicles, stationary sources, and area sources within San Francisco. Citywide air quality dispersion modeling was conducted using AERMOD<sup>22</sup> to assess emissions from the following primary sources: vehicles on local roadways, permitted stationary sources, port and maritime sources, and Caltrain. Emissions of PM<sub>10</sub> (DPM is assumed equivalent to PM<sub>10</sub>), PM<sub>2.5</sub>, and total organic gases (TOGs) were modeled on a 20- by 20-meter receptor grid covering the entire city. The citywide modeling results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the city. The methodology and technical documentation for modeling citywide air pollution is available in draft 2020 San Francisco Citywide Health Risk Assessment ~~The San Francisco Risk Reduction Community Plan: Technical Support Documentation~~.<sup>23</sup>

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<sub>2.5</sub> concentrations greater than 10 µg/m<sup>3</sup> and/or (2) an excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per 1 million persons exposed.

An additional health vulnerability layer was incorporated in the APEZ for those San Francisco ZIP codes in the worst quintile of Bay Area health vulnerability scores (ZIP codes 94102, 94103, 941105, 94124, and 941304). In these areas, the standard for identifying areas within the zone were lowered to (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 90 per 1 million persons exposed and/or (2) cumulative PM<sub>2.5</sub> concentrations greater than 9 µg/m<sup>3</sup>.

Lastly, all parcels within 500 feet of a major freeway were also included in the APEZ, consistent with findings in the Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.<sup>24</sup>

The project site is ~~not~~ located within an area that meets the draft APEZ criteria. Background cancer risk values on the project site are between 9.955 and 82133 in 1 million, with background values ranging from 0.9512 to 86233 in 1 million within 1,000 meters of the site.<sup>25</sup> Background PM<sub>2.5</sub> concentrations range from 8.24 to 8.89.4 µg/m<sup>3</sup> on the project site, with background values varying between 8.17.9 and 9.511 µg/m<sup>3</sup> within



1,000 meters of the site. ~~The nearest offsite receptors within an APEZ are located approximately 750 meters (2,460 feet) to the northwest.~~

<sup>23</sup> Air District, San Francisco Department of Public Health, and San Francisco Planning Department, draft 2020 San Francisco Citywide Health Risk Assessment ~~San Francisco Community Risk Reduction Plan: Technical Support Documentation, December 2012,~~ accessed October 2, 2018. February 2020.

- \* To correct the citation date, footnote 27 on p. 4.4-14 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>27</sup> Memorandum #2: Preliminary Impact Analysis Memo for 3700 California, Case No. 2017-003559ENV, ~~August 28~~October 26, 2018.

- \* To correct the radius of residential receptors surrounding the project site, the text in the first paragraph on p. 4.4-19 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

In addition to the residential receptors, other sensitive receptors were identified within 1,000 ~~meters~~ feet of the project site.

- \* To correct the hyperlink, footnote 45 on p. 4.4-24 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

<sup>45</sup> Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2040: Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area, 2017–2040, adopted July 26, 2017, <http://2040.planbayarea.org/reports> and [http://2040.planbayarea.org/cdn/farfuture/u\\_7TKELkH2s3AAiOhCyh9Q9QIWEZIdYeJzi2QDCZuIs/1510696833/sites/default/files/2017-11/Final\\_Plan\\_Bay\\_Area\\_2040.pdf](http://2040.planbayarea.org/cdn/farfuture/u_7TKELkH2s3AAiOhCyh9Q9QIWEZIdYeJzi2QDCZuIs/1510696833/sites/default/files/2017-11/Final_Plan_Bay_Area_2040.pdf) [http://2040.planbayarea.org/cdn/ff/buje2Q801oUV3Vpib-FoJ6mkOfWC9S9sgrSgJrwFBgo/1510696833/public/2017-11/Final\\_Plan\\_Bay\\_Area\\_2040.pdf](http://2040.planbayarea.org/cdn/ff/buje2Q801oUV3Vpib-FoJ6mkOfWC9S9sgrSgJrwFBgo/1510696833/public/2017-11/Final_Plan_Bay_Area_2040.pdf), accessed October 2, 2018.

- \* To reflect the updated health risk analysis, the following language on p. 4.4-25 and footnote 49, respectively, have been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Article 38 is ~~not~~likely applicable to the proposed project because the project site is ~~not~~ located within a mapped draft APEZ, according to the San Francisco Department of Public Health.<sup>49</sup>

<sup>49</sup> San Francisco Department of Public Health, draft Air Pollution Exposure Zone Maps, ~~accessed October 2, 2018~~February 2020.

- \* To reflect the updated health risk analysis, the following language on pp. 4.4-34 to 4.4-35 and footnote 68 respectively, have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The proposed project would locate new sensitive receptors (i.e., new residents) at the project site. With the proposed project, residents would occupy all buildings. For purposes of analysis, the entirety of the project site was conservatively assessed as a potential sensitive receptor, using a 20-meter receptor grid that coincided with the ~~Community Risk Reduction Plan's health risk assessment~~ draft 2020 San Francisco Citywide Health Risk Assessment database receptor locations. Exposure assessment guidance<sup>64</sup> established the assumption that people in residences would be exposed to air pollution 24 hours per day, 350 days per year for 30 years as the basis for calculating cancer risk in any health risk assessment. Therefore, the assessment of residents' air pollutant exposure typically results in the greatest adverse health outcomes of all population groups.

According to OEHHA guidance, <sup>65</sup> the estimated excess lifetime cancer risk for a resident was calculated in the draft Citywide Health Risk Assessment database ~~adjusted~~ using the age sensitivity factors recommended in OEHHA's *Technical Support Document for Cancer Potency Factors*.<sup>66</sup> This approach accounted for an "anticipated special sensitivity to carcinogens" of infants and children. Cancer risk estimates were weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age (labeled by OEHHA as "3<sup>rd</sup> trimester" and "0 < 2") and by a factor of three for exposures that occur from 2 through 15 years of age ("2 < 16"). No weighting factor (i.e., an age sensitivity factor of one, which is equivalent to no adjustment) was applied to ages 16 and older.

As discussed previously, ~~neither~~ the proposed project's onsite receptors ~~nor~~ and the nearest offsite receptors would be located within an area that currently meets the APEZ criteria: based on the draft Citywide Health Risk Assessment database; although there are parcels adjacent to the project site that do not meet the APEZ criteria. For receptors not located in areas that meet the APEZ criteria, a health risk assessment was conducted to determine whether the proposed project would, in combination with other existing sources in the area, result in a given offsite or onsite receptor meeting the APEZ criteria (i.e., expanding the APEZ). If, as a result of the proposed project, a receptor point goes from below the APEZ criteria to above the APEZ criteria, then a significant project-related health risk impact could result. Specifically, this would be the case if the proposed project were to contribute to PM<sub>2.5</sub> concentrations above 0.3 µg/m<sup>3</sup> or result in an excess cancer risk greater than 10.0 per 1 million persons exposed. According to the air district, new sources would not result in a considerable contribution to cumulative health risks with levels below ~~the~~ 0.3 µg/m<sup>3</sup> PM<sub>2.5</sub> concentration and ~~an~~ excess cancer risk of 10.0 per 1 million persons exposed.<sup>67</sup> For receptors that already meet the APEZ criteria without the

project, a proposed project that would emit PM<sub>2.5</sub> concentrations above 0.2 µg/m<sup>3</sup> or result in an excess cancer risk greater than 7.0 per million would be considered a significant impact. The 0.2 µg/m<sup>3</sup> concentration and excess cancer risk of 7.0 per million persons exposed are the levels below which the city considers new sources not to make a considerable contribution to cumulative health risks within an APEZ.<sup>68</sup>

<sup>68</sup>A 0.2 µg/m<sup>3</sup> increase in PM<sub>2.5</sub> would result in a 0.28 percent increase in non-injury mortality or an increase of about 21 excess deaths per 1,000,000 population per year from non-injury causes in San Francisco. This information is based on Jerrett, M., et al., *Spatial Analysis of Air Pollution and Mortality in Los Angeles*, *Epidemiology*, 16:727–736, 2005. The excess cancer risk has been proportionally reduced to result in a significance criterion of 7 per million persons exposed.

- \* To correct the citation date, footnotes 63 and 73 on pp. 4.4-33 and 4.4-40, respectively, have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

<sup>63</sup> Memorandum #2: Preliminary Impact Analysis Memo for 3700 California, Case No. 2017-003559ENV, October 26, 2018. ~~Fehr & Peers, Preliminary Impact Analysis Memo for 3700 California, Case No. 2017-003559ENV, August 28, 2018.~~

<sup>73</sup> Memorandum #2: Preliminary Impact Analysis Memo for 3700 California, Case No. 2017-003559ENV, October 26, 2018. ~~Fehr & Peers, Preliminary Impact Analysis Memo for 3700 California, Case No. 2017-003559ENV, August 28, 2018.~~

- \* To reflect the updated health risk analysis, Impact AQ-3 has been revised on p. 4.4-45 as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**Impact AQ-3: Construction and operation of the proposed project would ~~not~~ generate toxic air contaminants, including DPM, at levels that would expose sensitive receptors to substantial pollutant concentrations. (*Less than Significant with Mitigation*)**

- \* To reflect the updated health risk analysis, p. 4.4-45 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

~~Because neither the proposed onsite receptors nor the nearest~~ and ~~offsite receptors are within an area that currently~~ under the draft San Francisco Citywide Health Risk Assessment ~~meets the APEZ criteria (100 in 1 million excess cancer risk or a PM<sub>2.5</sub> concentration of 10 µg/m<sup>3</sup>), the health risk assessment was conducted. The purpose of the health risk assessment was to determine whether the proposed project would, in combination with other existing sources in the area, result in a given offsite or onsite receptor meeting result in PM<sub>2.5</sub> concentrations above 0.2 µg/m<sup>3</sup> or an excess cancer risk greater than 7.0 per million for receptors in an APEZ or if the project would result in PM<sub>2.5</sub> concentrations above 0.3 µg/m<sup>3</sup> or an excess cancer risk greater than 10.0 per million for receptors that currently do not meet the APEZ criteria.~~



## METHODOLOGY

In general, a health risk assessment is used to determine if a particular chemical poses a significant risk to human health and, if so, under what circumstances. For the proposed project, a health risk assessment was conducted to identify maximum onsite and offsite health risks due to inhalation of PM<sub>2.5</sub> and TACs. The health risk assessment prepared for the proposed project focused on PM<sub>2.5</sub> and TACs because these types of air pollutants, more so than others, pose substantial health impacts at the local level.<sup>76</sup> A detailed discussion of the methods used for this analysis is provided in the air quality scope of work included in EIR Appendix H and EIR Appendix I. Changes to the methodology made since the scope of work was approved included 1) use of a newer version of AERMOD (version 18081), released after the scope of work was approved; 2) the addition of an exposure scenario for the health risk assessment to ensure the maximally exposed receptor was found; 3) removal of the air quality impact from the existing generators; and 4) ~~changes to the methodology for the review of the 2040 condition (a more explicit quantitative evaluation rather than qualitative discussion)~~ an evaluation of project and cumulative health impacts based on the updated draft San Francisco Citywide Health Risk Assessment. Updated methodologies for these items are discussed in this section, which supersedes the methodologies described in the scope of work dated August 7, 2018.

- \* To reflect the updated health risk analysis, p. 4.4-45 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Existing cancer risk and PM<sub>2.5</sub> concentrations are available from ~~San Francisco's citywide health risk assessment~~ the draft 2020 San Francisco Citywide Health Risk Assessment database, the most recent comprehensive citywide health risk assessment available to date. As shown in Table 4.4-8, health impacts resulting from the proposed project plus existing background health impacts from exposure to air emissions and minus baseline generator health impacts result in a total excess cancer risk at the maximally exposed individual sensitive receptor ~~of 60 of 105~~ of 36.9 in 1 million, which is ~~well below~~ above 100 in 1 million, the level that would cause a new location to meet the APEZ excess cancer risk criterion. ~~The project also would not cause any other receptor point to exceed the proposed project's cancer risk criterion of 100.~~ contribution would be 36.9 in 1 million, which is above both the 7 in 1 million significance criterion for receptors in an APEZ and the 10 in 1 million significance criterion for receptors outside an APEZ. Therefore, the proposed project would result in a ~~less than~~ significant cancer risk impact at offsite sensitive receptors.

- \* To reflect the updated health risk analysis, Table 4.4-8 on p. 4.4-49 has been replaced with the revised table as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

**TABLE 4.4-8. LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATION AT MAXIMALLY EXPOSED OFFSITE RECEPTORS**

<b>Source</b>	<b>Excess Lifetime Cancer Risk<sup>a</sup> (in 1 million)</b>	<b>PM<sub>2.5</sub> Concentration<sup>b</sup> (µg/m<sup>3</sup>)</b>
Existing Background	23	8.3
Project Construction	41	0.21
Removal of Existing Generators <sup>c</sup>	-3.4	-0.0046
<b>Total</b>	<b>60</b>	<b>8.5</b>
APEZ Criteria	100	10
<b>Above APEZ Criteria?</b>	<b>No</b>	<b>No</b>

Source: Ramboll, 2018; Tables 18, 19, 20, and 21 in EIR Appendix H; Air District, San Francisco Department of Public Health, and San Francisco Planning Department, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, 2012.

Notes:

<sup>a</sup>The cancer risks were estimated, using the information specified in EIR Appendix H.

<sup>b</sup>Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the 2014 values in the citywide health risk assessment database.

<sup>c</sup>The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

**(REVISED) TABLE 4.4-8. LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATION AT MAXIMALLY EXPOSED OFFSITE RECEPTORS**

<b>Source</b>	<b>Unmitigated</b>		<b>Mitigated</b>	
	<b>Excess Lifetime Cancer Risk<sup>a</sup> (in 1 million)</b>	<b>PM<sub>2.5</sub> Concentration<sup>b</sup> (µg/m<sup>3</sup>)</b>	<b>Excess Lifetime Cancer Risk<sup>a</sup> (in 1 million)</b>	<b>PM<sub>2.5</sub> Concentration<sup>b</sup> (µg/m<sup>3</sup>)</b>
Existing Background	68	8.6	85	8.9
Project Construction	41	0.21	6.7	0.035
Removal of Existing Generators <sup>c</sup>	-4.1	-0.0055	-0.62	-0.0031
<b>Total</b>	<b>105</b>	<b>8.8</b>	<b>91</b>	<b>9.0</b>
APEZ Criteria	100	10	100	10
<b>Above APEZ Criteria?</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>
Project Contribution	36.9	0.2	6.1	0.03
APEZ Project Contribution Significance Threshold <sup>d</sup>	7	N/A <sup>e</sup>	N/A	N/A
<b>Exceed Threshold?</b>	<b>Yes</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

Source: Ramboll, 2018; Tables 18, 19, 20, and 21 in EIR Appendix H; EIR Appendix I; draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, 2020.

Notes:

<sup>a</sup>The cancer risks were estimated, using the information specified in EIR Appendix H and EIR Appendix I.

<sup>b</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the values in the draft 2020 citywide health risk assessment database.

<sup>c</sup> The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

<sup>d</sup> The cancer risk significance threshold presented is the most stringent of the two discussed above.

<sup>e</sup> N/A (not applicable) is shown when the APEZ criteria are not exceeded.

- \* To reflect the updated health risk analysis, Mitigation Measure M-AQ-3 has been added as follows to p. 4.4-50 (new text is double-underlined and deletions are shown in ~~strike through~~):

#### **PM<sub>2.5</sub> CONCENTRATIONS AT OFFSITE RECEPTORS**

The maximum estimated PM<sub>2.5</sub> concentrations from the project at offsite locations are presented in Table 4.4-8. As shown in Table 4.4-8, emissions from the proposed project, in combination with existing background concentrations but without impacts from the existing generators, would result in a PM<sub>2.5</sub> concentration at the maximally exposed individual sensitive receptor of 8.58  $\mu\text{g}/\text{m}^3$ , which is below 10  $\mu\text{g}/\text{m}^3$ , the level that would cause a new location to meet the APEZ PM<sub>2.5</sub> concentration criterion. ~~The project also would not cause any other receptor point to exceed 10  $\mu\text{g}/\text{m}^3$ .~~ Therefore, the proposed project would result in a less-than-significant PM<sub>2.5</sub> impact at offsite sensitive receptors.

To address the project's significant cancer risk impact with the updated background cancer risk values provided in the draft updated Citywide Health Risk Assessment database, Mitigation Measure M-AQ-3 has been identified and agreed to by the project sponsor, and the mitigation measure will be included as a condition of approval for the proposed project. This mitigation measure requires the use of lower emitting construction equipment and would not result in any new significant environmental impacts. Mitigation Measure M-AQ-3 would reduce the proposed project's contribution to cancer risk to below 7.0 in 1 million. Similarly, maximum PM<sub>2.5</sub> concentration would be reduced to 0.035  $\mu\text{g}/\text{m}^3$ <sup>88</sup> as shown in Table 4.4-8, Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed Offsite Receptors. Therefore, with implementation of Mitigation Measure M-AQ-3, the proposed project would result in a less-than-significant health risk impact.

#### **Mitigation Measure M-AQ-3: Construction Emissions Minimization**

The project sponsor shall comply with all of the following:

##### A. Engine Requirements.

1. All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either: (1) U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 and be equipped with a Level 3 Verified



Diesel Emissions Control Strategies (VDECS) or (2) Tier 4 Interim or Tier 4 Final off-road emission standards.<sup>89</sup>

2. Where grid power is available, portable diesel engines shall be prohibited.
3. All diesel engines, whether for off-road or on-road equipment or vehicles, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The project sponsor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.
4. The project sponsor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Waivers.

1. The Environmental Review Officer (ERO) or their designee may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment is not available or technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; or use of the equipment would create a safety hazard or impaired visibility for the operator. If seeking a waiver, the project sponsor shall demonstrate that with approval of the waiver, the project would not exceed a cancer risk of 7.0 in 1 million at sensitive receptor locations. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to Table AQ-1, below. Emerging technologies with verifiable emissions reductions supported by substantial evidence may also be employed in lieu of the step-down schedule below.
2. The ERO may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).

**Table AQ-1 – Off-Road Equipment Compliance Step-down Schedule**

<b><u>Compliance Alternative</u></b>	<b><u>Engine Emission Standard</u></b>	<b><u>Emissions Control</u></b>
<u>1</u>	<u>Tier 2</u>	<u>ARB Level 2 VDECS<sup>1</sup></u>
<u>2</u>	<u>Tier 2</u>	<u>ARB Level 1 VDECS</u>
<u>3</u>	<u>Tier 2</u>	<u>Alternative Fuels</u>

How to use the table: If the ERO determines that the equipment requirements listed in Section A.1, above, cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.

<sup>1</sup> VDECS are a Verifiable Diesel Emissions Control Strategy

- A. Construction Emissions Minimization Plan. Before starting on-site activities requiring the use of off-road equipment, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the project sponsor will meet the requirements of Section A.
1. The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date.
  2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the project sponsor agrees to comply fully with the Plan. A signed certification statement shall be submitted to the planning department before starting on-site construction activities requiring off-road equipment.
  3. The project sponsor shall make the Plan available to the public for review on-site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.
- B. Monitoring. After start of construction activities, the project sponsor shall submit reports every six months to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

<sup>88</sup> Although Table 4.4-8 shows that existing plus project PM<sub>2.5</sub> concentrations do not exceed the APEZ criteria of 10 µg/m<sup>3</sup>, M-AQ-3 would also reduce PM<sub>2.5</sub> concentrations at the maximally exposed receptor.

<sup>89</sup> See 40 CFR Part 1039 and Title 13 CCR Sections 2403 to 2784.

- \* To reflect the updated health risk analysis Table 4.4-9 was replaced with the revised table as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**TABLE 4.4-9. LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED ONSITE RECEPTORS**

<u>Source</u>	<u>Excess Lifetime Cancer Risk<sup>a</sup></u> <u>(in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration<sup>b</sup></u> <u>(µg/m<sup>3</sup>)</u>
Existing Background	45	8.5
Project Construction	7.0	0.037
Removal of Existing Generators <sup>c</sup>	-2.2	-0.0030
<b>Total</b>	<b>49</b>	<b>8.5</b>
APEZ Criteria	100	10
<b>Exceed APEZ Criteria?</b>	<b>No</b>	<b>No</b>

Source: Ramboll, 2018; Tables 18, 19, 20, and 21 in EIR Appendix H.

Notes:

<sup>a</sup>The cancer risks were estimated using the information specified in Tables 18 and 20 in EIR Appendix H.

<sup>b</sup>Existing background cancer risk and PM<sub>2.5</sub> concentrations were estimated using 2014 background values from the citywide health risk assessment database.

<sup>c</sup>The three existing generators are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

**(REVISED) TABLE 4.4-9. LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED ONSITE RECEPTORS**

	<u>Unmitigated</u>		<u>Mitigated</u>	
<u>Source</u>	<u>Excess Lifetime Cancer Risk<sup>a</sup></u> <u>(in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration<sup>b</sup></u> <u>(µg/m<sup>3</sup>)</u>	<u>Excess Lifetime Cancer Risk<sup>a</sup></u> <u>(in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration<sup>b</sup></u> <u>(µg/m<sup>3</sup>)</u>
Existing Background	121	9.2	121	9.2
Project Construction	7.0	0.037	1.6	0.011
Removal of Existing Generators <sup>c</sup>	-4.4	-0.0059	-4.4	-0.0059
<b>Total</b>	<b>125</b>	<b>9.2</b>	<b>119</b>	<b>9.2</b>
APEZ Criteria	100	10	100	10
<b>Above APEZ Criteria?</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Project Contribution <sup>d</sup>	7.0	0.037	1.6	0.011
APEZ Project Contribution Significance Threshold <sup>e</sup>	7	N/A <sup>e</sup>	7	N/A
<b>Exceed Significance Threshold?</b>	<b>Yes</b>	<b>N/A</b>	<b>No</b>	<b>N/A</b>

Source: Ramboll, 2018; Tables 18, 19, 20, and 21 in EIR Appendix H; EIR Appendix I; draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, 2020.

Notes:

<sup>a</sup>The cancer risks were estimated using the information specified in Tables 18 and 20 in EIR Appendix H and EIR Appendix I.



<sup>b</sup> Existing background cancer risk and PM<sub>2.5</sub> concentrations were estimated using background values from the draft 2020 citywide health risk assessment database.

<sup>c</sup> The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities. The on-site receptors would not be exposed to the impact of the existing generators. Therefore, the impact of the removal of the generators is a reduction to the existing background.

<sup>d</sup> The project contribution would be the health effects the receptors would experience from project construction. The cancer risk from project construction is at the threshold and in an abundance of caution is conservatively determined to exceed the threshold.

<sup>e</sup> N/A (not applicable) is shown when the APEZ criteria are not exceeded.

- \* To reflect the updated health risk analysis, pp. 4.4-49 to 4.4-51 have been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The estimated excess cancer risk from the emissions of this scenario at the onsite maximally exposed individual sensitive receptor is presented in Table 4.4-9, *Lifetime Cancer Risk and PM<sub>2.5</sub> Concentrations at the Maximally Exposed Onsite Receptors*. Existing background cancer risk information is available from the ~~citywide health risk assessment~~draft 2020 San Francisco Citywide Health Risk Assessment database. ~~The As shown in Table 4.4-9, Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed Onsite Receptors, the proposed project's emissions would result in health impacts that would combine with existing background health impacts but without the existing generators, resulting in a cancer risk at the maximally exposed onsite receptor of 49125 in 1 million, which is well below above the APEZ criteria of 100 in 1 million, the level that would cause a new location to meet the APEZ excessThe proposed project's cancer risk contribution would be 7.0 in 1 million, which is the cancer risk significance criterion.<sup>87</sup>~~The project also would not cause any other onsite receptor point to meet the APEZ cancer risk criterion<sup>90</sup>. The project also would not cause any other onsite receptor point to meet the APEZ cancer risk criterion for receptors in an APEZ.~~ Therefore, in an abundance of caution, the proposed project would result in a ~~less than~~ significant cancer risk impact ~~at on onsite-site sensitive~~ receptors.~~

#### **PM<sub>2.5</sub> CONCENTRATIONS AT ONSITE RECEPTORS**

The maximum estimated PM<sub>2.5</sub> concentrations from the proposed project at onsite locations are presented in Table 4.4-9. The proposed project's emissions would combine with existing PM<sub>2.5</sub> concentrations, after removing the existing generator impacts, at the maximally exposed onsite receptor, resulting in a PM<sub>2.5</sub> concentration of 8.59.2 µg/m<sup>3</sup>, which is below 10 µg/m<sup>3</sup>, the level that would cause a new receptor location to meet the APEZ PM<sub>2.5</sub> criterion. ~~The project also would not cause any other onsite receptor point to meet the APEZ PM<sub>2.5</sub> criterion.~~ Therefore, the proposed project would result in a less-than-significant PM<sub>2.5</sub> impact for onsite receptors.

To address the project's significant cancer risk impact with the updated background cancer risk values provided in the draft updated Citywide Health Risk Assessment

database, Mitigation Measure M-AQ-3 has been identified and agreed to by the project sponsor. This mitigation measure requires construction activities to use lower emitting construction equipment and would not result in any new significant environmental impacts. Mitigation Measure M-AQ-3 would reduce the proposed project's cancer risk contribution at sensitive receptors to below 7.0 in 1 million. Similarly, maximum PM<sub>2.5</sub> concentration would be reduced to 0.011 µg/m<sup>3</sup><sup>91</sup> as shown in Table 4.4-9, Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed Offsite Receptors. Therefore, with implementation of Mitigation Measure M-AQ-3, the proposed project would result in a less-than-significant health risk impact.

In summary, the proposed project would result in a less-than-significant-~~with-mitigation~~ health risk impact on both offsite and onsite sensitive receptors.

<sup>91</sup> Although Table 4.4-9 shows that existing plus project PM<sub>2.5</sub> concentrations do not exceed the APEZ criteria of 10 µg/m<sup>3</sup>, M-AQ-3 would also reduce PM<sub>2.5</sub> concentrations at the maximally exposed receptor.

- \* To reflect the updated health risk analysis, p. 4.4-54 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**Impact C-AQ-1: The proposed project, in combination with reasonably foreseeable future cumulative projects, would ~~not~~ result in significant health risk impacts ~~to~~ sensitive receptors. (*Less than Significant with Mitigation*)**

- \* To reflect the updated health risk analysis, the language on p. 4.4-55 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The 2040 baseline citywide cancer risks and PM<sub>2.5</sub> concentrations were compared to the 2014 draft 2020 citywide cancer risks and PM<sub>2.5</sub> concentrations, ~~as shown in EIR Appendix H.~~ The higher 2014 and 2040 baseline cancer risks and PM<sub>2.5</sub> concentrations are presented below to determine the most conservative cumulative results.

- \* To reflect the updated health risk analysis, the language on p. 4.4-56 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

Vehicle-generated emissions from the 3637–3657 Sacramento Street and 3641 California Street projects would be accounted for in the ~~2040~~ citywide health risk assessment database and are therefore accounted for in this cumulative analysis.

- \* To reflect the updated health risk analysis, pp. 4.4-56 to 4.4-57 have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

Results of this analysis at the maximum offsite receptor are presented in Table 4.4-10. The cumulative plus project excess lifetime cancer risk at the maximally exposed off-site receptor would be 105 in 1 million. The proposed project's contribution to cumulative excess lifetime cancer risk at the maximally exposed offsite residential receptor would be 61 in 1 million, and the PM<sub>2.5</sub> concentration would be 8.6 µg/m<sup>3</sup>. Although the analysis

~~does not account for the construction effects of the 3641 California Street project or the 3637-3657 Sacramento Street project, those projects are much smaller in scale, not expected to require much heavy construction equipment, 36.9 in 1 million, exceeding both the 7 in 1 million significance criterion for receptors in an APEZ and the 10 in 1 million significance criterion for receptors outside an APEZ, resulting in considerable contribution to a significant cumulative health risk impact. The PM<sub>2.5</sub> concentration from the proposed project, in combination with existing background concentrations but without impacts from the existing generators, would be 8.8 µg/m<sup>3</sup> at the maximally exposed individual sensitive receptor, which is below 10 µg/m<sup>3</sup>, the level that would cause a new location to meet the APEZ PM<sub>2.5</sub> concentration criterion.~~

As mentioned above, the proposed project would result in a considerable contribution to cumulatively significant health risk impacts at offsite sensitive receptors. However, as discussed in Impact AQ-3, the project sponsor has agreed to implement Mitigation Measure M-AQ-3 which would reduce the project's contribution to cumulative health risk impacts below significance thresholds, as shown in Table 4.4-10. Therefore, with implementation of M-AQ-3, as agreed to by the project sponsor, the proposed project would result in a less than significant contribution to cumulative health risks.

~~and are more than 250 feet from the project's MEIR. Therefore, construction emissions from those projects are unlikely to combine with those of the proposed project and background risk and PM<sub>2.5</sub> concentrations to result in levels that would exceed the APEZ criteria of an excess cancer risk of 100 in one million or PM<sub>2.5</sub> concentrations of 10 µg/m<sup>3</sup>.~~

The results of this analysis at the maximum onsite receptor are presented below in Table 4.4-11. ~~The cumulative plus project excess lifetime cancer risk at the maximally exposed on-site receptor would be 125 in 1 million. The proposed project's contribution to cumulative excess lifetime cancer risk at the maximally exposed onsite residential receptor would be 507.0 in 1 million, and which is the significance criterion for receptors in an APEZ. Therefore, in an abundance of caution, the proposed project would result in a significant cancer risk impact at on-site sensitive receptors.~~

The PM<sub>2.5</sub> concentration from the proposed project, in combination with existing background concentrations but without impacts from the existing generators, would be 8.68 µg/m<sup>3</sup>. Similar to the offsite analysis, the effects of construction of the 3641 California Street project or at the 3637-3657 Sacramento Street project are not included. Because those projects are much smaller in scale, not expected maximally exposed individual sensitive receptor, which is below 10 µg/m<sup>3</sup>, the level that would cause a new receptor location to meet the APEZ PM<sub>2.5</sub> concentration criterion.

As mentioned above, the proposed project would result in a considerable contribution to  
~~require much heavy construction equipment, and are over 250 feet from the~~cumulatively



significant health risk impacts at onsite sensitive receptors. However, as discussed in Impact AQ-3, the project sponsor has agreed to implement Mitigation Measure M-AQ-3 which would reduce the project's MEIR, construction emissions from those projects are unlikely to combine with those of the proposed project and background risk and PM<sub>2.5</sub> concentrations contribution to result in levels that would exceed the APEZ criteria of an excess cancer risk of 100 in one million or PM<sub>2.5</sub> concentrations of 10 µg/m<sup>3</sup>. Therefore, cumulative health risk impacts would be below significance thresholds, as shown in Table 4.4-11. Therefore, with implementation of M-AQ-3, as agreed to by the project sponsor, the proposed project would result in a less than significant contribution to cumulative health risks.

and are more than 250 feet from the project's MEIR. Therefore, construction emissions from those projects are unlikely to combine with those of the proposed project and background risk and PM<sub>2.5</sub> concentrations to result in levels that would exceed the APEZ criteria of an excess cancer risk of 100 in one million or PM<sub>2.5</sub> concentrations of 10 µg/m<sup>3</sup>.

- \* To reflect the updated health risk analysis, Table 4.4-10 on p. 4.4-57 has been replaced with the revised table as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~)

**TABLE 4.4-10. CUMULATIVE LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED OFFSITE RECEPTORS**

Source	Lifetime Excess Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	23	8.4
Project Construction	41	0.21
Removal of Existing Generators <sup>b</sup>	-3.4	-0.0046
3333 California Project <sup>c</sup>	0.84	0.0022
<b>Cumulative Total</b>	<b>61</b>	<b>8.6</b>
<b>APEZ Criteria</b>	<b>100</b>	<b>10</b>
<b>Exceed APEZ Criteria?</b>	<b>No</b>	<b>No</b>

Sources: Ramboll, 2018; Tables 20 and 21 in EIR Appendix H; Air District, San Francisco Department of Public Health, and San Francisco Planning Department, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, 2012.

Notes:

<sup>a</sup> Baseline cancer risk and PM<sub>2.5</sub> concentrations were estimated using the maximum cancer risk or PM<sub>2.5</sub> concentration from either the 2014 and 2040 background values from the citywide health risk assessment database. The 2014 values were used for cancer risk, and the 2040 values were used for PM<sub>2.5</sub> concentration.

<sup>b</sup> The cancer risk and PM<sub>2.5</sub> concentration from the three emergency generators are negative because the existing onsite generators would be removed during construction.

<sup>c</sup> As discussed above, impacts from only 3333 California Street project were quantitatively evaluated here.

**TABLE 4.4-10. CUMULATIVE LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED OFFSITE RECEPTORS**

<u>Source</u>	<u>Unmitigated</u>		<u>Mitigated</u>	
	<u>Excess Lifetime Cancer Risk<sup>a</sup></u> <u>(in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration<sup>b</sup></u> <u>(µg/m<sup>3</sup>)</u>	<u>Excess Lifetime Cancer Risk<sup>a</sup></u> <u>(in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration<sup>b</sup></u> <u>(µg/m<sup>3</sup>)</u>
<u>Existing Background</u>	<u>68</u>	<u>8.6</u>	<u>85</u>	<u>8.9</u>
<u>Project Construction</u>	<u>41</u>	<u>0.21</u>	<u>6.7</u>	<u>0.035</u>
<u>Removal of Existing Generators<sup>c</sup></u>	<u>-4.1</u>	<u>-0.0055</u>	<u>-0.62</u>	<u>-0.0031</u>
<u>3333 California Street Project<sup>c</sup></u>	<u>0.84</u>	<u>0.0022</u>	<u>0.44</u>	<u>0.0022</u>
<b><u>Total</u></b>	<b><u>105</u></b>	<b><u>8.8</u></b>	<b><u>91</u></b>	<b><u>8.6</u></b>
<u>APEZ Criteria</u>	<u>100</u>	<u>10</u>	<u>100</u>	<u>10</u>
<b><u>Above APEZ Criteria?</u></b>	<b><u>Yes</u></b>	<b><u>No</u></b>	<b><u>No</u></b>	<b><u>No</u></b>
<u>Project Contribution</u>	<u>36.9</u>	<u>0.2</u>	<u>6.1</u>	<u>0.03</u>
<u>APEZ Project Contribution Significance Threshold<sup>d</sup></u>	<u>7</u>	<u>N/A<sup>e</sup></u>	<u>N/A</u>	<u>N/A</u>
<b><u>Exceed APEZ Criteria?</u></b>	<b><u>Yes</u></b>	<b><u>N/A</u></b>	<b><u>N/A</u></b>	<b><u>N/A</u></b>

Source: Ramboll, 2018; Tables 18, 19, 20, and 21 in EIR Appendix H; EIR Appendix I; draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, 2020; 3333 California Street Mixed Use Project, EIR Case Number 2015-014028ENV.

Notes:

<sup>a</sup> The cancer risks were estimated, using the information specified in EIR Appendix H and EIR Appendix I.

<sup>b</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the values in the draft 2020 citywide health risk assessment database.

<sup>c</sup> The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

<sup>d</sup> The cancer risk significance threshold presented is the most stringent of the two discussed in Impact AQ-3.

<sup>e</sup> N/A (not applicable) is shown when the APEZ criteria are not exceeded.

- \* To reflect the updated health risk analysis, Table 4.4-11 on p. 4.4-58 has been replaced with the revised table as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**TABLE 4.4-11. CUMULATIVE LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED ONSITE RECEPTORS**

Source	Lifetime Excess Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	45	8.6
Project Construction	7	0.037
Removal of Existing Generators <sup>b</sup>	-2.2	-0.0030
3333 California Street Project <sup>c</sup>	0.7	0.0019
<b>Cumulative Total</b>	<b>50</b>	<b>8.6</b>
<i>APEZ Criteria</i>	<i>100</i>	<i>10</i>
<b>Exceed APEZ Criteria?</b>	<b>No</b>	<b>No</b>

Sources: Ramboll, 2018; Tables 20 and 21 in EIR Appendix H; Air District, San Francisco Department of Public Health, and San Francisco Planning Department, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, 2012.

Notes:

<sup>a</sup>—Background cancer risk and PM<sub>2.5</sub> concentrations were estimated using the maximum between the 2014 and 2040 background values from the citywide health risk assessment database. The 2014 values were used for cancer risk, and the 2040 values were used for PM<sub>2.5</sub> concentration.

<sup>b</sup>—The cancer risk and PM<sub>2.5</sub> concentration from emergency generators are negative because the three existing onsite generators would be removed during construction.

<sup>c</sup>—As discussed above, impacts from only 3333 California Street project were quantitatively evaluated here.



**(REVISED) TABLE 4.4-11. CUMULATIVE LIFETIME CANCER RISK AND PM<sub>2.5</sub> CONCENTRATIONS AT THE MAXIMALLY EXPOSED ONSITE RECEPTORS**

<u>Source</u>	<u>Unmitigated</u>		<u>Mitigated</u>	
	<u>Lifetime Excess Cancer Risk (in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration (µg/m³)</u>	<u>Lifetime Excess Cancer Risk (in 1 million)</u>	<u>PM<sub>2.5</sub> Concentration (µg/m³)</u>
<u>Cumulative Baseline<sup>a</sup></u>	<u>121</u>	<u>9.2</u>	<u>121</u>	<u>9.2</u>
<u>Project Construction</u>	<u>7</u>	<u>0.037</u>	<u>1.6</u>	<u>0.011</u>
<u>Removal of Existing Generators<sup>b</sup></u>	<u>-2.2</u>	<u>-0.0030</u>	<u>-4.4</u>	<u>-0.0059</u>
<u>3333 California Street Project<sup>c</sup></u>	<u>0.7</u>	<u>0.0019</u>	<u>0.72</u>	<u>0.0019</u>
<b><u>Cumulative Total</u></b>	<b><u>125</u></b>	<b><u>9.2</u></b>	<b><u>119</u></b>	<b><u>9.2</u></b>
<u>APEZ Criteria</u>	<u>100</u>	<u>10</u>	<u>100</u>	<u>10</u>
<b><u>Above APEZ Criteria?</u></b>	<b><u>Yes</u></b>	<b><u>No</u></b>	<b><u>Yes</u></b>	<b><u>No</u></b>
<b><u>Project Contribution<sup>d</sup></u></b>	<b><u>7.0</u></b>	<b><u>0.037</u></b>	<b><u>1.6</u></b>	<b><u>0.011</u></b>
<u>APEZ Project Contribution Significance Threshold<sup>d</sup></u>	<u>7</u>	<u>N/A<sup>e</sup></u>	<u>7</u>	<u>N/A</u>
<b><u>Exceed APEZ Criteria?</u></b>	<b><u>Yes</u></b>	<b><u>N/A</u></b>	<b><u>No</u></b>	<b><u>N/A</u></b>

Sources: Ramboll, 2018; Tables 20 and 21 in EIR Appendix H; EIR Appendix I; draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation, 2020*.

Notes:

<sup>a</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated using values in the draft 2020 citywide health risk assessment database.

<sup>b</sup> The cancer risk and PM<sub>2.5</sub> concentration from emergency generators are negative because the three existing onsite generators would be removed during construction. The on-site receptors would not be exposed to the impact of the existing generators. Therefore, the impact of the removal of the generators is a reduction to the existing background.

<sup>c</sup> As discussed above, impacts from only 3333 California Street project were quantitatively evaluated here.

<sup>d</sup> The project contribution would be the health effects the receptors would experience from project construction. The cancer risk from project construction is at the threshold and in an abundance of caution is conservatively determined to exceed the threshold.

<sup>e</sup> N/A (not applicable) is shown when the APEZ criteria are not exceeded.

## SECTION 6, ALTERNATIVES

- \* To reflect the updated health risk analysis, p. 6-2 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The EIR and initial study (see Appendix B) identified ~~1315~~ significant impacts of the proposed project (see Chapter 4, *Environmental Setting and Impacts*, of the EIR and the initial study in Appendix B). These significant impacts would occur in the areas of cultural

resources, tribal cultural resources, biological resources, paleontological resources, ~~and noise, and air quality.~~

- \* To reflect the updated health risk analysis, p. 6-4 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

#### **AIR QUALITY (EIR TOPIC)**

- Impact AQ-3. Construction and operation of the proposed project would generate toxic air contaminants, including DPM, at levels that would expose sensitive receptors to substantial pollutant concentrations. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-AQ-3 (Construction Emissions Minimization).
- Impact C-AQ-1. The proposed project, in combination with reasonably foreseeable future cumulative projects, would result in significant health risk impacts on sensitive receptors. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-AQ-3 (Construction Emissions Minimization).

- \* To reflect the updated health risk analysis, the language on p. 6-5 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):



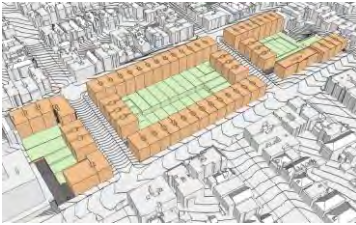

- **Alternative B: Reduced Construction Alternative.** This alternative was selected based on its ability to reduce construction-related impacts associated with the mass grading and excavation necessary to create below grade parking, loading, and access for the proposed project. This alternative has been specifically included for analysis because of its potential to reduce impacts ~~on~~ related to cultural resources, tribal cultural resources, paleontological resources, ~~and~~ construction-related noise, and construction-related emissions of toxic air contaminants. Alternative B assumes that all existing uses on the project site would be demolished with the exception of 401 Cherry Street and the Marshal Hale hospital building, and that a new residential development would be constructed that would continue the neighborhood's residential land use pattern of homes with individual garages and driveways at grade level. Alternative B would allow for the construction of 141 new multi-family residential uses, primarily in the form of duplex buildings (including the nine existing units at 401 Cherry Street).
- **Alternative C: Rehabilitation/Reuse Alternative.** The selection of this alternative was based on its ability to reduce construction-related impacts, including impacts related to cultural resources, tribal cultural resources, biological resources (i.e., impacts on nesting birds resulting from tree removal), paleontological resources, ~~and~~ construction-related noise (i.e., construction noise), and construction-related emissions of toxic air contaminants. Alternative C assumes retention of all existing hospital buildings and conversion of those buildings into residential uses, with minimal demolition, less

excavation, and minimal construction activities during renovations. This alternative would result in 258 residential units.

- \* To update the characteristics of the proposed project, Table 6-1, Comparison of Proposed Project and Alternatives, on p. 6-6 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):



**(REVISED) TABLE 6-1. COMPARISON OF PROPOSED PROJECT AND ALTERNATIVES**

	Proposed Project	No Project Alternative	Reduced Construction Alternative	Rehabilitation/Reuse Alternative
				
<b>Building Heights</b>	36' - 89' <del>96'</del>	25'–112'	36'–40' <sup>a</sup>	25'–112'
<b>No. of Stories</b>	3–7	3–8	3	3–8
<b>Total No. Units</b>	273	9	141	258
<b>Studio</b>	<del>13</del> 16: <del>5</del> 6%	0: 0%	0: 0%	8: 3%
<b>1 Bedroom</b>	<del>56</del> 67: <del>21</del> 23%	9: 100%	13: 9%	65: 25%
<b>2 Bedroom</b>	<del>88</del> 91: <del>32</del> 33%	0: 0%	42: 30%	84: 33%
<b>3 Bedroom</b>	<del>96</del> 79: <del>35</del> 29%	0: 0%	86: 61%	91: 35%
<b>4 Bedroom</b>	20: 7% <sup>b</sup>	0: 0%	0: 0%	10: 4%
<b>Square Footage (sf) by Use</b>	<del>603,200</del> 627,200 sf residential; 15,000 sf amenity	7,000 sf residential (401 Cherry); 622,000 sf medical office	235,000 sf residential	462,000 sf residential; 25,000 sf amenity; 142,000 sf storage/unusable (subgrade)
<b>Open Space</b>	<del>86,200</del> 88,100 sf (common and private)	25,000 sf (common)	82,600 sf (common) <sup>d</sup>	88,200 sf (common) <sup>d</sup>
<b>Parking</b>	416 spaces; 221,000 sf	439 spaces; 105,000 sf	132 spaces; 52,000 sf <sup>e</sup>	354 spaces; 105,000 sf
<b>Bike Stalls</b>	411 class 1 22 class 2	16	212 class 1 21 class 2	387 class 1 39 class 2
<b>No. of Lots (lot size)</b>	16 (2,500–99,400 sf)	14 (approx. 2,000–59,000 sf)	+/- 60 (+/- 3,000 sf)	Not determined – potentially same/less than existing
<b>Entitlements</b>	CU/PUD	None	Potential PUD	CU/PUD
<b>Excavation Depth</b>	13'–75' below grade; <sup>c</sup> 61,800 cubic yards (cy)	None	Up to 10' below grade; approx. 6,600 cy	Approx. 8' below grade; approx. 1,200 cy

Proposed Project	No Project Alternative	Reduced Construction Alternative	Rehabilitation/Reuse Alternative
Source: TMG Partners 2018.			
f. Forty feet for all new buildings, 40 feet for existing 401 Cherry Street, and 36 feet for existing 3698 California Street (Marshal Hale hospital building).			
g. 12 single-family residential (SFR) units on separate lots and two SFR units on podium lots are included in four-bedroom count; exact bedroom count not yet determined.			
h. Maximum depths of 13 feet on Block A, 75 feet on Block B, and 17 feet on Block C.			
i. Some portion of open space could be made private.			
j. Accounts for one space per unit, except 401 Cherry Street.			
Notes: Amenity = common areas, fitness facility, recreation space; CU/PUD = conditional use/planned unit development.			

- \* To reflect the updated health risk analysis, the language on p. 6-11 been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

With respect to toxic air contaminants, the No Project Alternative would not increase the cancer risk or localized concentrations of particulate matter 2.5 microns in diameter or less (PM<sub>2.5</sub>) because only minimal construction activity for a short duration would occur during renovation of hospital use areas to general medical uses. ~~As such, the project site and surrounding areas would continue to be below the Air Pollutant Exposure Zone (APEZ) criteria. Due to the limited use of heavy duty construction equipment, the No Project Alternative would not cause a new location to meet the APEZ criteria or exceed the project contribution significance threshold for areas already in an APEZ.~~ The No Project Alternative would result in continued operation of onsite diesel generators; however, as shown in Tables 4.4-8 and 4.4-9 in Section 4.4 *Air Quality* (pp. 4.4-49 and 4.4-50, respectively), the excess cancer risk and PM<sub>2.5</sub> concentrations associated with project construction activity for onsite and offsite receptors would be greater than the cancer risk and PM<sub>2.5</sub> concentrations associated with the generators. As such, even with the existing generators still in operation, the No Project Alternative would result in a lower excess cancer risk and PM<sub>2.5</sub> concentration than the proposed project because it would not require substantial or heavy construction. ~~Neither the proposed project nor the No Project Alternative, however, would result in sensitive receptor locations meeting the APEZ criteria. Therefore, the No Project Alternative would not result in significant health risk impacts and no mitigation is required.~~

- \* To reflect the updated health risk analysis, p. 6-12 been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Overall, air quality impacts under the No Project Alternative would be less than significant, but regional air quality impacts would generally be greater than those under the proposed project because a net reduction in operational air emissions would not occur as a result of fewer vehicle trips and removal of the three onsite emergency generators. As with the proposed project, the No Project Alternative would make a less-than-significant contribution to cumulative regional air quality impacts. No mitigation measures are necessary. Regarding cumulative health risks, because the No Project Alternative would have only minimal construction activity for a short duration and impacts from cumulative projects isare minimal around the project site ~~no impact with respect to health risks~~, the No Project Alternative would not have the potential to combine with cumulative projects and result in a cumulative health risk impact.

- \* To reflect the updated health risk analysis, p. 6-20 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):



With respect to toxic air contaminants, compared to the proposed project, the Reduced Construction Alternative would result in a lower cancer risk and lower localized PM<sub>2.5</sub> concentration from construction because this alternative would require marginally less heavy-duty diesel equipment (i.e., below the levels shown in Tables 4.4-8 and 4.4-9 in Section 4.4, *Air Quality*, pp. 4.4-49 and 4.4-50, respectively). While the Reduced Construction Alternative would reduce the activity of heavy duty construction equipment, the reduction likely would not be enough to not cause a new location to meet the APEZ criteria or exceed the project contribution significance threshold for areas already in an APEZ without mitigation. Therefore, Similar to the proposed project, the Reduced Construction Alternative therefore would not result in sensitive receptor locations meeting the APEZ criteria and would not result in significant impacts related to toxic air contaminants. Construction air quality impacts would be less than significant with mitigation and less than the less-than-significant with mitigation impacts of the proposed project.

- \* To reflect the updated health risk analysis, p. 6-21 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~)

As with the proposed project, the Reduced Construction Alternative would make a less-than-significant contribution to cumulative regional air quality impacts, and no mitigation measures would be necessary. Regarding cumulative health risks, because the Reduced Construction Alternative would require marginally less construction equipment than the proposed project, it would result in ~~similar~~ cumulative health risk impacts that are less-than-significant with mitigation cumulative health risk and less than the project's impacts, which would also be less than significant with mitigation.

- \* To reflect the updated health risk analysis, p. 6-26 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

With respect to toxic air contaminants, compared to the proposed project, the Rehabilitation/Reuse Alternative would result in a reduced cancer risk and reduced localized PM<sub>2.5</sub> concentration from construction, below levels shown in Tables 4.4-8 and 4.4-9 in Section 4.4, *Air Quality* (pp. 4.4-49 and 4.4-50, respectively) due to the reduction in use of heavy duty diesel construction equipment. To perform the interior rehabilitation of the buildings, most equipment would not be diesel fueled and would have less of an impact. Because the Rehabilitation/Reuse Alternative would reduce diesel construction equipment and truck trips associated with the reduction in soil haul, the Rehabilitation/Reuse Alternative likely would not cause a new location to meet the APEZ criteria or exceed the project contribution significance threshold for areas already in an APEZ without mitigation. The Rehabilitation/Reuse Alternative therefore would not

~~result in sensitive receptors that meet the APEZ criteria and likely~~ would not result in significant impacts related to toxic air contaminants and no mitigation is required.

\* To reflect the updated health risk analysis, p. 6-27 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The Rehabilitation/Reuse Alternative would result in the construction of fewer residential units and less parking at the project site compared with the proposed project, resulting in less energy consumption and fewer vehicle trips at the project site once completed. Although the proposed project would also result in fewer vehicle trips than the former hospital and current medical uses at the project site (refer to 4.2, *Transportation and Circulation*), the Rehabilitation/Reuse Alternative would further reduce traffic and air quality impacts associated with energy use and vehicle trips. Because the Rehabilitation/Reuse Alternative would reduce diesel construction equipment use, the Rehabilitation/Reuse Alternative project impact would be less than significant, and the impact from cumulative projects is minimal around the project site, the Rehabilitation/Reuse Alternative would not have the potential to combine with cumulative projects and result in a cumulative health risk impact. Therefore, ~~for the same reasons as the proposed project,~~ cumulative air quality impacts would ~~also~~ be less than significant for the Rehabilitation/Reuse Alternative and less than the project's impact which would be less than significant with mitigation.

\* To reflect the updated health risk analysis, the text on p. 6-28 and Table 6-2 on p. 6-29 have been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

No project-specific or cumulatively significant and unavoidable impacts would occur as a result of the proposed project; however, several potential construction-related impacts ~~on-related to noise, toxic air contaminants,~~ and cultural, tribal cultural, paleontological, and biological resources would require mitigation to be reduced to less-than-significant levels.

**(REVISED) TABLE 6-2. COMPARISON OF SIGNIFICANT IMPACTS OF PROPOSED PROJECT TO IMPACTS OF ALTERNATIVES AFTER MITIGATION [EXCERPT]**

Impact Statement	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Construction Alternative	Alternative C: Rehabilitation/ Reuse Alternative
<u><b>Air Quality</b></u>				
<u>Impact AQ-3. Construction and operation of the proposed project would generate toxic air contaminants, including DPM, at levels that would expose sensitive receptors to substantial pollutant concentrations.</u>	<u>LSM</u>	<u>LS</u> ≤	<u>LSM</u> ≤	<u>LS</u> ≤
<u>Impact C-AQ-1. The proposed project, in combination with reasonably foreseeable future cumulative projects, would result in significant health risk impacts on sensitive receptors.</u>	<u>LSM</u>	<u>LS</u> ≤	<u>LSM</u> ≤	<u>LS</u> ≤
NI (no impact); LS (less than significant); LSM (less than significant with mitigation); = (equal to); < (less than); > (greater than)				

\* To reflect the updated health risk analysis, the text on p. 6-30 and p. 6-31 have been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

Although the Rehabilitation/Reuse Alternative would require the same mitigation measures to address impacts on archaeological resources, human remains, tribal cultural resources, and paleontological resources, the potential for impacts would be reduced compared with those of the project because of the reduced amount of excavation and earth movement. Furthermore, the significant construction impacts with regard to noise and vibration, toxic air contaminants, impacts, as well as impacts on and nesting birds, would be eliminated, and mitigation would not be required. As discussed above, the Rehabilitation/Reuse Alternative would meet a few of the project sponsor's basic objectives (refer to Section 2.2 in Chapter 2, *Project Description*).



## F. REVISIONS TO APPENDIX B, INITIAL STUDY

- \* To correct and editorial error in the Table of Comments, the following text has been added to p. i.

21. Wildfire.....144

- \* To update the height of the building rooftops on Block B, the text in the second paragraph of p. 2, has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

Taller multi-family buildings would be along the California Street and Maple Street frontages, including Buildings B7, B10, and B12, which would have a height of 80 feet; Buildings B8, B9, and B11 would range in height from 58 to ~~66~~ 65 feet.

- \* To update the height of the rooftop appurtenances on Block A, the text near the bottom of p. 2 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

When accounting for rooftop appurtenances (e.g., stairs, elevators, mechanical penthouses), building heights would range from 42 to ~~75~~ 81 feet.

- \* To update the height of the rooftop appurtenances on Block B, the text in the first full paragraph on p. 3 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

When accounting for rooftop appurtenances (e.g., stairs, elevators, mechanical penthouses), building heights would range from 42 to ~~90~~ 96 feet.

- \* To update the height of the rooftop appurtenances on Block C, the text in the second full paragraph on p. 3 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

When accounting for rooftop appurtenances (e.g., stairs, elevator, mechanical penthouses), building heights would range from 38 to ~~90~~ 96 feet.

- \* To update the project's total open space characteristics, the text in the first full paragraph on p. 4 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

In total, the project would provide approximately ~~86,200~~ 80,100 square feet of open space, comprising ~~52,800~~ 47,700 square feet of private open space and ~~33,400~~ 40,400 square feet of common open space.

- \* To correct the access date, the citation in footnote 31 on p. 45 has been revised as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

San Francisco Department of the Environment, *San Francisco's Carbon Footprint*, <https://sfenvironment.org/carbon-footprint>, accessed ~~May 10, 2019~~ October 30, 2018.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees, the text in the first full paragraph on p. 49 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

As shown in Table 2-3 in Chapter 2, *Project Description*, p. 2-26, of the EIR, the proposed project would result in a net increase of ~~93~~91 trees.

- \* To update the project's total open space characteristics, the text in the last paragraph on pp. 59 to 60 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

In total, the project would provide approximately ~~86,200~~ 80,100 square feet (~~1.97~~ 1.84 acres) of open space, comprising ~~52,800~~ 47,700 square feet (~~1.21~~ 1.1 acres) of private open space and ~~33,400~~ 40,400 square feet (~~0.76~~ 0.93 acre) of common open space, which is in excess of planning code requirements for usable open space in the zoning districts where the project site is located.

- \* To update the project's total open space characteristics, the text in the first partial paragraph on p. 61 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

In addition, the proposed project would include approximately ~~1.97~~ 1.84 acres of open space for the use of residents, ~~0.76~~ 0.93 acre of which would be common open space for residents.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees, the text in the first partial paragraph on p. 86 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Only ornamental landscape vegetation is present, including ~~163~~ 165 trees, 91 of which are regulated trees (77 street trees and 14 significant trees) and ~~72~~ 74 of which are non-regulated trees.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees, the text in the last paragraph on p. 87 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

As illustrated in Table 2-3 in Chapter 2, *Project Description*, p. 2-26, the proposed project would remove ~~42~~ 45 of the ~~77~~ 73 existing street trees and plant ~~68~~ 73 new street trees, for a total of ~~103~~ 105 street trees.

Of the other ~~72~~ 74 non-regulated trees on-site, ~~70~~ 72 would be removed and replaced with ~~146~~ 144 new trees. Overall, the project would increase the total number of trees onsite from ~~163~~ 165 to 256 after removing ~~121~~ 126 trees and planting ~~244~~ 217 new trees.

In response to Comment I Klipp2-2, the following Improvement Measure has been added to p. 90 and p. 153 (new text is double-underlined and deletions are shown in ~~striketrough~~):

In addition, although candidate, sensitive, or special status bee species are not known to occur in San Francisco, the sponsor should also implement Improvement Measure I-BI-A to avoid impacts to declining bee populations.

**Improvement Measure I-BI-A: Preconstruction Survey for Bee Populations**

Prior to construction and tree removal, personnel should check trees to verify there are no active swarms or colonies present. If found, personnel should report the findings to the San Francisco Beekeepers Association or other agency/organization approved by the Planning Department, and either wait for the bees to depart or work with the agency/organization to move the bees to safety.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees, the text in the last paragraph on pp. 91 to 92 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

The project site currently contains ~~163~~ 165 trees. Of those, 91 trees are subject to regulation by the Bureau of Urban Forestry; ~~72~~ 74 trees are located on private property and non-regulated. Of the 91 trees that are subject to regulation, 77 are street trees and 14 are significant trees. Landmark trees are absent from the project site. The proposed project would remove ~~42~~ 45 of the existing 77 street trees and plant ~~68~~ 73 new street trees, for a total of ~~103~~ 105 street trees.

Of the other ~~72~~ 74 non-regulated trees on-site, ~~70~~ 72 would be removed and replaced with ~~146~~ 144 new trees. Overall, the project would increase the total number of trees onsite from ~~163~~ 165 to 256 after removing ~~121~~ 126 trees and planting ~~214~~ 217 new trees, as detailed in Table 2-3 in Chapter 2, *Project Description*, p. 2-26. Notwithstanding the increase in total trees that would result from the project, the project is requesting a partial waiver from Public Works Code section 806(d) to provide ~~34~~ 29 fewer street trees than required.

- \* To update the project sponsor's proposed revisions to the existing tree count, trees to be removed, and proposed trees, the text in the first full paragraph on p. 114 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Furthermore, the existing site is covered predominantly by hardscape areas with limited open space and landscaping, which includes ~~163~~ 165 trees.

In response to Comment A-NAHC-1, Mitigation Measure MM-CR-2: Archaeological Testing on p. 38 and pp. 151-152 has been revised as follows (new text is double-underlined and deletions are shown in ~~striketrough~~):

Human Remains, and Associated or Unassociated Funerary Objects. ~~If The Treatment of~~ human remains and of associated or unassociated funerary objects ~~are~~ discovered during any soil-



disturbing activity, shall comply with all applicable state and federal laws. This shall be followed, include immediate notification of the ~~coroner~~ Medical Examiner of the City and County of San Francisco; and, in the event that of the coroner ~~Medical Examiner's determination~~ that the human remains are Native American remains, notification of the Native American Heritage Commission (NAHC) shall be notified. The NAHC, which shall appoint a most likely descendant Most Likely Descendant (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment and disposition within 48 hours of granted access to the site (Public Resources Code section 5097.98). The Environmental Review Officer (ERO) shall also be notified immediately ~~notified~~ upon discovery of human remains.

The ~~archaeological consultant~~, project sponsor, ~~ERO~~, and ~~MLD~~ the ERO shall make all reasonable efforts to develop ~~an agreement~~ a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment of human remains and associated or unassociated funerary objects ~~disposition~~, with appropriate dignity of the human remains and associated or unassociated funerary objects (as detailed in (CEQA Guidelines section 15064.5(d)) within six days of the discovery of the human remains. This proposed timing shall not preclude the Public Resources Code section 5097.98 requirement that descendants make recommendations or preferences for treatment within 48 hours of being granted access to the project site. The agreement should. The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. ~~The archaeological consultant shall retain possession of any Native American human~~ However, if the ERO, project sponsor, and MLD are unable to reach an agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, in cooperation with the project sponsor, shall ensure that the remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or funerary objects, as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archaeological consultant and the ERO. If no agreement is reached, state regulations shall be followed, including the reinternment of the human remains and associated burial objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity on the property, in a location not subject to further or future subsurface disturbance (Public Resources Code section 5097.98).

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during soil-disturbing activity additionally shall follow protocols laid

out in the archaeological testing program and any agreement established between the project sponsor, the Medical Examiner, and the ERO.

# **APPENDIX I**

# **MITIGATED CONSTRUCTION HEALTH RISK ANALYSIS MEMORANDUM**

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# MEMO

To **Heidi Mekkelson, ICF**  
 From **Michael Keinath, Sarah Manzano**  
 Re **Mitigated Construction Health Risk Analysis for Proposed Project at 3700 California Street, San Francisco**

## 1 Introduction

Date: January 28, 2020

Ramboll US Corporation (Ramboll) evaluated the health impacts of the construction of the proposed residential development at 3700 California Street in San Francisco, California (the "Project") for the Draft Environmental Impact Report (DEIR).<sup>1</sup>

Since the release of the DEIR, the City of San Francisco has updated its Community Risk Reduction Plan database of health impacts throughout the City, now called the Citywide Health Risk Assessment, or Citywide HRA. Using this new Citywide HRA database for the baseline health impacts in the City, the Project and immediately surrounding areas would meet the Air Pollution Exposure Zone (APEZ) criteria. The following analysis was conducted to assess the project's health risk impact with incorporation of the City of San Francisco's standard mitigation for construction equipment. The City's standard mitigation for construction equipment includes a requirement that all off-road equipment shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).<sup>2</sup>

Ramboll  
 201 California Street  
 Suite 1200  
 San Francisco, CA 94111  
 USA

T +1 415 796 1950  
 F +1 415 398 5812  
<https://ramboll.com>

## 2 Updated Health Risk Assessment Methods

### 2.1 Construction Emissions

The updated analysis assumes all equipment would have Tier 2 engines with Level 3 Verified Diesel Emissions Control Strategies (VDECS). In reality, many equipment will likely actually have Tier 4 engines as a method of meeting the requirement in the mitigation. However, Tier 2 with Level 3 VDECs was analyzed

<sup>1</sup> San Francisco Planning Department. 2019. Draft Environmental Impact Report, 3700 California. State Clearinghouse Number 2018092043, Case Number 2017-003559ENV.

<sup>2</sup> Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

to be conservative. Emissions were calculated using the same equipment list, schedule, truck trips, and activity data as described in Appendix H of the DEIR. Emissions calculations methodologies are the same as described under Impact AQ-1 in the DEIR, with the exception of the emission factors used for the off-road equipment. To account for the mitigation of Tier 2 engines with Level 3 VDECS, diesel particulate matter (DPM) and fine particulate matter (PM<sub>2.5</sub>) emissions from off-road equipment were calculated using emission factors for Tier 2 engines from CalEEMod. A reduction in particulate matter of 85% was taken, consistent with the requirements of a Level 3 VDECS.

**Table 1** shows DPM and PM<sub>2.5</sub> emissions from off-road equipment used to evaluate the effectiveness of the mitigation, as compared to the unmitigated emissions shown in Table 9 in Appendix H of the DEIR. On-road emissions remain unchanged from the DEIR analysis.

**Table 1. Mitigated Construction Off-road Toxic Air Contaminant Emissions**

Block	Year	Annual Off-road TAC Emissions <sup>a</sup>		Modeled Off-road Emissions <sup>b</sup>	
		[lbs]		[g/s]	
		DPM	PM <sub>2.5</sub>	DPM	PM <sub>2.5</sub>
C	2021	4.7	4.7	6.8E-05	6.8E-05
	2022	1.0	1.0	1.4E-05	1.4E-05
	2023	1.1	1.1	1.6E-05	1.6E-05
B	2021	5.3	5.3	7.7E-05	7.7E-05
	2022	1.0	1.0	1.4E-05	1.4E-05
	2023	1.8	1.8	2.6E-05	2.6E-05
	2024	0.062	0.062	9.0E-07	9.0E-07
A	2022	3.4	3.4	4.8E-05	4.8E-05
	2023	1.0	1.0	1.4E-05	1.4E-05
	2024	0.81	0.81	1.2E-05	1.2E-05
Notes:					
<sup>a</sup> . Emissions calculated using the same methodology as described in Appendix H of the DEIR, with the exception of the off-road emission factor, as described above.					
<sup>b</sup> . Modeled emissions calculated using the same methodology as described in Appendix H of the DEIR.					

## 2.2 Construction Health Impacts

Updated excess lifetime cancer risk and PM<sub>2.5</sub> concentration from the project were calculated to account for the application of mitigation. The mitigated emissions were used to estimate excess lifetime cancer risk and PM<sub>2.5</sub> concentration using the same methodologies described in Impact AQ-3 and in Appendix H of the DEIR.

## 2.3 Existing Generator Health Impacts

As discussed in Impact AQ-3 of the DEIR, the impact of the removal of the existing generators at the site was evaluated. The impact of the existing generators was included in the Citywide HRA, so to estimate total impact in the area, this impact should be removed from the total.

The updated Citywide HRA still includes the health risk impact from these generators, but incorporates updated emissions information from these generators. For this analysis, emissions were updated from



the analysis in the DEIR to incorporate the updated emissions used in the updated Citywide HRA. All modeling and health risk assumptions remain the same. Updated DPM emissions are 0.097 lb/day.

## 2.4 Cumulative Baseline

The cumulative baseline background health risk impacts were updated from the DEIR to take into account the updated Citywide HRA for both the existing analysis and the cumulative analysis. The health risk impacts in the updated Citywide HRA were provided by the City of San Francisco.

The cumulative analysis also includes the impacts from the cumulative project for which impacts were calculated in the DEIR, the 3333 California Street project. The analysis of this project is unchanged from the DEIR.

## 3 Results

Existing and cumulative health risk impacts were updated based on the updated Citywide HRA, construction impacts with mitigation, and updated generator analysis.

### 3.1 Project Impacts

**Table 2** shows the excess lifetime cancer risk and PM<sub>2.5</sub> concentration at the maximally exposed off-site receptors for the mitigated and unmitigated case. The maximally exposed off-site receptors were determined by identifying the maximum health risk impact from the combination of mitigated construction and the generator removal. **Table 3** shows the excess lifetime cancer risk and PM<sub>2.5</sub> concentration at the maximally exposed on-site receptors for the mitigated and unmitigated case. The maximally exposed on-site receptors were determined by identifying the maximum health risk impact from mitigated construction only because the on-site receptor would not be exposed to the generator impacts. Therefore, these impacts are a correction to the cumulative baseline in this case. These tables can be compared to the unmitigated results in Table 4.4-8 and 4.4-9 in Impact AQ-3 of the DEIR, respectively.

**Table 2. Excess Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed Off-site Receptor**

Source	Unmitigated		Mitigated	
	Excess Lifetime Cancer Risk	PM <sub>2.5</sub> Concentration	Excess Lifetime Cancer Risk	PM <sub>2.5</sub> Concentration
	(in 1 million)	(µg/m <sup>3</sup> )	(in 1 million)	(µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	68	8.6	85	8.9
Project Construction	41	0.21	6.7	0.035
Removal of Existing Generators <sup>b</sup>	-4.1	-0.0055	-0.62	-0.0031
<b>Cumulative Total</b>	<b>105</b>	<b>8.8</b>	<b>91</b>	<b>9.0</b>

Source: San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

Notes:

<sup>a</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the 2020 citywide health risk assessment database.

<sup>b</sup> The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

**Table 3. Excess Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed On-site Receptor**

Source	Unmitigated		Mitigated	
	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	121	9.2	121	9.2
Project Construction	7.0	0.037	1.6	0.011
Removal of Existing Generators <sup>b</sup>	-4.4	-0.0059	-4.4	-0.0059
<b>Cumulative Total</b>	<b>125</b>	<b>9.2</b>	<b>119</b>	<b>9.2</b>

Source: San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

Notes:

<sup>a</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the 2020 citywide health risk assessment database.

<sup>b</sup> The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

### 3.2 Cumulative Impacts

**Table 5** shows the cumulative excess lifetime cancer risk and PM<sub>2.5</sub> concentration at the maximally exposed off-site receptors, incorporating the mitigated construction impacts and cumulative projects.

**Table 6** shows the cumulative excess lifetime cancer risk and PM<sub>2.5</sub> concentration at the maximally exposed on-site receptors incorporating the mitigated construction impacts and cumulative projects. These tables can be compared to the unmitigated results in Table 4.4-10 and 4.4-11 in Impact C-AQ-1 of the DEIR, respectively.

**Table 5. Cumulative Excess Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed Off-site Receptor**

Source	Unmitigated		Mitigated	
	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	68	8.6	85	8.9
Project Construction	41	0.21	6.7	0.035
Removal of Existing Generators <sup>b</sup>	-4.1	-0.0055	-0.62	-0.0031
3333 California Street Project <sup>c</sup>	0.84	0.0022	0.44	0.0022
<b>Cumulative Total</b>	<b>105</b>	<b>8.8</b>	<b>91</b>	<b>9.0</b>

Source: San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

Notes:

<sup>a</sup> Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the 2020 citywide health risk assessment database.

<sup>b</sup>. The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.

**Table 6. Cumulative Excess Lifetime Cancer Risk and PM<sub>2.5</sub> Concentration at the Maximally Exposed On-site Receptor**

Source	Unmitigated		Mitigated	
	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Excess Lifetime Cancer Risk (in 1 million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
Cumulative Baseline <sup>a</sup>	121	9.2	121	9.2
Project Construction	7.0	0.037	1.6	0.011
Removal of Existing Generators <sup>b</sup>	-4.4	-0.0059	-4.4	-0.0059
3333 California Street Project <sup>c</sup>	0.72	0.0019	0.72	0.0019
<b>Cumulative Total</b>	<b>125</b>	<b>9.2</b>	<b>119</b>	<b>9.2</b>

Source: San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

Notes:

<sup>a</sup>. Background cancer risk and PM<sub>2.5</sub> concentrations were estimated from the 2020 citywide health risk assessment database.

<sup>b</sup>. The three existing generators that are included in the citywide health risk assessment database would be removed as part of the project prior to the commencement of construction activities.





# **ATTACHMENT A   DRAFT EIR PUBLIC HEARING TRANSCRIPT**

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SAN FRANCISCO PLANNING COMMISSION

PUBLIC HEARING RE DRAFT ENVIRONMENTAL IMPACT REPORT  
2017-003559ENV - 3700 CALIFORNIA STREET

COMMISSION CHAMBERS, ROOM 400  
CITY HALL, 1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CALIFORNIA

Thursday, September 19, 2019

1:00 p.m.

Reported by:

SONIA BOUGHTON ROGERS, CSR NO. 8153

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JAN BROWN & ASSOCIATES  
WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES  
701 Battery St., 3rd Floor, San Francisco, CA 94111  
(415) 981-3498 or (800) 522-7096

A P P E A R A N C E S

COMMISSIONERS:

Myrna Melgar, President  
Joel Koppel, Vice President  
Frank Fung  
Kathrin Moore  
Dennis Richards

COMMISSION SECRETARY:

Jonas P. Ionin

Staff in Attendance:

Jeanie Poling

Public Comment Speakers:

Rose Hillson  
Victor Hargett  
Leonard Basoco  
Marie Sullivan

September 19, 2019

Afternoon Session  
5:10 p.m.

P R O C E E D I N G S

---o0o---

THE CLERK: Commissioners, this will place us on line number 11, case number 2017-003559ENV, 3700 California Street. This is for the draft Environmental Impact Report.

Please note that written comments will be accepted by the Planning Department until 5 p.m. on September 24th, 2019.

And I will respectfully remind members of the public that the purpose of today's hearing is to accept testimony of the adequacy of the draft environmental report, not on the project itself.

MS. POLING: Good evening, President Melgar and Members of the Commission. I'm Jeanie Poling, Environmental Planning staff.

Can we have the overhead presentation. Thank you.

The item before you is the review and comment on the 3700 California Street project's draft Environmental Impact Report or EIR. The purpose of today's hearing is



1 to take public comments on the adequacy, accuracy and  
2 completeness of the draft EIR pursuant to the California  
3 Environmental Quality Act, or CEQA, and San Francisco's  
4 local procedures for implementing CEQA.

5 No approval action on this document was requested at  
6 this time.

7 The public review period for the project's draft EIR  
8 began on June 13th and will continue until September 24th.  
9 This public hearing was rescheduled from an earlier date;  
10 and the comment period was extended because of an error in  
11 distribution of the Notice of Availability of the draft  
12 EIR.

13 I'll briefly summarize the project description and  
14 draft EIR analysis before opening up the meeting to public  
15 comment.

16 The 4.9-acre project site is the former California  
17 Pacific Medical Center, California campus, in the Presidio  
18 Heights neighborhood, comprising the full block bounded by  
19 California, Cherry, Maple and Sacramento Streets and  
20 portions of the adjacent blocks to the east and west.

21 The proposed project would demolish 5 of the 6  
22 existing buildings on the project site, renovate a portion  
23 of the Marshal Hale Hospital building at 3698 California  
24 Street for residential use, retain and renovate an  
25 existing 9-unit residential building at 401 Cherry Street

1 and construct 31 new residential buildings.

2 The proposed 273 dwelling units would include 14  
3 single family homes and 19 multi-family residential  
4 buildings, with buildings ranging from 3 to 7 stories, or  
5 36 to 80 feet in height. A total of 416 vehicle parking  
6 spaces and over 450 class I and class II bicycle parking  
7 spaces would be provided.

8 The draft EIR finds that the project would result in  
9 no significant and unavoidable impacts. Impacts related  
10 to the following topics could be reduced to less than  
11 significant with mitigation measures:

12 Historic resources, human remains, archeological  
13 resources, tribal/cultural resources, paleontological  
14 resources, nesting birds and construction noise and  
15 vibration. All other impacts were found to be less than  
16 significant.

17 The draft EIR identifies three project alternatives.  
18 A no project alternative is required under CEQA law and  
19 assumes that non-acute medical uses would operate at the  
20 project site with minimal alterations to the existing  
21 buildings.

22 The reduced construction alternative would reduce  
23 construction-related impacts associated with mass grading,  
24 such as impacts on archeological, tribal/cultural and  
25 paleontological resources and construction noise impacts.

1           The rehabilitation reuse alternative would reduce  
2           impacts related to construction noise and vibration and  
3           nesting birds from less than significant with mitigation  
4           to less than significant.

5           Since the project would not result in significant,  
6           unavoidable impacts, none of the alternatives would reduce  
7           significant and unavoidable impacts to less than  
8           significant.

9           Sorry. That is the slide that shows the  
10          alternatives.

11          Today the Planning Department is seeking comments on  
12          the adequacy and accuracy of the information contained in  
13          the draft EIR.

14          For members of the public who wish to speak, please  
15          state your name for the record. Please speak slowly and  
16          clearly so that the court reporter can make an accurate  
17          transcript of today's proceedings.

18          Staff is not here to respond to comments today.  
19          Instead, all verbal and written comments received today,  
20          and during the public comment period, will be transcribed  
21          and responded to in a Responses to Comment document.  
22          Revisions to the draft EIR will be made as appropriate.

23          Those who wish to submit written comments on the  
24          draft EIR may either give them to the Commission secretary  
25          today or deliver them to me by e-mail or hard copy by the



1 end of the comment period, which is 5 p.m., on Tuesday,  
2 September 24th.

3 Unless you have procedural questions, I respectfully  
4 suggest that the public hearing be opened.

5 Thank you.

6 COMMISSIONER RICHARDS: All right. Let's do  
7 some public comment. I have some speaker cards. Anyone  
8 can speak. If I call your name, please come on up. Line  
9 up on the screen side of the room.

10 Rose Hillson, Leonard Basoco and Victor Hargett.

11 Anyone else is more than welcome to speak. Please  
12 come on up. And please address the Environmental Impact  
13 Report.

14 MS. HILLSON: May I have the overhead, please.  
15 So I submitted this 100-plus document of comments. And  
16 within it, because I didn't want to go over it too much,  
17 here has showing a bunch of things that I wrote in kind of  
18 summary. I'll read it.

19 There's a reduction of on-street parking. And  
20 although we don't talk about level of service anymore, I  
21 just want to make this point. Reduction of on-street  
22 parking in the high-occupancy level of service D, which  
23 was some years ago at CPMC -- this is a level of service D  
24 area -- drivers will circle in queue.

25 Maple driveway has been predicted to be 1 to 2

1  
(TR-4)

1 vehicles a minute. That's an increase, depending on the  
 2 stats you use, of 250% and 214%. That's a 38% traffic  
 3 increase on the south side of Parker. And that is going  
 4 to conflict with the Parker/Euclid bike path.

5 The increase and probability of pedestrian  
 6 vehicle/conflicts, VisionZero Failure, studied two blocks  
 7 of Parker south, mitigation measures. Decreased the  
 8 garage ceiling stackers to be used for the two tallest  
 9 parts of blocks B and C so that you can decrease the  
 10 California Street level impact.

11 French Laundry chemicals is still a concern. Greater  
 12 garage depth increases the impact on archeological and  
 13 tribal resources. Increase the radius, depending on  
 14 tribal desires.

15 The net numbers used via the reliance on CPMC  
 16 Hospital data is not environmentally friendly. Prior CPMC  
 17 EIR hospital stats would be used to analyze this 3700  
 18 project. Not clearly stated, nor prior noticed.

19 New low-pressure fire hydrants. For safety, I think  
 20 there should be high-pressure. 61,800 cubic yards of soil  
 21 movement. Phase workers, 738 trips. Material, 30.

22 Hauling, 6,552 trips. Total, 7320 trips.

23 Need for construction transportation management plan,  
 24 contractor parking plan, and future delivery routes.

25 Rooftop appurtenances are not in the shadow study.

8  
(PD-1)

1

Negative 23% street trees is -- well, not

2

environmentally friendly. Explicitly list 150 Parker

3

Avenue School as "Sensitive Receptor." That is in the

9  
(AQ-1)

4

DEIR modeling extent shown. And also, it was already

5

included in the 3333 California EIR.

10  
(TR-4)

6

Decrease the number of car shares from 7 to 2, a

7

ratio used by 3333 California.

8

Thank you very much. And 30 seconds left to go.

9

COMMISSIONER RICHARDS: Thank you.

10

Next speaker, please.

11

MR. HARGETT: Good afternoon, President Melgar

12

and fellow Commissioners. My name is Victor Hargett. And

13

I have been a journeyman carpenter for 34 years. I live

14

here in San Francisco. And I am speaking in support of

15

the 3700 California Street project.

16

This project will allow a carpenter like me to

1  
(ME-1)

17

continue living in the City of San Francisco. This

18

project will help me continue my career as a carpenter

19

moving toward retirement.

20

This project will provide me with the necessary

21

income to provide for my family. This project will bring

22

much-needed housing to the area.

23

I am in full support of this project and ask that you

24

move to forward this project.

25

Thank you.



1 PRESIDENT MELGAR: Thank you. Next speaker,  
2 please.

3 THE CLERK: I will remind members of the public  
4 that this is not about the project but, rather, the draft  
5 environmental impact report.

6 MR. BASOCO: Yes. Good afternoon, President  
7 Melgar, fellow commissioners. Name's Leonard Basoco. I  
8 am field representative Carpenters Local 22, here in the  
9 City.

10 I'm here today to ask that you guys accept the EIR  
11 and move this project on. TMP Partners is committed to  
12 using a signatory and general contractor that will provide  
13 numerous individuals with the opportunity to earn a good  
14 wage; provide both health, retirement benefits to our  
15 members.

16 This project will also offer training and educational  
17 opportunities for those entering the carpentry trade  
18 through apprenticeship. This includes women, minorities,  
19 veterans.

20 This project will also bring much-needed housing to  
21 the area. We already heard, you know, over 30 people that  
22 just said how much we need housing. This is part of it.

23 So like to thank you for the opportunity to speak and  
24 urge you to accept the EIR.

25 Thank you.

1 PRESIDENT MELGAR: Thank you.

2 Any other public comment on this item?

3 MS. SULLIVAN: Hi. I'm Marie Sullivan. And I  
4 am a property owner across the street from 3838, actually,  
5 since 1968. My parents bought the place.

6 I certainly support new housing and jobs for people.  
7 But I'm very concerned about the -- with how this is going  
8 to affect the environment and parking. And so that's why  
9 I'm here, to say that -- speak my concerns.

10 Thank you.

11 PRESIDENT MELGAR: Thank you.

12 Any other public comment on this item?

13 (No audible response.)

14 PRESIDENT MELGAR: Okay. Public comment is  
15 closed. Commissioner Moore.

16 COMMISSIONER MOORE: I have a few  
17 questions. Generally, I think the draft EIR is very well  
18 set up, very well drafted and very clear. I appreciate  
19 that. However, I'm concerned that the cumulative  
20 impact of the two large projects, where we have change  
21 land use, 333 California and 3700 California have cumulative  
22 impacts, which reminds me of creating something which is  
23 slightly too far center.

24 And I am concerned that the high number of parking  
25 spaces for each of these projects -- and I'm addressing

3  
(TR-4)  
cont.

1 now, at this moment, 3700 California -- has an impact that  
2 cannot be fully evaluated, particularly that saddled  
3 constantly shifting overlay of Uber and Lyft.

4  
(ME-1)

4 I am all in support of density. However, the  
5 massive excavation that both projects are trying to  
6 undertake in order to achieve this very car-centric  
7 outcome is of great concern to me, particularly because I  
8 believe the infrastructure of public transportation,  
9 should be increased prior to either of these two projects  
10 starting in that area.

11 And that is not just the linear expansion and higher  
12 loading of the 1-California and a couple of other buses  
13 that are in that corridor, but cross-connections, which  
14 really kind of weave this particular large development,  
15 focused into the larger project and larger destinations  
16 throughout the City. I would like the EIR to address  
17 that.

5  
(ME-1)

18 And there is another challenge I'd like to pose. And  
19 that's probably not within the traditional structure of  
20 how we do EIRs. I'd like to start to address what we do  
21 after cars diminish.

22 In our agenda today are two other projects where  
23 we're seeing the reinterpretation of parking. And if  
24 we're talking about higher and better uses of parking --  
25 we have a project just coming up in a few minutes -- then



5  
(ME-1)  
cont.

1 I would like this project, as it is providing massive  
2 below-grade parking, to be able to already anticipate that  
3 change to a higher and better use.

4 Those are my comments. And they're a little bit  
5 looking into some future interpretations. But I believe  
6 they're important to address.

7 PRESIDENT MELGAR: Thank you, Commissioner  
8 Moore. I agree with all your comments.

9 (Thereupon, the proceedings were  
10 adjourned at 5:25 o'clock p.m.)

11 ---o0o---

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA ) SS.

I, SONIA BOUGHTON ROGERS, a Certified Shorthand Reporter in and for the State of California, hereby certify:

That on the 19th day of September, 2019, I fully, truly and correctly took down in shorthand writing, to the best of my ability, all of the proceedings had and all of the testimony given in said hearing and cause;

That I thereafter truly, fully and correctly caused the same to be transcribed by computer-aided transcription, that the foregoing is a full, true and correct transcript of my shorthand notes taken at said time and place therein named.

DATED: OCTOBER 7, 2019

  
Sonia Boughton Rogers, C.S.R. No. 8153

## **ATTACHMENT B   DRAFT EIR COMMENT LETTERS AND EMAILS**

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**From:** [Leung, David \(DBI\)](#)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Cc:** [Jayin, Carolyn \(DBI\)](#); [Pei, Carrie \(DBI\)](#); [Strawn, William \(DBI\)](#); [Hui, Tom \(DBI\)](#); [Lowrey, Daniel \(DBI\)](#); [Ho, Gary \(DBI\)](#)  
**Subject:** RE: 3700 California Street  
**Date:** Wednesday, September 19, 2018 4:53:28 PM

---

Dear Ms. Poling:

Thank you for letting us know that the Planning Department has published a notice of preparation of an environmental impact report for the project at 3700 California Street.

Page 16 of the notice on "Actions by other City Departments:

Department of Building Inspection

- Review and approval of demolition, grading, and building permits
- Night noise permit for work performed outside the normal 7 a.m. to 8 p.m. construction hours, if necessary"

These are consistent with DBI procedures.

Thank you.

**David Leung, P.E., LEED AP, GPR-NH,**  
 Marshall & Swift Certified Appraiser  
 Manager  
 Permit Submittal & Issuance  
 Department of Building Inspection  
 1660 Mission Street  
 San Francisco, CA 94131  
 (415) 558-6033 Phones  
 (415) 558-6401 Fax  
[David.Leung@sfgov.org](mailto:David.Leung@sfgov.org)

---

**From:** Hui, Tom (DBI)  
**Sent:** Tuesday, September 18, 2018 10:05 PM  
**To:** Lowrey, Daniel (DBI); Ho, Gary (DBI); Leung, David (DBI)  
**Cc:** Jayin, Carolyn (DBI); Pei, Carrie (DBI); Strawn, William (DBI)  
**Subject:** Fwd: 3700 California Street

Hi Dan,

Please, review and take proper action this week.

Bye

Tom

Sent from my iPhone

Begin forwarded message:

**From:** "Poling, Jeanie (CPC)" <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Date:** September 18, 2018 at 6:05:01 PM PDT

**To:** "Hui, Tom (DBI)" <[tom.hui@sfgov.org](mailto:tom.hui@sfgov.org)>

**Subject:** 3700 California Street

Hello,

This is to let you know that the Planning Department has published a notice of preparation of an environmental impact report for the project at 3700 California Street.

Documents are available at:

[http://sfmea.sfplanning.org/NOA%20of%20NOP\\_9.19.18.pdf](http://sfmea.sfplanning.org/NOA%20of%20NOP_9.19.18.pdf)

[http://sfmea.sfplanning.org/NOP\\_9.19.18\\_web.pdf](http://sfmea.sfplanning.org/NOP_9.19.18_web.pdf)

Thank you.

**Jeanie Poling**

**Senior Environmental Planner**

San Francisco Planning Department

1650 Mission Street, Suite 400 San Francisco, CA 94103

Direct: 415.575.9072 | [www.sfplanning.org](http://www.sfplanning.org)

[San Francisco Property Information Map](#)



**From:** [Totton, Gayle@NAHC](mailto:Totton, Gayle@NAHC)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Subject:** SCH# 2018092043 3700 California Street  
**Date:** Tuesday, July 02, 2019 1:03:15 PM  
**Attachments:** [DEIRReview SCH2018092043 3700California-SFPlanning-Poling 7-2-19.pdf](#)

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

Good afternoon,

Attached is a comments letter for the environmental document on the project referenced above. The letter will also be sent via the postal service.

Please let me know if you have any questions.

Sincerely,

Gayle Totton, M.A., Ph.D.  
Associate Governmental Program Analyst  
Native American Heritage Commission  
(916) 373-3714

STATE OF CALIFORNIA  
 NATIVE AMERICAN HERITAGE COMMISSION  
 Cultural and Environmental Department  
 1550 Harbor Blvd., Suite 100  
 West Sacramento, CA 95691  
 Phone (916) 373-3710  
 Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
 Website: <http://www.nahc.ca.gov>

Gavin Newsom, Governor



July 2, 2019

Jeanie Poling  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94109

Also sent via e-mail: [Jeanie.poling@sfgov.org](mailto:Jeanie.poling@sfgov.org)

RE: **SCH# 2018092043, 3700 California Street Project**, City of San Francisco; San Francisco County, California

Dear Ms. Poling:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the above referenced project. The review included the Executive Summary; the Project Description; and the Environmental Setting, Impacts and Mitigation, section 3.5, Cultural Resources and 3.18, Tribal Cultural Resources, prepared by David J. Powers & Associates, Inc. for the City of Redwood City. We have the following concern(s):

1. Mitigation Measure CR-2 states that the Archaeologist will retain Native American Human Remains until testing is complete. Only the Most Likely Descendant (MLD) can authorize testing on Native American Human Remains and the remains cannot be "retained" for testing if the MLD does not expressly authorize such activities. Please refer to Public Resources Code 5097.98 for the process of MLD recommendations for treatment and disposition of Native American Human Remains (see separate attachment).

Agencies should be aware that AB 52 does not preclude them 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](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf), entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

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.

If you have any questions, please contact me at my email address: [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

*Gayle Totton*

Gayle Totton, B.S., M.A., Ph. D  
 Associate Governmental Program Analyst

Attachment  
 cc: State Clearinghouse

The California Environmental Quality Act (CEQA)<sup>1</sup>, specifically Public Resources Code §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.<sup>2</sup> 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.<sup>3</sup> 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).<sup>4</sup> **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”<sup>5</sup>, 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.”<sup>6</sup> Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.<sup>7</sup> 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<sup>8</sup> may also apply.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

### **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.<sup>9</sup> 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).<sup>10</sup>

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.<sup>11</sup>

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.<sup>12</sup>

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 §6254 (r) and §6254.10.** Any information submitted by a California Native 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.<sup>13</sup>

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.

<sup>1</sup> Pub. Resources Code § 21000 et seq.

<sup>2</sup> Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

<sup>3</sup> Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

<sup>4</sup> Government Code 65352.3

<sup>5</sup> Pub. Resources Code § 21074

<sup>6</sup> Pub. Resources Code § 21084.2

<sup>7</sup> Pub. Resources Code § 21084.3 (a)

<sup>8</sup> 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

<sup>9</sup> Pub. Resources Code § 21080.3.1, subds. (d) and (e)

<sup>10</sup> Pub. Resources Code § 21080.3.1 (b)

<sup>11</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>12</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>13</sup> Pub. Resources Code § 21082.3 (c)(1)



- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.<sup>14</sup>

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.<sup>15</sup>

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §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 §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.<sup>16</sup>

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 §21084.3 (b).<sup>17</sup> 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 §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §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 §21080.3.1 (d) and the tribe failed to request consultation within 30 days.<sup>18</sup>

***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 Public Resources Code §5097.9 and §5097.993.

- 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](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.**<sup>19</sup>
- **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,<sup>20</sup> 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 §5097.9 and §5097.993 that are within the city’s or county’s jurisdiction.<sup>21</sup>
- **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
  - 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.<sup>22</sup>

#### **NAHC Recommendations for Cultural Resources Assessments:**

- Contact the NAHC for:

<sup>14</sup> Pub. Resources Code § 21082.3 (b)

<sup>15</sup> Pub. Resources Code § 21080.3.2 (b)

<sup>16</sup> Pub. Resources Code § 21082.3 (a)

<sup>17</sup> Pub. Resources Code § 21082.3 (e)

<sup>18</sup> Pub. Resources Code § 21082.3 (d)

<sup>19</sup> (Gov. Code § 65352.3 (a)(2)).

<sup>20</sup> pursuant to Gov. Code section 65040.2,

<sup>21</sup> (Gov. Code § 65352.3 (b)).

<sup>22</sup> (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

- 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](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.<sup>23</sup>
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.<sup>24</sup>

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.<sup>25</sup> 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 §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be 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.

<sup>23</sup> (Civ. Code § 815.3 (c)).

<sup>24</sup> (Pub. Resources Code § 5097.991).

<sup>25</sup> per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).



FOR  
ADDITIONAL INFORMATION  
CONTACT:



Native American Heritage Commission

915 Capitol Mall, Room 364

Sacramento, CA 95814

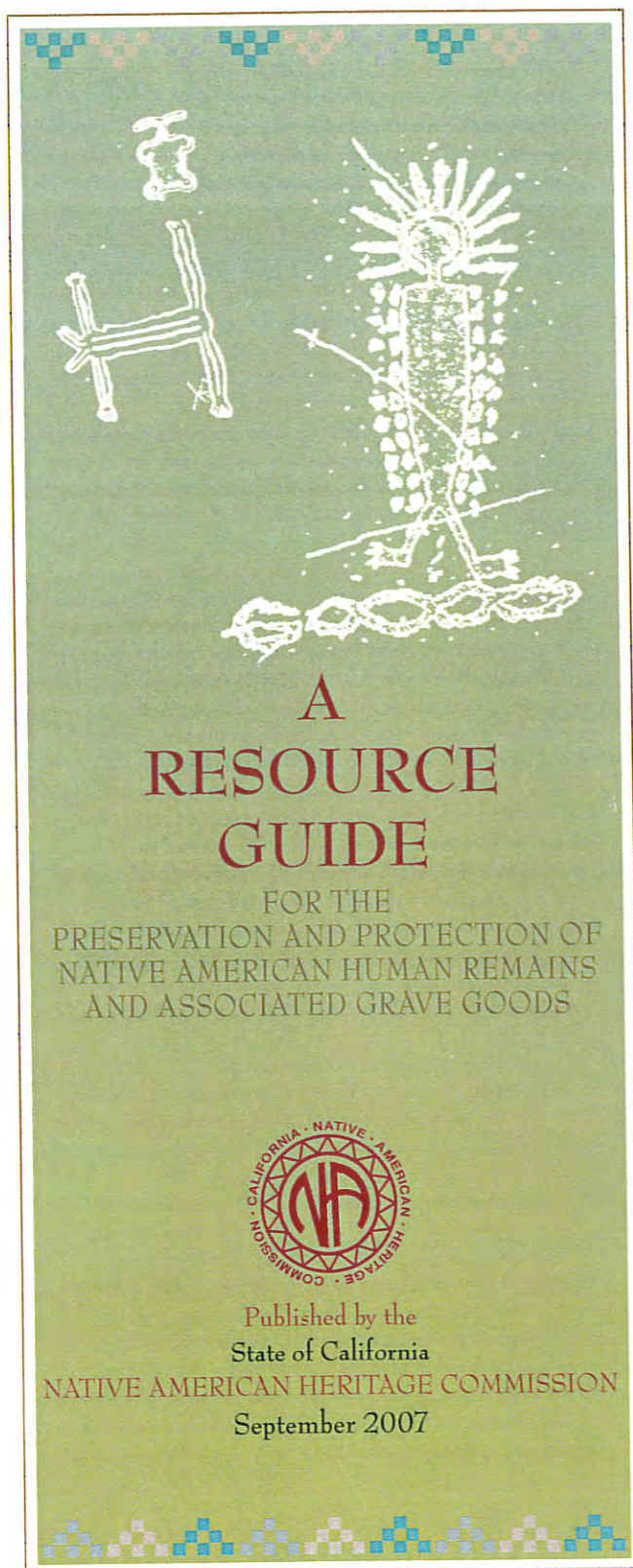
(916) 653-4082

FAX (916) 657-5390

[www.nahc.ca.gov](http://www.nahc.ca.gov)  
[nahc@pacbell.net](mailto:nahc@pacbell.net)



OSP 08 105801





# A RESOURCE GUIDE FOR

CORONERS

MOST LIKELY DESCENDENTS

TRIBAL GOVERNMENTS

TRIBAL ORGANIZATIONS

LAW ENFORCEMENT OFFICIALS

NATIVE AMERICAN MONITORS

CITY AND COUNTY PLANNERS

PROPERTY OWNERS

DEVELOPERS

ARCHAEOLOGISTS



## WHAT TO DO

The following actions must be taken immediately upon the discovery of human remains:

- Stop immediately and contact the County Coroner.
- The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
- The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendant of the deceased Native American.
- The most likely descendant has 48 hours to make recommendations to the landowner, or representative, for the treatment or disposition, with appropriate dignity, of the human remains and grave goods.

If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further subsurface disturbance, or:

- If the landowner does not accept the descendant's recommendations, either party may request mediation by the Native American Heritage Commission.
- Discuss and confer means the meaningful and timely discussion with careful consideration of the views of each party's cultural values and, where feasible, seeking agreement.
- If mediation fails, the landowner shall reinter the human remains with appropriate dignity on the property in a location not subject to future subsurface disturbance.





*The following excerpts from California Public Resources Code Chapter 1.75 Section 5097.9 – 5097.991 and Section 7050.5 of the Health and Safety Code concerning Native American human remains are provided for your reference:*

*From California Public Resources Code Amended Statutes 1982 Chapter 1492:*

“(a) The Legislature finds as follows:

(1) Native American human burials and skeletal remains are subject to vandalism and inadvertent destruction at an increasing rate.

(b) The purposes of this act are:

(1) To provide protection to Native American human burials and skeletal remains and items associated with Native American burials.

(2) To provide a regular means by which Native American descendants can make known their concerns regarding the need for sensitive treatment and disposition of Native American burials, skeletal remains, and items associated with Native American burials.”

*From California Public Resources Code Statutes 2006, Chapter 863, Section 1:*

“(d) It is the intent of the legislature...to accomplish the following:

(1) Encourage landowners to consider preservation or avoidance of California Native American human remains in place, whenever feasible.

(2) Encourage culturally sensitive treatment of California Native American human remains when preservation is not feasible.

(3) Encourage meaningful discussions including the development of agreements to establish a protocol for the dignified and culturally sensitive treatment of Native American human remains...”

*From Section 7050.5 of the Health and Safety Code:*

(b) In the event of discovery or recognition of any human remains in any location other than a dedi-

cated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.

(c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

*From Section 5097.94 of the Public Resources Code:*

The commission shall have the following powers and duties:

...(k) To mediate, upon application of either of the parties, disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

The agreements shall provide protection to Native American human burials and skeletal remains from vandalism and inadvertent destruction and provide for sensitive treatment and disposition of Native American burials, skeletal remains, and associated grave goods consistent with the planned use of, or the approved project on, the land.





(1) To assist interested landowners in developing agreements with appropriate Native American groups for treating or disposing, with appropriate dignity, of the human remains and any items associated with Native American burials.



*From Section 5097.98 of the Public Resources Code:*

(a) Whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendations or preferences within 48 hours of being granted access to the site.

(b) Upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.



(c) For the purposes of this section, "conferral" or "discuss and confer" means the meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Each party shall recognize the other's needs and concerns for confidentiality of information provided to the other.

(e) Whenever the commission is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further subsurface disturbance.

*SB 447 (Chapter 404, Statutes of 1987):*

On January 1, 1988, Senate Bill 447 went into effect. This legislation amended Section 5097.99 of the Public Resources Code, making it a felony to obtain or possess Native American remains or associated grave goods.

(a) No person shall obtain or possess any Native American artifacts or human remains which are taken from a Native American grave or cairn on or after January 1, 1984, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (1) of Section 5097.94 or pursuant to Section 5097.98



(b) Any person who knowingly or willfully obtains or possesses any Native American artifacts or human remains which are taken from a Native American grave or cairn after January 1, 1988, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (1) of Section 5097.94 or pursuant to Section 5097.98, is guilty of a felony which is punishable by imprisonment in the state prison.



(c) Any person who removes, without authority of law, any Native American artifacts or human remains from a Native American grave or cairn with an intent to sell or dissect or with malice or wantonness is guilty of a felony which is punishable by imprisonment in the state prison.





**From:** [Mekkelson, Heidi](#)  
**To:** [Viramontes, Jessica](#); [Vurlumis, Caroline](#)  
**Subject:** FW: Questions about 3700 California Street EIR  
**Date:** Monday, September 9, 2019 1:28:03 PM

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**From:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Sent:** Monday, September 9, 2019 10:01 AM  
**To:** Mekkelson, Heidi <[Heidi.Mekkelson@icf.com](mailto:Heidi.Mekkelson@icf.com)>  
**Subject:** FW: Questions about 3700 California Street EIR

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**From:** Range, Jessica (CPC) <[jessica.range@sfgov.org](mailto:jessica.range@sfgov.org)>  
**Sent:** Thursday, September 05, 2019 8:18 AM  
**To:** Sara Alexander <[saraalexander@me.com](mailto:saraalexander@me.com)>  
**Cc:** [marcyliner@hotmail.com](mailto:marcyliner@hotmail.com); Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** RE: Questions about 3700 California Street EIR

Good Morning Sara,

I hope that I helped answer some of your questions or that Chris May could address other questions you have about the project. We will consider the concerns below comments on the Draft EIR for the 3700 California Project. These concerns will be responded to in a Response to Comments document that the Department will prepare following the close of the public comment period. Please feel free to submit additional comments while the public comment period is open.

Kind Regards,

**Jessica Range**  
**Principal Planner, Environmental Planning**

San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9018 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

**Planning Information Center (PIC):** 415-558-6377 or [pic@sfgov.org](mailto:pic@sfgov.org)  
**Property Information Map (PIM):** <http://propertymap.sfplanning.org>

**From:** Sara Alexander <[saraalexander@me.com](mailto:saraalexander@me.com)>  
**Sent:** Wednesday, September 04, 2019 2:51 PM  
**To:** Range, Jessica (CPC) <[jessica.range@sfgov.org](mailto:jessica.range@sfgov.org)>  
**Cc:** [marcyliner@hotmail.com](mailto:marcyliner@hotmail.com)  
**Subject:** Questions about 3700 California Street EIR

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Dear Jessica:

1  
(CEQA-1) Looks like you are covering for Jeanie Poling. So I am forwarding you a copy of the email that I sent her that bounced back today. When I first called her in July about the planned July 11 EIR meeting she discovered that our address (and our whole area) had never been on the 'contact list' for the project so she postponed the EIR from July to September 19th.

2  
(GC-1) I just went to read it over the weekend and realized the EIR is very long and also pretty hard to understand. So I sent her the email below on behalf of myself and the owner of one of the other units in our 3 unit building. I have not heard back from the third member of our HOA as to their concerns so this letter just mentions the concerns of the two of us.

Thanks, in advance, for any help you can offer.

Best,  
Sara

Dear Jeanie

I'm wondering if I could talk to you about EIR for 3700 California Street? I've been trying to understand it from reading it and am having a hard time.

3  
(CEQA-1) As you may remember we have never received a neighbor survey. Ever. Or an invite to a neighbor meeting. Although our building is directly next door to one of the construction sites (3905 Sacramento site). We have never heard of a single (there were 35????) neighbor meeting. So we have none of the information or understanding that we would have been able to get if we had been informed/ invited into that process. We did meet once, several years ago, with Matt Fields but have not had any other interaction with the planning process.

4  
(GE-1) Our concerns - so far, until we understand better - are the loss of open space and trees, the allocation for light and air at our property line, the relocation of the bus routes, and traffic/parking stress during construction.

5  
(GC-1) Let me know if we could talk, or if there is a more appropriate format to address our concerns. (This

<sup>5</sup>  
(GC-1) cont. ] is a 3 unit building; 3 owners in the HOA, one commercial and 2 residential units.)

Sincerely,

Sara Alexander (writer of this letter on behalf of myself and Marcy )

Marcy Liner (owner of 3925)

Sara Alexander

3923A Sacramento Street

San Francisco, CA 94118

415-606-5335



**From:** [Sara Alexander](#)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Subject:** How to submit written comments: Re: 3700 California St project  
**Date:** Monday, September 16, 2019 8:30:30 PM

---

Hi Jeanie:

1 (PD-1) [ Thanks for your time on the phone today.  
 I did look at the EIR more carefully this evening and its not clear but it looks like all the trees under discussion will be destroyed.  
 Chris May returns tomorrow so maybe he will get back to me with what the TMG partners have to say about it.

Where do people submit written comments by Sept 24?

Please advise.

Thanks, again!

Best,

Sara

Sara Alexander  
 3923A Sacramento Street  
 San Francisco, CA 94118  
 415-606-5335

On Aug 30, 2019, at 11:56 AM, Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)> wrote:

Hi Sara,

The Sept 19 agenda will be posted at <https://sfplanning.org/planning-commission> on Friday, Sept 13. The agenda will list the order of the items to be heard, so I can't estimate the time that 3700 California St draft EIR item will be heard until the agenda is published. But it will definitely occur on Sept 19 sometime after 1:00.

Thanks,

Jeanie

---

**From:** Sara Alexander <[saraalexander@me.com](mailto:saraalexander@me.com)>  
**Sent:** Friday, August 30, 2019 11:51 AM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** Re: 3700 California St project

Dear Jeanie:

I went online to find the EIR for 3700 California Street and looked at agenda for 9/19 using link below. I do not see it on the agenda for 9/19.

Can you confirm that it IS on the agenda before I clear my calendar?

Thanks.

Sara

Sara Alexander  
 3923A Sacramento Street  
 San Francisco, CA 94118  
 415-606-5335

On Jul 5, 2019, at 1:56 PM, Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)> wrote:

Hi Sara,

The hearing on the draft EIR will be “continued” on July 11, meaning the Commission will vote at the beginning of the hearing to move the hearing to another date, which we’ve decided will be September 19. The item will still be on the agenda, which will be available later today on this page: <https://sfplanning.org/planning-commission>

Thanks,  
Jeanie

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**From:** Sara Alexander <[saraalexander@me.com](mailto:saraalexander@me.com)>  
**Sent:** Wednesday, July 03, 2019 6:07 PM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** Re: 3700 California St project

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Wow! That’s quite a difference! So are you saying that the meeting on July 11 Won’t take place? Or is that a different meaning than the public hearing you’re referencing?

Sent from my iPhone

On Jul 3, 2019, at 4:34 PM, Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)> wrote:

Hello Sara,

Thank you again for letting me know you didn’t receive the notification in the mail. I researched it and discovered that we made an error and only notified neighbors within 300 feet of 3700 California Street and not within 300 feet of the entire project site. Because of this notification error, we will be sending out revised notification. The public hearing will be continued to September 19th and the close of comment period will be extended to September 24th. You will receive a formal notice in the mail.

Sincerely,  
Jeanie Poling

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**From:** Poling, Jeanie (CPC)  
**Sent:** Wednesday, July 03, 2019 10:28 AM  
**To:** [saraalexander@me.com](mailto:saraalexander@me.com)  
**Subject:** 3700 California St project

Hello Sara,

Thank you for letting me know that you didn’t receive the hard copy notification. The Planning Department published the environmental impact report for the 3700 California Street project on June 12. The public hearing before the Planning Commission will be on July 11, and the close of the public comment period is on July 29. Documents are available here:

- [Notice of Public Hearing and Availability of a Draft Environmental Impact Report](#)
- [Draft Environmental Impact Report](#)
- [Notice of Preparation, Initial Study, and Other Appendices](#)

Thank you.

**Jeanie Poling**  
**Senior Environmental Planner**  
San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9072 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)



**From:** [Sara Alexander](#)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Subject:** Written Comments: 3700 California Street EIR.  
**Date:** Monday, September 23, 2019 11:34:00 PM  
**Attachments:** [Street tree removal and planting diagram.pdf](#)

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

Dear Jeanie:

I want to call your attention to 28 beautiful and very large trees on the SE corner of Sacramento and Cherry in a park-like area adjacent to the #33 Muni Stop. There are 10 Redwood trees that are 4 to 5 stories tall and another 18 healthy and mature trees (sorry that I do not know the species) that are between 3 and 5 stories tall. About half of these trees are within 18 feet of the curb (within 9 feet of the sidewalk) which, I have been told, makes them “significant trees”, protected from removal by SF tree policies.

<sup>1</sup>  
(PD-1)

The tree diagram that I received from Tuija Catalano, the project sponsor, (lawyer for the developer) indicates that 22 of these 28 beautiful and mature trees *will* be destroyed (drawing attached below). I am hoping that by bringing this to your attention something might be done to preserve more, or even, *all* of these trees, and ... perhaps...to preserve some bit of precious open space for this (my) neighborhood.

I had hoped to have had an opportunity to make my comments earlier on in the design process. I would requested the preservation of some fraction of both the tree canopy and the open sky that currently extend from the enormous (gated) garden behind Marshall Hale hospital to this wooded (public access) corner of Sacramento and Cherry Street. Trees and open spaces and courtyards extend along all the blocks from Spruce Street to Arguello Avenue. (in front of apartment complexes, the Claire Lillienthal school, etc.)

The developers *could* leave this small open space at Sacramento and Cherry exactly as it is right now: accessible to the public, and a home to these beautiful trees...and the habitat that these trees support. But if I correctly understand the plans, there will be solid wall of buildings the whole length of Sacramento Street and the 33,000 sf of Open Space that the developers propose will exist (hidden) on the inside of a perimeter of housing, in what appear to be a “gated

community". i.e. the open space that currently exists at the edges of both of the hospital sites will be buried inside the housing site and will be removed from the character and enjoyment of the neighborhood.

The particular building that will require the destruction of 80% the significant trees at the corner of Sacramento and Cherry *could* be built nine or more feet away from the sidewalk. Such a design change could preserve 100% of these trees...and also some of the current feel of the neighborhood.

It will be many decades before the newly planted trees that the developer proposes achieve a small fraction of the grace and stature (and ability to requester carbon dioxide from the atmosphere) of the 28 beautiful and healthy trees that currently frame this small park. Growing new trees takes a very long time frame. *You* have an opportunity *here* to simply to save a few trees that do not need to be destroyed.

This opportunity seems even more *urgent* in the context of the current call to arms to mitigate the devastation of climate change. And even more *timely* in light of the threatened loss of about 275 additional trees within one mile, at the 3333 California Street development.

Respectfully submitted,  
Sara Alexander

Sara Alexander  
home: 3923A Sacramento Street  
San Francisco, CA 94118  
415-606-5335

office: 3600 California Street  
San Francisco, CA 94118  
415-606-5335





"My actions are my only true belongings" Thich Nhat Hann

1  
(PD-1)  
cont.





LEGEND

-  (36) TREES TO REMAIN AT STREET SIDEWALK
-  (5) SIGNIFICANT TREES TO REMAIN, (2) PRIVATE UNREGULATED TREES TO REMAIN WITHIN PROPERTY LINE
-  (68) PROPOSED STREET TREES
-  (146) PROPOSED PRIVATE TREES



3700 CALIFORNIA STREET SAN FRANCISCO, CA



PRELIMINARY OVERALL TREE PLANTING PLAN



KEY PLAN

STREET TREE REMOVAL PERMIT APPLICATION  
 JUNE 2018  
 NOT INTENDED FOR CONSTRUCTION PURPOSES.



September 11, 2019

Planning Department, Environmental Planning  
 Attn: Jeanie Poling, Sr. Environmental Planner ([Jeanie.poling@sfgov.org](mailto:Jeanie.poling@sfgov.org))  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

via email and hardcopy (hand-delivered)

SUBJECT: CASE NO. 2017-003559ENV -- 3700 CALIFORNIA DEIR – COMMENTS

Dear Ms. Poling,

I submit to you my comments on the proposed 3700 California Draft Environmental Impact Report (DEIR).

Page S-27 - S-28: “Environmental topics raised during this process included traffic, parking, noise, walkability, and consistency with the quality and character of existing neighborhood architecture. ... Although the community outreach process is separate from the NOP scoping effort and not part of the environmental review process required by CEQA, the planning department considered each of these topics in preparing the EIR for the proposed project. ...As noted in Section 4.1, *Introduction*, the proposed project is subject to California Public Resources Code section 21099(d), which eliminates consideration of impacts related to aesthetics and parking in determining the significance of physical environmental impacts under CEQA for residential, mixed-use residential, or employment-center projects on infill sites within transit priority areas. Accordingly, this EIR does not contain a separate discussion of impacts related to aesthetics or parking. ...”

1  
(GE-1)

See Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6”.

Page S-27, “S.5 Areas of Known Controversy and Issues to Be Resolved”:

See Page 2-11 that refers to a “Development Agreement”.

Page 1-2, 1.2 “Purpose of This EIR”: States the meaning of “significant effect on the environment” under CEQA Guidelines Section 15382:

“...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.”

Some of the MITIGATION measures are not detailed enough and need to be added to. See within this document.

2  
(GE-1)

Page 1-5: It states that the Initial Study determined that the impacts on Cultural Resources, Biological Resources, and Geology and Soils as \*not\* significant but the DEIR shows them as “significant impact” on Pages S-1 – S-19, Table S-1, “Summary of Impacts of Proposed Project Identified in EIR”. The impacts appear to be on birds and on tribal resources. It says that there are no hazardous impacts in the DEIR. The French Laundry use on Sacramento and Maple could have dry cleaning chemicals that seeped downhill to the historic Marshall Hale Building which is being repurposed. What have the soils samples shown for the Marshall Hale Building? Please provide. What if such chemicals are found to

3  
(HZ-1)

<sup>3</sup>  
(HZ-1) cont. ] have leached into the soil under and around this building? Which Mitigation step addresses this in the DEIR?

<sup>4</sup>  
(TCR-1) ] Also, re the TRIBAL RESOURCES... While the CPMC vacation of the hospital would not disturb them, the proposed 3700 California St. Project will be digging subterranean garages to there may be much more significant impact. MITIGATION measures appear OK so long as the tribal leaders and City Planning agree.

<sup>5</sup>  
(CR-1) ] If there are artifacts that are \*not\* tribal but of historic interest, one mitigation measure I suggest to be included in the DEIR would be to create a display and then a weblink for a movie showing what was found, the significance, etc. by a qualified paleontologist or historian. Have media also available at the Main San Francisco Public Library in the History Room.

<sup>6</sup>  
(HU-1) ] Page 2-11: Reference is made to Section 2.4 of Chapter 2 re "2.4 Development Agreement Background." The first paragraph states:

"In August 2013, the City and Sutter West Bay Hospitals (doing business as CPMC), entered into a development agreement regarding redevelopment of some of CPMC's existing facilities that were no longer needed by CPMC when its new hospital campus at Geary Street and Van Ness Avenue became operational in the spring of 2019. The development agreement did **not include a project description or development controls for the 3700 California Street site** <emphasis added> (known as the California Campus in the development agreement)."

Perhaps a more detailed traffic study is needed for a residential population as opposed to the visitors who frequented the old CPMC hospital buildings. It is also deficient in analyzing the traffic impact at the Euclid and Parker intersection one block south of the site. I think the traffic will be greater than the 38% increase (See Page 4.3-46) predicted for Parker Ave.

<sup>7</sup>  
(TR-4) ] Please provide a traffic count for the two blocks of Parker between Geary and California after the project is built. If the increase is such that it causes impacts to the 38-Geary and 1-California bus lines from vehicles blocking intersections due to people not being able to get out, further traffic mitigation would be requested.

3700 California St. DEIR states that Maple St. will have the highest increase. Maple St. feeds into Parker Avenue directly so that is why the request to see the impacts to the residents on the 2 blocks of Parker south of California. It is most important because at Parker & Euclid, a student at the One Fifty Parker Avenue School (between Euclid and Geary) was hit. In addition to the pedestrian-vehicle collision, there were still an overly burdened Parker Avenue that necessitated a traffic circle with a 4-way STOP that was ineffective with drivers using the "tap and zoom through" technique of driving. In fact, this and other driver behavior initiated more traffic calming features on Parker Avenue through the Jordan Park-Laurel Heights Traffic Calming Project with humps as well, with 2 each on the 000- & 100-blocks of Parker. With a 38% increase in traffic volume, more safety measures will be needed as much as another hump each on Parker and even "Your Speed Is" flashing speed signs. The 100-block has a "School" sign but drivers tend to keep going fast on this block as I have witnessed. In addition, the parents often jaywalk with small children to the One Fifty Parker Avenue School so the potential with 38% more traffic will increase the likelihood of more pedestrian-vehicle collisions without further safety improvements as well as having these improvements maintained from wear and tear (e.g. speed humps crumbling). If more volume of traffic is diverted down Parker Avenue, besides pedestrians being delayed further as vehicles do not allow them to cross, there could be another statistic to add to the pedestrian-vehicle conflict totals and this will not be helpful to attain the goal of "Vision Zero".

Initial Study, in the DEIR, Appendix B, Page 9, "Approach to Analysis":

8 (HU-1) This section states that there was a checklist used to determine levels of impact (LTS, NI, or NA) for 3700 California St. Nowhere does it state in clear terms or even in vague terms that this "Initial Study" would use the old prior CPMC EIR (which described a project to vacate certain buildings to various other locations) to evaluate the CEQA impacts for the 3700 California DEIR.

9 (TR-1) In addition, whether or not one was required legally, I did not receive any Planning Department notice or have I seen any document stating clearly that the old CPMC DIR will be used for this 3700 California St. DEIR. The hospital use was being vacated so there was no real analysis in the CPMC EIR for traffic impact from the then unknown 3700 California proposal except for a very small traffic analysis for the small garage building on Cherry St. to remain. Not much of the 2010 traffic data contained any traffic of vehicles out of the Block B proposed location because there was only a small drop-off parking area for Block B near Sacramento and the hospital itself had NO UNDERGROUND PARKING at the Block B site. There was a truck LOADING bay outside on Maple St. The big impact would be the quantity of vehicles that would be a source potentially for 24-hour use from the Block B underground parking proposed. The 3700 California St. DEIR relying on prior surveys from prior hospital patients and visitors for a NEW construction of a residential Block B building does not paint the same picture as, again, the use is potentially also 24-hour use rather than during business hours/hospital visitors' hours only. A cursory survey of current traffic along the street with the Cherry St. garage also will not indicate the traffic patterns nor resulting volumes in great accuracy after Blocks A, B, and C are completed. As discussed later, the traffic count at the intersections are mostly lumped with multiple streets together rather than counts for each street block. Also, the data is given as "net" results taking a "credit" in vehicular counts from the old hospital site use. Not sure this gives an accurate impact analysis, or if even legally allowed under CEQA.

Again, while a tad more traffic analysis was done for incorporating the visitors at the Cherry St. garage that will be kept, I still think using statistics from an old hospital use which is traffic data that is not the same as for residential use. While surveys were used in the CPMC hospital site, they were employees and patients and visitors for the hospital, not permanent residents who have a different pattern for transportation and parking impacts and are potentially 24-hour uses vs. business-hour uses as in the hospital/office setting of Blocks B & C. I think the analysis for the traffic and volumes was inadequate for traffic from Maple St. that feeds into Parker Avenue to the south.

10 (TR-1) The 3700 California St. DEIR admits Maple St. will have the largest increase in traffic – about 1-2 vehicles coming out of the driveways per minute. It also elsewhere states Parker Avenue increase in traffic as 38% more (See Page 4.3-46). Yet the conclusion is no significant impact as the other streets (other than Parker Avenue) will be less.

See Page 4.2-57 about this impact from Maple St.

Again, the significant environmental impacts of the proposed 3700 California Project were **\*NOT\*** known (see above comment Page S-27 – S-28, Page 2-11, 1<sup>st</sup> Paragraph) to be included in the old CPMC EIR now used for this 3700 California St. DEIR so hardly any of the CPMC EIR statistics for the transportation impact should have been used for a residential project. There should have been a wider look and a more in-depth look at traffic volumes on *\*each\** block as opposed to a combination of street counts (e.g. Maple-California-Parker). Just data for Parker, Palm, Jordan, Commonwealth and Euclid between Palm and Spruce would help clarify and make residents aware of the true impact coming. Please provide new statistics.

11 (HU-1) I looked at CEQA Guidelines which states this and I am unclear if this has been met with the 3700 California St. DEIR:



11  
(HU-1)  
cont.

- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
- (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
    - (A) The general environmental setting of the project,
    - (B) The significant environmental impacts of the project, and
    - (C) Alternatives and mitigation measures related to each significant effect.
  - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. The notice shall include as a minimum:
    - (A) An identification of the project with a brief description;
    - (B) A statement that the agency plans to use a certain EIR prepared for a previous project as the EIR for this project;
    - (C) A listing of places where copies of the EIR may be examined; and
    - (D) A statement that the key issues involving the EIR are whether the EIR should be used for this project and whether there are any additional, reasonable alternatives or mitigation measures that should be considered as ways of avoiding or reducing the significant effects of the project.

12  
(PD-1)

Page 2-11, 2.3.6 "Open Space and Vegetation":

States "On the northwest corner of Block B, at the intersection of Cherry Street and Sacramento Street, there is a publicly accessible outdoor plaza with hardscape features, trees and seating areas." Is this what is referred to as a "City Park" in the DEIR?

This area is about 1,000 square feet in size from what I can tell from the diagrams in the DEIR. See Page 3-11, "Street Trees".

13  
(ME-1)

Page 2-17: For the 273 residential units (Page 2-12) "...at a rate of 1.5 parking spaces per unit. Overall, the project site would include 416 parking spaces, which would be located primarily in below-grade parking podiums. Four off-street loading zones would also be provided. ..."

The City Planning Department came out with a memorandum regarding a new change to Planning Code in January 2019 of \*no\* minimum parking requirements. If some projects are forced on the transit corridors to have no parking while others are not, what factors go into consideration for allowing parking or not allowing a certain number of parking spaces for projects? Please provide how these decisions are made and specific criteria used to determine final allocation.

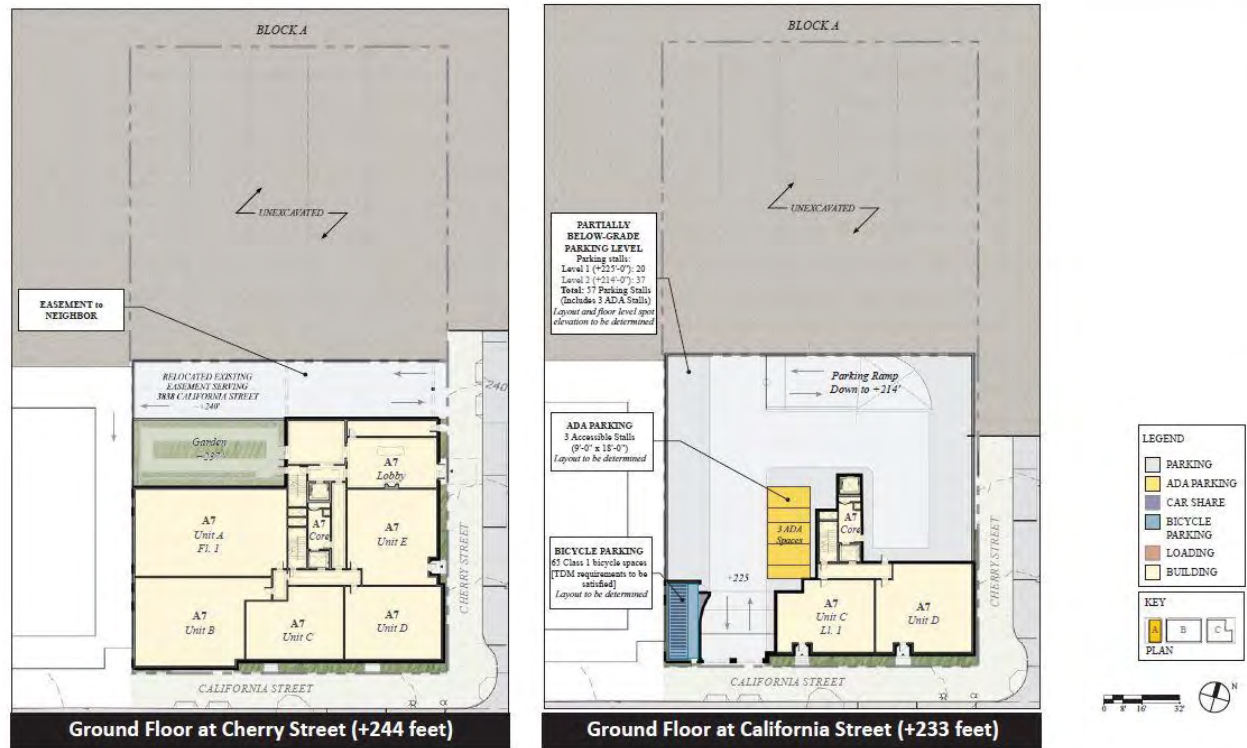
Page 2-17, 2.5.1 "Block A": Block A would have 57 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 13-ft deep, 2-level, underground parking area.

Page 2-24, 2.5.2 "Block B": Block B would have 215 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 75-ft deep, 2-level, underground parking area.

Page 2-25, 2.5.3 "Block C": Block C would have 120 parking spaces (of 416 spaces as stated on Page S-2 & Page 2-17) in a 17-ft deep, 2-level, underground parking area.

- 13  
(ME-1)  
cont. With the above parking space information for the 3 blocks, over half – about 52% -- of the parking spaces will be in Block B. For Block B the driveway exits will be on Cherry and Maple only – 2 points of entry/exit. This will be a reduction from the 4 driveways that used to service almost as many vehicles from the old CPMC hospital use. There will be conflicts and queuing that is likely to increase and would need mitigation for pedestrian safety.
- 14  
(TR-4) To MITIGATE the high number of vehicles that will be using only the Cherry and Maple driveways, have a driveway or alternate “out” on another street or the queuing will become worse as traffic volumes increase cumulatively to 2040. See my comments on traffic on the Maple and Cherry driveways and impacts to residents south of California under Page 4.2-48 on driveway volumes (as above) which is a huge increase from current use and already impactful on Cherry, Maple/Parker.
- See Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6” for additional parking space comments.
- 15  
(PD-1) Page 2-26, Table 2-3, “Existing and Proposed Trees”: This shows 42 street trees to be removed with 68 new trees resulting in 103 street trees.
- See Page 3-11, “Street Trees”.
- 16  
(PD-1) Page 2-27, 2.5.5 “Open Space”: States “The project would not include publicly accessible open space.” Please confirm this to mean that there will not be any POPOS (“Privately Owned Public Open Space”). While a developer is not required to provide open space for the public, what is the city’s policy on loss of public open space for a neighborhood? Should that open space be located elsewhere in the neighborhood? Prop M policy includes protection of open space (also referenced in 3700 California St. DEIR on Page 3-7).
- 17  
(PD-1) Pages 2-28, 2-30 & 2-31, Figures 2-13, 2-14, & 2-15, “Access, Circulation and Ground-Floor Parking Plan” (each for Blocks A, B & C): While this is about parking, this has an impact on building height. With building height appearing to loom over the California Parker view corridor from the south, perhaps parking stackers could lessen the higher portion of the building heights of Blocks B & C as one looks from the south towards the north (from California to Sacramento). Building C on Sacramento when seen from Parker & California appears to be very tall due to the huge slope from California to Sacramento. Suggestion to decrease the individual subterranean spaces to parking stackers and shift some livable space lower. Can you provide how much of the taller buildings on Blocks B & C could be lessened if stackers were used? This would lessen the impact to those looking uphill from California to Sacramento and from the view westward along California looking at the taller portions of the buildings for Blocks B & C.

17  
(PD-1)  
cont.



SOURCE: RAMSA, 2018. 3700 California Street,  
San Francisco, CA: EE Application—Revision: June.

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**Figure 2-13**  
**Block A Access, Circulation, and Ground-Floor Parking Plan**



17  
(PD-1)  
cont.

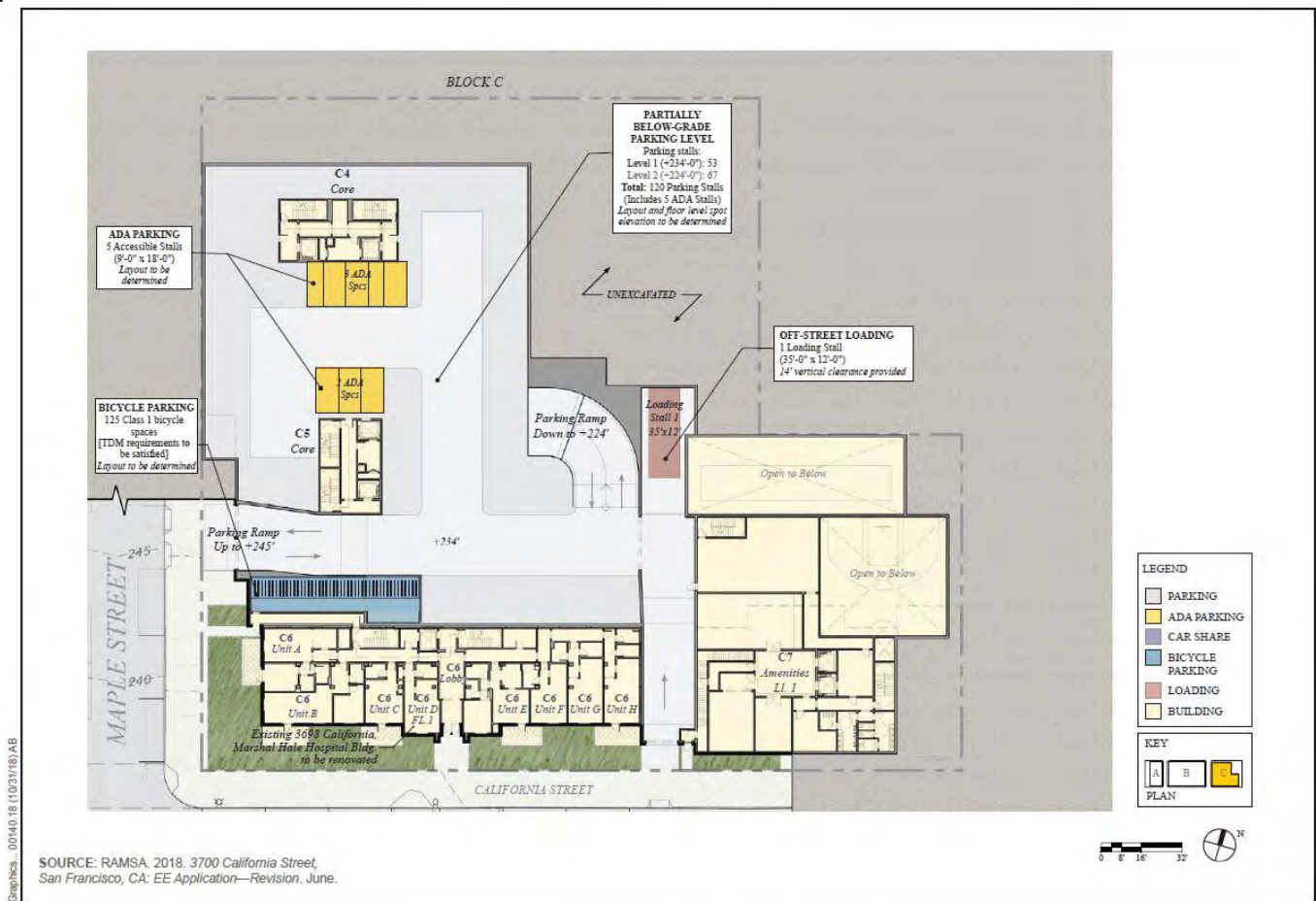


SOURCE: RAMSA 2018. 3700 California Street,  
San Francisco, CA: EE Application—Revision: June.

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**Figure 2-14**  
**Block B Access, Circulation, and Ground-Floor Parking Plan**

17  
(PD-1)  
cont.



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**Figure 2-15**  
**Block C Access, Circulation, and Ground-Floor Parking Plan**

18  
(PD-1)

Here are the views Page 2-20 & 2-21, Figures 2-9 & 2-10 provided in the EIR for Buildings B & C. The 7-8-story higher portions of Building B (SE corner) & Building C (overall at 96 ft. + rooftop appurtenances) is a much more looming impact on the pedestrian on the sidewalk in this area of mostly 40-foot tall residential buildings in the JPIA area. Having 1 story less on the SE portion of Building B & 1 less story on Building C would create a more harmonious and smoother transition to the lower heights of JPIA buildings. The camera angle in the pictures in the DEIR do not show from a nearby pedestrian's perspective but from farther away and even that is not such a smooth transition.

18  
(PD-1)  
cont.



**EXISTING VIEW**



**PROPOSED VIEW**

*Note: All views are for illustrative purposes only, providing approximate representations of the building masses in relation to existing neighboring context, and do not include measured views of actual building heights.*

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**Figure 2-10**  
**View of Blocks B and C from**  
**California Street Looking West**

Look at Block B building in this [Figure 2-10](#). See how the 7<sup>th</sup> story is not a smooth transition looking from the historic Marshall Hale Building (where the trees on the right are). The brick building at 2 Parker is 40 feet tall. Count 4 floor up on Block B – the new proposal is 3 stories above it.



The slope from California to Sacramento is 10.18% so BLOCK C as viewed from Parker Ave south of California looks much taller than is depicted from a pedestrian viewpoint closer to California Street rather than 200+ feet south of California as shown in Figure 2-9.

The view going westbound (towards the left in the diagram) along California of the tallest part of Block B is much more impactful as a pedestrian closer to the corner than is depicted in the image in [Figure 2-10](#).





EXISTING VIEW



PROPOSED VIEW

*Note: All views are for illustrative purposes only, providing approximate representations of the building masses in relation to existing neighboring context, and do not include measured views of actual building heights.*

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**Figure 2-9**  
**View of Block C from**  
**Parker Avenue Looking North**

One story lower with stackers would lessen this impact from Parker & California where the low-density 40-X Height and Bulk buildings stand.

Page 2-33, "Potable Water System": The last sentence of this section states, "Four new low-pressure fire hydrants would be installed along California and Sacramento Streets." Is there enough water to fight any fire that erupts for all the residences being proposed with the underground parking? Low pressure hydrants run out of water after a spell. If the fire rages on, would that not be considered a potential

19 (PS-1) cont. hazard or safety issue? Would more Fire Department personnel be required? Will an additional ladder truck or engine be required? This is not analyzed in the DEIR and appears incomplete in analyzing the introduction of these 4 new hydrants. Where is this analyzed? I could not find it in the Appendices either.

20 (UT-1) Page 2-34, 2.5.10 "Construction Activities and Schedule": "The project would excavate a total of approximately 61,800 cubic yards of soil across Blocks A, B, and C, which would be hauled off-site." Where is this dumped? Are the dump sites capable of taking this much debris? Would the City need to buy more land to dump the materials or cause another jurisdiction to provide the dump site or acquire more land for the waste?

21 (SH-2) Page 2-35, 2.6.1 "Planning Commission": "Conditional use authorization to permit development of buildings with heights in excess of 50 feet in an RM district and in excess of 40 feet in an RH district, all within the 80-E height and bulk district, as well as planned unit development approval of rear yard modifications (Planning Code section 134), building front moderations (sic? – modifications?) (section 144.1), minor deviation from height measurement (sections 261 and 304(d)(6)), projections over streets (section 136), and dwelling unit exposure (section 140)"

The buildings are much taller on the east side and leaves a 96-foot tall building for Blocks B and C. The shadows from a 96-foot tall building will cast a shadow on the historic Marshall Hale Hospital Building and impact some homes in the surrounding potential historic district of the Jordan Park Improvement Association (JPIA) neighborhood & possibly other southside buildings on California which are yet to be determined as to historic status. Perhaps lower the finished height of the floors to end up with what would be a 1-2 floor reduction overall on the higher areas of Block C and Block B buildings as one sees the impact from California St.

Page 3-5, "Environmental Protection Element": "The proposed project would be generally consistent with the objectives and policies of the environmental protection element regarding reduced automobile traffic at the project site and related noise and air quality effects in the project area because, with the removal of the existing hospital, the proposed project would result in a net reduction in vehicle trips and resulting air and noise effects (refer to Sections 4.2..."

22 (TR-1) Please see my comments about using prior high automobile traffic numbers to offset via "trip credits" the rationale to say that with a "net reduction" that the higher automobile traffic that will emanate from the proposed project will impact the already jammed streets south of California and especially on Parker which will get the traffic dumped on from the Maple driveway statistics shown. See my other comments related to Section 4.2 about the "trip credits" being used to validate the potential significant impact on Parker with no mitigation specifically stated for it. While other streets are not impacted, the residents of Parker will not be able to safely leave and enter their homes with the increase in traffic especially during the AM and PM peak commute hours. Truck trips should be monitored to not use Parker Avenue as a weight-restricted street with 2 speed humps per each Parker block south of California. More mitigation measure needed.

23 (TR-1) Page 3-6: "The project is expected to reduce traffic at the project site and in the vicinity, compared with existing conditions with the hospital use." This statement further continues the idea I brought up earlier in this comments document (e.g. related to Section 4.2) that the developers continue to emphasize "hospital use" as if the hospital is still fully functioning and that is the current environment when it has been known since at least 2015 from neighborhood meetings that the site will be mostly vacated of hospital use. When traffic affects one street over nearly all others, a mitigation measure is needed and that would be for Parker Avenue south of California. Pedestrian countdown lights would help at Parker and California



23  
(TR-1)  
cont. ] going east-west. Additional humps for speeding vehicles down Parker Avenue would be another suggestion.

24  
(PP-1) ] Page 3-9: I agree that the Spanish-Mediterranean design which works most harmoniously to the design of buildings in this older part of SF in the neighborhoods of Jordan Park and Presidio Heights that A.M. Stern designed “enhances the unique setting and character of the city and its residential neighborhoods.” Too often developers come into an existing older neighborhood and try to impose other designs upon the residents who have come to enjoy this Spanish-Mediterranean design and have therefore decided to purchase in this area as a neighborhood with this ambiance than other parts of the Richmond District to the west but especially in contrast to the designs used on office buildings Downtown of late.

I want to thank A.M. Stern and the developers for taking the time to “hear” and actually incorporate a truly fantastic design for this fairly large parcel in the JPIA area of SF. The design is complementary to the neighborhood and it is obviously so. This building shows an example of the application of the Residential Design Guidelines that is more appropriate than the design used as depicted in the “Urban Design Guidelines” (UDGs).

25  
(PD-1) ] Page 3-10, “Open Space”: If the roof decks were to be installed, it is not clear where they will be. How will the heights with appurtenances to these decks be beyond the 80-X height or the 76 ft. or 96 ft. buildings proposed? Will the rooftop penthouses (stairwell accesses) be visible from the streets lower on California St.? Would they be put in the center so that they will be less impactful visually from the lower streets near California St.?

See also Page 3-10, “Rooftop Screening.”

26  
(GHG-1) ] “The project would not include publicly accessible open space, and none is required by the planning code.” While this is true, the impact of reducing open space and those with trees or other greenery helps to soften all the hardscape and building materials. The existing CPMC open space of about 1,000 square ft. at Sacramento and Cherry has mature native redwood trees that are working to mitigate GHGs. So also for global warming concerns, the more all can do no matter if it does not trigger a CEQA threshold, should strive to ensure that the workhorses such as the redwood trees would be incorporated as well. No species list was made available as to the landscaping so this is yet unknown and unstudied.

What is the calculated loss of GHG mitigation done by these redwood trees to have the same or more GHG reduction in this new project? To MITIGATE the loss of the redwood trees the prior Open Space area at Sacramento and Cherry St., perhaps need more street trees and/or have a community plan to plant and pay Public Works donation to keep up the tree plantings in this area.

27  
(SH-2) ] Page 3-10, “Rooftop Screening”: The statement, “The project’s rooftop configurations – including mechanical equipment, potential solar and living roof areas, and potential open space areas – **have not yet been fully determined** <emphasis added>; however, the project is expected to comply with rooftop screening requirements. The roof coverage of the project would incorporate 15 percent solar or 30 percent living roof, or a combination of the two.” still leaves unanswered the question about shadow onto other neighboring properties.

Also, while this project could use solar panels because no other building is as tall in the immediate vicinity to cast shadows on it, how would neighbor’s properties be affected so that they would be deprived of the same opportunity if their properties are put in shade?

27  
(SH-1)  
cont.

If the additional roof screening is 10 ft. in height, that would likely extend the 76 ft. building to 86 ft. and the 96 ft. tall building to 106 ft. How much more shadow would be cast from this, and where would those shadows appear? The 2017-003559PPA shadow study from June 23, 2017 that shows certain JPIA buildings affected but not with the potential roof deck features. Please provide what the shadows would be at 106 ft.

28  
(PD-1)

Page 3-11, "Street Trees": States that 134 street trees are required. The proposed project is deficient in street trees by 23% under the Better Streets Plan.

With 31 trees less than that required, where could those trees be put or donated to otherwise? Would they be planted along Parker Avenue and one other area most impacted by the increase of vehicular traffic?

This is also in addition to the loss of the 1,000 sq. ft. open space with native redwood trees at Cherry and Sacramento.

See Page 2-11, Page 2-27 & Page 3-10.

29  
(TR-4)

Page 3-12, "Vehicular Parking, Bicycle Parking, and Loading": The project will have 416 parking spaces that includes 392 subterranean and 24 at-grade for the 12 single-family residences. While parking may be required for the future residents of this building, the problem becomes more apparent when the vehicles are funneled in and out of fewer driveways and forcing them out onto one street more than others. The old CPMC Hospital had curb cuts on California, and although the idea is to not impact transit corridors, with a light on California and Maple and at Cherry, cars would not necessarily impact the Muni lines when the signal is red for California traffic and vehicles can leave out the California driveways. The new configuration proposed for the residential project has no curb cuts for the large Block B building on the California street side which would lessen the impact of all the vehicles going in and out of Cherry and Maple, the latter of which might impact Parker, the street that runs from Maple south of California. MITIGATION via another curb cut on California might lessen the intensification of vehicles trapped in the Cherry/California and Maple/Parker/California intersections. Traffic dispersed for the CPMC Hospital when it utilized the California St. curb cuts for vehicles to relieve Cherry and also Maple driveways as the count of the vehicles at the Block B site during hospital use was relegated to only a small drop-off area where maybe a handful of vehicles could park for short duration and an outside truck loading area on Maple.

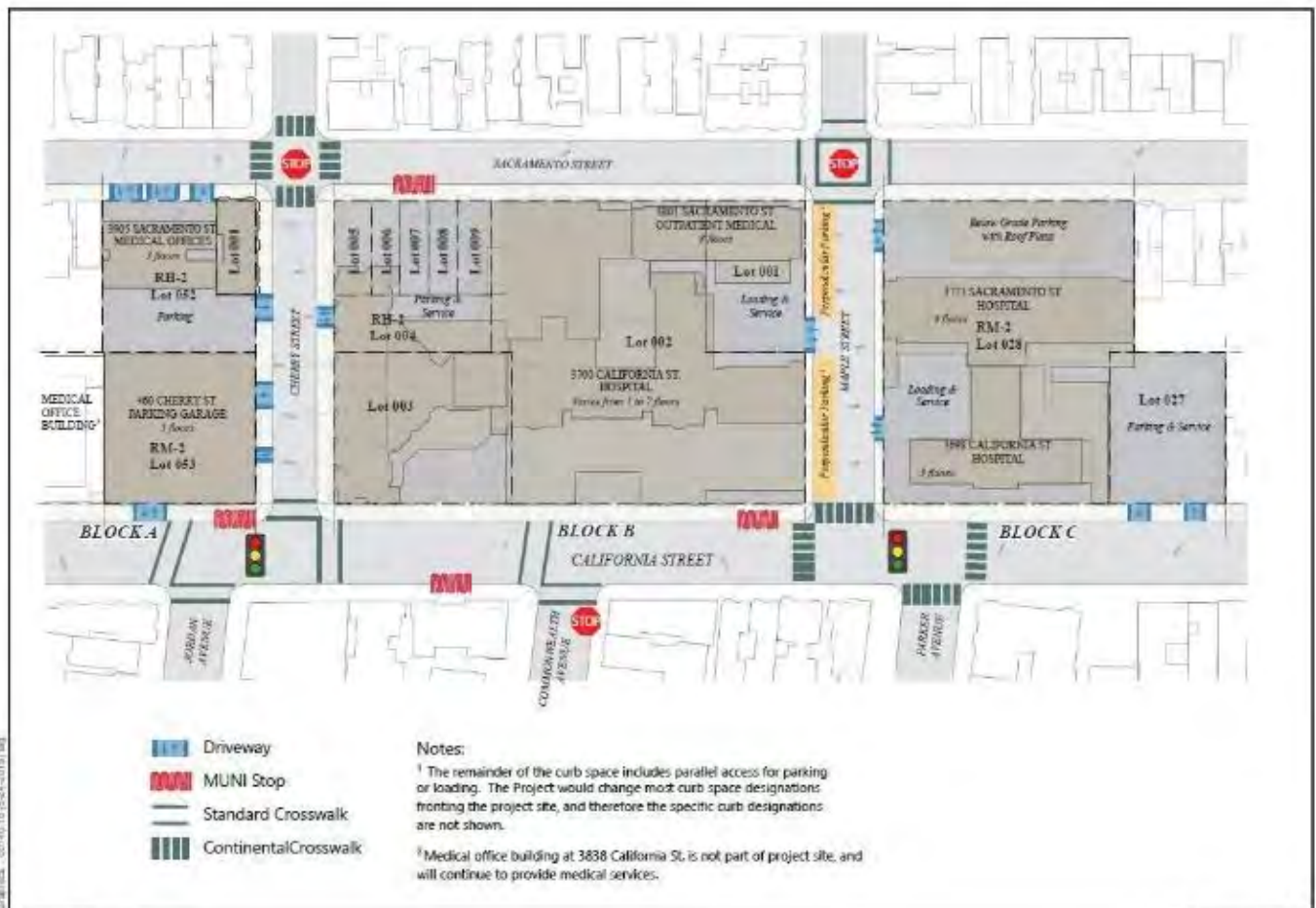
30  
(TR-4)

Page 3-17, "Vision Zero": In 2014, the City "adopted a resolution to implement an action plan to reduce traffic fatalities to zero by 2024." Not sure that funneling and increasing the vehicular ingress/egress at the Cherry and Maple driveways by over 200% (see later my traffic comments) is the way to lessen the chances of vehicle-pedestrian conflicts, hazards (even with the proposal of "a new crosswalk with flashing lights across California Street from west of Commonwealth Avenue to east of Maple Street." (Page 3-17, "San Francisco Better Streets Plan")). The need for such a flashing light suggests that there could be a potential problem near the Cherry and Maple area.

31  
(TR-4)

Page 4.2-3, Figure 4.2-2, "Existing Site Plan and Access Routes": There were 4 existing CPMC driveways For the Block A portion. Vehicles could use Cherry, Sacramento and California for relief from all the traffic. Cherry St. had 4 driveways for Block A and Block B location hospital use visitors and employees to park their vehicles. There were 3 driveways on Maple for vehicles but 2 of the driveways were for \*only\* LOADING vehicle purposes. See below Page 4.2-37 for comments that relate to Figure 4.2-2 (hospital use driveways that were there) and Figure 4.2-5 (proposed residential driveways).

31  
(TR-4)  
cont.

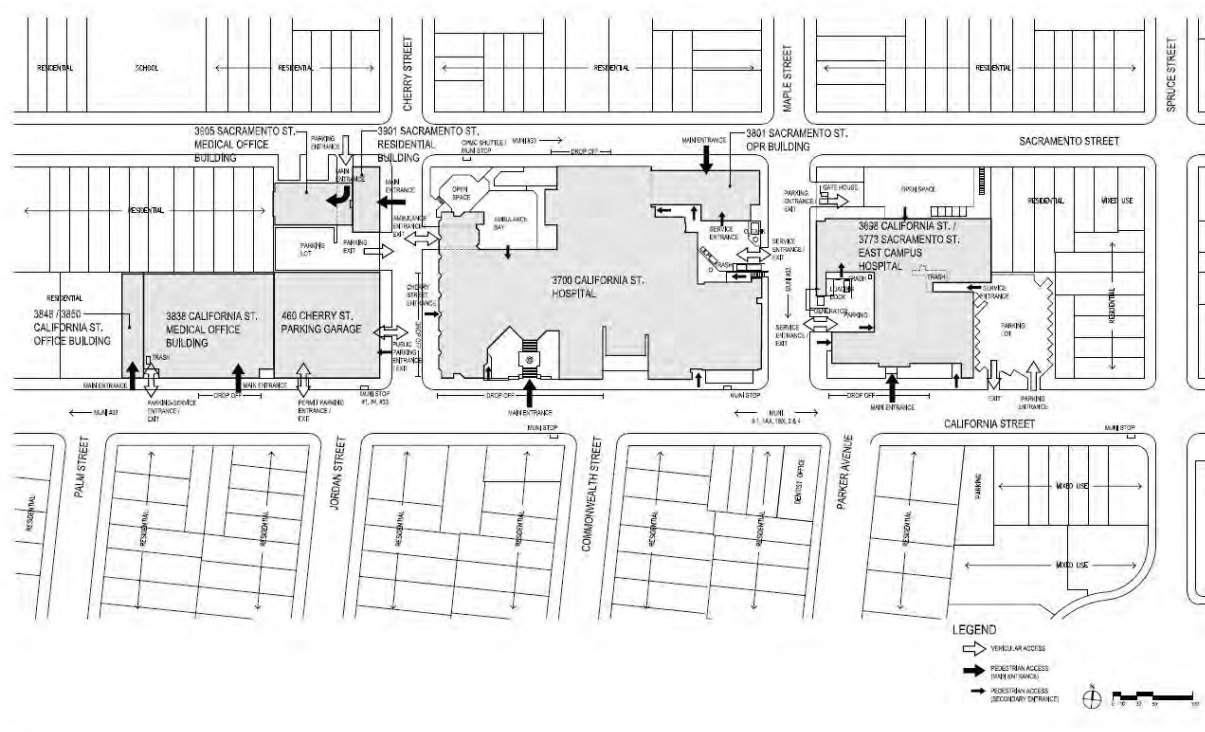


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**Figure 4.2-2**  
**Existing Site Plan and Access Routes**

The CPMC LRDP EIR shows what exists at the old site in this Figure below:





Source: SmithGroup 2010

California Campus—Existing Site Plan

Figure 2-42

Block B (middle building location) which will have most of the parking spaces had no parking in the hospital building proper and parking for only a few cars to drop off patients near Sacramento and Cherry. The difference with the new proposal is that the vehicles remain in the neighborhood for a potential 24 hours a day vs. during office / hospital hour use. The VMTs would likely increase for the longer available use of vehicles for the residence units and with the 7 carshare spaces.

Page 4.2-6: With Parker Avenue having a bike connection along Euclid from the 3700 California St. site, the safety could be compromised with the additional projected “38%” increase (See Page 4.3-46) in volume on Parker south of California.

One mitigation measure would be installation of an additional 3<sup>rd</sup> street hump for the speeders still running between the 2 existing humps on both the 000-block and the 100-block of Parker which are unusually long (at least 1000 ft.). Drivers then accelerate between the humps (over 25 mph) as the spacing is so far apart that it is dangerous for the residents to even try to enter or leave their homes.

Some kind of slowing traffic measures like a “Your Speed Is” electronic flashing sign on poles is needed to slow traffic on Parker.

The additional conflicts at the already high-volume intersection of California/Parker to Geary across Euclid would need mitigation as today there are still many speeders over the humps (not bumps) even with 2 humps per Parker block (000-block & 100-block). Neighbors will need more SFPD traffic officers in the area and there is apparently no City funding for this so even with a pedestrian hit at Parker & Euclid, there is still no traffic officers available to help mitigate the high volume of vehicles that fail to observe the “basic speed law” or the traffic signs. Bicyclists can be challenged at Parker and Euclid with the additional 38% (See Page 4.3-46) traffic volumes on Parker.

Page 4.2-16, "Bicycle Conditions": The "Euclid Avenue Bicycle Lane" could be impacted from the funneling of the vehicles ingress/egress from Maple St. driveways that feed into Parker Avenue in the north and south directions. The "Euclid Avenue Bicycle Lane" crosses Parker. This may be significant because the proposed scenario changes from mostly freight LOADING on Maple St. which turns into Parker Ave. to having ALL vehicles in addition to the vehicles from Blocks B and C.

34  
(TR-4)

Parker Avenue has the highest volume of traffic over all the JPIA streets (Palm, Jordan, Commonwealth & Parker) and is at a disadvantage over the next street to the east, Commonwealth, in that it is about 6 feet narrower. It does not make sense to keep putting more cars down the narrowest street at such volume.

People at the ends of the blocks cannot get in and out of their driveways safely. There is not an in-depth analysis of the intersection at Euclid & Parker, a block south of the proposed project. Counting cars without having the scenario of 2 driveways on Maple St. does not give a real life result and I think it will be worse than projected. What is the volume of traffic after many vehicles in addition to only the LOADING vehicles use the Maple St. to Parker Avenue driveways? Please provide as they were not in the body of the DEIR nor in the Appendix F. Data for Parker/Maple/California was lumped with other streets to get a clear picture of each street's volumes before and after as well to make the presentation of the data very confusing, at least to me. The one data for the vehicles on Parker did not say at what cross street(s). It is unclear and not totally analyzed as to what the neighbors on Parker would expect as a huge increase over the other adjacent streets. One can design in a more equitable traffic distribution.

35  
(TR-3)

Page 4.2-20: "At intersections along California Street, occasional vehicular queues were observed in the eastbound direction during the AM peak hour and in the westbound direction during the PM peak hour." Whether the queues cleared up swiftly or not, there was a queue and there is not a hospital use physical environment there anymore. When the new residential project is completed in phases, Block C vehicular traffic will cause a burden onto the queueing onto California. As Block B is completed, even more vehicles in greater numbers than from Block C enter the picture to impact a further snarling up and queuing of that intersection. While the construction is occurring, when there is queuing, there needs to be mitigation to have someone monitor and orchestrate this area so that it does not occur as there will end up being a lot of cut-through traffic down all the other JPIA streets. Mitigation is stated as unnecessary but as a good-neighbor gesture, there might be more features to be implemented not listed in the mitigation measures.

See Page 6.25 which states such mitigation measure will \*NOT\* be implemented.

If the intersections become blocked DURING CONSTRUCTION, what are the PROPOSED DETOUR ROUTES? Sample of construction detour map for CPMC LRDP EIR Addendum, Page 4 here:

35  
(TR-3)  
cont.



\*Multiple detour options available. For the purpose of this TMP, these are the recommended routes.

May 3700 California have such a plan? Please provide.

36  
(TR-4)

Page 4.2-30, "Intersection Operating Conditions": "At intersections along California Street, occasional vehicular queues were observed in the eastbound direction during the AM peak hour and in the westbound direction during the PM peak hour. The queues typically cleared within one signal cycle, indicating that reoccurring vehicle queues that would block downstream intersections would be unlikely." While the intersections being \*blocked\* would be unlikely based on the CURRENT CPMC Hospital driveway configuration (INCLUDING the driveways being used on the California St. side to disperse vehicle volume traffic which will be ELIMINATED), this test for queuing is flawed. One must test the queueing problem based on the proposed much more significant INCREASE in traffic volume out of the Maple and Cherry driveways from the Block B and C buildings proposed.



37  
(TR-4) In addition, on Page 4.2-21, there are observations documented of taxis, Lyfts, Ubers doing pick-ups and drop-offs and these also will add to the proposed INCREASE in traffic volume concentrated now at Maple St. more than on Cherry St.

38  
(TR-4) Page 4.2-30: What is the total truck and service vehicle count to the proposed project? Will they be serviced by taking the larger non-weight-restricted streets such as Arguello, Masonic, Presidio, California? How many *Recology* truck trips to the proposed project is estimated? Please provide.

39  
(UT-1) Would *Recology* need to buy more trucks? Would there be an increase in garbage and recycling materials over what the prior CPMC Hospital Use generated? What impact, if any, would there be to the volume of materials to the local landfill and recycling facility capacity? Since China and other countries have refused recyclables from the United States, where is this going? Where is this in the DEIR? Please provide.

See also under Page 4.2-50.

40  
(TR-4) Page 4.2-37, "Figure 2.4-5, "Multi-Family Parking Garage and Onsite Loading Access": As you can see, the Block B building is going to have 147 residential units the highest number of parking spaces at 223. Block A will have 67 parking spaces for 43 units. Block C will have 126 parking spaces with 83 units. Seems like a lot of vehicles considering the mantra at City Hall that the younger folks do not drive. Elderly people will eventually not drive. What segment of the population was being targeted to build units for Block B with the number of parking spaces proposed?

See Page 2-14, Table 2-2, "Proposed Project Characteristics":

TABLE 2-2. PROPOSED PROJECT CHARACTERISTICS

Building <sup>1</sup>	Lot Area	Floors	Roof Height	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space <sup>3</sup>
<b>Block A</b>								
A1 (SFR)	2,500	3	40	5,200	1	2	1,100	n/a
A2 (SFR)	2,500	3	40	4,800	1	2	1,100	n/a
A3 (SFR)	2,500	3	40	4,800	1	2	1,300	n/a
A4 (SFR)	2,500	3	40	4,600	1	2	1,200	n/a
A5 (MF, existing)	2,800	4	40	7,000	9	in podium	n/a <sup>2</sup>	0
A6 (SFR)	5,000	3	40	5,900	1	2	2,900	n/a
A7 (MF)	17,600	5	65	61,200	29	57	4,600	2,900
<b>Block A Total</b>	<b>35,400</b>			<b>93,500</b>	<b>43</b>	<b>67</b>	<b>12,200</b>	<b>2,900</b>
<b>Block B</b>								
B3 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B4 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B5 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B6 (SFR)	2,500	3	40	4,500	1	2	1,100	n/a
B1 (SFRH)	99,400	3	40	4,900	1	215	1,400	11,500
B2 (SFRH)		3	40	5,800	1		1,300	
B7 (MF)		7	80	48,200	26		2,200	
B8 (MF)		5	66	35,900	17		2,700	
B9 (MF)		5	66	35,000	14		3,500	
B10 (MF)		7	80	44,000	16		900	
B11 (MF)		5	58	21,200	10		700	
B12 (MF)		7	80	66,000	34		3,000	
B13 (MF)		3	40	10,400	4		1,000	
B14 (MF)		3	40	11,600	4		1,000	
B15 (MF)		3	40	11,600	4		1,000	
B16 (MF)		3	40	11,600	4		1,000	
B17 (MF)		3	40	11,600	4		1,000	
B18 (MF)		3	40	10,400	4		1,000	
<b>Block B Total</b>	<b>109,400</b>			<b>346,200</b>	<b>147</b>	<b>223</b>	<b>26,100</b>	<b>11,500</b>
<b>Block C</b>								
C1 (SFR)	3,400	3	38	5,500	1	2	1,500	n/a
C2 (SFR)	3,400	3	36	5,700	1	2	1,400	n/a
C3 (SFR)	3,100	3	42	5,700	1	2	1,100	n/a
C4 (MF)	59,100	5	58	50,400	22	120	4,000	19,000
C5 (MF)		7	80	59,200	27		5,700	
C6 (MF)		3	36	18,800	24		900	
C7(Amenity/MF)		3	50	28,700	4		n/a	
C8 (MF)		3	38	4,200	3			
<b>Block C Total</b>	<b>69,000</b>			<b>178,200</b>	<b>83</b>	<b>126</b>	<b>14,500</b>	<b>19,000</b>
<b>Proposed Project Total</b>	<b>213,800</b>			<b>618,200</b>	<b>273</b>	<b>416</b>	<b>52,800</b>	<b>33,400</b>

Notes: Numbers may not sum due to rounding.

SFR = single family residence. MF = multi-family. SFRH = single-family rowhouse (on podium).

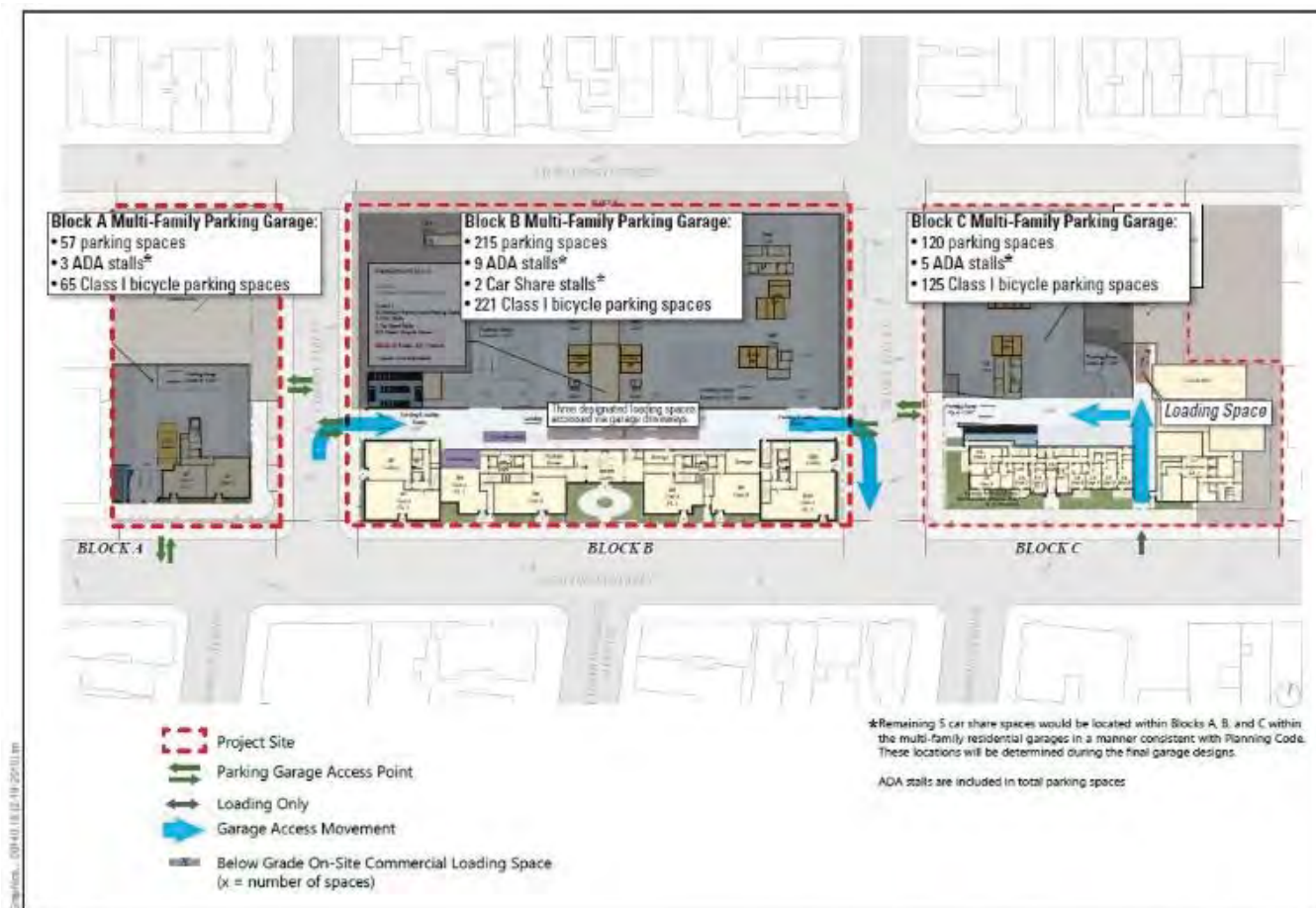
<sup>1</sup> Refer to Figure 2-5, p. 2-13, for building locations.

<sup>2</sup> Building A5 is an existing legal nonconforming use.

<sup>3</sup> In addition to the common spaces included in this table, some buildings may have common roof deck areas.

The former CPMC Hospital building here did not have visitor or regular passenger vehicle parking even close to 223 spaces. In fact, here. With the increased use of vehicles at this site compared to the prior use, the Cherry and Maple St. driveway cuts are not enough as they will force all the vehicles to go out mostly Maple St. and downstream to Parker Avenue south of California. Compared to when the CPMC Hospital was there, the number of vehicles will be huge when taken in isolation from the project as a whole and even as a whole there appears to be a good probability that many vehicles will emanate from the parking spaces (416) allowed for this project. See prior comment on [Page 4.2-3](#), [Figure 4.2-2](#) to show how the lack of driveways in the proposed project might cause queuing downstream (south).

40  
(TR-4)  
cont.



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**Figure 4.2-5**  
**Multi-Family Parking Garage and Onsite Loading Access**

The prior hospital Block B did not have as many parking spaces for vehicles that will be emanating from it when the residential project is built there. Having all the vehicles come out of the 2 driveways – 1 at Cherry St. and 1 at Maple St. and so close to California intersection will cause queuing, if not on the street, within the path of the 2 driveway entrances that also \*share\* the path with LOADING vehicles. One mitigation measure may be to have the driveways farther up north rather than so close to the heavier traffic street or people will get stuck in a queue.

41  
(TR-4)

It is difficult to tell from [Page 2-10](#) of the number of parking spaces that used to service the hospital site at Block A, B and C separately. The data is lumped so that 333 parking spaces are at 3905 Sacramento + 460 Cherry. In total with another building on Block B & C, there appear to be 439 parking spaces.

The old hospital had few parking spaces where the proposed Block B residential parking will be located. Block B had 2 exterior LOADING spaces for hospital use.



41  
(TR-4)  
cont.

Page 2-27 states that the new multi-residential and single-family buildings proposed for Block B will have 215 parking spaces multi-residential lot and 24 spaces for the single-family residences. This is a total of 239 parking spaces (assume all are going to be used by vehicles).  
With 439 parking spaces at the old hospital use, there were 4 driveways. The scenario proposed for 239 parking spaces at the new use there are only 2 driveways but they share the loading vehicle use so this might get traffic backed up with people not being able to have an “out” south or north.  
Mitigation may be to have special directional signs for IN and OUT instead of all turning onto California such that AM traffic goes north out via Sacramento and PM traffic goes south to lessen the impact of 38% increase (See Page 4.3-46) downstream on Parker Avenue near California St.

42  
(TR-4)

While parking is not discussed in the EIR per se as being impactful, the parking occupancy rate will create an impact to the surrounding neighborhood or cause more traffic volumes from carshares. More volumes of any vehicles increases the chances of pedestrian-vehicle conflict and the prior impact measurements of LOS (though no longer used), showed all 14 intersections around CPMC hospital at a LOS of D back in 2010 in the CPMC LRDP EIR, Page 4.5-16:

- **California Campus**—All 14 study intersections currently operate at LOS D or better during the p.m. peak hour. Table 4.5-37, “Levels of Service at California Campus Study Intersections—P.M. Peak-Hour Conditions” (page 4.5-180), presents the intersection LOS operating conditions during the p.m. peak hour for the California Campus study intersections.

Pedestrians may soon be affected at a significant level as the carshares are more numerous today and with the potential 24-hour use of vehicles afforded to the residents of 3700 California St. project, there may be more pedestrian delays. With traffic and pedestrian delays, the Muni service may also be impacted with other projects nearby coming online (3333 California, 3300 Geary, prior “Lucky Penny” site at Geary-Masonic). If people without vehicles are not taking Muni to work more than a mile away, they are probably using carshare – drivers often also take up residential parking waiting for their next customers. The impact of rideshares to the JPIA area and adjacent Laurel Village Shopping area and the Geary Blvd. merchants are not shown in the 3700 California St. DEIR and needs further analysis as it is inadequate. Please provide.

43  
(ME-1)

On Page 4.5-49 in the old CPMC LRDP EIR, below were/are the existing counts of parking. There are a total of 98 public parking spaces on-street:

43  
(ME-1)  
cont.

On-street parking regulations on the streets adjacent to the California Campus are as follows:

- ▶ On the south side of Sacramento Street between Cherry and Spruce Streets, there are 17 RPP spaces, four 10-minute spaces, eight 2-hour time-limited spaces, and a shuttle zone and a passenger loading/unloading zone.
- ▶ On the north side of California Street between Palm and Spruce Streets, there are 24 metered spaces, one handicapped-accessible space, and a passenger loading/unloading zone.
- ▶ On the west side of Cherry Street between California and Sacramento Streets, there are 11 unrestricted parking spaces.
- ▶ On the east side of Cherry Street between California and Sacramento Streets, there are 10 unrestricted spaces and a passenger loading/unloading zone.
- ▶ On the west side of Maple Street between California and Sacramento Streets, there are 25 RPP parking spaces.
- ▶ On the east side of Maple Street between California and Sacramento Streets, there are 11 RPP parking spaces.

Page 4.2-39, "Proposed Project Curb Colors and Street Parking, Figure 4.2-6":

Now, if you compare the above CPMC LRDP EIR parking counts to the proposed parking scheme for the new 3700 California project & based on this Figure 4.2-6...

43  
(ME-1)  
cont.

The result of comparing for on-street parking availability for the proposal as compared to the old CPMC parking on-street spaces is as follows:

Sacramento St. (South side, between Cherry & Spruce)	0 change
California St. (North side, between Palm & Spruce)	minus 7 spaces
Cherry St. (West side, between Sacramento & Calif.)	minus 6 spaces
Cherry St. (East side, between Sacramento & Calif.)	minus 4 spaces
Maple St. (West side, between Sacramento & Calif.)	minus 22 spaces
Maple St. (East side, between Sacramento & Calif.)	minus 5 spaces
<b>NET NUMBER OF ON-STREET PARKING SPACES</b>	<b>MINUS 44 spaces</b>

When one is stating that this area has a lot of families and they need car parking, and those who may be renters or lower socio-economic persons who cannot afford the parking, the 44 spaces taken away will make those people's lives a bit more challenging especially as they rely on vehicles over Muni or other public transit. Not sure how that will make this area livable for these folks. Maybe it is an "equity" issue & while not part of CEQA impacts or DEIR, that may force more people to take less-than-robust alternatives to transportation. I see my neighbors drive 2 – 3 blocks to pick up their morning coffee at Starbuck's rather than walking and they are not elderly or disabled. It appears to be a lifestyle choice.



On Page 4.5-50 of the CPMC LRDP EIR, the parking occupancy rate for the streets south of California and ***especially between Geary and California – the blocks of JPIA*** – are already high without 44 public parking spaces being deleted from the proposed project and having the number of parking spaces within the project at a 1.5 per unit level. There is no guarantee that the people with the parking spaces inside the residential project would necessarily park their vehicle in their spots. As the parking spaces can be rented out, some of the vehicles may be out on the street to further exacerbate the already high occupancy of public on-street parking near the California St. merchants and impact them. Most people buying groceries for families do not take Muni. While one market on California does delivery, not everyone uses it. Even so, that adds more VMTs to the area as a service to residents in the area. Here is the text:

#### 4.5 Transportation and Circulation

July 21, 2010

these, about 1,577 are 2-hour and 3-hour RPP spaces, about 184 are metered spaces (15-minute, 1-hour, and 2-hour spaces), 121 are unrestricted spaces, and the remainder comprise commercial-vehicle spaces and passenger loading zones. During the 1 p.m. to 8 p.m. survey period, on-street parking occupancy was observed to range between 65 and 86 percent. The blocks closest to California Street and Geary Street had the highest observed occupancy throughout the day, with average occupancy 75 percent or greater throughout the survey period.

Most blocks immediately adjacent to the California Campus had a parking occupancy of at least 70 percent during the 1 to 8 p.m. survey period, and several blocks had an occupancy greater than 85 percent during the peak 1 p.m. to 3 p.m. period.

There are eight off-street parking facilities (five garages and three surface lots) in the California Campus study area providing both permit and public parking spaces, and containing a total of 698 parking spaces. Six of the eight facilities are managed by CPMC. Of the 698 off-street spaces, 31 are dedicated to CPMC employees and physicians, and the remainders are available to the general public, including CPMC patients and visitors. CPMC also leases 700 parking spaces at the Geary Mall garage located on Geary Street at 17th Avenue, which could be accessed via the CPMC shuttle system.

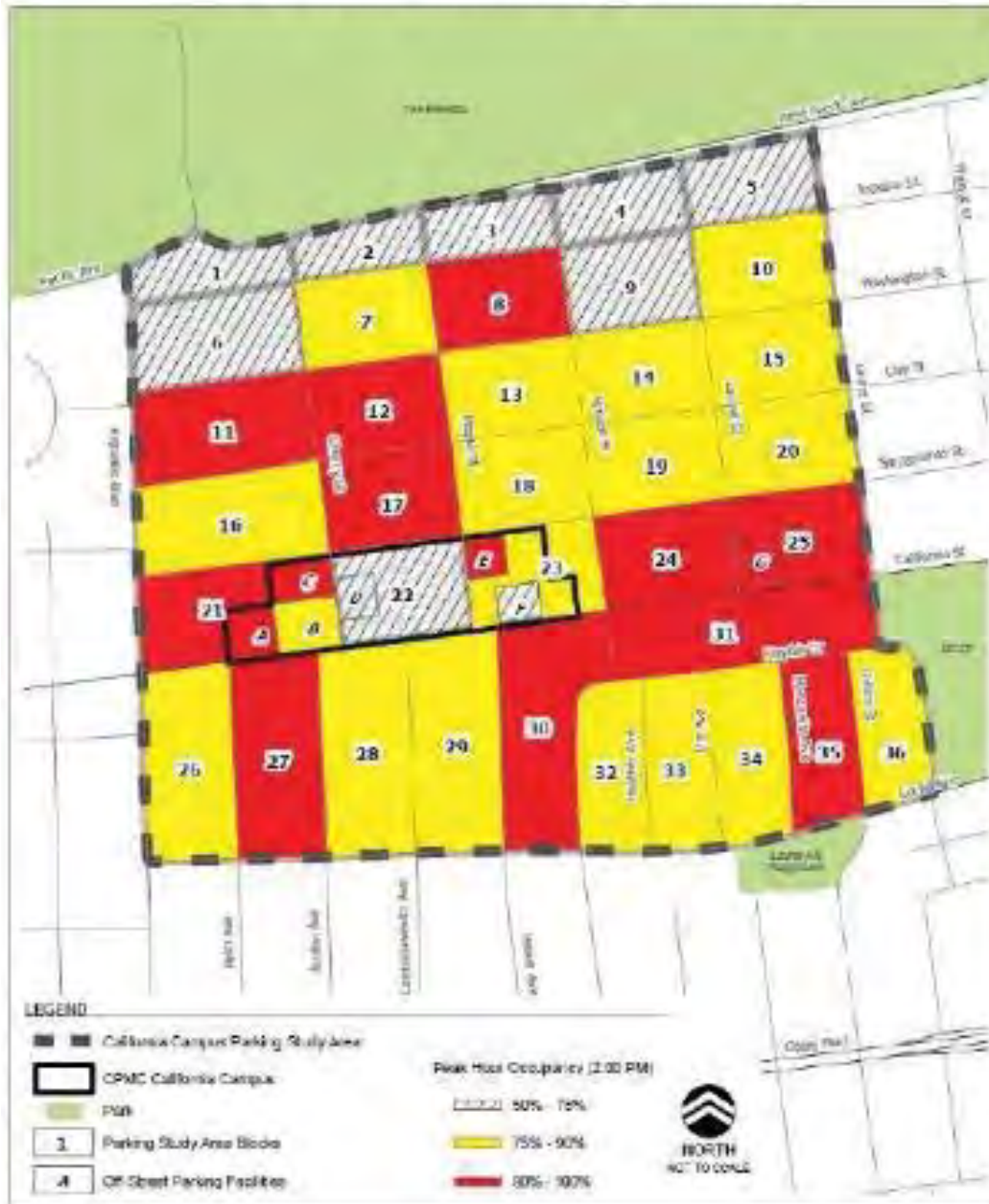
Parking occupancy at the off-street facilities averages about 83 percent occupied between 1 and 5 p.m., with a peak in the midday hours between 1 and 3 p.m. Parking occupancy between 5 and 8 p.m. drops to about 40 percent.

If the 3700 California St. DEIR uses the prior CPMC transportation or traffic and parking conditions as a net negative impact overall without incorporating the potential trips that the 44 less on-street parking spaces afforded. This will impact residents as one straight calculation below assumes use every 2 hours in the RPP area.

With more vehicles (within an 8-hour day with a 2-hour parking maximum in the RPP area), this could be 4x44 vehicles or 176 vehicles that can no longer park. Pedestrians may have to stop for these circling the area or because they cause queuing of vehicles at the existing Cherry St. garages or they cannot clear the sidewalks at the only 2 driveways on Maple. Some vehicles double-park on the 000-block of Parker when there is 90-degree parking on the opposite side and cannot pass safely for cars trying to back out of the perpendicular parking or cause pedestrians going to their cars to get hit. There are also garage entrances close to the ends of the blocks on the residential streets so when the 176 vehicles who are circling for parking decide to double-park near the ends of the streets, the hazard of pedestrian-vehicle conflict increases.

Appendix A, Page 57: This shows the already high capacity parking on the streets of the JPIA area, some areas being 90-100% occupied in the peak hour at 2PM:

Figure 2. Existing Off-Street and On-Street Parking



Source: CPMC EIR, 2008

Hash area = 50-75% (Occupancy Per Hour)

Yellow area = 75-90%

Red area = 90-100%

From the prior CPMC EIR stating the high occupancy rate of a mostly business hour use from the hospital use and the reduction in on-street parking spaces around the area for an all residential use with the

number of trips predicted to emanate from the project at completion, the streets south of California will be impacted significantly.

Vehicles will just stop in the middle of the road, double-park or block sidewalks, leading to increased pedestrian-vehicle conflict. I see this behavior already on my block and the project has not even started yet. Parking is like gold for this area. Illegally parked vehicles block the line of sight for pedestrians to cause hazards. So it is not just about parking spaces being reduced but the unintended consequences of not having an amount that would be sufficient for the new changes for the number of units proposed.

44  
(TR-4)  
cont.

One mitigation measure could be to put back the perpendicular or 45-degree parking on Sacramento St. from the Block A building location to the Block C building location as that is a flat street. While perpendicular parking could be reinstated on Maple, In the CPMC "Preliminary Project Assessment" (PPA), 2017-003559PPA, the SDAT recommended widening Maple St. sidewalk so that with that change, perpendicular parking would no longer be feasible on Maple St. If not all of the spaces on Sacramento converting to diagonal parking, perhaps some.

To add to the issue with parking spaces being removed, it is not only the reduction of 44 parking spaces just at the proposed project site location but also the more recent reductions to parking along the south side of California for a bus bulb-out and other "Better Streets" modifications that are \*NOT\* mentioned at in the 3700 California St. DEIR. This part has not been analyzed adequately nor on a cumulative basis.

Would request to include a chart to show the number of parking spaces that have been removed from the south side of California St. between Palm and Spruce Avenues since the CPMC LRDP EIR. As the conditions were for CPMC, and as stated earlier, the southern streets from the proposed project site already had a higher usage capacity for parking even without the new "Better Streets" changes on the south side of California. This may further impact pedestrian walkability.

Page 4.2-44, Table 4.2-5 "Person and Vehicle Trip Generation by Mode":

This Table shows total during AM Peak Hour – which is only a few hours of a day – to be 205 vehicles out of the 1,448 person trips in vehicles generated. The PM Peak Hour shows 250 vehicles.

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Environmental Setting and Impacts  
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45  
(TR-4)

**TABLE 4.2-5. PERSON AND VEHICLE TRIP GENERATION BY MODE**

Trip Mode	Daily Trips			AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out	Total	In	Out
Person Trips in Vehicles	1,448	724	724	205	41	164	250	166	84
Other Trips	272	136	136	39	8	31	47	31	16
Transit Trips	732	366	366	104	21	83	126	84	42
Walk Trips	108	54	54	15	3	12	18	12	6
<b>Total Person Trips</b>	<b>2,560</b>	<b>1,280</b>	<b>1,280</b>	<b>363</b>	<b>73</b>	<b>290</b>	<b>442</b>	<b>294</b>	<b>148</b>
Vehicle Trips	1,389	694	694	198	40	158	240	160	80

Source: San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, 2002; Fehr & Peers, 2018.

Note: Trips by mode may not sum to total person trips because of rounding.



45  
(TR-4)  
cont.

How many vehicles would get through the light at California St. each cycle with the 1,448 vehicle trips generated? How long is the California St. cycle? Where is this analysis before concluding based only on EXISTING queuing of an environment that is not going to be in the PROPOSED configuration with 44 fewer on-street parking spaces which could service up to 176 vehicles in an 8-hour timeframe within a 2-hour RPP zone?

Is there modeling of the traffic flow for the PROPOSED configuration and impacts to the downstream streets of JPIA? Please provide.

Page 4.2-45, Table 4.2-6, "Project Trip Generation": Why is the "Person Trips per Vehicle" (PTV) different than the "Vehicle Trips" (VT)? What does the PTV include that is not in VT? Please clarify.

Table 4.2-6 shows VT as 1,389 vehicle trips every day. How many PTVs would that be for each data point? Is the amount of PTV more or less than the commercial CPMC hospital use that existed in 2010? By how much?

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Environmental Setting and Impacts  
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**TABLE 4.2-6. PROJECT TRIP GENERATION**

Land Use	Daily Trips			AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out	Total	In	Out
<b>Vehicle Trips</b>									
Proposed Project	1,389	694	694	198	40	158	240	160	80
CPMC Trip Credit <sup>a</sup>	-6,262	-3,131	-3,131	-516	-324	-192	-607	-219	-388
<b>Net New Trips</b>	<b>-4,873</b>	<b>-2,437</b>	<b>-2,437</b>	<b>-318</b>	<b>-284</b>	<b>-34</b>	<b>-367</b>	<b>-59</b>	<b>-308</b>
<b>Transit Trips</b>									
Proposed Project	732	366	366	104	21	83	126	84	42
CPMC Trip Credit	-1,494	-747	-747	-121	-78	-43	-140	-50	-90
<b>Net Trips</b>	<b>-762</b>	<b>-381</b>	<b>-381</b>	<b>-17</b>	<b>-57</b>	<b>40</b>	<b>-14</b>	<b>34</b>	<b>-48</b>
<b>Walking Trips</b>									
Proposed Project	108	54	54	15	3	12	18	12	6
CPMC Trip Credit	-- <sup>b</sup>	-- <sup>b</sup>	-- <sup>b</sup>	-7	-6	-1	-12	-2	-9
<b>Net New Trips</b>	<b>108</b>	<b>54</b>	<b>54</b>	<b>8</b>	<b>-3</b>	<b>11</b>	<b>6</b>	<b>10</b>	<b>-3</b>
<b>Other Trips</b>									
Proposed Project	272	136	136	39	8	31	47	31	16
CPMC Trip Credit	-455	-228	-227	-32	-26	-5	-41	-6	-35
<b>Net New Trips</b>	<b>-183</b>	<b>-92</b>	<b>-91</b>	<b>7</b>	<b>-18</b>	<b>26</b>	<b>6</b>	<b>25</b>	<b>-19</b>

Source: Fehr & Peers, 2018; Adavant Consulting, CPMC EIR, 2010.

Notes: Totals may not sum precisely because of rounding.

<sup>a</sup> Transit, Walking, and Other categories show person trips, while Vehicle Trips represents the number of vehicles.

<sup>b</sup> Daily external walk trips are not available from the 2010 CPMC EIR, therefore, no credit taken; peak-hour credits are based on travel survey data and the corresponding mode share.

46  
(TR-2)

46  
(TR-2)  
cont.

Page 4.2-48, "Table 4.2-8. Proposed Project Driveway Volumes": This table shows only driveway counts on Cherry, Maple Sacramento and California. All show "trip credits" from the prior hospital use vehicle counts.

TABLE 4.2-8. PROPOSED PROJECT DRIVEWAY VOLUMES

Driveway Location (side of street)	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
<b>Cherry Street</b>				
Block B Garage/Single-Family homes (east)	13	47	47	23
CPMC Trips Removed (both) <sup>a, b</sup>	-66	-38	-44	-77
<b>Net Trips</b>	<b>-53</b>	<b>9</b>	<b>3</b>	<b>-54</b>
<b>Maple Street</b>				
Block B Garage (west)	11	39	40	20
Block C Garage (east)	9	45	48	24
CPMC Trips Removed (both)	-40	-24	-28	-48
<b>Net Trips</b>	<b>-20</b>	<b>60</b>	<b>60</b>	<b>-4</b>
<b>Sacramento Street</b>				
Single-Family Homes (south)	0	4	4	0
CPMC Trips Removed	-13	-8	-9	-16
<b>Net Trips</b>	<b>-13</b>	<b>-4</b>	<b>-5</b>	<b>-16</b>
<b>California Street<sup>c</sup></b>				
Block A Garage	6	23	23	11
CPMC Trips Removed (Block A)	-171	-103	-117	-206
CPMC Trips Removed (Block C)	-33	-19	-23	-39
<b>Net Trips</b>	<b>-198</b>	<b>-99</b>	<b>-117</b>	<b>-234</b>
<b>Total Net Trips</b>	<b>-284</b>	<b>-34</b>	<b>-59</b>	<b>-308</b>

## Notes:

<sup>a</sup> Existing CPMC driveway vehicle trips are estimated based on the trip distribution and assignment of trips from the 2010 CPMC EIR.

<sup>b</sup> Cherry Street volumes represent the net decrease in CPMC vehicle trips. The easement to the 3838 California garage will remain.

<sup>c</sup> Vehicle trips to the loading-only entrance on California Street east of Maple Street would be infrequent; less than one trip would occur on average during peak hours.

Source: Fehr & Peers, 2018; Adavant Consulting. CPMC Long-Range Development Plan EIR, 2010.

46  
(TR-2)  
cont.



It is unclear of where this data is broken down by trip counts and VMT for not only California St., but also on each Jordan Park Improvement Association (JPIA) area street – Palm, Jordan, Commonwealth and Parker -- \*without\* the “trip credits”. It appears the traffic counts are lumped with California St. so it is difficult to say how many vehicles for each of JPIA’s streets.

46  
(TR-2)  
cont.

Table 4.2-8 shows for Cherry St., WITHOUT the “trip credits,” the “OUT” traffic during “AM Peak Hour” is more than the prior CPMC Hospital use – 47 vs. prior 38 – this is about a 24% INCREASE. The “IN” traffic during “PM Peak Hour” is also more than prior CPMC Hospital use – 47 vs. 44 – this is about a 7% INCREASE.

For Maple St., without the “trip credits,” the “OUT” traffic during “AM Peak Hour” for \*both\* **Block B \*and\* Block C is 84 vs. 24 – this is about a 250% INCREASE**. The “IN” traffic during “PM Peak Hour” for **both Blocks is 88 vs. 28 – this is about a 214% INCREASE**. Again, if one takes out the “trip credits,” the straight-forward calculations show a much greater percentage of potential significant impact.

The vehicle counts for these 2 streets – Cherry and Maple – are for the 2 proposed driveways only. The Maple Street driveway has the most increase by 250% / 214% for the peak hours. This is a tremendous increase to what exists. Such a large increase to dump the cars out on Maple Street without the cars going out at least 1 more alternate driveway as there used to be offloading of vehicles out of a southern California St. driveway when the hospital was there to not overburden Maple St. which had mainly outdoor LOADING bays. The residents near Maple and Parker might have trouble getting in and out safely from their homes with the additional volume and cause more pedestrian-vehicle conflict even farther south towards Euclid and Parker.

47  
(TR-4)

With a 250% and 214% increase for these 2 driveways, it is going to be significant for the residents south of California on to get some if not most of this traffic causing safety on both these streets for pedestrians and even bicyclists using the Euclid Bike Lane that crosses the JPIA blocks. After decades on Parker, I have seen how traffic is diverted down Parker over other streets in JPIA. Without further mitigation of perhaps an additional hump on both 000-Parker and 100-Parker blocks, the traffic will just be sitting and while there will be fewer VMTs this way with nobody moving, the NOISE & AIR QUALITY on these 2 blocks will increase to affect small children and the elderly on the blocks. While masks can be worn, perhaps as a MITIGATION measure, more greenery could be provided on these blocks to offset the loss of GHGs to a street that will be the most impacted in terms of vehicle VOLUME.

48  
(TR-4)

Again, Parker Avenue already had a small child get hit by a vehicle because there is a lot of parents and children going to and from the One Fifty Parker Avenue School located south of the project site about mid-block on Parker between Euclid and Geary, less than 2 blocks away. More analysis for this area of Maple St. to Parker Avenue and mitigation needs to be done so that most of the vehicles from the Block B and Block C buildings are not driven as a cut-through for the neighborhood down Parker Avenue where the school is located and where my neighbors with children and the elderly live. People speed down Parker Avenue even with the humps as they are too far apart. Mitigation may be to put one more hump in between as the block is 1,000 feet long on each. 2 driveways on Maple St. may be insufficient especially with shared LOADING vehicles.

49  
(TR-4)

Vehicles will be funneled to the Cherry and Maple/Parker area with Maple taking the LARGEST INCREASE of vehicles compared to existing. The residents of Parker pitched in to pay for the speed humps. With the increase of vehicle volume, there will be a more frequent increase in the NOISE and VIBRATIONS over the humps. Another mitigation would be to open up a driveway to let the vehicles out of Building B and C north or south rather than dump all onto Cherry St. and Maple St.

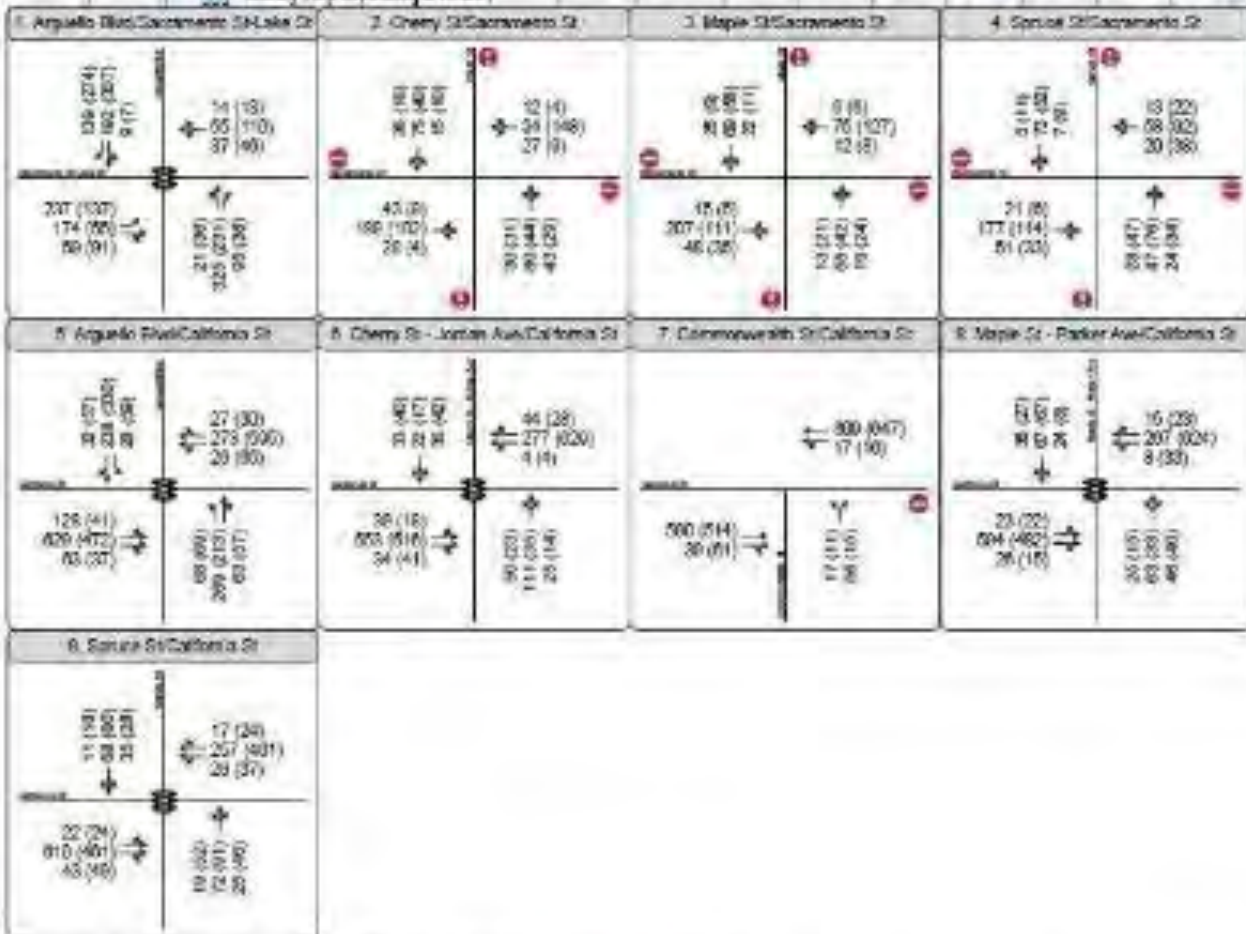
50  
(TR-4)

With a **250% and 214% increase in driveway traffic on Maple**, the residents on Parker may likely get much of this traffic with California having queues from the traffic lane that will squeeze into one lane after the bus and “Better Streets” reconfiguration east of Parker and Maple. There will be queueing on California after these cars cannot go anywhere fast. This will cause cut-through traffic in the area.

See also under Page 4.2-39, “Proposed Project Curb Colors and Street Parking, Figure 4.2-6” for impact of potentially 176 more vehicles that cannot park due to a 44 parking space reduction at the project site.

Page 4.2-48, Table 4.2-8, “Proposed Project Driveway Volumes”: See earlier comments above. These “Existing ‘Peak Hour’ Traffic Volumes” are from the Appendix on Page 15, Figure E-1:

50  
(TR-4)  
cont.



AM (PM) Peak Hour Traffic Volume    Signalized Intersection    Stop Sign

Peak Hour Traffic Volumes  
Existing Conditions



50  
(TR-4) cont. The peak-hour counts for “Existing Plus Project” are in the Appendix in Figure E-2 below:

50  
(TR-4)  
cont.



If one looks at the Maple-Parker-California traffic volumes, there is not much improvement from “Existing” intense hospital use which is being converted to residential use, a supposedly less traffic-inducing use.

The hospital use had 67(67) going to 85(68) which is a total of 134 vs. 153, a **~14% increase** (19 vehicles increase) of a less intense residential use. Also, 63(33) is going to 60(51) which is a total of 96 vs. 111, a **~16% increase** (15 vehicles increase). This is an increase only during the peak hour and what is not shown are the total counts daily on each street separately. Please provide the new data for each separate street block south of California 000-blocks of Palm, Jordan, Commonwealth & Parker; and 100-blocks of Palm, Jordan, Commonwealth & Parker during a time when the full University of San Francisco student body is in active session because they park on the JPIA streets from my observations over the decades. This is also not taken into account in the DEIR.

50  
(TR-4)  
cont.

Page 4.2-49, Figure 4.2-8, “Peak Hour Traffic Volumes, Net Change in Project Trips” (aka “Appendix F, Page 48”):

This below Figure 4.2-8 shows like there is very little traffic volume but one must look at Figure E-2 above found in the Appendix to see that there will be a lot of traffic at the intersections and turning south onto JPIA streets. Use of “trip credits” from the old CPMC Project as if that still existed which has been vacant for a while now rather than exact numbers for the PROPOSED scenario once the residential project is built is like using a bad driving scenario to justify the number of vehicles on-site without, I believe, enough driveways for the vehicles to eek out to other areas north and south where there are NO DRIVEWAYS. How does one account for the psychology or the verified potential employment locations or habits of the NEW RESIDENTS to determine which direction they will drive to conclude that the impacts to the neighborhood streets downstream (south of the site) is NI or LTS? Please explain.

This Figure 4.2-8 shows “Peak Hour” Traffic Volumes as “Net Change” for the counts for Maple St/Parker Ave – California St. These are counts after the hospital has moved out and still there are 322 vehicles at this location.

How many vehicles are expected down each of the streets south of California without “netting out”? Please provide.



50  
(TR-4)  
cont.



3700 California Street  
Case No. 2017-003558ENV

**Figure 4.2-8**  
**Peak Hour Traffic Volumes**  
**Net Change in Project Trips**

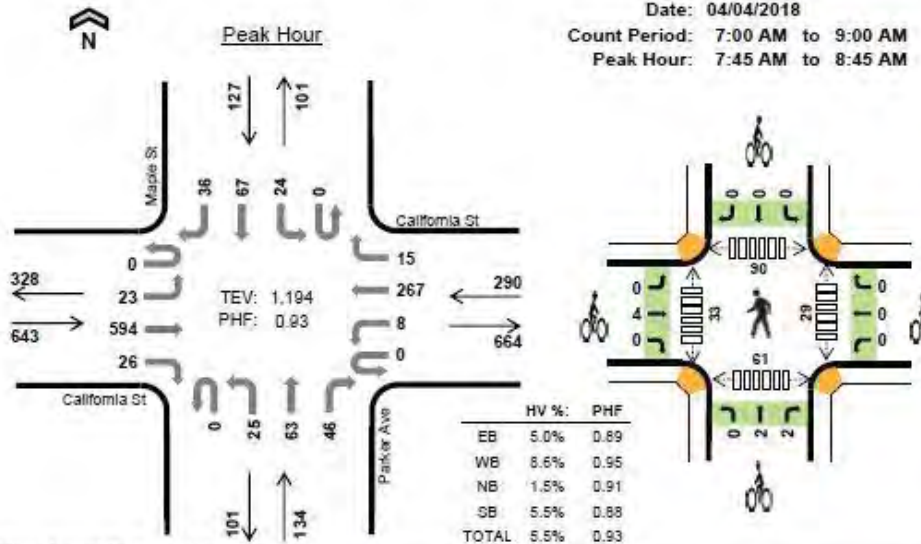
www.idaxdata.com

# Maple St/Parker Ave California St

Date: 04/04/2018

Count Period: 7:00 AM to 9:00 AM

Peak Hour: 7:45 AM to 8:45 AM



## Two-Hour Count Summaries

Interval Start	California St Eastbound				California St Westbound				Parker Ave Northbound				Maple St Southbound				15-min Total	Rolling One Hour	
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT			
7:00 AM	0	6	92	3	0	2	48	1	0	6	3	4	0	3	5	4	177	0	
7:15 AM	0	3	125	3	0	1	54	5	0	9	6	11	0	6	5	3	231	0	
7:30 AM	0	5	141	3	0	0	57	5	0	7	13	11	0	3	7	5	257	0	
7:45 AM	0	6	163	6	0	5	67	4	0	8	20	9	0	3	20	5	322	967	
8:00 AM	0	7	127	10	0	1	69	2	0	5	18	12	0	4	17	14	286	1,096	
8:15 AM	0	2	148	4	0	1	69	3	0	6	13	11	0	9	16	11	293	1,158	
8:30 AM	0	8	150	6	0	1	62	6	0	6	12	14	0	8	14	6	293	1,194	
8:45 AM	0	9	156	4	0	7	62	4	0	8	13	11	0	8	11	9	302	1,174	
Count Total	0	46	1,108	39	0	18	488	30	0	55	98	83	0	44	95	57	2,161	0	
Peak Hour	All	0	23	594	26	0	8	267	15	0	25	63	46	0	24	67	36	1,194	0
	HV	0	0	32	0	0	0	25	0	0	0	2	0	0	1	1	5	66	0
	HV%	-	0%	5%	0%	-	0%	9%	0%	-	0%	3%	0%	-	4%	1%	14%	6%	0

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
7:00 AM	7	7	0	1	15	0	0	0	0	0	0	5	22	5	32
7:15 AM	13	5	0	2	20	0	0	0	0	0	5	6	10	6	27
7:30 AM	6	6	1	1	14	1	0	0	0	1	2	4	19	10	35
7:45 AM	7	5	1	2	15	1	0	2	0	3	5	2	15	9	31
8:00 AM	8	9	0	3	20	2	0	2	0	4	3	15	27	16	61
8:15 AM	8	6	0	1	15	1	0	0	0	1	9	7	27	20	63
8:30 AM	9	5	1	1	16	0	0	0	0	0	12	9	21	16	58
8:45 AM	7	4	2	4	17	0	0	1	0	1	15	6	23	20	64
Count Total	67	47	5	15	134	5	0	5	0	10	51	54	164	102	371
Peak Hour	32	25	2	7	66	4	0	4	0	8	29	33	90	61	213

Project Manager: (415) 310-6489

project.manager.ca@idaxdata.com

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(TR-4)  
cont. How many **vehicles TOTAL** during the hours of 7AM to 7PM daily for each of the above streets?

The 3700 California DEIR also neglects to count the number of carshare vehicles that will be frequenting the site and the nearby residences and businesses. The data was not in the old CPMC EIR because the carsharing transportation mode was not fully matured as it is today. Here is an anecdotal report from The Chronicle on carshares impact in the City:

Uber, Lyft account for two-thirds of traffic increase in SF over six years, study shows  
[Rachel Swan](#) May 8, 2019 Updated: May 8, 2019 7:19 p.m.

Uber and Lyft accounted for two-thirds of a **62% rise** *<emphasis added>* in congestion in San Francisco over six years, according to a report published on the day of a coordinated protest by drivers.

The figures “are eye-popping,” said Joe Castiglione, deputy director for technology, data and analysis at the San Francisco County Transportation Authority. He co-authored the study with researchers from the University of Kentucky.

51  
(TR-4) It shows that hours of vehicle delays increased by 62% throughout the city from 2010 to 2016, the period when ride-hailing services began proliferating on the streets. Traffic models that exclude Uber and Lyft cars show that hours of delay would have gone up 22% in their absence.

Extrapolating from those numbers, the study’s authors concluded that on-demand ride services — or transportation network companies, as they’re known in academic patois — are clogging roads and siphoning people from mass transit, going against the companies’ stated mission to wean people off of private cars. The authors laid out their findings in the scholarly journal Science Advances, providing fodder for policymakers seeking to regulate these companies.

Among the measures being considered in San Francisco are a proposal to tax Uber’s and Lyft’s net fares, as well as congestion pricing — a road-toll intervention that aims to unclog busy streets.

A similar study that the Transportation Authority published last year looked more broadly at swelling traffic from 2010 to 2016, and found that transportation network companies comprised about half of it, with the other half stemming from job and population growth. Wednesday’s study narrowly measured the correlation between ride-hailing services and increased congestion.

Uber and Lyft contested the data Transportation Authority officials released in October, saying that it didn’t account for the growth in tourism, freight or delivery services that increased with the economic recovery. Both companies support congestion pricing, and both say their on-demand services help bolster mass transit, claims that the researchers dispute.

“While studies disagree on causes for congestion, almost everyone agrees on the solution,” an Uber spokesperson said in a statement Wednesday. “We need tools that help ensure sustainable travel modes like public transportation are prioritized over single occupant vehicles. That’s one reason we believe in comprehensive congestion pricing, which would provide millions to invest in cities’ public transportation systems.”

To Castiglione, though, the report’s findings “are pretty clear.”

“Many factors contribute to congestion — including population growth,” he said. “But the addition of TNCs (such as Uber and Lyft) is greater than all of them.”



He cautioned that the story isn't quite the same across the city. Although transportation network companies had a deep impact downtown and in North Beach, they barely made a blip in peripheral neighborhoods like the Outer Sunset.

While for-hire vehicles abound in urban areas throughout the globe, they're especially popular in Uber's birthplace, next to Silicon Valley. And maybe that's not a bad thing, said Randy Rentschler, legislative director of the Metropolitan Transportation Commission.

"If Uber and Lyft are creating more traffic, maybe it's because people want to be in the city now," Rentschler said. "Maybe it's a sign of economic vitality. One of the things that the Bay Area has a hard time struggling with is that traffic is not universally bad."

Yet the problem with transportation network companies isn't just volume. It's also the drivers' behavior, said Gregory Erhardt, an assistant professor of civil engineering at the University of Kentucky and co-author of the study.

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(TR-4)  
cont.

"When you look at pickup and drop-off behavior, the drivers stop in turn lanes, travel lanes or bicycle lanes," Erhardt said. Each time that happens in a major arterial, it blocks the flow of traffic for 140 seconds — more than two minutes of dead time, the researchers found.

Several other features of for-hire cars add to traffic misery in San Francisco. Most Uber and Lyft drivers — some 70% — come in from other cities, including a substantial labor force from as far away as the Central Valley. **They spend 20 to 30% of the day trawling for passengers** *<emphasis added>*, mostly in downtown areas where public transit options are plentiful.

Nationally, buses and rail systems saw a precipitous decline over the past four years, because they're competing for the same customers as the transportation network companies, Erhardt said. BART is fighting to keep night and weekend riders who have peeled off to Uber and Lyft, and Muni, while growing, is scrambling to improve service.

There is an optimal way to fit these companies into a complex transportation puzzle, if people use them to travel from a transit hub to a specific Point B that's not served by mass transit. But a growing body of evidence suggests that's not what's happening.

**"Between 43 and 61% of TNC trips substitute for transit, walk or bike travel or would not have been made at all, adding traffic to the road that otherwise would not have been there," the report said.** *<emphasis added>*

Erhardt said it may be hard for other researchers to replicate those findings because Uber and Lyft keep such a tight lid on their trip data. Officials at the California Public Utilities Commission — the public agency that regulates transportation companies — are also reluctant to turn over numbers.

When Erhardt approached Uber for records two years ago, the company only offered to provide data on trips from rail stations, which show how Uber supports mass transit.

"That only tells the positive part of the story," Castiglione said. He and Erhardt ultimately teamed up with computer scientists at Northeastern University to mine the data themselves.

The report came as Uber approaches its initial public offering of shares, scheduled for Friday. In San Francisco, Uber and Lyft drivers blocked off Market Street in protest of what they call unfair working conditions. It's unclear how that action affected traffic.

51  
(TR-4)  
cont.

Rachel Swan is a San Francisco Chronicle staff writer. Email: [rswan@sfgate.com](mailto:rswan@sfgate.com) Twitter: [@rachelswan](https://twitter.com/rachelswan)

<https://www.sfchronicle.com/bayarea/article/Uber-Lyft-account-for-of-traffic-increase-in-13830608.php>

Suggest MITIGATION that 3700 California proposed project reduce the 7 carshares to 2 because the residents will already have vehicles based on the count being provided in the subterranean garages. Some folks commenting on the known-future-project called "3333 California" project that more people would generate more VMTs with carshare availability because they would not want to drive themselves even if they had vehicles. More VMTs driven can lead to more pedestrian-vehicle conflicts

52  
(TR-4)

Page 4.2-50, "Freight Delivery and Service Vehicle Demand": Why is the prior hospital use employee and patient surveys being used for the future residential project buildings in Blocks A, B, and C? Would not the new residential project residents be different from the hospital use survey respondents to determine freight delivery and service vehicle demand? With residential service delivery, would there not also be more hours of use in the building as opposed to medical offices that close at night? It would seem like the figure of *19 daily truck trips is low* considering that a 12-unit apartment building in San Francisco gets 2 garbage / recycling pickups PER WEEK but if a larger garbage truck is used, there will be more impactful noise and vibrations if the JPIA streets with humps are used. Also, more recently, Recology has started to use 3 trucks – 1 each for the black, blue and green bins. I still think 19 DAILY TRUCK TRIPS is low. What makes it so low? Are other service vehicles for dry cleaning pickups, water deliveries, plant deliveries, mail-order package deliveries, food deliveries, janitorial and maintenance worker vehicle trips included? Would there need to be an upward revision to the truck number?

See also Page 4.2-30.

"Table 12" from the Appendix shows the 19 truck trips (This is the same table as Table 4.2-9, "Freight Delivery and Service Vehicle Loading Demand" on Page 4.2-50 of the DEIR).

## Freight Delivery and Service Vehicle Demand

Freight delivery and service vehicle loading demand was estimated in terms of daily total trips and number of required loading spaces during peak hour truck trip generation (which typically occurs between 10:00 A.M. and 1:00 P.M., unrelated to PM peak hour for other transportation analyses).

Freight delivery and service vehicle demand was not analyzed in the 2010 CPMC EIR; thus, the methodology from the Guidelines to estimate the level of daily and peak hour truck trip generation was used to estimate them for the existing condition for comparison purposes. As noted above, travel behavior has not changed substantially since the 2010 CPMC EIR. Therefore, the information presented in the Guidelines remains valid for the purposes of this study.

The freight delivery and service vehicle loading demand is presented in **Table 12**. The Proposed Project would generate approximately 55 fewer truck trips than existing conditions each day and would require three fewer loading spaces to accommodate peak hour truck loading demand.

52  
(TR-4)  
cont.

**Table 12: Freight Delivery and Service Vehicle Loading Demand**

Land Use	Daily Truck Trips	Peak Hour Loading Demand (Spaces) <sup>1</sup>
<i>Proposed Project<sup>2</sup></i>	19	1
<i>CPMC Trip Credit</i>	-73	-4
<b>Net Loading Demand</b>	<b>-54</b>	<b>-3</b>

**Notes:**

1. Peak hour of truck trip generation generally occurs between 10:00 A.M. and 1:00 P.M. and is unrelated to P.M. peak hour used in other transportation analyses.
2. Includes 476,088 gross square feet of residential space per June 1, 2018 project application.

Source: *Transportation Impact Analysis Guidelines for Environmental Review*, 2002, SF Planning Department; Fehr & Peers, 2018.

Analysis of new truck traffic south of California along Maple St. to Parker Avenue is not thoroughly analyzed. Is the truck traffic count for all of Maple St. going to Parker only or that also going along California?

I am unclear about only 19 trucks predicted for 3700 California at full buildout. Is this one-way so the figure is 38 truck trips? What kind of trucks are included in this count? Only construction-related trucks or trucks that will eventually service 3700 California residents?

What is the truck trip count at south of California from Maple/Parker?



Please provide specifically the total number of vehicles that are expected to use the new **\*shared\*** driveway out of Maple St. EAST and separately out of Maple St. WEST that would be going down Parker Avenue south of the site and have the Euclid/Parker intersection 1 block away analyzed. Please.

The current setup of the old CPMC Maple St. driveway was for external LOADING trucks only with no passenger vehicles except for the 90-degree parking spots on the Maple St. hill.

The proposed driveway setup for Block B will combine all passenger vehicles and loading trucks rather than how the vehicles function today with a **\*loading dock only\*** driveway to avoid conflicts out on the street from the large trucks turning and / or with waiting for the vehicle queue to die down.

53  
(TR-4)

Mitigation of this one driveway allowing many vehicles from Block B to ingress and egress from it could be made by a path north to the Sacramento St. side. Another mitigation of future blockage of traffic due to queueing at the Maple-Parker-California intersection is to have the driveway higher up the street rather than so close to California street to allow for the linear street footage to stage vehicles travelling south onto and downstream (south) of California St. Another mitigation of the potential snarling up of traffic due to both Maple St. driveways facing opposite each other is to have the driveways separated much more than is shown – a larger stagger – so that vehicles are not going to be waiting for the vehicle across from them to leave/enter as that would add to time and potential further queueing or blocking of the sidewalks for pedestrians near the driveways. Yet another mitigation measure may be to implement “Right Turn Only” or “Left Turn Only” from the driveways so traffic is not all funneled south down Maple-Parker.

While there was a short queue seen which cleared after a signal cycle, there could be problems with so much traffic out of the Maple Street garage entries. Cherry will also have a fairly high traffic due to the 3838 California St. Garage that is to remain so perhaps the Cherry St. driveway should be reconfigured as well so as not to have a queue of vehicles trying to get in or out of the driveway so close to California St. Maple and Cherry driveways should funnel the vehicles onto Sacramento to not block Muni on California St. nor block the 33-Stanyan’s route down Maple St.

There needs to be more specific traffic mitigation for the vehicles out of Block B and Block C not stated in the DEIR. This is needing more specific mitigation measures than is written about in the DEIR.

54  
(TR-4)

For the record, in relation to the 38% increase (See Page 4.3-46) in traffic down Parker Avenue south of the 3700 California site, the 100-block of Parker Avenue residents pitched in to pay for speed humps for traffic calming to prevent further incidents of pedestrian-vehicle conflict from a prior event when a child from the 150 Parker School got hit. These traffic calming features help to reach the goal of “Vision Zero”. The street is also a weight-restricted street of “No Trucks Over 3 Tons”. I and my neighbors would appreciate the management or operations crew at the future 3700 California St. project to have an agreement with their delivery trucks to not cut through the JPIA streets with the humps.

55  
(TR-4)

When the additional traffic goes down Parker Avenue, the humps will also be subjected to more wear and tear and may fail prematurely. Would the 3700 California Project sponsors be agreeable to pay for maintenance of the further increase of traffic over the humps? If 3700 California had a list of truck plates and can prove they are not sending their trucks over the humps, they do not have to pay for the wear and tear. Or would the City have enough funding to replace them in future? What could be the solution?

56  
(NO-3)

The NOISE and VIBRATION coverage in the DEIR omits the NOISE from the trucks and other vehicles projected to be increased in volume. This may create an almost constant noise all day with vibrations affecting the older homes of the early 19<sup>th</sup> and 20<sup>th</sup> centuries on the Parker Avenue block. Also, with the aging gas lines and water lines under Parker Avenue, the vibrations may be causing infrastructure

56  
(NO-3)  
cont.

damage as the gas pipes are not deep on this street. The February 6, 2019 gas line explosion at Parker and Geary is a telltale sign of how shallow the gas lines are and with too many heavy vehicles in the volumes projected with the other vehicles, the whole 2 blocks of Parker Avenue in JPIA may be another fiery explosion waiting to happen. There have also been PG&E in the area to fix gas leaks.

These impacts for each JPIA block south of the proposed site are not clear to me in this DEIR. The homes of Jordan Park are older and some have brick foundations that are sensitive to additional vibrations from vehicles going over the humps and not driving slowly to \*not\* cause banging noises during the wee hours of the night/day for deliveries. Perhaps trucks should be fitted with quiet gate devices so that the banging is not so loud but be told not to take the JPIA streets with the humps.

See also Page 4.2-63.

57  
(TR-3)

Page 4.2-53: "Construction-related trucks would access the project site from major arterials such as California Street and enter and exit the site primarily via Maple and Cherry Streets."

It would be better if these construction-related trucks use California directly rather than go up Parker from Geary or Euclid or Commonwealth, Jordan or Palm. Request they stick to Arguello also to minimize the CONSTRUCTION DUST carried on the trucks in front of 150 Parker School – mid-block on Parker between Euclid and Geary. Request mitigation through a hotline to call in rogue construction-related trucks when there is no major blockage of traffic in the area.

58  
(TR-4)

Page 4.2-57: This text states how much more the traffic volume will be at the driveways on Maple St. Having 1-2 more vehicles per minutes is a lot of vehicles. It reminds me of the cars at the airport garages. While traffic operations on Maple, California and Sacramento will not be affected, these vehicles may be headed southbound and northbound on Parker that Maple turns into to get to work in the South Bay in Silicon Valley. I think the traffic on Parker Ave. downstream (south) of California will be impacted to a significant level. It may be unavoidable but when 200 vehicles are generated at the intersection per peak hour, it is not trivial. A study needs to be performed as to impacts to Parker south of California as this street is omitted from further analysis. Please provide analysis of north and southbound traffic with the 1-2 vehicles per minute of vehicles being generated. The statement here says, "The proposed project would reduce the amount of traffic on other streets in the study area following the removal of the existing CPMC hospital." And while it may be true for many of the streets, the DEIR already stated that Parker would have at least a 38% increase (See Page 4.3-46 & elsewhere in this document) so it is ignoring the impact on Parker Avenue and is inadequate.

Maple Street is a local neighborhood street with lower traffic volumes compared with Sacramento or California streets (approximately 200 total vehicles per peak hour). The proposed project would add 40 to 50 net new vehicle trips to Maple Street during the AM and PM peak hours, representing a new vehicle traveling on Maple Street every 1 to 2 minutes during these hours. These additional vehicles would not substantially affect traffic operations on Maple

58  
(TR-4)  
cont.

<sup>45</sup> Block B also provides parking for two of the single-family homes.

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4.2-57

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Street or at the adjacent intersections at Sacramento and California streets. The proposed project would reduce the amount of traffic on other streets in the study area following the removal of the existing CPMC hospital.

59  
(TR-2)

Page 4.2-69: "...the SF-CHAMP 2040 cumulative model runs assume continued medical land uses at the project site under the 2020 cumulative scenario without the project." Using the 2040 cumulative model seems to be flawed when the residential project and the access to traffic through the fewer openings to a higher vehicles presence building is replacing one that was not – such as Block B. I think that the 2040 cumulative model needs to be using the existing vacant use to proposed residential use with no "net trips" or "trip credits" or the full brunt of the proposed project is hidden or at least obscured. Please provide.

Page 4.2-71:



## CUMULATIVE CONSTRUCTION

**Impact C-TR-1:** The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative construction-related transportation impacts. (*Less than Significant*)

Construction of the proposed project may overlap with the construction of other nearby projects, including projects at 3641 California Street, 3637–3657 Sacramento Street, and 3333 California Street. Development at 3641 California Street would be directly across from Block C of the proposed project, while the projects at 3637–3657 Sacramento Street and 3333 California Street would be approximately 0.2 and 0.25 mile east of the project site, respectively. The timing for construction of the 3641 California Street and 3637–3657 Sacramento Street developments is currently unknown; however, because construction of the proposed project would extend until 2024, it is likely that the 3641 California Street and 3637–3657 Sacramento Street developments could receive approval and start construction during that time. Construction of the 3333 California Street project is expected to commence around the same time as the proposed project and last 7 to 15 years. Therefore, it is likely that construction of the proposed project and the three reasonably foreseeable projects could run concurrently for several years. Construction impacts from nearby planned development projects would not combine with construction impacts from the proposed project.

It is anticipated that construction of the proposed project would occur over a period of approximately 40 months, concluding by 2024. Construction of the reasonably foreseeable future projects in the vicinity of the project site could temporarily increase traffic at the same time as the proposed project and on the same roads (e.g., California Street and Sacramento Street). Although the 3641 California Street and 3637–3657 Sacramento Street projects would be directly across the street or one block away from the proposed project, given the smaller scale of these projects (i.e., demolition and construction of one building), a construction-related cumulative impact would not be expected. As part of the construction permitting process, similar to the requirements for the proposed project, each development project would be required to work with various City departments to develop detailed and coordinated construction logistics and contractor parking plans to address issues related to construction vehicle routing, traffic control, transit vehicles, and accessibility plans for people walking and biking adjacent to the construction area. Overall, because construction activities associated with the proposed project and other projects would be temporary and limited in duration, and conducted in accordance with City requirements, the

60  
(TR-3)  
cont.

"Impact C-TR-1" discusses the 3641 California St. Project. However, just 2 blocks to the south, less than ¼-mile, is a project at 3330 Geary proposing 41 units and 41 parking spaces which is \*NOT\* listed in the text at all. 3330 Geary lies within the "modeling extent" of 3,000 ft. The vehicle circulation pattern of 3700 California St. may have to be analyzed with this 3330 Geary Project as it will likely be built along with 3700 California's 40-month construction period. In addition, 3700 California St. traffic volume will have to contend with the Geary Bus Rapid Transit (BRT) project that will impact JPIA streets running north-south - Palm, Jordan, Commonwealth & Parker Avenues. I do not believe the 3700 California DEIR traffic analysis has incorporated all of these into the analysis and is incomplete without it and inadequate as to analysis.

61  
(TR-4)

Page 4.2-72, "Cumulative Traffic Hazards," Impact C-TR-2:...(Less than Significant)": "**Traffic volumes are expected to increase in the future on California Street** <emphasis added> and other streets under 2040 cumulative conditions because of the 3333 California Street project." The 3700 California DEIR stated that there is no queueing using a prior CPMC Hospital as the existing scenario but that is going to occur when California St. traffic is not moving very much. This might lead to MORE vehicles from the proposed residential project to go downstream south of California out of the Maple and Cherry St. driveways to Parker Avenue and impact the Euclid Bike Lane and also safety for the Parker blocks when there was already a pedestrian-vehicle conflict and knowing that there is the small children's 150 Parker School mid-block. There must be mitigation to relieve the traffic by allowing traffic from the underground garages to go north as an exit as well as even south onto California or higher up on Maple to the north so that traffic does not get bogged down south of California St. from the proposed 273-unit residential development.

62  
(TR-4)

Page 4.2-73, "Cumulative Transit Impacts," Impact C-TR-3:...(Less than Significant)": "The proposed project would reduce the number of trips on regional transit slightly through replacement of the existing CPMC hospital with residential land uses at the site." If the trips on regional transit is reduced, how will the regional transit be impacted with more vehicles being used to make the regional trips? Is this analyzed? Please provide.

63  
(TR-4)

Page 4.3-46, "Average Daily Traffic Volumes," Table 4.3-16 "Cumulative 2040 Traffic Volume Increases": As stated earlier in relation to the driveway and Building B and Building C vehicle volume, Parker Avenue south of California will see a **38% increase** (See Page 4.3-46) in DAILY traffic volume and is burdened further compared to adjacent north-south streets. This is already on a street that has the most vehicles and besides not spreading the traffic out, it is being funneled down this street through the design of the proposed Block B building which does not have an "out" for most of the vehicles to go north or south at a driveway. Commonwealth is expected to have a REDUCTION of traffic volume from its ALREADY LOW vehicle volume compared to other JPIA streets of "-13%".

As shown in the "Average Daily Traffic Volumes" Table, Parker Avenue south of California street will have an almost 40% increase in traffic volume – projected to be 38%.

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Environmental Setting and Impacts  
Noise

Roadway Segment	Average Daily Traffic Volumes <sup>a</sup>		
	Existing Daily Volumes	Cumulative 2040 Daily Volume Increases <sup>b</sup>	Percentage Increase Relative to Existing Conditions
<b>Maple Street</b>			
north of California	1,800	500	28%
north of Sacramento	1,980	490	25%
south of Sacramento	2,480	520	21%
<b>Parker Avenue</b>			
south of California	2,030	770	38%
<b>Spruce Street</b>			
north of California	2,450	750	31%
south of California	3,350	1,150	34%
north of Sacramento	2,300	440	19%
south of Sacramento	3,580	600	17%

Source: Goyne, Matt. Associate, Fehr and Peers. August 31, 2018—email to Heidi Mekkelson of ICF regarding peak-hour intersection volumes and the “hourly to daily” calculation method.

Notes:

See Appendix G for data.

<sup>a</sup> Daily traffic volumes have been calculated by multiplying the PM peak hour by a factor of 10, based on the guidance of the traffic engineer evaluating the proposed project.

<sup>b</sup> The volume increases include the proposed project trips and non-project trips from background growth in the city.

While Page 4.3-46, Table 4.3-16, “Cumulative 2040 Traffic Volume Increases” was found only under the NOISE impact section & \*NOT\* in the TRANSPORTATION impact section, the notable TRAFFIC VOLUME INCREASE on Parker Street to 38% above all other streets will not make it a family-friendly environment for the families with children and the elderly who live on this street. The projected almost 40% increase in traffic volume on this street will make it more difficult for family members to get in and out of their residential driveways with an almost constant flow of traffic from such a large increase in volume. This increase has the potential to lead to more pedestrian-vehicle conflict on this street. More pedestrian delays from waiting for vehicles to get in and out of residences contending with the almost constant stream of traffic from this volume increase is another potential impact. MITIGATION might be to put up new speed signs to reduce to 20 MPH and to put up “YOUR SPEED” to get the speeders who presently speed over the humps on this street as no traffic enforcement officers are available.

Ensure that the service and freight trucks related to the 3700 California Project over 3 tons go along the California St. transit corridor to the maximum extent possible and especially to avoid blocks with “Sensitive Receptors” like the One Fifty Parker Avenue School as the trucks hauling dirt will have the most potential of impacting them and the other residents who include small children and the elderly.



64  
(TR-4)  
cont.

Another MITIGATION might be to install another speed hump between the 2 humps on the 100-block of Parker as vehicles today are not deterred from speeding between the double humps on a block that is 1,000 ft. long even with a small children's school located at the One Fifty Parker Avenue School. While the 000-block of Parker provides a bit more speed attenuation because drivers have to be careful of the 90-degree parked vehicles on the east side coming at them, there is no potential hit from the sides of the road on the 100-block of Parker so the drivers speed and large trucks not delivering within the 1 block cut through to service commercial area of California St.

MITIGATION measure to add would be to put up no deliveries except for 1 block as they have in the Marina District.

A mitigation measure would be to install signs on Parker and blocks south of California from 3700 California for delivery vehicles only within 1 block so that heavier and larger 16- and 18-wheeler trucks should be dissuaded from going down JPIA streets as that will be more than 2 blocks from Geary and from California. If the drivers are not scofflaws, they would also take the transit corridors of California and the main feed at Arguello or Masonic or Presidio to service 3700 California.

Appendix F, Page 88, Table 11, "Other Trip Generation":

What are these trips? From where to where? What blocks adjacent and in JPIA would carry these trips? Where is this broken down? Please provide.

65  
(TR-2)

**Table 11: Other Trip Generation**

Land Use	Daily Trips	AM Peak Hour	PM Peak Hour
Proposed Project	272	39	47
CPMC Trip Credit	-455	-32	-41
<b>Net Trips</b>	<b>-183</b>	<b>7</b>	<b>6</b>

Source: *Transportation Impact Analysis Guidelines for Environmental Review*, 2002, SF Planning Department; *CPMC Long Range Development Plan EIR*, 2010. Adavant Consulting, 2010; *ITE Trip Generation*, 9th Edition; Fehr & Peers, 2018.

66  
(TR-3)

Appendix G, Construction Data, "Construction Schedule and Equipment List":

With Blocks B & C having the highest total "Hauling Trips" at  $1,696 + 1,088 = 2,784$  trips for demolition alone. Excavation & Shoring adds another 1,328 hauling trips for these blocks. "Sitework" for these blocks adds another 880 trips for a total for Blocks B & C to be 4,992 trips. The chart does not show a GRAND TOTAL to reflect the LARGE VOLUME overall.

The LARGE VOLUME OF TRIPS for this rather low-density family-oriented neighborhood to absorb in terms of impact and potential contamination is a concern especially when the vehicles go by "Sensitive Receptors."

To MITIGATE the effects of large quantity of trips, the developers of 3700 California should provide a "CONTRACTOR TRANSPORTATION PARKING PLAN" like the one used for the CPMC Hospital Project. Worker trips should be minimized by having them meet at a parking area to leave their vehicles and take passenger vans to work. There are parking passes for the parking lots and specific details of how the parking plan is to work along with forms for information on contractor's personal vehicles that will be parked in the off-site locations. Not sure how the garages would impact the other neighborhood demand for parking but this is needed for the number of worker trips to this California St. area.

Please add this as a MITIGATION MEASURE.

See attached "CONTRACTOR TRANSPORTATION PARKING PLAN".

Another MITIGATION MEASURE that would assist the neighbors would be to provide a "CONSTRUCTION MANAGEMENT PLAN".

Below is the text of the "CPMC Cathedral Hill Hospital Construction Management Plan, Updated: 09/11/2013". Replace "Cathedral Hill" with "3700 California St. Project" to help allay neighborhood residents' concerns:

### **1. General Operating Principles**

- a) Public Safety / Site Security
- b) Operating Hours, Noise and Vibration Controls
- c) Air Quality Management
- d) Storm Water Pollution Prevention Plan (SWPPP)
- e) Waste and Material Reuse
- f) Traffic and Parking Management

### **2. Phasing of Work: implementation of operating principles during specific phases**

Hospital Construction:

- a) Abatement and Demolition (Months 1 to 8)
- b) Shoring and Excavation (Months 9 to 14)
- c) Foundation and Concrete Walls (Months 15 to 30)
- d) Steel Erection and Concrete Decks (Months 18 to 34)
- e) Exterior Enclosure (Months 28 to 39)
- f) Interior Build-out and Final Site work (Months 26 to 59)

Tunnel Construction and coordination with Medical Office Building, other projects:

- a) Overview

### **3. Neighborhood Liaison / Communications with neighborhood**

#### **1. General Operating Principles and Commitments:**

These principles and commitments apply to all aspects and phases of the work related to the construction of the CPMC Cathedral Hill Hospital at Van Ness Avenue. The Contractor and CPMC shall continue to meet with SFMTA, DBI, DPW, the Fire Department, Planning Department, Police Department, CalTrans, MUNI and other appropriate City agencies to determine feasible traffic and pedestrian improvement measures for the duration of the construction period, and shall maintain an overall construction management plan as described herein. This plan shall be shared with neighborhood representatives and interested neighbors.

#### **a. Public Safety / Site Security**

- The project site will be made secure and sufficiently lit for safety and security purposes. 24 hour security will be provided.
- The area of the new hospital shall be fully fenced using a combination of temporary fencing and pedestrian and traffic barricades. The fence panels and mesh covering shall be maintained in a like-new condition at all times. Approved traffic barriers will be used as required around the site. Where sidewalks are impacted, temporary ramps and barriers will be erected in compliance with city standards to maintain pedestrian safety. Appropriate way-finding signage shall be provided. All sidewalk/on-street parking relocation or rerouting plans are subject to review and approval by DPW, SFMTA, DBI, CalTrans, and/or other agencies having jurisdiction.
- Open excavations, trenches, and the like shall be protected with fences, covers and

railings to maintain safe pedestrian and vehicular traffic passage at all times.

- Any construction debris in service access ways and streets shall be cleaned up promptly, but no less frequently than on a daily basis. A once-weekly survey of an extended area, including across the street from the project area will be made, and any trash and debris resulting from the project will be cleaned up.

- The Contractor shall implement a Site Safety and Health Plan that fulfills the requirements set forth in the California Code of Regulations (CCR) Title 8 Section 3203 Injury and Illness Prevention Plan (Cal/OSHA General Industry Standard) and CCR Title 8 Section 1509.

- The archaeological consultant shall prepare and submit to the Environmental Review Officer for review and approval archaeological monitoring, testing and reporting plans. The ERO shall determine what project activities shall be archaeologically monitored. Should evidence of cultural or historic artifacts of significance be found during project excavation, any excavation which could damage such artifacts shall be halted, and the appropriate agencies and persons shall be notified. The City of San Francisco (through its Environmental Review Officer) shall then review and if

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necessary, recommend specific mitigation measures to be implemented. Copies of reports prepared according to any implemented mitigation measures shall be sent to the Planning Department and to the California Archeological Site Survey Office at Sonoma State University.

***b. Operating Hours, Noise and Vibration Management***

- Working Hours:** Typical work hours will be between 7am and 7pm, Monday through Friday with some Saturday work (generally, 8am to 5pm during the demolition phase and 7am to 5pm thereafter). In the case of special conditions any work outside these hours will be handled through special permits if necessary and notice to the neighborhood if possible. Per the SF Noise Ordinance, work is allowed around the clock, but the Ordinance prohibits work exceeding 5 decibels above ambient levels between 8pm and 7am as measured at the nearest property plane.

- Powered construction equipment is required by the SF Noise Ordinance to meet a noise level standard of 80 dBA at a distance of 100 feet. Impact tools and equipment are exempt from the 80 dBA standard but are required to be equipped with mufflers that are approved by DPW or DBI.

- The Contractor shall make reasonable efforts to have the noisiest activities not commence until 8am or after. Noisy equipment will be kept as far from site boundaries as possible, and portable noise barriers may be used on an as-needed basis.

- The project will not require any pile driving. All shoring beams shall be placed in drilled soil mixed holes.

- To the extent practical, the demolition will begin near the center of the site and proceed to the edges. This will allow the remaining structures to act as noise barriers for a portion of the demolition phase. The use of impact hammers (hoe rams) and jackhammers during demolition will generally be limited to the concrete foundations



which are at or below ground level, further minimizing noise.

- The tower cranes and manhoists will be located near the center of the site, away from the edges of the site. The tower cranes will be electrically powered and not include diesel engines.
- The Contractor shall maintain regular communication with affected neighbors regarding construction activities. The Contractor shall make all reasonable efforts to provide notice of construction-related activities via phone, e-mail, and/or U.S. Mail to neighborhood representatives to apprise them of upcoming operations, street closures (if any), required after-hours disturbances, etc.

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- **Standard Noise measures:** CPMC shall minimize the impacts of construction noise where feasible by implementing the measures listed below in accordance with the San Francisco Noise Control Ordinance. These measures shall be required in each contract agreed to between CPMC and a contractor.
- Construction equipment shall be properly maintained in accordance with manufacturers' specifications and shall be fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All hand-operated impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.
- Construction equipment shall not idle for extended periods (no more than 5 minutes) of time near noise-sensitive receptors.
- Stationary equipment (compressors, generators, and cement mixers) shall be located as far from sensitive receptors as feasible. Sound attenuating devices shall be placed adjacent to individual pieces of stationary source equipment located within 100 feet of sensitive receptors during noisy operations to prevent line-of-sight to such receptors, where feasible.
- Temporary barriers (noise blankets or wood paneling) shall be placed around the construction site parcels and, to the extent feasible, they should break the line of sight from noise sensitive receptors to construction activities. If the use of heavy construction equipment is occurring on-site within 110 feet of an adjacent sensitive receptor, the temporary barrier located between source and sensitive receptor shall be no less than 10 feet in height. For all other distances greater than 110 feet from source to receptor, the temporary noise barrier shall be no less than 8 feet in height. For temporary sound blankets, the material shall be weather and abuse resistant, and shall exhibit superior hanging and tear strength with a surface weight of at least 1 pound per square foot.
- When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that would completely close the gaps, and would be dense enough to attenuate noise.
- **Noise Monitoring:** Long-term (24-hour) and short-term (15-minute) noise measurements shall be conducted at ground level and elevated locations to represent the noise exposure of noise-sensitive receptors adjacent to the construction area. The

measurements shall be conducted for at least 1 week during the onset of each of the following major phases of construction: demolition, excavation, and structural steel erection. Measurements shall be conducted during both daytime and nighttime hours of construction, with observations and recordings to document combined noise sources and maximum noise levels of individual pieces of equipment. If noise levels

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from construction activities are found to exceed City standards (daytime [80 dB at a distance of 100 feet] or nighttime [5 dB over ambient]) and result in complaints that are lodged with the community liaison, additional noise mitigation measures shall be identified. These measures shall be prepared by the qualified acoustical consultant.

66 (TR-1) cont. These measures shall identify the noise level exceedance created by construction activities and identify the anticipated noise level reduction with implementation of mitigation. These measures may include, among other things, additional temporary noise barriers at either the source or the receptor; operational restrictions on construction hours or on heavy construction equipment where feasible; temporary enclosures to shield receptors from the continuous engine noise of delivery trucks during offloads (e.g., concrete pump trucks during foundation work); or lining temporary noise barriers with sound absorbing materials.

- **Vibration control and monitoring:** CPMC shall minimize the impacts of construction noise and vibration where feasible by implementing the measures listed below. These measures shall be required in each contract agreed to between CPMC and a contractor.

- Construction equipment generating the highest noise and vibration levels (vibratory rollers) shall operate at the maximum distance feasible from sensitive receptors.

- Vibratory rollers shall operate during the daytime hours only to ensure that sleep is not disrupted at sensitive receptors near the construction area.

- A community liaison shall be available to respond to vibration complaints from nearby sensitive receptors. A community liaison shall be designated. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to the nearby receptors most likely to be disturbed. The community liaison shall manage complaints resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified acoustical consultant to ensure compliance with applicable standards. The community liaison shall contact nearby noise-sensitive receptors and shall advise them of the construction schedule.

- The preexisting condition of all buildings within a 50-foot radius and historical buildings within the immediate vicinity of proposed construction activities shall be recorded in the form of a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins and shall be used to evaluate damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) before construction. All buildings damaged shall be repaired to their preexisting conditions.

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- As part of the vibration management plan, vibration levels shall be monitored at the nearest interior location of adjacent uses, including Daniel Burnham Court, containing vibration sensitive equipment to monitor potential impacts from the project site. In the event that measured vibration levels exceed 65 VdB and disturb the operation of sensitive medical equipment, additional measures shall be implemented to the extent necessary and feasible, including restriction of construction activities, coordination with equipment operators, and/or installation of isolation equipment.

- A final noise/vibration monitoring report will be submitted to the Planning Department at completion of construction.

**c. Air Quality Management**

- The Contractor will create and implement a site-specific dust minimization and control plan, as required by the San Francisco Department of Public Health. Examples of dust control practices included are street sweeping; water spraying of paved and unpaved areas; covering soil and other material when kept in stockpiles and during truck hauling; and/or the use of portable dust barriers. Dust control activities will be increased during windy periods.

- The following mitigation measures shall be implemented during construction activities to avoid short-term significant impacts to air quality:

**BAAQMD Basic Control Measures**

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water three times daily, or apply (nontoxic) soil stabilizer on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
- Sweep street daily (with water sweepers) if visible soil material is carried into adjacent public streets.

**Additional Construction Mitigation Measures**

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered twice daily.

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- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

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- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 2 minutes, to the extent feasible, or 5 minutes maximum (as required by the California airborne toxics control measures, Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations. Emission-generating equipment will be kept as far from site boundaries as possible.

- To the extent practicable the Contractor will ensure that haul trucks are fully loaded, to reduce the number of trucks entering and leaving the site.

- To the extent practicable, truck egress and ingress routes will be as far from neighboring residents as possible.

- Site construction activities shall be optimized to minimize the hours of equipment operation, and equipment size.

- To reduce risk associated with exhaust emissions of DPM by construction equipment during construction of the Cathedral Hill Campus CPMC and its construction contractor shall implement the following BAAQMD-recommended control measures during construction:

- Where sufficient electricity is available from the PG&E power grid, electric power shall be supplied by a temporary power connection to the grid, provided by PG&E. Where sufficient electricity to meet short-term electrical power needs for

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specialized equipment is not available from the PG&E power grid, non-diesel or diesel generators with Tier 4 engines (or equivalent) shall be used.

- At least half of each of the following equipment types shall be equipped with Level 3-verified diesel emission controls (VDECs): backhoes, concrete boom pumps, concrete trailer pumps, concrete placing booms, dozers, excavators, shoring drill rigs, soil mix drill rigs, and soldier pile rigs. If only one unit of the above equipment types is required, that unit shall have Level 3 VDECs retrofits.

***d. Storm Water Pollution Prevention Plan***

- The contract drawings will include an erosion control plan for implementation on the Project site. The rainy season is from October 15 to April 15; this is when erosion control must be in place.

- The project erosion and sediment control measures shall meet or exceed the requirements of ABAG (Association of Bay Area Governments, the governing agency) and applicable City, County, and State Requirements.
- The site shall be maintained to prevent sediment-laden run-off from entering the storm drain system during construction. The actual mitigation measures that will be implemented are dependent upon the time of year the site work is occurring. Measures that the Contractor may apply include:

- Covering soil stockpiles with tarps.
- Installing silt bags at all impacted existing drainage structures.
- Placing fiber rolls, and/or velocity dams on all exposed slopes (bare soil) to trap sediment on the site.
- Establishing entrances/exits with stabilized tracking mats.

**e. Waste and Material Re-use**

- The Contractor shall remove all surplus soil, unsuitable top soil, obstructions, waste materials and demolished materials from project site and legally dispose of them. All hazardous materials, if any, will go to an EPA approved landfill.
- The existing structures being removed are of concrete construction. The majority of the structures shall be recycled.
- A waste and material reuse plan shall be developed with the Demolition Contractor as those documents are developed. A concerted effort will be made to divert construction waste from landfills by recycling or by returning unused material for use on other projects. When feasible, demolished materials will be salvaged and

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reused or repurposed for other projects. Additional material will be recycled as allowed.

**f. Traffic and Parking Management**

- The Contractor shall prepare a Construction Transportation Management Plan (CTMP) to reduce traffic and congestion from construction workers around the job site on Geary and Van Ness and to ensure access to parking for the local community. CTMP will be submitted to the City (DPW/MTA) for review and approval.
- The project will encourage construction workers to use public transportation, bike, or walk to work if possible.
- There will also be project-wide programs to encourage car pooling for those who find it necessary to ride in a vehicle. A shuttle service shall be provided, as needed, to offsite parking areas that have been identified as satellite parking available to the project.
- The anticipated truck route for deliveries and excavation off-haul, subject to approval by the San Francisco Metropolitan Transportation Agency (SFMTA). Prior to construction, the Contractor shall meet with SFMTA to review sidewalk and parking requirements and construction material staging for each phase of the work.
- The Contractor shall provide the city with anticipated truck routes to and from site for the various stages of construction. These routes may change in order to

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minimize traffic impacts.

- The Contractor shall make reasonable efforts to limit large truck movements to before 3:30 PM to avoid impeding traffic flow at the PM peak period.
- Operations that result in potential queuing or staging of vehicles (e.g. concrete pumping, import/off-haul, material delivery) shall not occur on Post Street from 6:00 a.m. to 8:00 a.m. or after 5:00 p.m.
- The Contractor will utilize proper signage and traffic control for deliveries to and from site.
- All sidewalk/on-street parking relocation or rerouting plans are subject to review and approval by DPW / SFMTA. The Contractor anticipates that parking lanes and sidewalks on the four sides of the project will be required for project use for most of the duration of construction. With the review and approval of DPW/SFMTA, the parking lane on Van Ness between Post and Geary is anticipated to be used for pedestrian traffic traveling under a covered and protected walkway. On other frontages pedestrian traffic will either be rerouted to avoid the closed sidewalks or walkways provided in the parking lanes, similar to Van Ness Avenue. At different times during the construction,

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**NOTE →** Change “Van Ness between Post and Geary” to “California between Palm and Spruce” and “Sacramento between Arguello and Spruce” or the “boundaries of the 3700 California St. Construction Site”. Change other street names to be those of the 3700 California St. construction project streets going forward.

Change construction period timeframes to match 3700 California St. project going forward.  
Change Community Liaison contact name/number and website URL for neighbors' information.  
Fix spelling errors in original document where found.

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parking lanes and sidewalks will be needed for: staging for concrete pours, staging for erection of steel and erection of curtain-wall and glazing, staging for roofing, and installation of utilities. Sidewalks will ultimately be removed and replaced as part of the project. Additionally, the Contractor may need to use some additional portions of the parking / bus lanes as needed for safety and logistics. See also Public Safety / Site Security section.

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**2. Phasing of Work: Implementation of operating principles during specific phases  
(Note: Phases will overlap during transition to subsequent phase.)**

**HOSPITAL CONSTRUCTION:**

**1. Mobilization, Abatement, and Demolition (Months 1 to 8):**

**a. Property surveys, baseline noise and vibration readings** – Within 60 days of the start of abatement and demolition, inspections of the existing buildings including written reports, photographs and/or video recordings shall be completed. This documentation shall serve as record to assess any actual or perceived damage during or immediately after



construction. Similarly, within 60 days of the start of any construction, Contractor shall determine the appropriate locations for vibration monitoring equipment on sensitive neighboring properties and shall install. The monitoring equipment shall include both crack monitors and vibration monitors. Once construction begins, baseline noise and vibration readings shall be taken at selected points around the project site, at representative times of day and thereafter monitored at key periods when high-vibration producing equipment is used.

During the first part of this phase, the existing buildings will be abated of any hazardous material using specific methods for this type of work and will be under the supervision of qualified personnel. Also at this time the Contractor shall make safe all utilities and begin setting up temporary facilities for operation of the project. The buildings are of concrete construction and will be demolished using a long reach excavator with a hydraulic processor. This machine uses a large set of hydraulic jaws to crush the concrete and reduce it to rubble that can be loaded and hauled away. The rubble will kept large for quick removal from the site for recycling.

**b. Public Safety / Site Security:** Before the structural demolition starts, the area of the new hospital will be fully fenced using a combination of temporary fencing and traffic/pedestrian barricades in accordance with the approved traffic plan.

**c. Hours, Noise and Vibration:** Excavators with hydraulic processors, loaders, and trucking will be used during this phase and this is generally the noisiest portion of the project. The noise will be a mix of continuous sources such as engines and intermittent impact sounds such as concrete rubble dropping into truck beds. To the extent practical, the demolition will begin near the center of the site and proceed to the edges. This will allow the remaining structures to act as noise barriers for a portion of the demolition phase. Vibration is likely to occur during removal of the perimeter building foundation. The use of impact hammers (hoe rams) and jackhammers will generally be limited to the concrete foundations which are at or below ground level. Extended hours may be needed to offhaul material.

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**d. Air Quality:** Demolition will begin at the center of the site and progress outwards, such that the building structures along Geary and Post Streets will remain intact until the latter stages of this phase. While they remain standing, these buildings will provide some shielding from emissions to areas along these streets. Such activities shall be increased during windy periods. Stockpiling of excavated material will be performed as far from the site boundaries as possible. To the extent practicable, the Contractor will ensure that haul trucks are fully loaded to reduce the number of truck trips, and trucking ingress and egress shall be away from residential areas. In addition, truck and equipment idling will be limited to two minutes where practicable, or five minutes maximum.

**e. Storm Water:** Erosion control measures will be established during this phase.

**f. Waste:** Proper disposal / recycling of off-hauled materials shall be as described above in the general operating principals.

**g. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on

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the Project.

This first stage of the project will generate the highest flow of truck traffic due to the amount of material removed from the site in the shortest time frame. We will be implementing the traffic plan as approved by appropriate agencies and augment our work to create the most efficient flow for the varying conditions.

**h. Nesting Bird Surveys:** It is not expected that any demolition or construction activities will occur during the nesting season (January 15 through August 15) involving removal of trees or shrubs. But if so, a contractor shall conduct a preconstruction survey for nesting birds. The surveys shall be conducted by a qualified wildlife biologist no sooner than 14 days before the start of removal of trees and shrubs. If no nests are present, tree removal and construction may commence. If active nests are located during the preconstruction bird nesting survey, the contractor shall contact Dept. of Fish and Game for guidance.

## **2. Shoring and Excavation (Months 9 to 14):**

Shoring of the excavation will be conventional using soldier beams and lagging with tiebacks.

66 (TR-1) cont. The soldier beam holes are drilled with a soil mixing machine creating a mixture that the beam will be pushed down into. The excavation of material will be done with excavators, trucks, and smaller equipment to move material. The excavation varies from 20ft to 60ft in depth.

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**a. Public Safety / Site Security:** same as above.

**b. Hours, Noise and Vibration:** Noise will primarily come from engines of the equipment. The shoring method will help reduce maximum noise levels since impact driven piles will not be used.

**c. Air Quality:** The Site will conduct dust control activities such as regular street cleaning and dust suppression by watering, covering or applying non-toxic soil stabilizers. Dust control activities will be increased during windy periods. To the extent practicable, equipment operation such as truck loading and stockpiling of excavated material will be performed in areas away from the site perimeter. Also, to the extent practicable the site will ensure that haul trucks are fully loaded to reduce the number of trucks entering and leaving the site, and that trucking ingress and egress will be away from residential areas. In addition, truck and equipment idling will be limited to two minutes if practicable, or five minutes maximum.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** Some small amount of debris will be generated.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

Trucks will be driven in and out of the excavation to off-haul material using a dirt ramp. This process will continue until the ramp sections of the excavation are reached, at which point, the ramp will be removed as the equipment works its way out of the excavation site.

## **3. Foundation / Concrete Walls (Months 15 to 30):**

This phase consists of pumping and placing concrete spread footings and poured in place concrete walls. The concrete walls will be constructed after the start of steel erection as the

two are tied together. The two tower cranes will be erected during this phase.

**a. Public Safety / Site Security:** same as above.

**b. Hours, Noise and Vibration:** Noise will primarily come from engines of the concrete trucks, pumps and placing equipment.

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**c. Air Quality:** Early in this phase the soil exposed by the excavation will be covered by concrete and base rock. The potential for dust emissions from soil will be greatly reduced, and will be minimized further by measures listed above. Usage of emission-generating equipment will be minimized to the extent practicable, and conducted as far from site boundaries as possible.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

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cont. **e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

**4. Steel Erection/Concrete Decks (Months 18 to 34):**

During this phase, the Contractor will be delivering and erecting structural steel, setting metal decking, delivering and placing reinforcement steel then pouring the floor and roof decks. Tower cranes are the primary method of handling material. Concrete pumps and trucks will be used.

**a. Public Safety / Site Security:** Fencing will be maintained

**b. Hours, Noise and Vibration:** Tower cranes will be the primary means of setting steel. Most noise will still be from engines. The tower cranes and manhoists will be located near the center of the site, away from the edges of the site. The tower cranes will be electrically powered and not include diesel engines.

**c. Air Quality:** To the extent possible, emission-generating equipment will be operated away from the site perimeter (Note, though, that the concrete pumping equipment must be operated outside the building perimeter).

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream.

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**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

**5. Exterior Enclosure (Months 28 to 39):**



During this phase the Contractor will be erecting the curtainwall and metal panel system. We will begin installing Mechanical, Electrical, and Plumbing (MEP) systems at this stage.

**a. Public Safety / Site Security:** same as above

**b. Hours, Noise and Vibration:** Noise will be limited to moving personnel and materials around the site and construction equipment such as screw guns and nail guns.

**c. Air Quality:** same as above.

**d. Storm Water:** Erosion control measures will be maintained during this phase.

**e. Waste:** The Contractor will be using debris boxes that will be delivered and removed (daily to weekly) as required by waste stream. Multiple boxes will be used to allow for onsite separation of recyclable materials (metals, etc...)

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

#### **6. Interior Buildout and Final Sitework (Months 26 to 59):**

In this phase, the Contractor will begin the interior finish work such as electrical and mechanical fixtures, sheetrock and other finishes. The Contractor will complete the connection of the building to major utilities (sewer, water, electricity) and perform all testing of systems. Also during the final phase, the Contractor will remove and replace the sidewalk. After the hardscape is installed, the landscaping will be installed. The final months of this phase will include move-in of equipment.

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**a. Public Safety / Site Security:** Fencing will be maintained for protection of the public.

**b. Hours, Noise and vibration:** The interior finish work will occur within the building shell and noise levels will be significantly reduced by the exterior skin of the building. Removal and replacement of existing sidewalk surfaces will be similar to normal street work in San Francisco involving excavators, jack hammers, backhoes, and concrete pumps and trucks.

**c. Air Quality:** Dust emissions from activities such as the installation of utilities, sidewalks and landscaping will be managed as outlined in the Dust Control Plan. To the extent practicable, usage of emission-generating equipment will be minimized and performed away from the site boundaries. Truck and equipment idling will be limited to two minutes if practicable, or five minutes maximum.

**d. Storm Water:** Erosion control measures shall be maintained as needed during this phase.

**e. Waste:** The Contractor shall use debris boxes that will be delivered and removed (daily to weekly) as required by waste stream. Multiple boxes will be used to allow for on-site separation of recyclable materials.

**f. Traffic, Parking:** The contractor shall develop and execute a site specific Construction Traffic Management Plan in accordance with all local governing agencies including but not limited to flagman and traffic control plan. The plan will be designed to minimize the interface wherever possible between Public and Site traffic, and reducing the number of deliveries where practicable, including the staging of deliveries such that the volume of traffic is kept as even as possible avoiding peaks, and controlling vehicular movements on the Project.

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### TUNNEL CONSTRUCTION AND COORDINATION WITH MEDICAL OFFICE BUILDING, OTHER PROJECTS

**Tunnel:** The tunnel connecting the new hospital and the MOB will be constructed during the shoring/excavation and foundation phases of the hospital project. A majority of the work will happen during the standard working hours for the project. The exception will be the first stage prep work as described below and the resurfacing stage upon completion of the tunnel, both of which will occur at night to reduce impacts on traffic along Van Ness.

**Tunnel Construction Phasing (Months 12 to 20)** - The new hospital and medical office building are located across from each other separated by Van Ness Avenue. A pedestrian tunnel is to be constructed between them running under Van Ness Avenue.

66 (TR-1) cont. The first stage of the tunnel construction will be to provide a steel roadcover that will bridge over the future tunnel excavation. This work consists of placing posts into drilled holes drilled in a regular pattern across the width of Van Ness Avenue.

Concrete planks are then placed across the posts to provide a solid surface for the roadway. This surface work will be done outside of normal hours due to the traffic flow on Van Ness Avenue. The tunnel will then be excavated and constructed from below ground with no surface impact, starting at the Hospital site and working toward the MOB site. The final portion of the excavation and structural work will be to restore the roadway. Interior completion of the tunnel shall occur during the final months of construction of the hospital.

**Medical Office Building:** The Medical Office Building project is not anticipated to start within the first three months of the Hospital Project. When that project is ready to start, a similar Construction Management Plan will be prepared, and the construction activities of that project will be coordinated with the Hospital project to minimize overall disruption to the neighborhood.

**Other Projects:** Similarly, should other projects occur proximate to the Hospital project site (such as the proposed Van Ness Bus Rapid Transit project), the Construction Management Plan will be reviewed and modified if necessary to minimize overall disruption.

## CPMC CATHEDRAL HILL HOSPITAL CONSTRUCTION MANAGEMENT PLAN FINAL 09/11/2013

20

### 3. Neighborhood Liaison / Communications with neighborhood

A website shall be maintained by the Contractor and the Construction & Community Liaison that will provide up-to-date information about project construction activities, potential traffic impacts, contact information, etc. The website address is [www.rebuildcpmc.org](http://www.rebuildcpmc.org).

To submit a written question or comment please visit

<http://rebuildcpmc.org/contact/>

For questions or comments related to items on the construction activity logs please reference the contact information below;

#### Construction Coordination Hotline:

415 517 3578

#### Construction & Community Liaison:

Paul Klemish

1200 Van Ness, San Francisco, CA 94109

Office - 415 415 762 7435, Mobile - 415 517 3578

In addition, a newsletter shall be prepared and distributed to affected neighbors. Community

66  
(TR-1)  
cont. | meetings to present and discuss ongoing project issues will occur no less than quarterly, with  
locations to be determined



67  
(HWQ-1)

Construction Schedule and Equipment List  
3700 California  
San Francisco, California

Hauling Trips	Block A			Block B			Block C		
	Average Worker Trips trips/day	Average Material Trips trips/day	Total Hauling Trips total trips	Average Worker Trips trips/day	Average Material Trips trips/day	Total Hauling Trips total trips	Average Worker Trips trips/day	Average Material Trips trips/day	Total Hauling Trips total trips
Demolition	48	0	832	48	0	1,696	48	0	1,088
Site Preparation & Grading	38	0	0	38	0	0	38	0	0
Excavation & Shoring	28	0	448	28	0	932	28	0	496
Drainage/Utilities/ Subgrade	38	0	0	38		0	38	0	0
Building Construction (New Construction)	29	5	0	104	16	0	59	9	0
Sitework	30	0	280	30	0	480	30	0	400

With all 3 blocks totaling to a LARGE VOLUME of 6,552 trips, of which many are for hauling trucks, it is likely potential of loose dirt to adhere to the vehicle tires and the residue left on the surface streets that will eventually be washed into the storm drains. There needs to be MITIGATION MEASURE for

#### HYDROLOGY & WATER QUALITY – not analyzed in DEIR:

Add: All excavated dirt left in piles shall be covered so as not to let any of it run off through wind and rain or watering down into the storm drains. Tires of construction-activity-related vehicles shall be washed off prior to leaving the site so as not to contaminate nearby residences and merchants. Some merchants sell groceries and other materials out on the sidewalk that will end up in people's homes and the contamination could become a health and safety issue.

See MITIGATION via "Construction Management Plan". This project will be one of the largest projects under construction to ensure that the City is taking all impacts with an abundance of caution. Should biological species get affected from the water and other contaminants, while not necessarily a CEQA requirement, all mitigation measures including those related to "good neighbor" gestures would be appreciated by keeping in mind the City's officially adopted "Precautionary Principle".

Page 4.4-18, "Sensitive Receptors": "the population subgroups that are sensitive to the health effects of air pollutants include the elderly and the young.; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. The air district defines sensitive receptors as children, adults, and seniors who occupy or reside in residential dwellings, schools, daycare centers, hospitals, or senior-care facilities." With this in mind, to MITIGATE as much as possible such exposure, request that construction-related trucks and equipment (bulldozers, etc.) \*NOT\* go down Parker Avenue in front of the 150 Parker School which caters to small children. Another MITIGATION measure would be to have a hotline 24-hours to report violators. An additional MITIGATION measure would be for the drivers to refrain from the primarily residential streets such as those south of California to get to and from the project site. Use of the main commercial streets such as Divisadero, California, Masonic, Arguello should be utilized over the smaller residential streets.

#### Page 4.4-19 (continuation of "Sensitive Receptors"):

While the DEIR refers to some of the "Sensitive Receptors" and calls them out by name, the DEIR \*does not call out\* the "One Fifty Parker Avenue School" by name even if within the "Project Boundary and Modeling Extent". It is just as far from the site as the Laurel Hill Nursery School depending on which Block one chooses to measure the distance of effect.

The One Fifty Parker Avenue School is less than 2 blocks south of the site. Even the 3333 California DEIR revised the FEIR to include the One-Fifty Parker Avenue School to cover the pre-K children and potential exposure. The One Fifty Parker School has an outside playground that is street-level beyond a low picket gate so the air flows freely through there. As the particulates get to the lungs of people lower to the ground than up high, it may be better to keep most if not all of the construction debris hauling trucks off this 100-block of Parker. There is also a disabled young child living as a resident near the school. Other residents include young children as well as the elderly. Here is the text on this page:

June 2019

Environmental Setting and Impacts  
Air Quality68  
(AQ-1)  
cont.

Existing receptors evaluated in this analysis include a representative sample of known residents (children and adults) in the surrounding neighborhood and other sensitive receptors (school children, nursing home patients, etc.) located in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks. The project is adjacent to residential receptors in all directions. In addition to the residential receptors, other sensitive receptors were identified within 1,000 meters of the project site. The closest non-residential sensitive receptors include the Claire Lilienthal Elementary School Presidio Hill School, Temple Emanuel Preschool, Montessori Children's House of the West Coast, JCCSF Louise and Claude Rosenberg Early Childhood Center, San Francisco Boys and Girls Home at the Euclid House, and the Laurel Hill Nursery School. Additionally, there are medical offices in the commercial zones on California Street located close to the project site. Medical office buildings are not considered to be sensitive receptors because the duration of time that visitors to these facilities spend onsite is typically limited to a few hours. The citywide modeling effort, discussed under *San Francisco Modeling of Air Pollution Exposure Zones*, p. 4.4-13, evaluated all sensitive receptors as residential receptors because they have longer exposure durations and are therefore expected to have greater health impacts. The locations of sensitive receptors surrounding the project site are presented in Figure 4.3-2, *Sensitive Receptor Locations in the Immediate Vicinity of Project Site*, in Section 4.3, *Noise*.

This page also refers back to Page 4.3-14, Figure 4.3-2, "Sensitive Receptor Locations in the Immediate Vicinity of Project Site" but only goes out 600 feet in radius from the site. I believe that 2 blocks is not too far to explicitly mention the One Fifty Parker Avenue School as a "Sensitive Receptor" and to show it on a map that would be within 1/4-mi. of the construction site.

Most recently, the "Comments and Responses" (C&Rs) document to the 3333 California St. EIR was revised to *\*include\** the One Fifty Parker Avenue School as a "sensitive receptor" and should be included in the 3700 California St. DEIR as being much closer to its project than 3333 California which is mentioned in it. The School is only less than 2 blocks away southward.





**Figure 4.3-2**  
**Sensitive Receptor Locations in the Immediate Vicinity of Project Site**

Page 4.4-27, Figure 4.4-1, "Project Boundary and Modeling Extent": This Figure shows the extent of the impact and mitigation for the DEIR and shows an area of 3,000 feet. The DEIR does not mention the "One Fifty Parker Avenue School" even though part of the modeling extent. Please show & make clear reference to it in the FEIR.

The 3330 Geary project was also a known project since 2017 that has not been called out in the June 13, 2019 release of the 3700 California St. DEIR. It proposes 41 units of housing with 41 vehicle parking spaces on the Geary Blvd. transit corridor between Parker and Commonwealth Avenues.

What is the determination to leave certain foreseeable projects off the list to be considered in an EIR? This might impact the additional vehicles coming to the streets queuing south of California St. onto the JPIA streets.

69  
(AQ-1)  
cont.



(This is the same picture as on [Page 4.4-27](#) – I used this from the Appendix so it says “Figure 2”. Ramboll’s scale is in meters but this is equivalent to the 3,000 feet shown in [Figure 4.4-1](#) on [Page 4.4-27](#).)

70  
(AQ-2)

[Page 4.4-36, “Fugitive Dust”](#): See also comments earlier from [Pages 4.4-18 & -19](#) on “Sensitive Receptors” as the “fugitive dust” can be brought down with the hundreds of construction-related trucks and equipment with toxic and harmful dust from the site being carried down many of the nearby streets and especially in the areas of young school children as at 150 Parker Avenue School not mentioned in the DEIR but it’s only 2 blocks away and in the “modeling extent” of 3,000 ft. but not shown on the 600-ft. modeling on [Page 4.3-14, Figure 4.3-2](#).

See “Sensitive Receptors” [Figure 4.3-2, Page 4.3-14](#) under [Page 4.4-19](#) above.

[Page 4.4-37](#): “...the site-specific dust control plan submitted to the Director of Public Health would be required to include a map showing the locations of sensitive receptors.” Please provide this map not in the DEIR.

This page also states, “...as specified in section 106.3.3.6.3 of the building code: designate an individual who will be responsible for monitoring compliance with all active construction areas to prevent dust from becoming airborne...establish a hotline for surrounding community members who may be affected by project-related dust; limit the area subject to construction activities at any one time.; install dust curtains and windbreaks at the property lines, as necessary, limit the amount of soil in hauling trucks to the size of



70  
(AQ-2)  
cont.

the truck bed and secure with a tarpaulin; enforce a 15-mile-per-hour speed limit for vehicles entering and exiting construction areas, sweep affected streets with water sweepers at the end of the day; install and use wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; and sweep off adjacent streets to reduce particulate emissions.”

If the construction-related truck traffic and construction equipment traffic can carry particulates and potentially hazardous substances down the streets south of California which are within the 3,000-ft. “modeling extent.” Should any of these streets be used for the construction-related truck traffic and construction equipment traffic, they need to be swept daily as the data shows HUNDREDS OF TRIPS. It is important to do the cleaning of the streets daily should the trucks use the streets south of California from the construction site so that the residents and visitors to the area do not carry the contaminants into their own homes or into the children’s classrooms for the blocks that have the schools for young children. Yes, the hotline is a good idea, but there needs to be a constant pro-active cleaning measure as a MITIGATION measure documented so this is a request.

Page 4.4-39, “Criteria Air Pollutants”:

71  
(AQ-2)

Seems like a lot of construction-related equipment will be creating particulate matters that could lodge in people’s lungs. Diesel is the worst so use of electric would be better. Maybe the rate of lung cancer and other cancers in the area that develop – especially in clusters -- could be a good study for medical students in the near future.

Page 4.4-40: “As discussed in Approach to Analysis, p.4.4-30, the CPMC LRDP EIR’s air quality analysis assumed that the hospital uses at 3700 California Street would remain in operation.” The 3700 California St. hospital use had ceased and although the site is being re-purposed to residential, the base physical environment is not the same today in terms of pollution level.

72  
(HU-1)

The 3700 California St. DEIR continues the above statement with, “Therefore, it is appropriate in this analysis to subtract emissions from existing hospital uses when determining the net impact of the proposed project on air quality.” It does not make logical sense from a vacant use to high-unit residential use with many vehicle parking spaces but maybe logic is thrown out the window for CEQA.

Page 4.4-42, Table 4.4-6, “Emissions from the Proposed Project During Construction and Operations”: All the numbers for the 3700 California St. Project show as negative with “credits” from the old hospital use. While it may or may not be illegal to do an environmental impact report like this to show very little or no impact, this does not help the air quality in the area for the health of the young children and elderly residents. People living on the transit corridors will get more of the pollution and a lot of it will flow eastward to other “sensitive receptors”. While the DEIR may conclude that there is no impact on the whole, I think the sensitive receptor group will have a lower quality of life. So much for livability?

If the hospital emissions were not used to negate the actual calculated measurements \*without\* offsets used from assuming the hospital is still in use, what would those be? Please provide impact on the JPIA streets (California to Geary, between Palm and Parker Avenues).



TABLE 4.4-6. EMISSIONS FROM THE PROPOSED PROJECT DURING CONSTRUCTION AND OPERATIONS

Year	Average Daily Emissions from Operation and Construction (lb/day) <sup>a, b, c</sup>			
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2021</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	2.5	25	1.3	1.0
Year 2021 Net Emissions	-30	-24	-27	-8.0
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2022</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	2.0	14	1.0	0.59
Year 2022 Net Emissions	-30	-34	-27	-8.4
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2023</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	40	9.1	0.71	0.41
Project Operations	5.1	1.2	1.2	0.38
Year 2023 Net Emissions	13	-38	-26	-8.2
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No
<b>2024</b>				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	0.20	2.2	0.11	0.072
Project Operations	18	3.8	4.23	1.3
Year 2024 Net Emissions	-14	-42	-24	-7.6
Significance Threshold	54	54	82	54
Above Threshold?	No	No	No	No

Source: Ramboll, 2018; Table 8 and Table 13 in EIR Appendix H.

Notes:

- <sup>a</sup> Operational criteria air pollutant emissions were estimated for Block C operation in 2023 and full project buildout in 2024. Average daily operational emissions were calculated from values listed in EIR Appendix H, Table 13. Emissions from the existing hospital and medical uses were subtracted from the project's emissions for each year, starting at the beginning of construction.
- <sup>b</sup> Average daily construction emissions were calculated from values listed in EIR Appendix H, Table 8, by summing all emissions in a given phase of the construction program and dividing by 250 construction days in a year.
- <sup>c</sup> Average daily construction emissions were added together with average daily operational emissions.

73  
(AQ-3)

Page 4.4-46: “However, no health risk analysis was conducted for mobile sources related to operation of the proposed project because the project would result in an overall decrease in the amount of traffic on surrounding roadways.” As commented earlier, the DEIR admits that traffic on California St. would increase. While there are some streets that will have a decrease in the amount of traffic, there are other streets like Parker Avenue which will increase in traffic by at minimum, 38% (See Page 4.3-46) per the DEIR. What is the health risk for Parker Avenue, with the children’s school at 150 Parker Avenue?

74  
(TR-4)

Page 4.4-53: “Parking would be provided for the proposed project’s residences in accordance with the parking requirements in the planning code (1.5 to 2.0 stalls per unit).” The Planning Code changed so that the City has no minimum parking requirements. With the increase in traffic down Parker Avenue, I now question the vehicle numbers and parking spaces for this project. Is it too much and causing more traffic or even if reduced, the streets south of California on Parker, etc. would still get the traffic? With all the traffic in the area that appears to be headed for the streets south of California on Parker Avenue, how will the walkability of the area be impacted? How many people cross Euclid and Parker Avenue daily? Where is the data to analyze impact in this area which is still within the “modeling extent” referred to in the DEIR? Please provide.

75  
(TR-4)

Page 6-25, Impacts, “Transportation and Circulation”: “...Improvement Measure 1-TR-B, Monitoring and Abatement of Queues, would not be recommended for this alternative because there are no existing queuing concerns in the area, and the same general driveway configurations would be maintained.” It is untrue that the same driveway configurations are maintained because the driveways on Maple were staggered rather than nearly opposite each other and the driveways were not used in the hospital use on Maple for vehicles out of the building on that block to go out Maple. In addition, the SHARED use by BOTH LOADING and PASSENGER VEHICLES would potentially cause the queuing with the number of vehicle parking spaces in Blocks B and C. Today the queues may not exist, but the proposed project configuration with all the parking at Blocks B and C are not used in the analysis but rather an old CPMC Hospital Use with no passenger vehicles going out onto Maple from the “Block B” location existed. When something does not sound logical, it cannot be true. I think that when the queues start up, which I think would occur, there needs to be this MITIGATION MEASURE TO STILL BE PUT IN PLACE, please. See also Page 4.2-20 earlier.

76  
(TR-4)

Appendix F, Page 90:

I believe the impact of **69% increase over the neighborhood baseline for VMTs**, while not determined in this DEIR as “SIGNIFICANT,” is high for a residential project on a transit corridor.

76  
(TR-4)  
cont.

The first check involves using auto availability per household as a proxy for the VMT per capita. **Table 14** shows that if auto availability and VMT per capita were correlated, the expected increase in VMT per capita would be around 69 percent above the neighborhood baseline. While this would represent a substantial increase in VMT per capita above the neighborhood baseline, it would not reach the established threshold for a significant VMT impact.

90

Potential MITIGATION might be to have zero to 1 parking space for smaller units like studio and 1-BR & have the 2-BR+ “family friendly” units be recalculated to 1.5 parking spaces. Would that bring the count and the increase in VMTs in the neighborhood down lower and potentially have less impact on the surrounding streets and to help with the goal for safety in “Vision Zero”?

77  
(SH-1)

Initial Study, in the DEIR Appendix, Page 55: Concludes impact of SHADOW from the proposed 3700 California St. Project will not affect the places as determined under CEQA.:

### *Conclusion*

As discussed above, the proposed project would not create new shadow that substantially affects existing outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation is necessary. This topic will not be discussed in the EIR.

June 2019  
Case No. 2017-003559ENV

55

3700 California Street  
Initial Study

While the DEIR concludes that “This topic will not be discussed in the EIR,” and though CEQA addresses shadows only in a narrow application (e.g. on outdoor recreation areas or on public parks), I request the Planning Department to consider all neighborhood impacts prior to approval of the project. This 3700



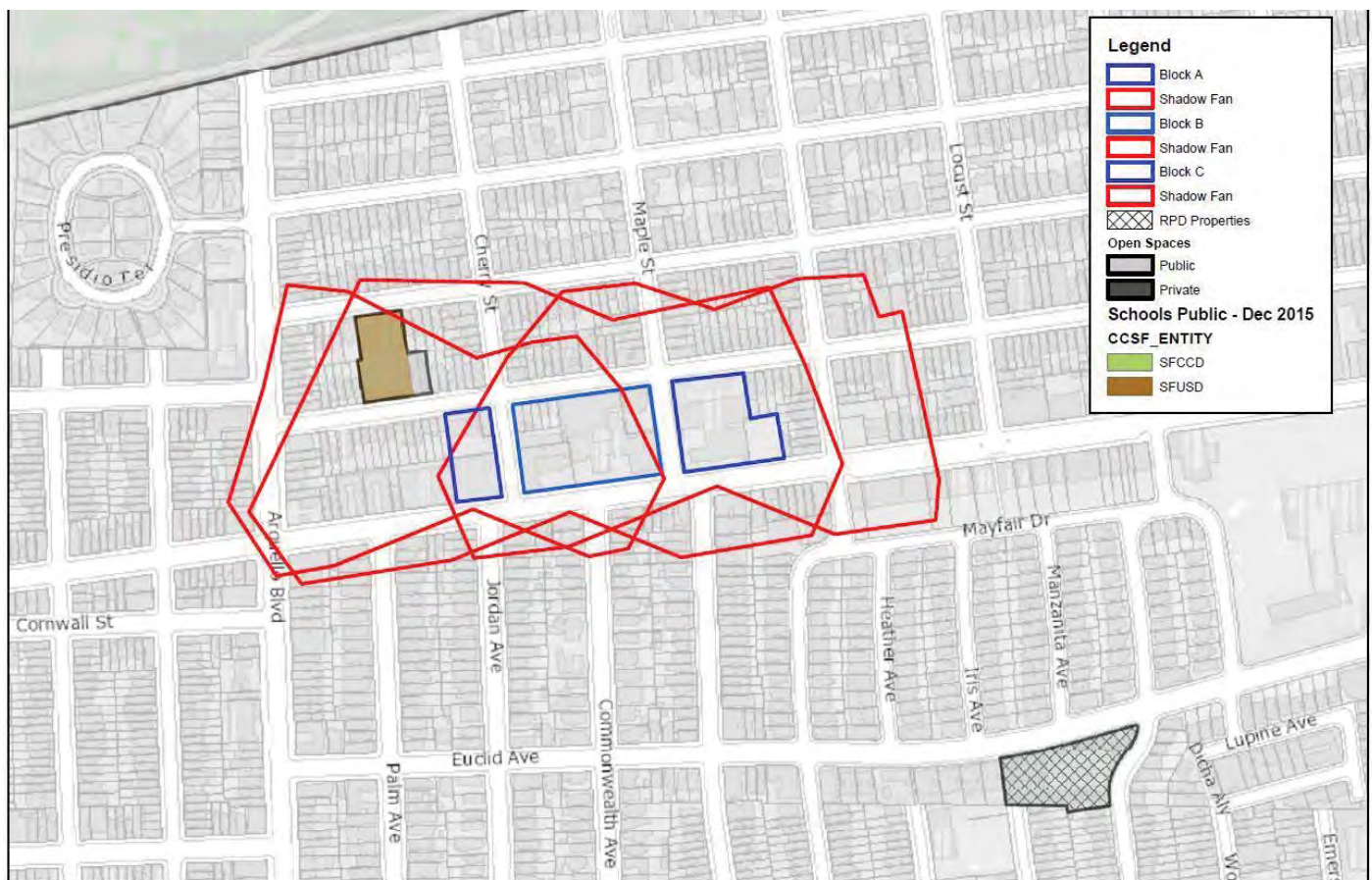
California St. Project covers about 4.9 acres or about half the size of the eastward project at the UCSF Laurel Heights (prior Firemen's Fund Insurance site) at 3333 California on about 10 acres.

The "Shadow Study" in the 3700 California St. Project's Preliminary Project Assessment (PPA) – 2017-003558PPA -- only considers 80-92 ft. tall buildings. Again, I request a shadow map of how the building would cast shadows with the "rooftop appurtenances" on the proposed "80-92 ft." tall buildings.

The DEIR rates the SHADOW impact at NI for CEQA purposes and lists "Mitigation Measure M-CR-1" to take steps to ensure protection for the Marshall Hale building but NOT related to SHADOW.

Below is the "Shadow Study" in the 3700 California St. PPA showing shadows falling on the California eligible Jordan Park Historic District. It is unclear 1) for what time of year this shadow fan map is for, 2) if this is the best-case or worst-case scenario for the shadow impact, and 3) if the shadow fan shows the shadows with the "rooftop appurtenances" added in for the buildings on Blocks B & C.

77  
(SH-2  
cont.



Title: 3700 California Street - 2017-003559PPA  
Comments: Building height modeled at 76 feet for Block A and 96 feet for Blocks B and C.  
Printed: 23 June, 2017

The City and County of San Francisco (CCSF) does not guarantee the accuracy, adequacy, completeness or usefulness of any information. CCSF provides this information on an "as is" basis without warranty of any kind, including but not limited to warranties of merchantability or fitness for a particular purpose, and assumes no responsibility for anyone's use of the information.

MITIGATION MEASURES additions to text proposed:

NOISE:

78  
(NO-1)

Page S-7, Mitigation Measure M-NO-1, "Construction Noise Control":

MITIGATE further with:

\* The "Construction Management Plan" details (such as one from the CPMC Project) mentioned above.

\* Change “A sign posted onsite describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction.” To “**Signs** shall be posted around the construction site at major intersections for the duration of the project describing....”

\* Change any other “A” sign to “Signs” to be posted around the construction site.

\* Add “Signs posted around the construction site shall have the hours of construction clearly stated.” (e.g. 7AM – 8PM)

78  
(NO-1)  
cont.

\* Add “Designation of an onsite construction complaint and enforcement manager for the project shall be <insert name> who may be reached at <insert phone number(s).” This information shall be visible on signs around the construction project for the duration of the project.

\*Add “Onsite Construction Manager shall request night noise permits from 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.”

\* Add “Monitoring stations shall be required to be set up to provide continuous noise monitoring at the most-impacted receptors to the south (along California St.), Also Sacramento St. nearest residential land use. See Page 4.3-14, Figure 4.3-2 “Sensitive Receptor Locations in the Immediate Vicinity of Project Site.” Alerts from the Onsite Construction Manager or other designated person(s) shall be given to Planning in the form of a report (see below) and exceedances shall be remedied with further portable barriers if the noise level exceeds allowable limits of 10dBA above established ambient levels. Faulty equipment shall be fixed or replaced.”

\* Add “Sponsor shall submit a Noise Control Plan to Planning Department and the Construction Manager or other designated person(s) shall on a weekly basis make available to the Planning Department a noise monitoring log report made available to the public. The log shall include any complaints in connection with an exceedance or not as well as calls to 311 and DBI. If there is any incident that exceeds allowed levels, the report shall be submitted to the Planning Department Development Performance Coordinator or his assignee within 3 business days following the week in which the exceedance occurred. The report shall list the corrective actions taken as well and all reports shall be submitted at the completion of each phase of the construction job. Reports shall be made accessible via a link on the Planning website.

79  
(AQ-1)

\* Add “De-electrification of the 33-Stanyan line will be supplemented by a clean-air bus from <insert period date> to <insert period date> notices for the riders. Has the use of the bus diesel been calculated in the AIR QUALITY SECTION? If the 33-Stanyan line will not be replaced with a diesel bus, then this will not be an issue. The driver may have to stand in construction dust if he is only taking the poles off and on to operate the bus but that will expose the riders to the construction dust and its spread. How will this be handled?”

80  
(GEO-1)

#### GEOLOGY:

Page S-19, Mitigation Measure M-GE-4, “Inadvertent Discovery of Paleontological Resources”: MITIGATE further with “...should fossils be encountered, and the laws and regulations protecting paleontological resources.” Change “within 25 feet of the find” to “within **50** feet of the find”.

Paleontological finds are not restricted to being found only within 25 feet of an initial find. A broader radius would ensure that any resources are not compromised nor overlooked.

81  
(TR-3) While the "Contractor Transportation Parking Plan" is an attachment here, I want it included as part of my comments of this document because I could not technically (computer-related issue) embed it within this document of comments. Thank you.

Respectfully submitted,

/s

Rose Hillson

Jordan Park Improvement Association Resident

Cc: Planning Commission, Commissions Secretary Ionin, Director John Rahaim

ATTACHMENT: "CONTRACTOR TRANSPORTATION PARKING PLAN"





# Contractor Transportation and Parking Plan

Contractor Transportation and Parking Plan	
Date Created/Modified: July 18, 2014	
Created/Modified By: Patrick M. Rodriguez Job Title: Parking Manager P: (707) 704 – 5219 E: prodriguez@herrero.com Signature:	Reviewed/Approved By: Paul Klemish Job Title: Director of Business and Risk Management P: (415) 517 – 3578 E: pklemish@herrero.com Signature:
Start Date: January 1, 2015	End Date and Time: Until Superseded or January 1, 2020

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## Introduction

Sutter Health California Pacific Medical Center (CPMC) plans to construct a new 274-bed Hospital and Medical Office Building (MOB) at the Van Ness & Geary Campus site located between Van Ness Avenue, Geary Boulevard, Post, and Franklin Streets. An underground tunnel will connect the Van Ness & Geary Campus Hospital and MOB. A replacement hospital will also be constructed at the St. Luke's Campus, and is located between Cesar Chavez, Guerrero, 27<sup>th</sup>, and Valencia Streets. Sutter Health CPMC is constructing the new facilities in response to Senate Bill 1953, requiring hospitals to remain operational after a major earthquake.

All three projects will take about five years to complete construction, and will open in 2019. The Environmental Impact Report's (EIR) Mitigation Measure TR-55, requires the creation and implementation of a Transportation Management Plan (TMP) for the Van Ness & Geary Campus to minimize parking impact. A TMP is not required for the Replacement Hospital at the St. Luke's Campus, however this program will be implemented for both campuses. This document illustrates those measures the Construction Manager/General Contractor (CM/GC) will enact to minimize disruption and limit congestion for motorists, pedestrians, bicyclists, and transit near the project sites. A highlight from Mitigation Measure TR-55, in regards to the aforementioned, is below for reference:

### Mitigation Measure TR-55

*CPMC shall develop and implement a Construction Transportation Management Plan (TMP) to anticipate and minimize impacts of various construction activities associated with the Proposed Project.*

*The Plan would disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation is maintained to the extent possible, with particular focus on ensuring pedestrian, transit, and bicycle connectivity. The program would supplement and expand, rather than modify or supersede, any manual, regulations, or provisions set forth by CALTRANS, SFMTA, DPW, or other City departments and agencies. Specifically, the plan should:*

*Identify construction traffic management best practices in San Francisco, as well as others that, although not being implemented in the City, could provide valuable information for the project. Management practices include, but are not limited to:*

- a. Identifying ways to reduce construction worker vehicle trips through transportation demand management programs and methods to manage construction work parking demands.*

### IDPT Goal

In April 2014, a transportation survey was disseminated to project office and field personnel. A total of 100 individuals were surveyed with 89% being office personnel, and 11% being field personnel. The data set for field workers is currently too small to accurately understand any trends; therefore, the survey will continue to be disseminated to office and field personnel as they arrive on the project site. By the end of the first quarter in 2015, it is expected that a good baseline will have been established. Based on the data currently collected, it has been estimated that approximately 47% of all project personnel already use an alternate means of transportation to and from the project site. Maintaining and increasing this percentage is the purpose of this program. The ideal end state of the Contractor Transportation and Parking Plan (CTPP) is:

By identifying and managing the use of existing parking capacity around the jobsite, the goal of the IPDT is to increase the current alternate transportation usage by project personnel from 47% to 65%. The plan will be implemented by creating a work environment that highly encourages the use of an alternate means of transportation and recognizing those that do. The desired outcome is to reduce congestion of city streets and minimize the impact on parking availability for local merchants, residents, and visitors.



## Parking Information

### General Guidelines for Parking

All project personnel will be briefed on the General Guidelines for Parking by the Parking Manager on their first day before starting work on the project site. An attempt will be made to keep the brief as short as possible, as to not impact productivity for the day, while maximizing the output of need-to-know information. The brief will include the following:

1. Parking Expenses
  - a. Parking will be provided and paid for by the CM/GC, provided all rules in the Parking Pass Acknowledgement are followed. See Appendix D for Parking Pass Acknowledgement & Sign-out Form. No reimbursement of any form for parking payments *outside of designated areas* and/or tickets will be provided by the CM/GC.
2. Restrictions on Parking
  - a. Project personnel will not be allowed to park on the street near the project site for any period longer than fifteen minutes. The fifteen minute grace period is to be used for pick-up/drop-off purposes only. This includes any company vehicles that have been issued a Contractor Parking Permit. This directive will be enforced, and a fine will be charged to the employer, should the rule be broken. This fine is due to the project's commitment, to the City of San Francisco, to not park on the street for the duration of the project. Any funds collected through fines are nonprofit, and will be recycled for use elsewhere in the project.
  - b. Parking on the project site, while it is under construction, will be at the discretion of the project's General Superintendent, but will otherwise not be allowed.
  - c. Stopping in travel lanes, for any duration, to pick up or drop off passengers and/or equipment is not allowed. Violators will be cited.
3. Parking Pass Acknowledgement
  - a. A parking pass will not be issued until the sign out form is completely filled out.
  - b. Parking placards will be displayed and easily visible through the front windshield while the vehicle is in the parking garage/lot. Project personnel will have the option of displaying the placard on the dashboard or rear-view mirror.
  - c. Any vehicle parked in a designated space, and not displaying a parking pass will be towed immediately at the owner's expense. It is highly encouraged that project personnel report vehicles not displaying a pass to the Parking Manager. Every effort will be made by the CM/GC to ensure that non-project personnel will not park in the designated spaces.
  - d. There will be a fee associated with losing or breaking a parking pass. This fee is to cover the cost to replace electronic key cards and placards, and will be charged to the employer. Stolen passes will be addressed on a case by case basis.
  - e. Passes must be returned to the Parking Manager, or other designated person, within one week of the employees' last day on the job site; any passes not turned in will be considered lost or broken and a fee will be charged to the employer.
  - f. A copy of the Parking Pass Acknowledgement Form will be provided to each individual signing for a parking pass or group of passes.
  - g. Project personnel who will be carpooling will only be issued one parking pass for the group. It is their responsibility to remember the pass if switching vehicles.
  - h. Should the occasion occur that a parking pass is forgotten at home, left in another vehicle, or the regular driver of a carpool calls in sick for the day, etc., a temporary day pass will be issued by the Parking Manager. The Parking Manager may also, alternatively, redirect the vehicle to park at a different location. It will be highly recommended that project personnel DO NOT take the chance of their vehicle being towed for not displaying a placard.
  - i. Any fees/fines associated with losing, or breaking parking passes, or using street parking for longer than 15 minutes, cannot be reissued to or reimbursed by the CM/GC.
4. Alternate Transportation and Incentive Program
  - a. See below for details.

## Total vs. Available Parking

Reference all of the information below with Appendix A for Parking Garages/Lots Map.

The most recent parking surveys were conducted in April 2014, for both the Van Ness & Geary Campus, and the Replacement Hospital at the St. Luke's Campus. Listed below are the results found for both campuses:

### *Van Ness & Geary Campus Hospital and MOB*

Over 25 separate parking garages/lots have been identified near the Van Ness & Geary Campus and MOB.<sup>1</sup> Of all the garages/lots, a few stand out above the rest:

GARAGE/LOT NAME	ADDRESS	TOTAL SPACES	AVAILABLE SPACES	DIS. FROM PROJ. SITE
AMC Theater Parking	1000 Van Ness Avenue	380	275	528 ft.
Public Parking	855 Geary Street	96	96	1056 ft.
LAZ Parking	1166 Post Street	165	60	260 ft.
Public Parking (CPMC)	1360 Franklin Street	150	50	450 ft.
	<b>TOTAL</b>	<b>791</b>	<b>481</b>	

### *The Replacement Hospital at the St. Luke's Campus*

13 separate parking garages/lots have been identified near the St. Luke's Campus.<sup>2</sup> Of all the garages/lots, a few stand out above the rest:

GARAGE/LOT NAME	ADDRESS	TOTAL SPACES	AVAILABLE SPACES	DIS. FROM PROJ. SITE
Central American RC	3101 Mission Street	98	30	528 ft.
Public Parking	3477 Caesar Chavez St.	87	25	150 ft.
First Church of God	3728 Cesar Chavez St	20	20	375 ft.
Private Garage	199 Tiffany Ave	76	41	700 ft.
	<b>TOTAL</b>	<b>281</b>	<b>116</b>	

Project personnel will be updated frequently as to current, and changing parking situations as new information becomes available.

## Manpower Projections

Reference all of the information below with Appendix B for Manpower Projection Graphs.

### Total Projected Numbers

This section accounts for the "Daily Average Head Count" of every individual working on the project site.

### *Van Ness & Geary Campus Hospital and Medical Office Building*

The peak number of project personnel anticipated for the Van Ness & Geary Hospital/MOB is 690/175, respectively, during the five year construction period. Combined, at the peak of construction, there will be about 865 personnel between the two sites.

### *The Replacement Hospital at the St. Luke's Campus*

The peak number of project personnel anticipated for the Replacement Hospital at the St. Luke's Campus is 240, respectively, during the five and a half year construction period.

<sup>1</sup> About half of these garages/lots are not available for various reasons, with a few being restrictions on sub-leasing from local businesses and residential parking areas, or Individual Parking Owners/Managers outright refusing to lease spaces.

<sup>2</sup> Parking is extremely limited near the St. Luke's Campus. All of the parking garages/lots identified within the one-half square mile are either very small or already at full capacity.

## Actual Projected Numbers

This section accounts for the "Daily Average Parking Demand 75%".

Multiple commuting and transportation censuses/surveys have been conducted throughout the years.<sup>3</sup> Through collecting and analyzing the data, it has been established that about 25% of all project personnel will already take an alternate means of transportation without providing any incentives or subsidies. Therefore, the daily average parking demand has been set at 75% of the total projected numbers.

## Most Recent Baseline Numbers

This section accounts for the "Daily Average Parking Demand 50%".

As of April 2014, project personnel have done an outstanding job of utilizing alternate transportation to and from the project site. As stated before, about 47% of all project personnel already utilize an alternate means of transportation. The *current* daily parking demand is set at 50%. Having seen the numbers above (total head count vs. available parking), it becomes obvious that there is not enough parking for everyone near the project site, unless these percentages are maintained.

## Alternate Transportation and Incentive Program

An incentive program will be implemented in order to encourage project personnel to use an alternate means of transportation other than driving alone. The program will start during the first or second quarter of 2015. The following incentives are part of the Incentive Program, and were based on survey feedback from project personnel.

### Public Transportation

Public Transportation continues to be highly desirable, and the number one recommended method for project personnel to commute to work. Any type of public transportation that accepts Clipper Cards is highly recommended, as anyone who uses this resource may potentially be issued a Clipper Card, with a set value on it that will recharge every month they are working for the project. See *Monthly Award/Recognition for Alternative Transportation Participants* below for details.

The options for public transportation, that accept Clipper Cards, are BART, Muni, AC Transit, Golden Gate Transit, CalTrain, samTrans, Valley Transportation Authority, and the San Francisco Bay Ferry.

### Carpool Matching and Preferred Parking

Carpooling is another option that will be extremely beneficial to the project. To encourage project personnel to carpool, a demographic study will be used internally, and continuously updated, to assist with carpool matching. Most individual employees may not realize that they live very close to another employee working on the same project. The carpool matching will not be mandatory, but it will be highly encouraged.

In addition to the benefit of having a carpool matched for the employees, if they participate, they will receive priority parking, provided space is available. For example, a carpool may be issued a parking spot on the first floor of a parking garage, vs a single driver being issued a parking spot on the third floor. Or, the carpool may be able to park in a closer garage altogether.

Carpool matching will be offered during the first day of orientation for those who are interested in the program. Should anyone miss the orientation, or wishes to add their name to the list later, they can let the Parking Manager know simply by telephone or email. A sign up form will be passed around during orientation in order to efficiently speed up the process. Project personnel interested in the program will need to provide their name, which program they are interested in, which city they live in, and a good telephone number. The Parking Manager will call individuals who live in the same city to coordinate their first meeting. Once the two or more have made an agreement, they will need to see the Parking Manager in order to be eligible for the Monthly Award/Recognition

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<sup>3</sup> The Commuting Survey, published in 2011, can be found at <http://www.census.gov/prod/2011pubs/acs-15.pdf>; Environmental Impact Report: Parking Demand; Bay Area Census: San Francisco City and County <http://www.bayareacensus.ca.gov/counties/SanFranciscoCounty.htm>; Project Survey Internal Distribution



Program. See Appendix F for the Bus and Carpool Matching Form. Carpoolers will need to arrive and depart from the garage/lot that they are assigned. Carpoolers will be reminded that stopping in travel lanes, for any duration, to pick up or drop off passengers and/or equipment is not allowed. Violators will be cited.

### **Charter Bus Pilot Program**

#### *Van Ness & Geary Campus Only*

One to two busses will be provided (depending on the year, and turnout of project personnel willing to use this service) to transport project personnel from major cities in the bay area, to the project site, and back every working day starting in July of 2015, and ending in December of 2017. If the resource is not utilized to at least 75% capacity on average, during the year, the program will be reassessed. The busses will meet at a designated time and location every week. Approximately 56 people will be able to fit onto each bus.

The previously mentioned demographic study will also be used to help find the best locations for project personnel to meet with the bus. The meeting point for the bus is still TBD. More information will be provided to project personnel interested in this program during the second quarter of 2015. The address of the pick-up location and directions will be provided when it becomes available.

The bus will be reserved for project personnel ahead of time; anyone who signs up to be on a bus must come to the understanding that the bus will leave at the same time every day. Should there be a waiting list, and an individual misses the bus two or more days in a row, without good reason, their spot will be forfeited to the first person on the waiting list.

Project personnel will be updated frequently as to any changes in the busses' schedule or pick up/drop off points.

Note: Busses shall not stop in any travel lanes for pick-ups/drop-offs. Busses will only load and unload at the curb, and legally allowed locations. Violators will be cited.

### **Emergency Transportation**

Reference all of the information below with Appendix E for Emergency Transportation Acknowledgement & Request Forms.

The City of San Francisco has a program in place, called San Francisco Emergency Ride Home (SFERH)<sup>4</sup>, to take project personnel who utilize an alternate means of transportation home, or to their choice location (within reason) free of charge. This resource is to be used for emergency purposes only. Specifics on what constitutes an emergency will not be dictated by the CM/GC; however, the SFERH policy does. In addition to this, if general management feels that this resource is being taken advantage of by an individual or group of individuals, they may be banned from utilizing the program. All emergency events will be thoroughly documented, followed up, and kept on file to track and extinguish any trends that may form.

The SFERH constitutes the following as an emergency:

1. Illness or crisis of employee or immediate family member.
2. Carpool or vanpool ride is unavailable due to unexpected changes in the driver's schedule or vehicle breakdown.
3. Unexpected bicycle problem, including flat tire, mechanical failure, vandalism, or theft.
4. Required unexpected overtime in which the employee was not aware of the situation before the start of his or her workday. Supervisor authorization is required, and the trip must take place after 10 p.m.

The individual will pay for the transportation up front, but will be reimbursed by the City of San Francisco in a timely manner. It is absolutely imperative that anyone using this service keeps any receipts received during their trip. It is impossible to be reimbursed without them. On the next day the employee comes to work, they must bring their receipts to the Parking Manager in order for the reimbursement form to be filled out.

The steps below must be completed in order and/or before an individual is allowed to use the SFERH transportation service:

---

<sup>4</sup> SFERH Home Page - <http://www.sfenvironment.org/transportation/sustainable-commuting-programs/emergency-ride-home>

1. Inform the Parking Manager of intent to use the service.
2. Parking Manager informs SFERH.
3. While the individual waits for the vehicle, they must fill out the Emergency Transportation Request Form.
4. Parking Manager acquires the driver's contact information.

It will be understood between the driver and the Parking Manager that a phone call will be made sometime after the individual has been dropped off. This is to ensure that the individual has arrived safely, and at their originally intended destination.

### **Monthly Award/Recognition for Alternative Transportation Participants**

Those employees who actively participate in the Monthly Award/ Recognition Program will be eligible to receive a Clipper Card, Gas Card, or VISA pre-paid card, depending upon the method of alternate transportation used.

#### *Public Transportation & Carpooling*

Project personnel, who take public transportation or carpool, will receive a Clipper Card/Gas Card that will reload with a set amount, every month they are working for the project. Clipper Cards will be issued to an individual, whereas a single Gas Card will be issued to a carpool.

The Clipper and Gas Cards will be managed by the individuals they are issued to. The CM/GC *will* replace any lost or stolen cards, but funds will not be available until the next reload date.

#### *Charter Bus*

There will be a raffle held for those that choose to use the charter bus as their method of alternate transportation. There will be 10 prizes per bus, per month. The prize will be a VISA pre-paid card, with a set value, that the individuals may do with as they please.

A maximum cap of eight wins per year will be in effect.

#### *Qualification Criteria*

In order for project personnel to qualify for the Monthly Award/Recognition Program, they must use some form of alternate transportation at least 90% of work days out of every month.

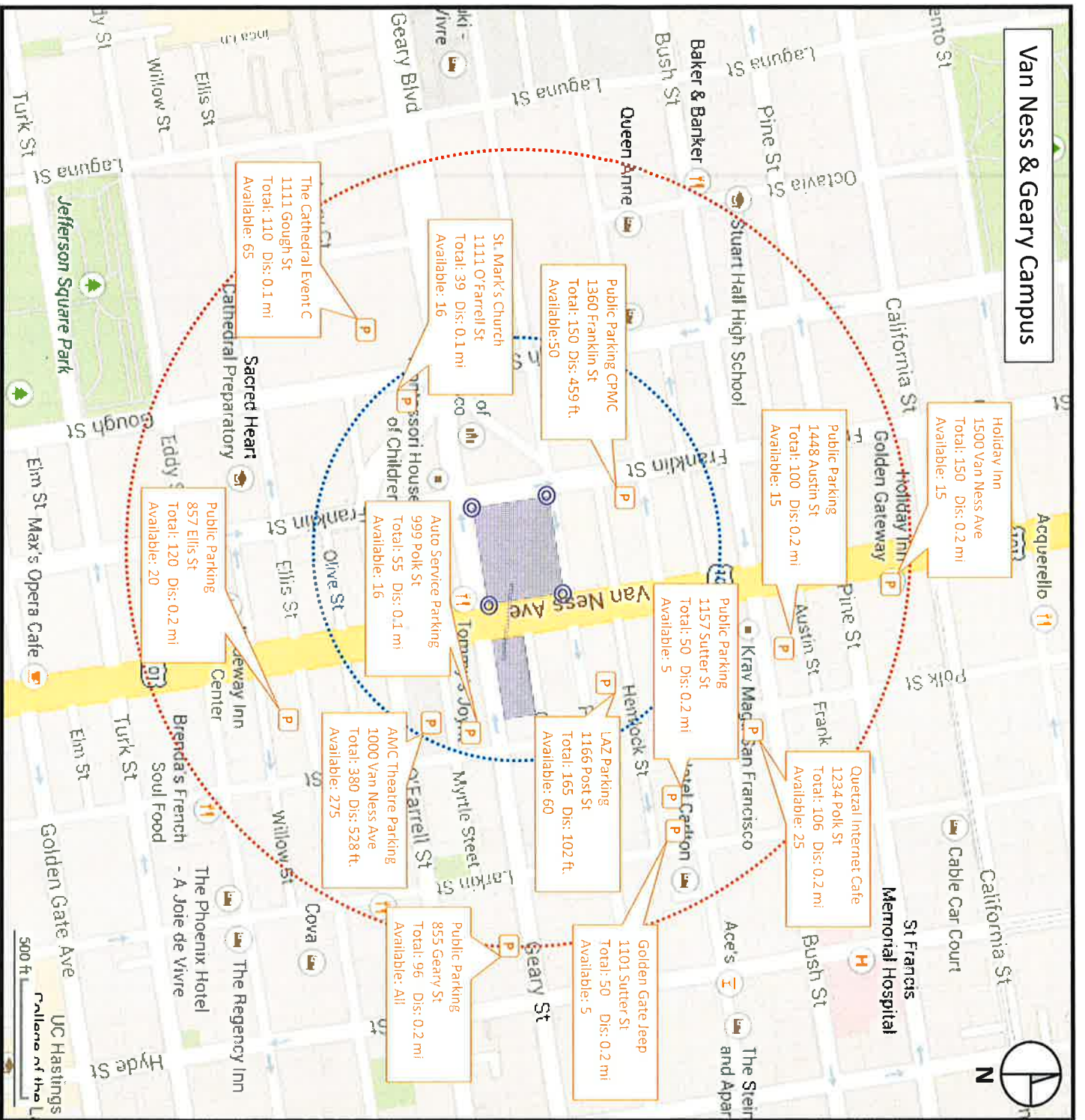
Integrity violation: Should the occasion arise where an individual or group of individuals are found intentionally making false claims as to the method in which they commute to work, they will be disqualified from the program indefinitely. No exceptions will be made.

## **APPENDIX A**

### **Parking Garages/Lots Map**

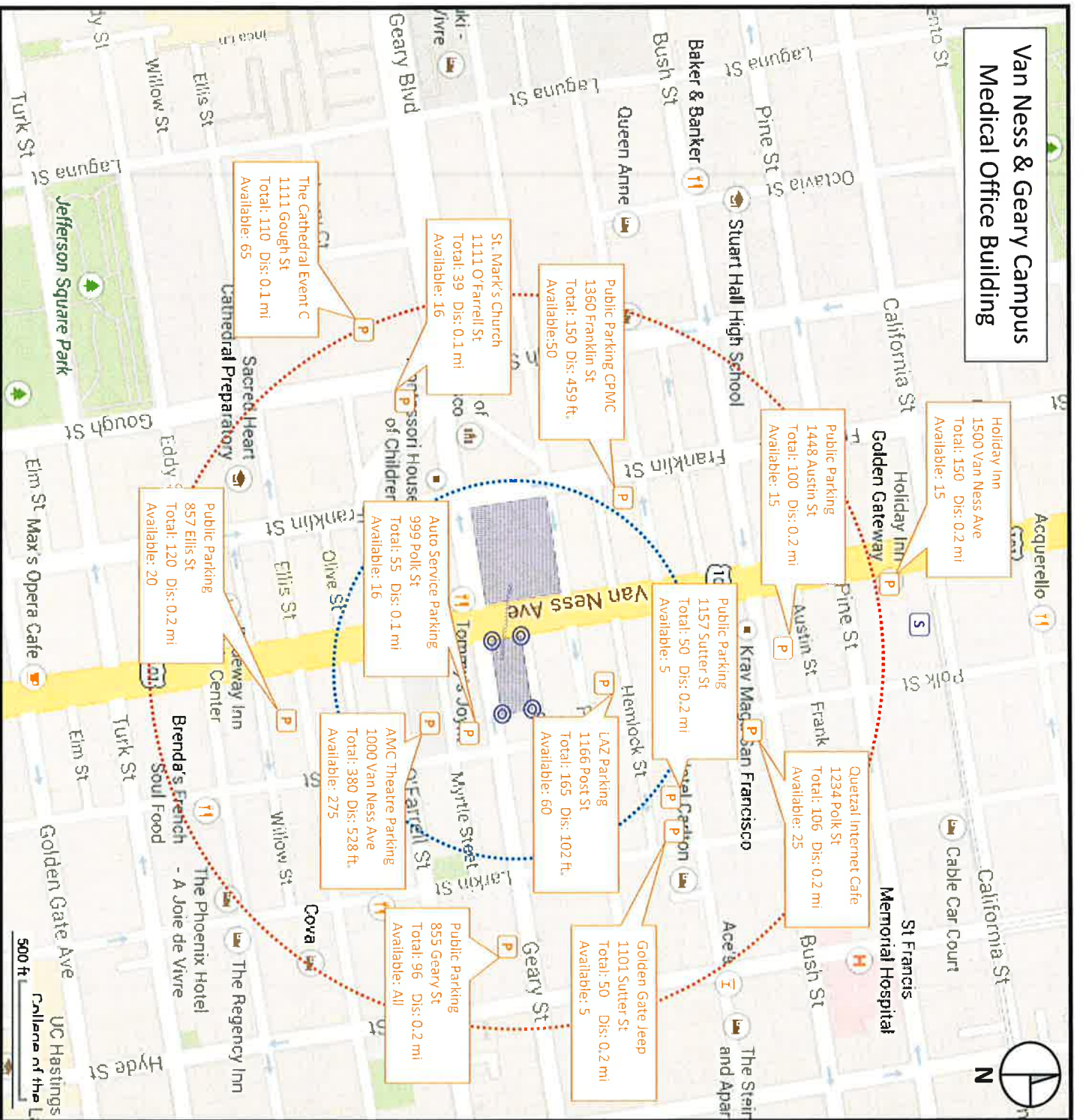






LEGEND	
<span style="background-color: #cccccc; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Project Site
<span style="border: 1px solid black; border-radius: 50%; padding: 2px;">S</span>	Requires a Shuttle
<span style="background-color: #ffffcc; border: 1px solid black; padding: 2px;">P</span>	Parking
<span style="border: 1px solid black; border-radius: 50%; padding: 2px;">●</span>	Measurement POO
<span style="color: blue;">.....</span>	.125 Mile = 660 Ft
<span style="color: red;">.....</span>	.25 Mile = 1320 Ft
GENERAL NOTES	
Total available parking spaces identified: 664 Spaces located within .125 Miles: 312 Spaces located within .25 Miles: 356	
SCALE	Not to Scale
CAMPUS	VN & Geary
BUILDING	All
VERSION	3.1
DATE	April 7, 2014
NUMBER	PL1

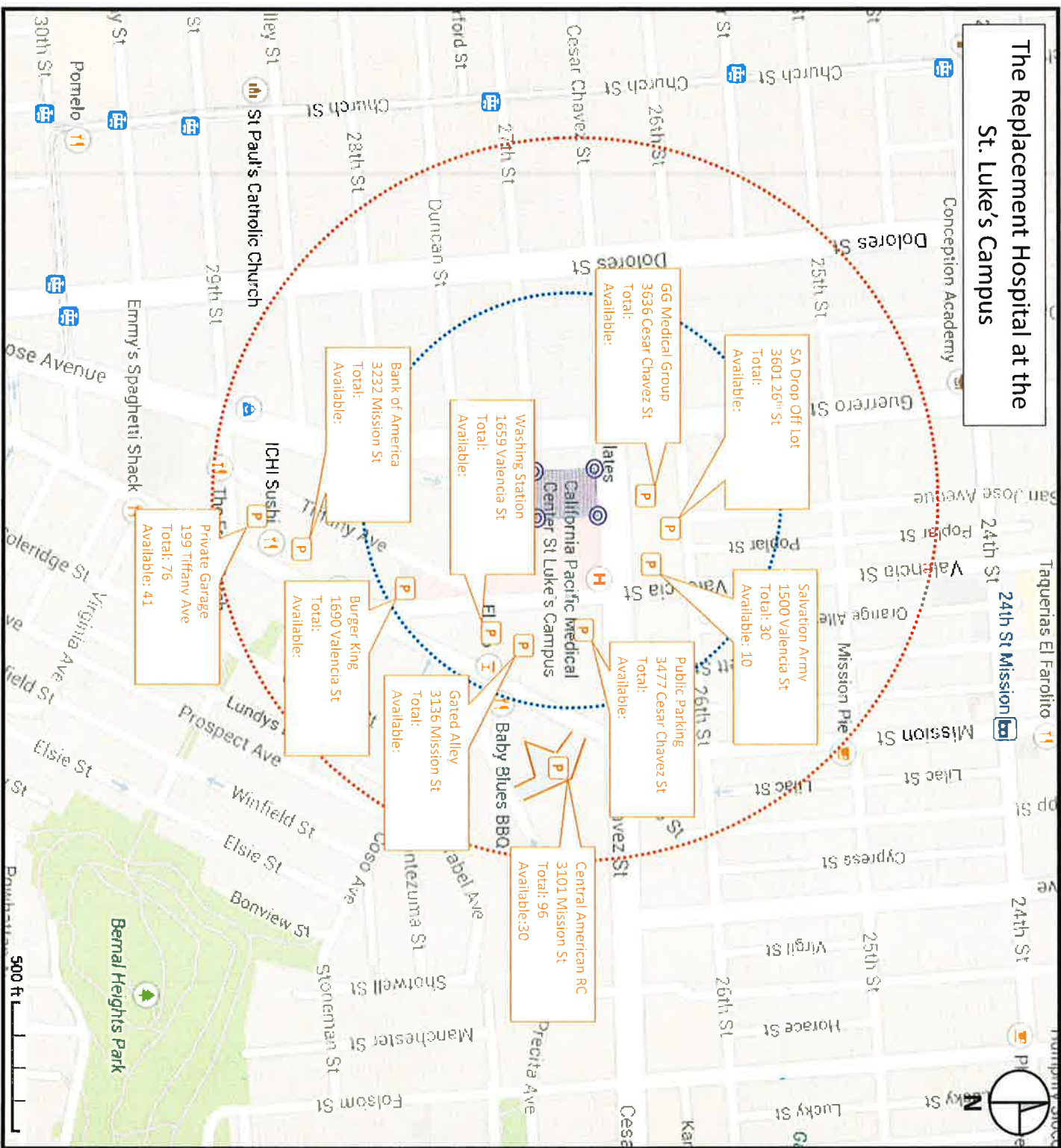
# Van Ness & Geary Campus Medical Office Building



LEGEND	
	Project Site
	Requires a Shuttle
	Parking
	Measurement POO
	.125 Mile = 660 Ft
	.25 Mile = 1320 Ft
GENERAL NOTES	
Total available parking spaces identified: 664 Spaces located within .125 Miles: 312 Spaces located within .25 Miles: 356	
SCALE	Not to Scale
CAMPUS	VN & G MOB
BUILDING	All
VERSION	3.1
DATE	April 7, 2014
NUMBER	PL1



# The Replacement Hospital at the St. Luke's Campus



LEGEND	
	Project Site
	Requires a Shuttle
	Parking
	Measurement POO
	.125 Mile
	.25 Mile
GENERAL NOTES	
Total available parking spaces identified to date	
Spaces located within .125 Miles:	
Spaces located within .25 Miles:	
SCALE	Not to Scale
CAMPUS	St. Luke's
BUILDING	All
VERSION	3.1
DATE	April 7, 2014
NUMBER	PL1

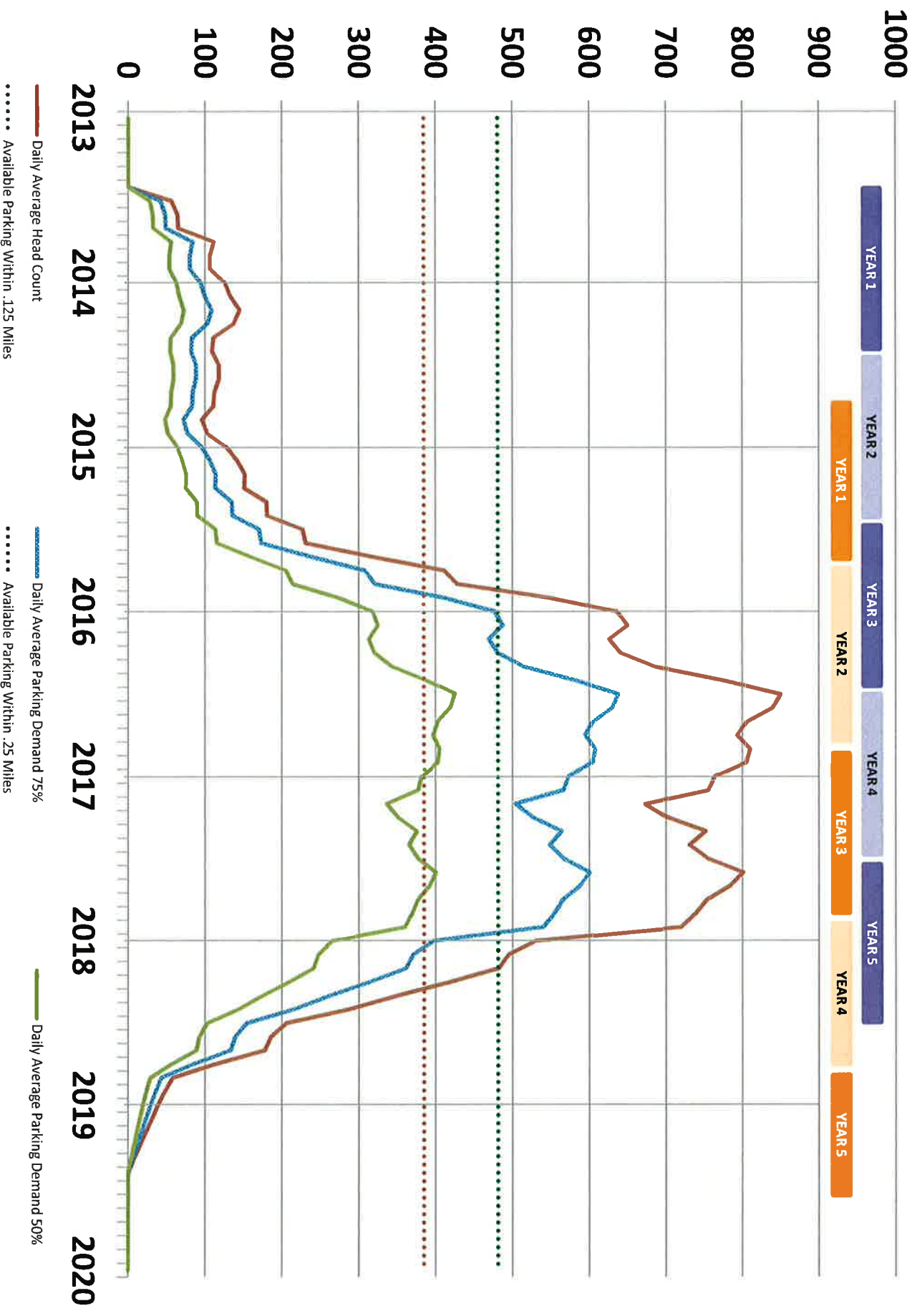


## **APPENDIX B**

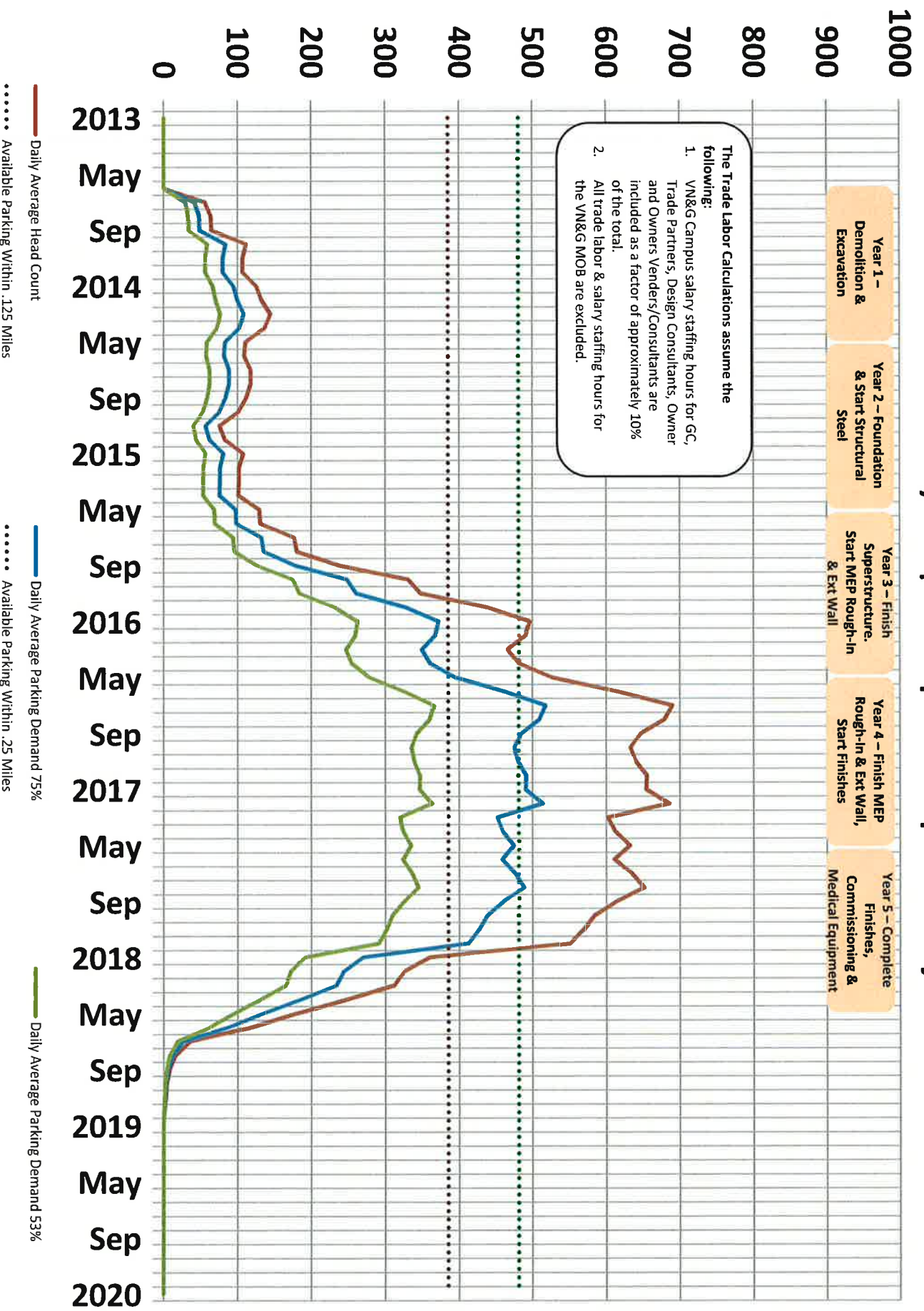
### **Manpower Projection Graphs**



# Van Ness & Geary Campus (Hospital and MOB) Manpower Projection

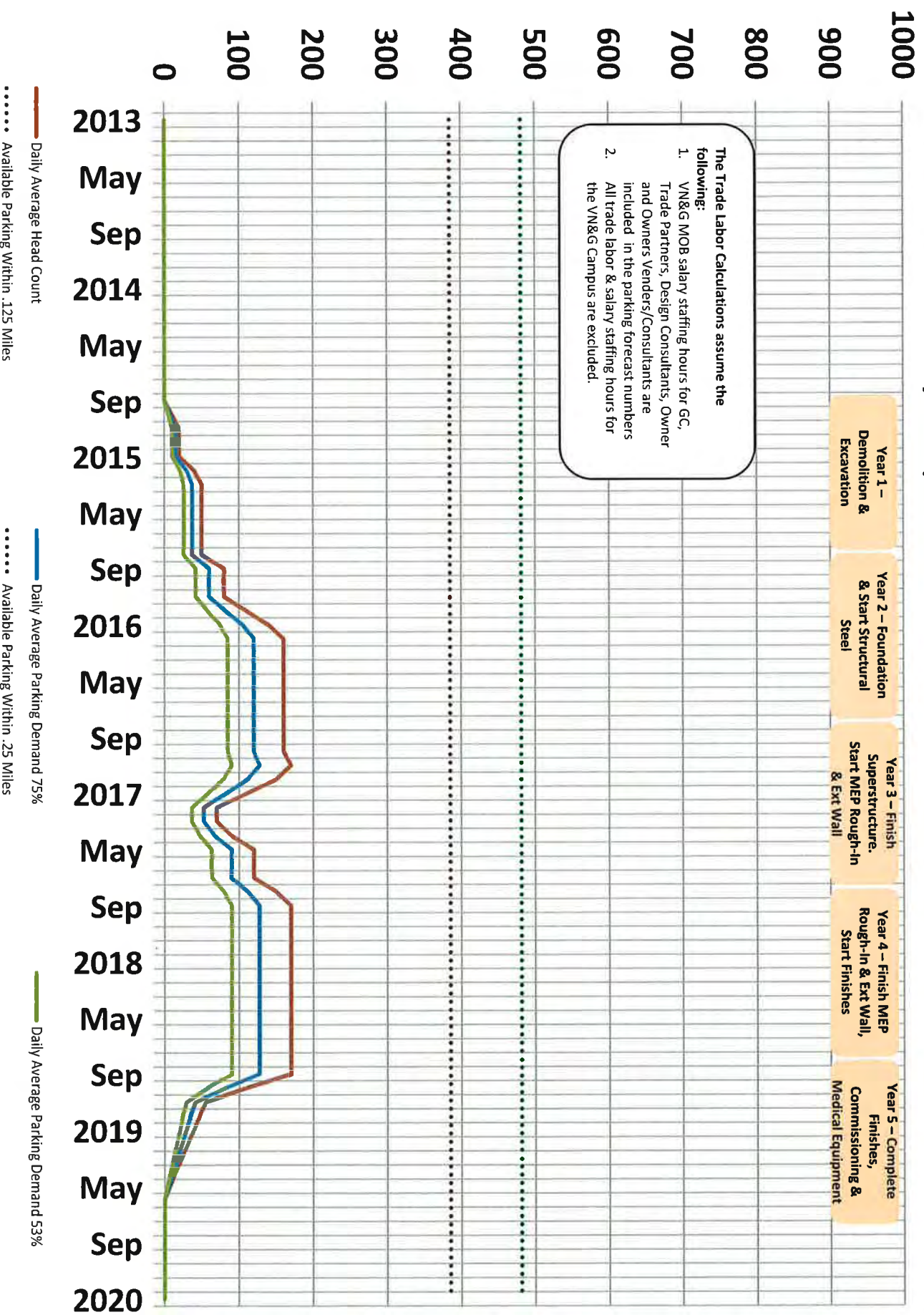


# Van Ness & Geary Campus Hospital Manpower Projection

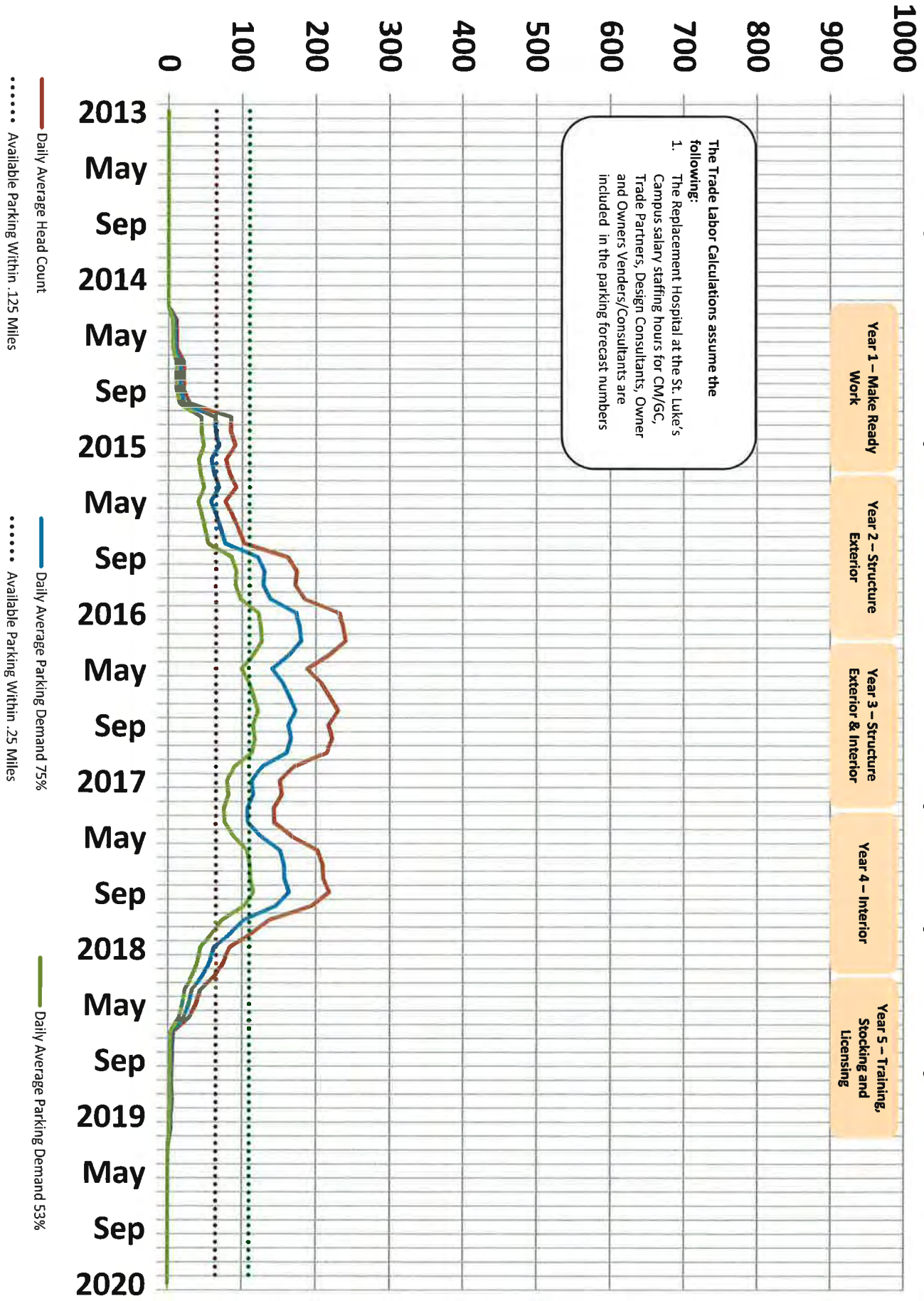




# Van Ness & Geary Campus Medical Office Building Manpower Projection

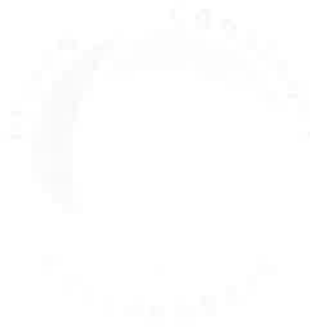


# The Replacement Hospital at the St. Luke's Campus Manpower Projection



## **APPENDIX C**

### **Parking Pass Acknowledgement & Sign-out Forms**





## **Parking Pass Acknowledgement**

By signing for (a) parking pass(es) distributed by the Construction Manager/General Contractor (CM/GC), you are agreeing to follow all guidelines set in place, and to take full responsibility for the condition of the parking pass(es). All of the following rules will apply:

1. DO NOT utilize street parking near the project site for more than 15 minutes, or a fine will be charged to your employer.
2. DO NOT park on the project site without prior approval from the General Superintendent.
3. The sign out sheet must be completely filled out before any pass(es) will be issued.
4. Parking placards will be displayed, and visible through the front windshield at all times when inside a designated parking garage.
5. Any vehicle parked in a designated space, and not displaying a parking pass will be towed immediately at the owner's expense. It is highly encouraged that you report vehicles not displaying a pass to the Parking Manager.
6. If a pass is lost/stolen/broken, it must be reported to the Parking Manager immediately.
7. A fee will be charged to your employer for lost or broken passes.
8. Passes must be returned to the Parking Manager, or other designated person, within one week of your last day on the job site; any passes not turned in will be considered lost or broken and the fee mentioned above will be charged.
9. If you are carpooling, your group will only be issued one parking pass. It is your responsibility to remember the pass if switching vehicles.
10. Should the occasion occur that your parking pass is forgotten at home, left in another vehicle, etc., a temporary day pass may be issued by the Parking Manager. DO NOT take the chance of your vehicle being towed for not displaying a placard.
11. Any fees/fines associated with losing or breaking parking passes/using street parking for longer than 15 minutes, cannot be reissued to, or reimbursed by the CM/GC.
12. Stopping in any travel lanes for any duration to pick up or drop off passengers or equipment is prohibited. Violators will be cited.

### Individual/Group Parking Pass Issue Form

First Name: \_\_\_\_\_ Vehicle Make: \_\_\_\_\_  
Last Name: \_\_\_\_\_ Vehicle Model: \_\_\_\_\_  
Company Name: \_\_\_\_\_ Licence Plate: \_\_\_\_\_  
Project Name: \_\_\_\_\_ Car Pool: Y N  
Contact Number: \_\_\_\_\_ Names of Passengers: 1) \_\_\_\_\_  
Supervisor: \_\_\_\_\_ 2) \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_ 3) \_\_\_\_\_  
Start Date: \_\_\_\_\_ 4) \_\_\_\_\_  
Projected End Date: \_\_\_\_\_ Parking Pass Type: \_\_\_\_\_  
Garage Address: \_\_\_\_\_ Car Pool Control Number: \_\_\_\_\_

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### Individual/Group Parking Pass Issue Form

First Name: \_\_\_\_\_ Vehicle Make: \_\_\_\_\_  
Last Name: \_\_\_\_\_ Vehicle Model: \_\_\_\_\_  
Company Name: \_\_\_\_\_ Licence Plate: \_\_\_\_\_  
Project Name: \_\_\_\_\_ Car Pool: Y N  
Contact Number: \_\_\_\_\_ Names of Passengers: 1) \_\_\_\_\_  
Supervisor: \_\_\_\_\_ 2) \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_ 3) \_\_\_\_\_  
Start Date: \_\_\_\_\_ 4) \_\_\_\_\_  
Projected End Date: \_\_\_\_\_ Parking Pass Type: \_\_\_\_\_  
Garage Address: \_\_\_\_\_ Car Pool Control Number: \_\_\_\_\_

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### Individual/Group Parking Pass Issue Form

First Name: \_\_\_\_\_ Vehicle Make: \_\_\_\_\_  
Last Name: \_\_\_\_\_ Vehicle Model: \_\_\_\_\_  
Company Name: \_\_\_\_\_ Licence Plate: \_\_\_\_\_  
Project Name: \_\_\_\_\_ Car Pool: Y N  
Contact Number: \_\_\_\_\_ Names of Passengers: 1) \_\_\_\_\_  
Supervisor: \_\_\_\_\_ 2) \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_ 3) \_\_\_\_\_  
Start Date: \_\_\_\_\_ 4) \_\_\_\_\_  
Projected End Date: \_\_\_\_\_ Parking Pass Type: \_\_\_\_\_  
Garage Address: \_\_\_\_\_ Car Pool Control Number: \_\_\_\_\_

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### Company Parking Pass Issue Form

First Name: \_\_\_\_\_  
Last Name: \_\_\_\_\_  
Job Title: \_\_\_\_\_  
Project Name: \_\_\_\_\_  
Contact Number: \_\_\_\_\_  
Supervisor: \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_  
Start Date: \_\_\_\_\_  
Projected End Date: \_\_\_\_\_

Company Name: \_\_\_\_\_  
Parking Pass Type: \_\_\_\_\_  
Number of Passes: \_\_\_\_\_

Notes:	
Garage Address:	

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### Company Parking Pass Issue Form

First Name: \_\_\_\_\_  
Last Name: \_\_\_\_\_  
Company Name: \_\_\_\_\_  
Project Name: \_\_\_\_\_  
Contact Number: \_\_\_\_\_  
Supervisor: \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_  
Start Date: \_\_\_\_\_  
Projected End Date: \_\_\_\_\_

Company Name: \_\_\_\_\_  
Parking Pass Type: \_\_\_\_\_  
Number of Passes: \_\_\_\_\_

Notes:	
Garage Address:	

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### Company Parking Pass Issue Form

First Name: \_\_\_\_\_  
Last Name: \_\_\_\_\_  
Company Name: \_\_\_\_\_  
Project Name: \_\_\_\_\_  
Contact Number: \_\_\_\_\_  
Supervisor: \_\_\_\_\_  
Supervisor Number: \_\_\_\_\_  
Start Date: \_\_\_\_\_  
Projected End Date: \_\_\_\_\_

Company Name: \_\_\_\_\_  
Parking Pass Type: \_\_\_\_\_  
Number of Passes: \_\_\_\_\_

Notes:	
Garage Address:	

**I have read, understood, and agree to all of the terms listed in the Parking Pass Acknowledgement.**  
**A copy of the Parking Pass Acknowledgement has been provided to me for my reference.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## **APPENDIX D**

### **Emergency Transportation Acknowledgement & Request Forms**

## Emergency Transportation Acknowledgement

By signing the Emergency Transportation Acknowledgement Form, you are agreeing to follow all the guidelines set in place. This service is paid for and provided by the City of San Francisco's Emergency Ride Home Program (SFERH). It will provide emergency transportation for project personnel who actively utilize alternative transportation, and will transport the individual to their choice destination, at no charge. The following rules will apply:

1. This service is for **EMERGENCY** purposes only. It is not meant to be used as a free ride to doctor's appointments or to get home early. Do not take advantage of the program.
2. Any and all transportation utilized with this service will be thoroughly documented.
3. The following steps must be taken, in order, before you leave the project site:
  - a. Inform the Parking Manager of intent to use the service.
  - b. The Parking Manager will inform SFERH.
  - c. While you wait for the vehicle, fill out the Emergency Transportation Request Form.
  - d. Parking Manager acquires the driver's contact information.
4. The driver will call the Parking Manager once you are dropped off to ensure you arrived safely, and at your intended destination.

### Emergency Transportation Acknowledgement

**I have read, understood, and agree to all of the terms listed in the  
Emergency Transportation Acknowledgement**

[illegible]



## Emergency Transportation Request Form

Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Reason for Emergency Transportation Request (Circle one):

Medical

Family

Personal

Other

Where are you requesting to be dropped off?

\_\_\_\_\_

What is your final destination?

Same as Above

☐

\_\_\_\_\_

**DO NOT WRITE BELOW THIS LINE**

Driver's Name: \_\_\_\_\_

Driver's Phone Number: \_\_\_\_\_

Time Called: \_\_\_\_\_

Time Received: \_\_\_\_\_

Time Dropped Off: \_\_\_\_\_

Was the employee dropped off at the requested location?

Y

N

Notes: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**APPENDIX E**

**Bus and Carpool Matching Form**



## Bus and Carpool Matching Sign Up Form

All personal Information will be kept confidential and used only for demographic purposes.

[illegible]



**Viramontes, Jessica**

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**Subject:**

RE: 3700 California Case No. 2017-003559ENV - DEIR Comments

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**From:** Dennis Hong <[dennisj.gov88@yahoo.com](mailto:dennisj.gov88@yahoo.com)>

**Sent:** Wednesday, July 31, 2019 12:55 PM

**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>

**Cc:** Gibson, Lisa (CPC) <[lisa.gibson@sfgov.org](mailto:lisa.gibson@sfgov.org)>; Rahaim, John (CPC) <[john.rahaim@sfgov.org](mailto:john.rahaim@sfgov.org)>; Board of Supervisors, (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>; Range, Jessica (CPC) <[jessica.range@sfgov.org](mailto:jessica.range@sfgov.org)>

**Subject:** 3700 California Case No. 2017-003559ENV - DEIR Comments

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Good afternoon Miss. Jeanie Poling and everyone. Jeanie as a follow up, as promised please find my comments for the above project. I received this DEIR on July 26, I'm sorry for the lateness and hope it makes it in on time.

First of all I fully support this project. This DEIR is very comprehensive and covers just about all the issues and has done an excellent job. Here are my rambling thoughts and comments.

Thank you for the opportunity to submit my comments on this CPMC Project. CPMC in the past has done an excellent job especially with their construction work. For example, the all to massive CPMC Build out on Van Ness Ave. Considering how large this project was.

CPMC has done a nice job with this 3700 California (proposed) project and it looks like it fits well with their Long Range Plan.

My Name is Dennis Hong, I have been a resident of San Francisco for seventy plus years, a retired construction project manager. I live in District 7. My family, many friends including myself use CPMC's services. Including this site. CPMC offers a great benefit to the city.

We need this Project. I can only hope the City can expedite this project.

2  
(ME-1)

**But better yet it is producing so many much needed new housing units.**

As I mention above, I fully support this project. With CPMC's community out reach with the Van Ness Ave project they have proven they can work with this Community too.

Here are my closing comments in General:

3  
(GE-2)

1. Construction work and phasing needs be be addressed especially with the Traffic, Noise, vibration, dust during construction, working hours, parking for construction workers as it impacts the residents and business'. I know that some of this is covered in the DEIR, but I did not want to miss these issues.

4  
(PD-1)

2. Housing: Overall Project does a wonderful job with the different type of housing units. Would it be possible to show a figure/chart how the new/proposed units will have on the overall current housing program.

5  
ME-1

3. Project Characteristics: Does a nice job with the Master Plan and the architectural appeal, traffic, loading/unloading and the open space.

6  
(TR-4)

4. What type of Commuter shuttle buses will be used, (bio-fuel or electric)? If these shuttle buses use the exciting Muni Stops how will this impact the Muni bus schedules and keeping Muni on time? All too often these shuttle buses delay the Muni service.

7  
(GE-3)

5. Cumulative projects: How will the CPMC project impact or overlap with UCSF proposed 3333 California Street Project a few blocks away; mostly in the Phasing of the construction periods?

8  
(GE-2) 6. How will this Project's construction work i.e., noise, dust, traffic, parking, vibration impact the local residents and the Laurel Village business's as they continue to thrive? Only because too often the best practices and mitigation does not work?

9  
(GC-2) 7. What provisions if any will there be for any displaced business and or residents impacted by this project?

10  
(TR-3) 8. Will there be traffic control officers to control vehicle, pedestrian traffic to and from the hospital along California Street during Construction?

11  
(GC-1) Finally, thanks again for the opportunity to review and comment on this most exciting & needed project and trust I have met this deadline. Please add my comments to this DEIR and please send me a hard copy of the RTC when finished.

If anyone has any questions to my email, please reach out to me for any additional information to my comments.

Best regards, Dennis



**From:** [Joshua Klipp](#)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Cc:** [Sara Alexander](#)  
**Subject:** 3700 California: Request for EIR  
**Date:** Friday, September 20, 2019 4:56:42 PM

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Hi Jeanie,

I'm Josh Klipp, a San Francisco resident and long time advocate for San Francisco trees. I attended part of yesterday's Planning Commission hearing but unfortunately was unable to stay for the duration. I'd like to ask a few quick questions!

- |               |  |
|---------------|--|
| 1<br>(CEQA-1) | 1. The draft EIR referenced requesting a copy via a postcard, but the draft EIR itself was a pdf. How would I request a copy of the final EIR?   |
| 2<br>(ME-2)   | 2. I'm an avid advocate for San Francisco's urban forest, and particularly focused on changing the way development approaches canopy. How do I submit an objection to the current EIR and plan (which includes large scale tree removal)?  |
| 3<br>(GE-4)   | 3. I also work closely with the Bureau of Urban Forestry on initiatives to change canopy management. One issue that comes up a lot is BUF not being brought in on proposed developments with street tree removals until it's much too late in the game to change anything. Would you be up for an introduction to the BUF inspector assigned to the area covering 3700 California so that they can be involved earlier on with regard to proposed tree removals? |

Thank you, and I look forward to hearing from you. Best, Josh

P.S. cc'ing my friend Sara Alexander who lives across the street from this proposed development.

--

Josh Klipp, Esq.

Certified Access Specialist with the California Division of the State Architect (CAsp-812)  
Accessibility for Built and Virtual Environments. [made-welcome.com](http://made-welcome.com)

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**From:** [Joshua Klipp](#)  
**To:** [Poling, Jeanie \(CPC\)](#)  
**Cc:** [Sara Alexander](#)  
**Subject:** Re: 3700 California: Request for EIR  
**Date:** Tuesday, September 24, 2019 2:19:47 PM

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Hi Jeanie,

1  
(GE-4)

Please see my objection(s), below, to the EIR for 3700 California Street. As you will see, my objections are primarily based on the tree removals. According to the Draft EIR, the project site currently contains 163 trees: 91 are regulated trees (77 street trees and 14 significant trees) and 72 are non-regulated trees. The proposed project would remove 42 of the 77 existing street trees and plant 68 new street trees, for a total of 103 street trees. Nine of the 14 significant trees would be removed due to conflicts with the proposed buildings. Of the other 72 non-regulated trees on-site, 70 would be removed and would be replaced with 146 new trees.

Although the EIR doesn't specify which trees it proposes to remove and/or plant (or their species), a map provided by the project sponsor gave some guidance. I visited the site today and measured some of the trees that were easily accessible (i.e. along the public rights of way, easily accessed on the property). Specifically, I looked at the 28 trees in the grove at Cherry and Sacramento, the 4 redwoods along California, the 8 trees in the small grove off Maple (at the loading dock) and the one large flowering tree on California directly across from the end of Commonwealth.

2  
(GE-4)

**Bees:** With regard to the last tree, species unknown, I was not able to measure its trunk but it looked to be at least 20" dbh, and covered in flowers that were visited by bees. I saw at least 100 bees at this tree. Please note that multiple scientific studies have concluded that bees are one of the most crucial species for the survival of humans in the face of climate change. Accordingly, any EIR should consider this - and any other applicable planned project features - that remove ecologically (and specifically bee) sustaining flora.

3  
(GE-4)

**Public health crisis:** Research indicates that [San Francisco is getting hotter](#), and this is not only a climate crisis, but a public health crisis as well. Warmer days and warmer nights mean that the most vulnerable among us - seniors, youth - are more susceptible to dehydration, heat stroke, and heat exhaustion. This project proposes, essentially, residential housing. Yet it does this while simultaneously removing the large natural assets already on site that would sustain healthy human life. Additionally, while on site I noticed several people sitting in the shade of these trees. Not only would their removal impact the viability of humans who ultimately would live in the project, it impacts the health of every person in the immediate neighborhood.

4  
(GHG-1)

**Mature versus young trees:** Multiple studies indicate that trees are one of our greatest

allies in the fight against irreversible climate change. Multiple studies also indicate that mature, established trees are far more effective in this fight than young trees. As San Francisco's climate changes and average temperatures rise, it becomes increasingly difficult for young trees to establish and survive. So, while an increase in net trees sounds like a good idea on paper, the reality is that it is ultimately a very risky gamble at best, and a massive loss in climate and ecological benefits at worst.

#### **Environmental benefits:**

Going now to the direct, measurable benefits of just some of the trees that will be removed. Using i-tree tools, I calculated the benefits of the 42 trees listed above in terms of their environmental benefits to date, this year, over the course of the next 20 years, and in the year 2039. Here are the results of that report. Remember, these are just the 42 trees that I could measure. The impact of these trees on one single city block is remarkable. In a city with the worst urban canopy of any major city in the United States, this is practically a collection of groves. These trees are mature, established and healthy - an exceedingly rare feature of any area in the city. In terms of their benefits, not only are these trees productive in sequestering CO<sub>2</sub>, but they divert thousands of gallons of stormwater away from San Francisco's combined sewer system, and prevent tons of pollution from reaching our ocean and our Bay. Here are the numbers according to i-tree.

To date, these trees have:

- intercepted 373,328 gallons of stormwater.
- reduced atmospheric carbon dioxide (CO<sub>2</sub>) by 95,470 pounds.

This year, these trees will:

- intercept 59,054 gallons of stormwater this year.
- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by 13,127 pounds.

In the year 2039, these trees will:

- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by 20,198 pounds that year.
- intercept 141,591 gallons of stormwater that year.

Over the next 20 years, these trees will:

- reduce atmospheric carbon dioxide (CO<sub>2</sub>) by a total amount of 330,648 pounds.
- intercept a total of 2,060,778 gallons of stormwater.



5  
(GE-4)

As I sit here typing up this email, it is 100 degrees outside (on September 25). I would respectfully submit that our city and our world literally cannot survive if we continue to do business as usual, i.e. cut down dozens of healthy trees for convenience sake and simply promise to plant more later. According to San Francisco's own Department of the Environment, we have ten years to act before climate change becomes irreversible. This project, as proposed, would reduce the city's climate resilience, and then try to compensate for that after it's too late. We must do better than this project proposes, and this project must go back to the drawing board to determine how to avoid these losses that contribute to our climate catastrophe.

Thank you for your attention to this objection to the Draft EIR for 3700 California Street. Please let me know what are the next steps here. Thank you again, Josh

On Mon, Sep 23, 2019 at 11:29 AM Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)> wrote:

Yes. Thank you.

**From:** Joshua Klipp <[joshuaklipp@gmail.com](mailto:joshuaklipp@gmail.com)>  
**Sent:** Monday, September 23, 2019 11:28 AM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Cc:** Sara Alexander <[saraalexander@me.com](mailto:saraalexander@me.com)>  
**Subject:** Re: 3700 California: Request for EIR

Hi Jeanie,

I appreciate your quick (and helpful) response, thank you. I can download the draft EIR, review, and then just submit my objections to you. That way we don't need to spend time (or City resources!) printing and dropping things off. Good?

Thank you again, Josh

On Mon, Sep 23, 2019 at 9:42 AM Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)> wrote:

Hi Joshua,

**From:** [Mekkelson, Heidi](#)  
**To:** [Viramontes, Jessica](#); [Vurlumis, Caroline](#)  
**Subject:** FW: 3700 California St  
**Date:** Monday, September 9, 2019 1:27:20 PM

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**From:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Sent:** Monday, September 9, 2019 10:04 AM  
**To:** Mekkelson, Heidi <[Heidi.Mekkelson@icf.com](mailto:Heidi.Mekkelson@icf.com)>  
**Subject:** FW: 3700 California St

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**From:** May, Christopher (CPC) <[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)>  
**Sent:** Thursday, September 05, 2019 3:27 PM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** FW: 3700 California St

Hi Jeanie,

I received this email with regards to the DEIR for 3700 California St.

**Christopher May, Senior Planner**  
**Northwest Team, Current Planning Division**  
San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9087 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

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**From:** MARCY LINER <[marcyliner@comcast.net](mailto:marcyliner@comcast.net)>  
**Sent:** Thursday, September 05, 2019 12:59 PM  
**To:** May, Christopher (CPC) <[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)>  
**Subject:** Re: 3700 California St

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Hi Christopher-

Thank you for talking with me the other day. I would like to submit a letter to the committee at the upcoming hearing on Sept 19th.

To Whom It May Concern-

1  
(NO-1)

I own the ground floor condominium at 3925 Sacramento street. My property is directly adjacent to the 3700 California project. There is a proposed house being built right next door along with 3 or 4 other houses next to that. There will also be a new building behind and over from my property. I run a small business called the Liner Clinic in my condo and we're very concerned about the noise and dirt and parking issues that the new construction will create. At the clinic there are 2 acupuncturists and 3 body workers and our patients come to relax and de stress during their treatments. We are very concerned that the noise of construction is going to negatively impact us and my renters/practitioners are talking about needing to find a new office when the project commences. This is obviously very concerning to me as the business owner. If I have no renters I will lose over \$6000 a month. What can be done about this situation? Thank you for your time.

Sincerely,

Marcy Liner

3925 Sacramento St.

On August 29, 2019 at 3:37 PM "May, Christopher (CPC)"  
<[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)> wrote:

Hi Marcy,

As requested, the project sponsor's attorney's name is Tuija Catalano. Her email address is [tcatalano@reubenlaw.com](mailto:tcatalano@reubenlaw.com) and her phone number is (415) 567-9000.

**Christopher May, Senior Planner**  
**Northwest Team, Current Planning Division**

San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9087 | [www.sfplanning.org](http://www.sfplanning.org)

[San Francisco Property Information Map](#)





**From:** [Mekkelson, Heidi](#)  
**To:** [Viramontes, Jessica](#); [Vurlumis, Caroline](#)  
**Subject:** FW: 3700 California St  
**Date:** Monday, September 9, 2019 1:26:58 PM

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**From:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Sent:** Monday, September 9, 2019 10:04 AM  
**To:** Mekkelson, Heidi <[Heidi.Mekkelson@icf.com](mailto:Heidi.Mekkelson@icf.com)>  
**Subject:** FW: 3700 California St

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**From:** May, Christopher (CPC) <[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)>  
**Sent:** Thursday, September 05, 2019 3:27 PM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** FW: 3700 California St

Here is a follow-up email to that previous one.

**Christopher May, Senior Planner**  
**Northwest Team, Current Planning Division**  
San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9087 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

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**From:** MARCY LINER <[marcyliner@comcast.net](mailto:marcyliner@comcast.net)>  
**Sent:** Thursday, September 05, 2019 1:26 PM  
**To:** May, Christopher (CPC) <[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)>  
**Subject:** Re: 3700 California St

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Hi I'd like to add to my letter:

To Whom It May concern-

1  
(CEQA-1)

I was informed recently that there have been over 35 neighbor meetings and several neighbor surveys that were sent out and never received any of these. I just learned of the meetings a few days ago. We almost missed the hearing that is coming up because it was scheduled for June and we were never sent notification. We found out about it and when we called the city they said they made a mistake and only sent notices to people a certain number of feet from 3700 California st and not the whole perimeter of the whole building site. I'm assuming that that is why we never were notified about neighbor meetings. I feel very uninformed about the project because of this and I'm finding the EIR very confusing and long. Our building is one of the most effected properties because it is directly adjacent to new buildings. I'm not sure what can be done about this at this point.

Thank you,

Marcy Liner

3925 Sacramento St

On August 29, 2019 at 3:37 PM "May, Christopher (CPC)"  
<[christopher.may@sfgov.org](mailto:christopher.may@sfgov.org)> wrote:

Hi Marcy,

As requested, the project sponsor's attorney's name is Tuija Catalano. Her email address is [tcatalano@reubenlaw.com](mailto:tcatalano@reubenlaw.com) and her phone number is (415) 567-9000.

**Christopher May, Senior Planner**  
**Northwest Team, Current Planning Division**

San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9087 | [www.sfplanning.org](http://www.sfplanning.org)

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## Viramontes, Jessica

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**Subject:** RE: Case No.: 2017-003559ENV

**From:** Poling, Jeanie (CPC)  
**Sent:** Tuesday, June 18, 2019 9:56 AM  
**To:** michael linn <[linn.michael@gmail.com](mailto:linn.michael@gmail.com)>  
**Subject:** RE: Case No.: 2017-003559ENV

Hello Mr. Linn,

Thank you for your comments.

Sincerely,  
**Jeanie Poling**  
**Senior Environmental Planner**  
San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Direct: 415.575.9072 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

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**From:** michael linn <[linn.michael@gmail.com](mailto:linn.michael@gmail.com)>  
**Sent:** Friday, June 14, 2019 9:54 PM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Subject:** Case No.: 2017-003559ENV

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hi Jeanie

1  
(GC-1) I live with my wife and family at 16 Commonwealth Avenue. We have lived in the neighborhood for almost 10 years. We have received Notice of Public Hearing with respect to a project at 3700 California Street, the case number is cited in my email title. Thank you in advance for all your efforts running a process to get to the right answer on this project for both the developer, City of SF and surrounding neighborhoods.

2  
(ME-1) It would appear that the dwelling would incorporate 273 residential units, but only 416 parking units. I would encourage you and the developer to do further work to make sure this is an appropriate number of spots. Given the likely cost of the new dwellings, its very likely that the residents in these units will have multiple cars per dwelling, as the residents will have high disposal income and economic means. They will also likely create additional demand for spots during the week with various service providers - nannies, cleaning services, cooks, etc. I would encourage the developer to incorporate this into the math behind the number of parking spots so that parking availability isn't made considerably more difficult for the existing neighbors and commercial interests. Please keep in mind that there are always several building projects (home remodels) ongoing in the surrounding neighborhood which also consume parking spots, its incredible to me as a 10 year resident how often houses consume 2-3 spots for 6 month periods...

All the best,  
Michael Linn

**From:** [Mekkelson, Heidi](#)  
**To:** [Viramontes, Jessica](#); [Vurlumis, Caroline](#)  
**Subject:** FW: Case 2017-003559ENV 3700 California St  
**Date:** Friday, September 20, 2019 1:44:17 PM

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**From:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>  
**Sent:** Wednesday, September 18, 2019 4:38 PM  
**To:** Tuija Catalano <[tcatalano@reubenlaw.com](mailto:tcatalano@reubenlaw.com)>; Mekkelson, Heidi <[Heidi.Mekkelson@icf.com](mailto:Heidi.Mekkelson@icf.com)>  
**Cc:** [dpinkston@tmgpartners.com](mailto:dpinkston@tmgpartners.com)  
**Subject:** FW: Case 2017-003559ENV 3700 California St

FYI, my response.

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**From:** Poling, Jeanie (CPC)  
**Sent:** Wednesday, September 18, 2019 4:36 PM  
**To:** Dennis Parks <[dennisrparks@yahoo.com](mailto:dennisrparks@yahoo.com)>  
**Cc:** LaRue Perkins <[larueperkins@sbcglobal.net](mailto:larueperkins@sbcglobal.net)>; [dpinkston@tmgpartners.com](mailto:dpinkston@tmgpartners.com)  
**Subject:** RE: Case 2017-003559ENV 3700 California St

Hello Mr. Parks,

Thank you for your comments. They will be considered and responded to in a responses to comments (RTC) document after the close of the draft EIR comment period. You are welcome to submit additional written comments on the adequacy of the EIR until the end of the public comment period, which is 5 pm on Tuesday, September 24<sup>th</sup>.

The draft EIR, including a detailed project description, is available on the Planning Department's website at <https://sfplanning.org/environmental-review-documents>. For proposed plans, please see the following figures:

- Figure 2-5 Proposed Site Plan on page 2-13 (pdf page 62)
- Figure 2-15 Block C Access, Circulation, and Ground-Floor Parking Plan on page 2-31 (pdf page 80).

Sincerely,

**Jeanie Poling**  
**Senior Environmental Planner**  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400 San Francisco, CA 94103  
 Direct: 415.575.9072 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

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**From:** Dennis Parks <[dennisrparks@yahoo.com](mailto:dennisrparks@yahoo.com)>  
**Sent:** Wednesday, September 18, 2019 4:15 PM  
**To:** Poling, Jeanie (CPC) <[jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)>; [dpinkston@tmgpartners.com](mailto:dpinkston@tmgpartners.com)

**Cc:** LaRue Perkins <[larueperkins@sbcglobal.net](mailto:larueperkins@sbcglobal.net)>

**Subject:** Case 2017-003559ENV 3700 California St

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Dear Jeanie and Denise,

We cannot make the Public Hearing, tomorrow, but it is important that we receive copies of plans for the project.

1 We are particularly concerned about what effect the project will have, when the  
(SH-2) building at 3698 California St is renovated.

Our property is at 439/441 Spruce St, and we need to be assured that our privacy and natural light will not be compromised, if the present car park of 3698 California St is built upon.

We look forward to hearing from you.

Yours truly, Dennis Parks 415 254 8732

Dennis R Parks



**Marie Sullivan**

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**From:** Marie Sullivan <mlmsully@comcast.net>  
**Sent:** Saturday, September 21, 2019 9:17 AM  
**To:** 'Jeanie.poling@sfgov.org'  
**Subject:** Case # 2017-003559 - 3700 CALIFORNIADEIR - COMMENTS

Dear Ms. Jeanie Poling,

1 After attending the meeting at the Planning Commission on September 19, I would like to voice some more concerns,  
 (GE-1) specifically noise, traffic, parking, and heights of roof lines casting shadow on my property on the corner of Palm and California. My family has owned 3845 California since appropriately 1964.

2 First, I'm concerned about the noise during the many years of demolition and construction and noise from trucks going  
 (NO-1) up and down California Street. Once the buildings are built there will be noise from Sanitation and Recology trucks and  
 3 from service and delivery trucks.  
 (NO-2)

4 Second, I'm concerned about losing parking spaces during construction and after because of the configuration of the  
 (TR-3) new buildings. Traffic flow might be forever adversely affected.

5 Third, I'm concerned that the heights of the roofs on the new buildings will cast a shadow on my building on the corner  
 (SH-2) of Palm and California. It would be so depressing to loose sunlight.

Thank you for your attention.

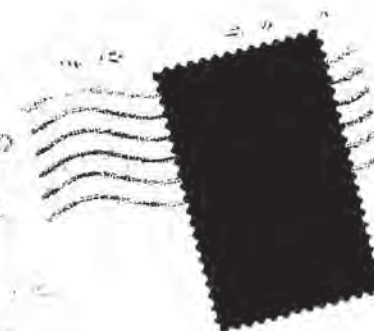
Marie Laidas Sullivan

*Marie Laidas Sullivan*



Marie Sullivan  
173 Harvard Dr  
Larkspur, CA 94939

SAN FRANCISCO, CA 94102  
**RECEIVED**  
21 SEP 2019 THU 2  
SEP 23 2019  
CITY & COUNTY  
DEPT. OF  
RECLAMATION



Planning Department, Environmental Planning  
Attn: Jeanie Poling, Sr. Environmental Planner  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
<b>MITIGATION MEASURES FOR THE 3700 CALIFORNIA STREET PROJECT</b>				
<i>Cultural Resources and Tribal Cultural Resources Mitigation Measures</i>				
<p><b>Mitigation Measure M-CR-1: Historic Preservation Plan and Protective Measures for 3698 California Street</b></p> <p>A historic preservation plan and protective measures shall be prepared and implemented to aid in preserving and protecting those historical resources that would be retained and rehabilitated as part of the project. The historic preservation plan shall be prepared by a qualified historic preservation architect who meets the Secretary of Interior's Professional Qualification Standards (36 CFR, Part 61), and the project sponsor shall ensure that the contractor follows the plan. The preservation and protection plan, specifications, monitoring schedule, and other supporting documents shall be incorporated into the building or site permit application plan sets for Block 1017, and all documentation shall be reviewed and approved by the planning department's preservation staff.</p> <p>Implementation of the historic preservation plan shall ensure that the proposed rehabilitation and adaptive reuse meet all requirements by establishing measures to protect retained building façades and character defining features from construction equipment that could inadvertently damage historic resources. Specifically, the preservation plan shall incorporate construction specifications that require the construction contractor(s) to use all feasible means to avoid damage to the historic building, including, but not necessarily limited to, staging equipment and materials as far as possible from the historic building to avoid direct impact damage, maintaining a buffer zone when possible between heavy equipment and historical resources, appropriately shoring excavation sidewalls to prevent the movement of adjacent structures, designing and installing new adjacent foundations so as to minimize any uplift of soils, ensuring adequate drainage from adjacent sites,</p>	Project sponsor and qualified historic preservation specialist shall implement the requirements of the plan.	Prior to the issuance of building or demolition permits for Block 1017.	Qualified historic preservation specialist to prepare historic preservation plan and present to the planning department preservation staff.	Ongoing during all demolition, site preparation and construction activities on Block 1017.



MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
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covering the roofs of adjacent structures to avoid damage from falling objects, and ensuring appropriate security to minimize risks related to vandalism and fire. The consultant shall conduct regular periodic inspections of the historic building during ground disturbing activities on the project site. Shall damage to the building occur, the building shall be remediated to its preconstruction condition at the conclusion of ground disturbing activity on the site and fixed during rehabilitation of the resource.				
<p><b>M-CR-2: Archaeological Testing</b></p> <p>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 proposed project on buried or submerged historical resources and on human remains and associated or unassociated funerary objects. The project sponsor shall retain the services of an archaeological consultant from the rotational Qualified Archaeological Consultants List (QACL) maintained by the planning department archaeologist. After the first project approval action, or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the planning department archaeologist to obtain the names and contact information for the next three archaeological consultants on the QACL. The archaeological consultant shall undertake an archaeological testing program, as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the 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 considered draft reports and subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the proposed 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</p>	Project sponsor and archeological consultant at the direction of the ERO	Prior to issuance of site permits	Planning department	Considered complete after archeological consultant is retained and archeological consultant has approved scope by the ERO for the archeological testing program

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means for reducing potential effects on a significant archaeological resource, as defined in CEQA Guidelines section 15064.5 (a) and (c), to a less-than-significant level.				
<i>Consultation with Descendant Communities:</i> On discovery of an archaeological site associated with descendant Native Americans, the overseas Chinese, or other potentially interested descendant group, an appropriate representative of the descendant group and the ERO shall be contacted. The term “archaeological site” is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial. 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; in the case of the overseas Chinese, this applies to individuals listed by the Chinese Historical Society of America. An appropriate representative of other descendant groups shall be determined in consultation with the planning department archaeologist. The representative of the descendant group shall be given an opportunity to monitor archaeological field investigations of the archaeological site and offer recommendations to the ERO regarding appropriate treatment of the archaeological site, recovered data from the archaeological site, and, if applicable, interpretative treatment of the associated archaeological site. A copy of the final archaeological resources report shall be provided to the representative of the descendant group.	Project sponsor and archeological consultant at the direction of the ERO	In the event that an archeological site is uncovered during the construction period	Planning department	Considered complete after Final Archeological Resources Report is approved and provided to descendant group
<i>Archaeological Testing Program.</i> The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property type of the expected archaeological resource(s) that could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine, to the extent possible, the presence or absence of	Project sponsor and archeological consultant at the direction of the ERO	Prior to soil disturbance	Planning department	Considered complete after approval of Archeological Testing Report

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<p>archaeological resources and whether any archaeological resource encountered on the project site constitutes a historical resource under CEQA. At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If, based on the archaeological testing program, the archaeological consultant finds that significant archaeological resources may be present, the ERO, in consultation with the archaeological consultant, shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. No archaeological data recovery shall be undertaken without the prior approval of the ERO or the planning department archaeologist. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor, either:</p> <p>A) The proposed project shall be redesigned so as to avoid any adverse effect on the significant archaeological resource, or</p> <p>B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive rather than research significance and that interpretive use of the resource is feasible.</p>				
<p><i>Archaeological Monitoring Program.</i> If the ERO, in consultation with the archaeological consultant, determines that an archaeological monitoring program shall be implemented, the archaeological monitoring program shall minimally include the following provisions:</p> <ul style="list-style-type: none"> <li>The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soil-disturbing activities commencing. The ERO, in consultation with the archaeological consultant, shall determine what project activities shall be archaeologically monitored. In most cases, any soil-disturbing activities, such as demolition, excavation, grading, utility installation, foundation work, pile driving (foundation, shoring, etc.), and site</li> </ul>	Project sponsor and archeological consultant at the direction of the ERO	During soil disturbing activities	Planning department	Considered complete after completion of the archeological monitoring program



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<p>remediation, shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and their depositional context;</p> <ul style="list-style-type: none"> <li>▪ The archaeological consultant shall undertake a training program for workers who are involved in soil-disturbing activities; this will include an overview of the expected resource(s), how to identify evidence of the expected resource(s), and the appropriate protocol to be implemented in the event of apparent discovery of an archaeological resource;</li> <li>▪ 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;</li> <li>▪ The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;</li> <li>▪ If an intact archaeological deposit is encountered, all soil-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/ excavation/pile installation/construction activities and equipment until the deposit is evaluated. If, in the case of pile installation or deep foundation activities (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile installation or deep foundation activities may affect an archaeological resource, the pile installation or deep foundation activities shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. 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.</li> </ul> <p>Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the</p>				

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monitoring program to the ERO.				
<p><i>Archaeological Data Recovery Program.</i> The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The 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.</p> <p>The scope of the ADRP shall include the following elements:</p> <ul style="list-style-type: none"> <li>▪ <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations.</li> <li>▪ <i>Cataloging and Laboratory Analysis.</i> Description of selected cataloging system and artifact analysis procedures.</li> <li>▪ <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies.</li> <li>▪ <i>Interpretive Program.</i> Consideration of an onsite/offsite public interpretive program during the course of the archaeological data recovery program.</li> <li>▪ <i>Security Measures.</i> Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.</li> <li>▪ <i>Final Report.</i> Description of proposed report format and distribution of results.</li> </ul>	Project sponsor and archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning department	Considered complete after FARR is reviewed and approved

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<ul style="list-style-type: none"> <li><i>Curation.</i> 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.</li> </ul>				
<p><i>Human Remains and Associated or Unassociated Funerary Objects.</i> The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity shall comply with all applicable state and federal laws. This shall include immediate notification of 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 Native American Heritage Commission, which shall appoint a Most Likely Descendant (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment and disposition within 48 hours of granted access to the site (Public Resources Code section 5097.98). The Environmental Review Officer (ERO) shall also be notified immediately upon discovery of human remains.</p> <p>The project sponsor, and the ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity of the 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.</p> <p>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</p>	Project sponsor and archeological consultant at the direction of the ERO, Medical Examiner, and NAHC as warranted	Following the discovery of human remains	Planning department	Considered complete on finding by the ERO that all state laws regarding human remains/burial objects have been adhered to, consultation with MLD is completed as warranted, sufficient opportunity has been provided to the archeological consultant for scientific/historical analysis of human remains/funerary objects, and after FARR is reviewed and



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<p>agreement on specific treatment of the remains and associated or unassociated funerary objects, the ERO, in cooperation with the project sponsor, shall ensure that the remains and associated or unassociated funerary objects 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 (Public Resources Code section 5097.98).</p> <p>Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during soil-disturbing activity additionally shall follow protocols laid out in the archaeological testing program and any agreement established between the project sponsor, the Medical Examiner, and the ERO.</p>				approved
<p><i>Final Archaeological Resources Report.</i> The archaeological consultant shall submit a draft 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. The draft FARR shall include a curation and deaccession plan for all recovered cultural materials. The draft FARR shall also include an interpretation plan for public interpretation of all significant archaeological features.</p> <p>Copies of the draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, the consultant shall also prepare a public distribution version of the FARR. Copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one 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 and one unlocked, searchable PDF copy on CD of the FARR, along with copies of any formal site recordation forms (California Department of Parks and Recreation 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public</p>	Archeological consultant at the direction of the ERO	Following completion of additional measures by archeological consultant as determined by the ERO	Planning department	Considered complete upon distribution of approved FARR

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interest or high interpretive value, the ERO may require additional content for the final report or a different format or distribution plan.				
<b>Mitigation Measure M-CR-3: Tribal Cultural Resources Interpretive Program</b> If the Environmental Review Officer (ERO) determines that preservation in place of a tribal cultural resource (TCR), pursuant to Mitigation Measure M-CR-2, Archaeological Testing, is both feasible and effective, then the archaeological consultant shall prepare an archaeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archaeological consultant shall be required when feasible. If the ERO determines that preservation in place of a TCR is not a sufficient or feasible option, then the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated Native American tribal representatives. An interpretive plan produced in consultation with affiliated Native American tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installations, 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; artifact displays and interpretation; and educational panels or other informational displays.	Project sponsor archeological consultant, and ERO, in consultation with the affiliated Native American tribal representatives	If significant archeological resources are present, during implementation of the project	Planning department	Considered complete upon project redesign, completion of ARPP, or interpretive program of the TCR, if required
<b>Noise and Vibration Mitigation Measures</b>				
<b>Mitigation Measure M-NO-1: Construction Noise Control</b> The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the	Project sponsor	Prior to the issuance of building permits; implementation ongoing during construction.	Project sponsor to submit the Construction Noise Control Plan to the planning department for review and approval. A single	Considered complete upon approval and implementation of the Construction Noise Control Plan.

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<p>ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below.</p> <ul style="list-style-type: none"> <li>Require that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.</li> <li>Prohibit gasoline or diesel engines from having unmuffled exhaust systems.</li> <li>Ensure that equipment and trucks for project construction use the best available noise control techniques (e.g., improved mufflers, redesigned equipment, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible. According to the Federal Highway Administration, the use of shields or barriers around noise sources can reduce noise by 5 to 10 dBA, depending on the type of barrier used.</li> <li>Use “quiet” gasoline-powered or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.</li> <li>Locate stationary noise sources, such as temporary generators, concrete saws, and crushing/processing equipment, as far from nearby receptors as possible; muffle and enclose noise sources within temporary enclosures and shield with barriers, which could reduce construction noise by as much as 5 dB; or implement other measures, to the extent feasible.</li> <li>Undertake the noisiest activities during times of least disturbance to surrounding residents and occupants, such as midday or early afternoon when residents are more likely to be at work and less likely to be sleeping, as feasible.</li> <li>In response to noise complaints received from people in the project area, monitor the effectiveness of noise attenuation measures by taking noise</li> </ul>			Noise Control Plan or multiple Noise Control Plans may be produced to address project construction phasing.	

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<p>measurements. A plan for noise monitoring shall be provided to the City for review prior to the commencement of each construction phase. The construction noise control plan must include the following measures for responding to and tracking complaints pertaining to construction noise:</p> <ul style="list-style-type: none"> <li>• A procedure and phone numbers for notifying the Department of Building Inspection, health department, or the police department of complaints (during regular construction hours and off hours).</li> <li>• Signs posted onsite and around the project site at major intersections immediately adjacent to the project site for the duration of project construction describing noise complaint procedures and providing a complaint hotline number that shall be answered at all times during construction. Signs shall include construction work hours.</li> <li>• Designation of an onsite construction complaint and enforcement manager, with telephone contact information, for the project. This information shall be visible on all signs posted at and around the project site for the duration of project construction.</li> <li>• A plan for notification of neighboring residents and nonresidential building managers within 300 feet of the project construction area at least 30 days in advance of activities that could increase daytime ambient noise levels at sensitive receptor locations by 10 dBA or more. The notification must include the associated control measures that will be implemented to reduce noise levels.</li> </ul>				
<p><b>Mitigation Measure M-NO-2: Vibration-Sensitive Equipment at 3838 California Street</b></p> <p>If vibration-sensitive equipment at 3838 California Street is not present in the building prior to the start of project construction, the sponsor shall submit documentation to the San Francisco Planning Department, verifying that this equipment is not present, and the remainder of this mitigation measure shall</p>	Project sponsor and community liaison	Notification to occur 10 days prior to the start of project construction and ongoing.	Project construction notification materials would be posted with a copy provided to the planning	Ongoing throughout the construction phase.



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<p>not be required.</p> <p>A community liaison shall be designated and made available to respond to vibration complaints from building occupants at 3838 California Street. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to building occupants most likely to be disturbed. Through the community liaison, the project sponsor shall provide notification to property owners and occupants of 3838 California Street of construction activities involving equipment that can generate vibration capable of interfering with vibration-sensitive equipment 10 days prior to the start of project construction, informing them of the estimated start date and duration of vibration-generating construction activities. These equipment types include a large bulldozer, or similar equipment, operating within 135 feet of the building; a jackhammer operating within 75 feet of the building; or a loaded truck operating within 125 feet of the building. The community liaison shall manage concerns and complaints resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified noise and vibration consultant to ensure that there are no exceedances of the 65 VdB vibration level threshold for vibration-sensitive equipment. If concerns prior to construction or complaints during construction related to equipment interference are identified, the community liaison shall work with the project sponsor and the affected building occupants to resolve the concerns. To resolve concerns raised by building occupants, the community liaison shall convey the details of the complaint(s) to the project sponsor so that specific measures can be implemented, such as scheduling certain construction activities outside the hours of operation of specific vibration-sensitive equipment and/or conducting ground-borne vibration monitoring to document that no exceedances of the 65 VdB impact level occur at specific distances and/or locations. Ground-borne vibration monitoring, if appropriate to resolve concerns, shall be conducted by a qualified noise and vibration consultant.</p>			department by the project sponsor and/or team at least on an annual basis.	
<i>Air Quality Mitigation Measures</i>				

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<p><b>Mitigation Measure M-AQ-3: Construction Emissions Minimization</b></p> <p>The project sponsor shall comply with all of the following:</p> <p>A. <i>Engine Requirements.</i></p> <ol style="list-style-type: none"> <li>1. All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either: (1) U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 <i>and</i> be equipped with a Level 3 Verified Diesel Emissions Control Strategies (VDECS) or (2) Tier 4 Interim or Tier 4 Final off-road emission standards.<sup>1</sup></li> <li>2. Where grid power is available, portable diesel engines shall be prohibited.</li> <li>3. All diesel engines, whether for off-road or on-road equipment or vehicles, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The project sponsor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.</li> <li>4. The project sponsor shall instruct construction workers and</li> </ol>	Project sponsor	Prior to the issuance of building permits; implementation ongoing during construction	Planning department	Ongoing during construction activities

<sup>1</sup> See 40 CFR Part 1039 and Title 13 CCR Sections 2403 to 2784.

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<p>equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.</p> <p><i>B. Waivers.</i></p> <ol style="list-style-type: none"> <li>1. The Environmental Review Officer (ERO) or their designee may waive the equipment requirements of Subsection (A)(1) if: a particular piece of Tier 4 Interim or Tier 4 Final off-road equipment is not available or technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; or use of the equipment would create a safety hazard or impaired visibility for the operator. If seeking a waiver, the project sponsor shall demonstrate that with approval of the waiver, the project would not exceed a cancer risk of 7.0 in 1 million at sensitive receptor locations. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to Table AQ-1, below. Emerging technologies with verifiable emissions reductions supported by substantial evidence may also be employed in lieu of the step-down schedule below.</li> <li>2. The ERO may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the</li> </ol>				

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<p>requirements of Subsection (A)(1).</p> <p><b>Table AQ-1 – Off-Road Equipment Compliance Step-down Schedule</b></p> <table><tr><th>Compliance Alternative</th><th>Engine Emission Standard</th><th>Emissions Control</th></tr><tr><td>1</td><td>Tier 2</td><td>ARB Level 2 VDECS<sup>1</sup></td></tr><tr><td>2</td><td>Tier 2</td><td>ARB Level 1 VDECS</td></tr><tr><td>3</td><td>Tier 2</td><td>Alternative Fuels</td></tr></table> <p>How to use the table: If the ERO determines that the equipment requirements listed in Section A.1, above, cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.</p> <p><sup>1</sup> VDECS are a Verifiable Diesel Emissions Control Strategy</p> <p><i>C.Construction Emissions Minimization Plan.</i> Before starting on-site activities requiring the use of off-road equipment, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the project sponsor will meet the requirements of Section A.</p> <p>1. The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The</p>	Compliance Alternative	Engine Emission Standard	Emissions Control	1	Tier 2	ARB Level 2 VDECS <sup>1</sup>	2	Tier 2	ARB Level 1 VDECS	3	Tier 2	Alternative Fuels				
Compliance Alternative	Engine Emission Standard	Emissions Control														
1	Tier 2	ARB Level 2 VDECS <sup>1</sup>														
2	Tier 2	ARB Level 1 VDECS														
3	Tier 2	Alternative Fuels														



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<p>description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date.</p> <p>2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the project sponsor agrees to comply fully with the Plan. A signed certification statement shall be submitted to the planning department before starting on-site construction activities requiring off-road equipment.</p> <p>3. The project sponsor shall make the Plan available to the public for review on-site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.</p> <p>D. <i>Monitoring.</i> After start of construction activities, the project sponsor shall submit reports every six months to the ERO documenting compliance with the Plan. After completion of construction</p>				

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.				
<i>Biological Resources Mitigation Measures</i>				
<p><b>Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas</b></p> <p>Nesting birds and their nests shall be protected during construction by implementation of the following measures for each construction phase:</p> <ol style="list-style-type: none"> <li>To the extent feasible, the project sponsor shall conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15).</li> <li>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. 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 in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall be performed in publicly accessible areas within 100 feet of the project site in order to locate any active nests of common bird species and within 250 feet of the project site to locate any active raptor (birds of prey) nests.</li> </ol>	Project sponsor; qualified biologist; CDFW	Pre-construction surveys during the bird nesting season would occur within 14 days prior to the start of construction. Implementation ongoing during construction if active nests are observed.	Qualified biologist in coordination with planning department staff if active nests are observed.	Ongoing during construction if active nests are observed.

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
<p>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; if so, the following measures shall apply, as determined by the biologist:</p> <p>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 that 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.</p> <p>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 within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for passerines and 250 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.</p> <p>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 the California Department of Fish and Wildlife (CDFW). Necessary actions to remove or relocate an active nest(s) shall be coordinated with the planning department and approved by CDFW.</p> <p>iv. Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If</p>				

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
<p>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.</p> <p>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 affected.</p> <p>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.</p>				
<b><i>Paleontological (Geology and Soils) Mitigation Measures</i></b>				
<p><b>Mitigation Measure M-GE-4: Inadvertent Discovery of Paleontological Resources</b></p> <p>Before the start of any excavation activities, the project applicant shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, who is experienced in teaching non-specialists. 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, the proper notification procedures shall fossils be encountered, and the laws and regulations protecting paleontological resources.</p> <p>The qualified paleontologist shall also make periodic visits during earthmoving in high sensitivity sites to verify that workers are following the</p>	Project sponsor and qualified paleontologist.	Before the start of any excavation activities.	If necessary, qualified paleontologist to prepare and submit a recovery plan for planning department review and approval.	Ongoing during construction. Considered complete once ground disturbing activities are complete or once the planning department approves the recovery plan, if



MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
<p>established procedures.</p> <p>If potential paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease all earthwork or other types of ground disturbance within 25 feet of the find and notify the project sponsor, the qualified paleontologist, and the planning department. The fossil shall be protected by an “exclusion zone” (i.e., an area of approximately 5 feet around the discovery that is marked with caution tape to prevent damage to the fossil). Construction work in the affected areas shall remain stopped or be diverted to allow recovery of fossil remains in a timely manner. The qualified paleontologist shall evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines if the resource is deemed significant (see Society of Vertebrate Paleontology, <i>Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources</i>, <a href="http://vertpaleo.org/Membership/MemberEthics/SVP_Impact_Mitigation_Guidelines.aspx">http://vertpaleo.org/Membership/MemberEthics/SVP_Impact_Mitigation_Guidelines.aspx</a>). The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, university or museum storage coordination for any specimen recovered, and a report of findings. If storage of a specimen is required, upon receipt of the fossil collection, a signed repository receipt form shall be obtained and provided to the planning department.</p> <p>Recommendations in the recovery plan that are determined by the planning department to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered. The project sponsor shall be responsible for ensuring that the paleontologist’s recommendations regarding treatment and reporting are implemented, including the costs necessary to prepare and identify collected fossils and any curation fees charged for university or museum storage.</p>				required.

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
<b>IMPROVEMENT MEASURES FOR THE 3700 CALIFORNIA STREET PROJECT</b>				
<i>Cultural Resources Improvement Measures</i>				
<b>Improvement Measure I-CR-A: Historic Resource Interpretation</b> The project sponsor shall provide a permanent display of interpretive materials concerning the history and architectural features of the Marshal Hale hospital building as well as the history of the CPMC California Campus. The historic interpretation shall be supervised by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards and conducted in coordination with an exhibit designer. The interpretative materials (which may include, but are not limited to, a display of current and historical photographs, news articles, artifacts associated with the hospital, and video recordings) shall be placed in prominent public settings. A proposal describing the general parameters of the interpretive program shall be approved by the planning department's preservation staff prior to issuance of a site permit. The substance, media, and other elements of such an interpretive display shall be approved by the planning department's preservation staff prior to issuance of a temporary certificate of occupancy for Block 1017.	Project sponsor and qualified architectural historian.	For Block 1017 prior to issuance of site permit (for outline) and temporary certificate of occupancy (for substantive content).	Planning department preservation planning staff to review and approve the interpretive display.	Considered complete upon installation of display.
<i>Noise Improvement Measures</i>				
<b>Improvement Measure I-NO-A: Stationary Equipment Noise Controls</b> Prior to approval of each building permit, the project sponsor shall submit documentation to the San Francisco Planning Department, demonstrating that the building's stationary equipment (such as HVAC equipment) meets the noise limits specified in section 2909 of the San Francisco Police Code (i.e., a 5 dB increase at the property plane and interior limits of 55 dBA and 45 dBA for daytime and nighttime hours, respectively). Acoustical treatments may include, but are not limited to: <ul style="list-style-type: none"> <li>• Enclosing HVAC and other noise-generating mechanical equipment</li> <li>• Installing relatively quiet models of air handlers, exhaust fans, and other mechanical equipment</li> </ul>	Project sponsor to provide documentation that building HVAC systems meet requirements.	Prior to the issuance of certificate of occupancy for each building located on the site.	The planning department to review and approve sponsor provided documentation of stationary equipment.	Considered complete after submittal and approval of plans by the planning department

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
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<ul style="list-style-type: none"> <li>Using mufflers or silencers on equipment exhaust fans</li> <li>Orienting or shielding equipment to protect sensitive uses to the greatest extent feasible</li> <li>Increasing the distance between stationary equipment and noise-sensitive receptors (residences, schools, and childcare facilities)</li> <li>Placing barriers around the equipment to facilitate the attenuation of noise.</li> </ul>				
<i>Biological Resources Improvement Measures</i>				
<b>Improvement Measure I-BI-A: Preconstruction Survey for Bee Populations</b> Prior to construction and tree removal, personnel shall check trees to verify there are no active swarms or colonies present. If found, personnel shall report the findings to the San Francisco Beekeepers Association or other agency/organization approved by the Planning Department, and either wait for the bees to depart or work with the agency/organization to move the bees to safety.	Project sponsor	Before the start of any construction activities or tree removal.	Copies of findings would be reported to the San Francisco Beekeepers Association or other approved agency/organization if swarms or colonies are present.	Considered complete once project construction and tree removal is complete or, there are active swarms or colonies present, once bees depart or are moved to safety.
<i>Transportation and Circulation Improvement Measures</i>				
<b>Improvement Measure I-TR-A: Project Construction Updates</b> To minimize construction impacts on access for nearby residences, institutions, and businesses, the project sponsor shall 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 through a newsletter and/or website.	Project sponsor	Ongoing throughout the construction phase.	Copies of project construction update materials would be provided to the planning department at least annually or	Ongoing throughout the construction phase.

MITIGATION MONITORING AND REPORTING PROGRAM FOR 3700 CALIFORNIA STREET PROJECT				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Implementation Responsibility	Mitigation Schedule	Monitoring/ Reporting Responsibility (Public Agency)	Monitoring Schedule
			upon request.	
<p><b>Improvement Measure I-TR-B: Monitoring and Abatement of Queues</b></p> <p>A vehicle queue is defined as one or more vehicles blocking any portion of adjacent sidewalks or travel lanes for a consecutive period of 3 minutes or longer on a daily basis. It will be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts do not occur adjacent to the project site. If recurring queuing occurs, the owner/operator of the facility will employ abatement methods as needed to abate the queue. Appropriate abatement methods would vary, depending on the characteristics and causes of the recurring queue as well as the characteristics of the parking and loading facility, the street(s) to which the facility connects, and the associated land uses (if applicable).</p> <p>Suggested abatement methods include, but are not limited to, the following: redesign of facility to improve vehicle circulation and/or onsite queue capacity; ingress/egress restrictions, such right in/right out access limitations; employment of parking attendants to facilitate parking garage ingress and egress; and additional TDM transportation demand management strategies.</p> <p>If the planning director, or his or her designee, determines that a recurring queue or conflict may be present, the planning department will notify the project sponsor in writing. Upon request, the owner/operator will hire a qualified transportation consultant to evaluate the conditions at the site for no less than 7 days. The consultant will prepare a monitoring report to be submitted to the planning department for review. If the planning department determines that a recurring queue or conflict does exist, the project sponsor will have 90 days from the date of the written determination to abate the recurring queue or conflict.</p>	Project sponsor, and owner/ operator of the facility.	Ongoing	The project sponsor would prepare a monitoring report for planning department, if recurring queuing occurs.	Project sponsor's obligations deemed complete once effective abatement measures are implemented.



Motion No. \_\_\_\_\_  
Hearing Date: February 27, 2020

CASE NO. 2017.003559ENV  
3700 California Street Project

# Exhibit D:

## Land Use Data

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# SAN FRANCISCO PLANNING DEPARTMENT

## Land Use Information

PROJECT ADDRESS: 3700 CALIFORNIA ST  
RECORD NO.: 2017-003559CUA

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

	EXISTING	PROPOSED	NET NEW
<b>GROSS SQUARE FOOTAGE (GSF)</b>			
Parking GSF	105,000 gsf <sup>1</sup>	221,000 gsf	221,000 gsf
Residential GSF	7,000 gsf	625,500 gsf	632,500 gsf
Retail/Commercial GSF	-	-	-
Office GSF	-	-	-
Industrial/PDR GSF <i>Production, Distribution, &amp; Repair</i>	-	-	-
Medical GSF	622,000 gsf	0	0
Visitor GSF	-	-	-
CIE GSF	-	-	-
Usable Open Space	Unknown amt.	88,000 gsf	88,000 gsf
Public Open Space	-	-	-
Other ( )			
<b>TOTAL GSF</b>	<b>734,000 gsf<sup>1</sup></b>	<b>846,500 gsf (parking and resid.)</b>	<b>853,500 gsf (parking and resid.)</b>
	EXISTING	NET NEW	TOTALS
<b>PROJECT FEATURES (Units or Amounts)</b>			
Dwelling Units - Affordable	0	0	0
Dwelling Units - Market Rate	9	264	273
Dwelling Units - Total	7,000 gsf	625,500 gsf	632,500 gsf
Hotel Rooms	-	-	-
Number of Buildings	7	31 (+2 retained)	33
Number of Stories	3-8	3-7	3-7
Parking Spaces	333 + 106	416	416
Loading Spaces	2	4	4
Bicycle Spaces	Unknown	424	424
Car Share Spaces	0	2 + 5	7
Other ( )			

<sup>1</sup> Not including surface parking area for the 106 surface parking spaces.

	EXISTING	PROPOSED	NET NEW
<b>LAND USE - RESIDENTIAL</b>			
Studio Units	0	16	+16
One Bedroom Units	9	67	+58
Two Bedroom Units	0	91	+91
Three Bedroom (or +) Units	0	99	+99
Group Housing - Rooms	0	0	-
Group Housing - Beds	0	0	-
SRO Units	0	0	-
Micro Units	0	0	-
Accessory Dwelling Units	0	0	-



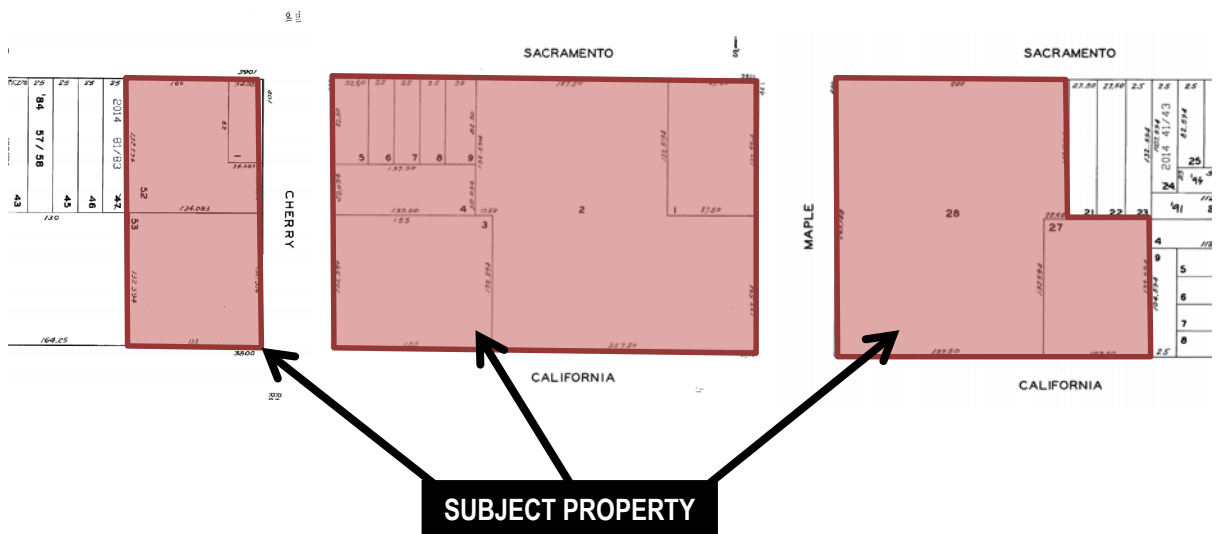
# **Exhibit E:**

## **Maps and Context Photos**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Block Book Map



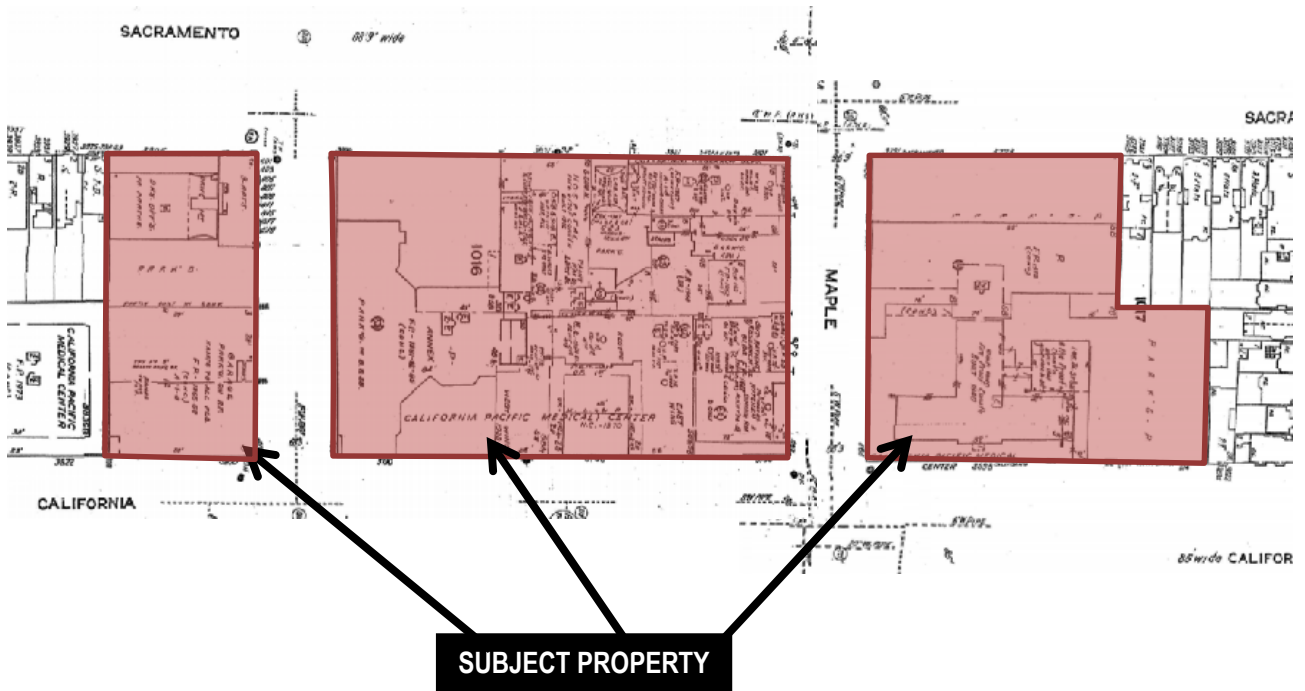
SAN FRANCISCO  
PLANNING DEPARTMENT



Conditional Use/PUD Hearing  
Case Number 2017-003559CUA  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Sanborn Map\*



\*The Sanborn Maps in San Francisco have not been updated since 1998, and this map may not accurately reflect existing conditions.

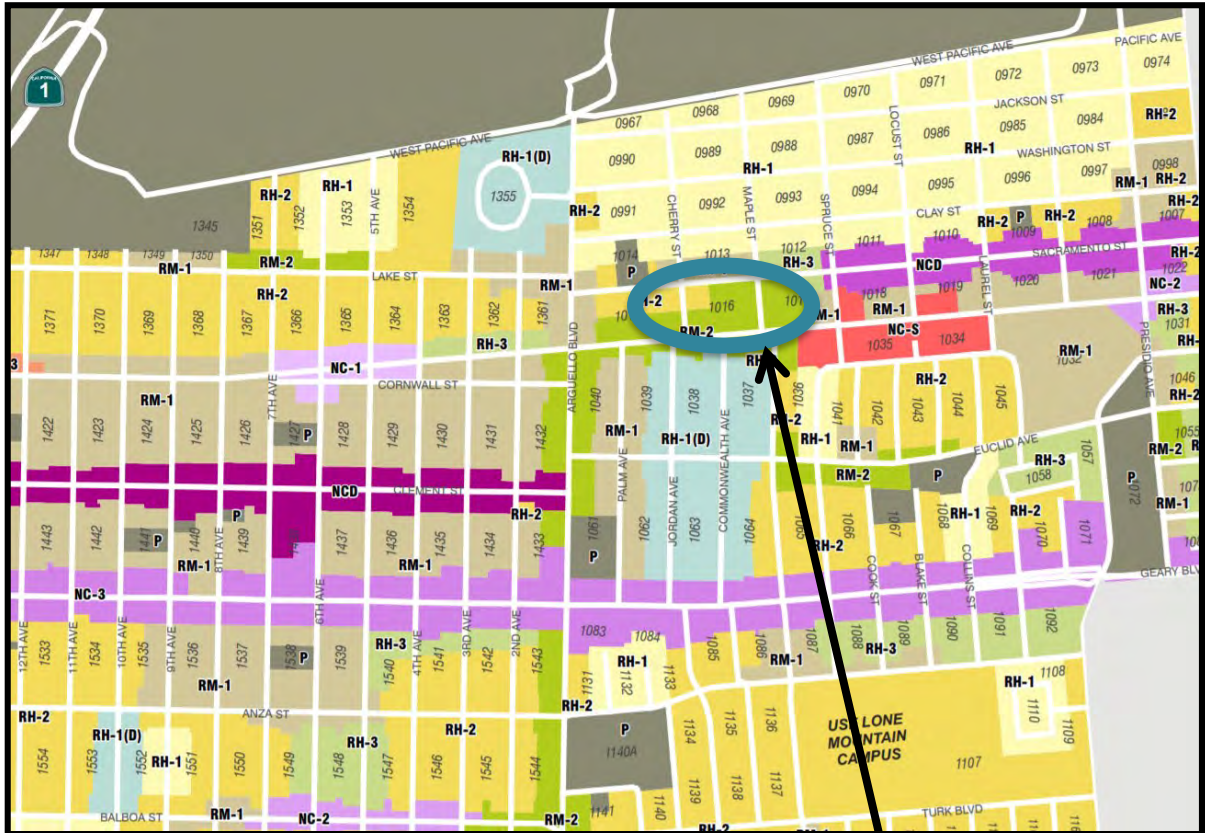
SAN FRANCISCO  
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Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Zoning Map



**SUBJECT PROPERTY**

SAN FRANCISCO  
**PLANNING DEPARTMENT**

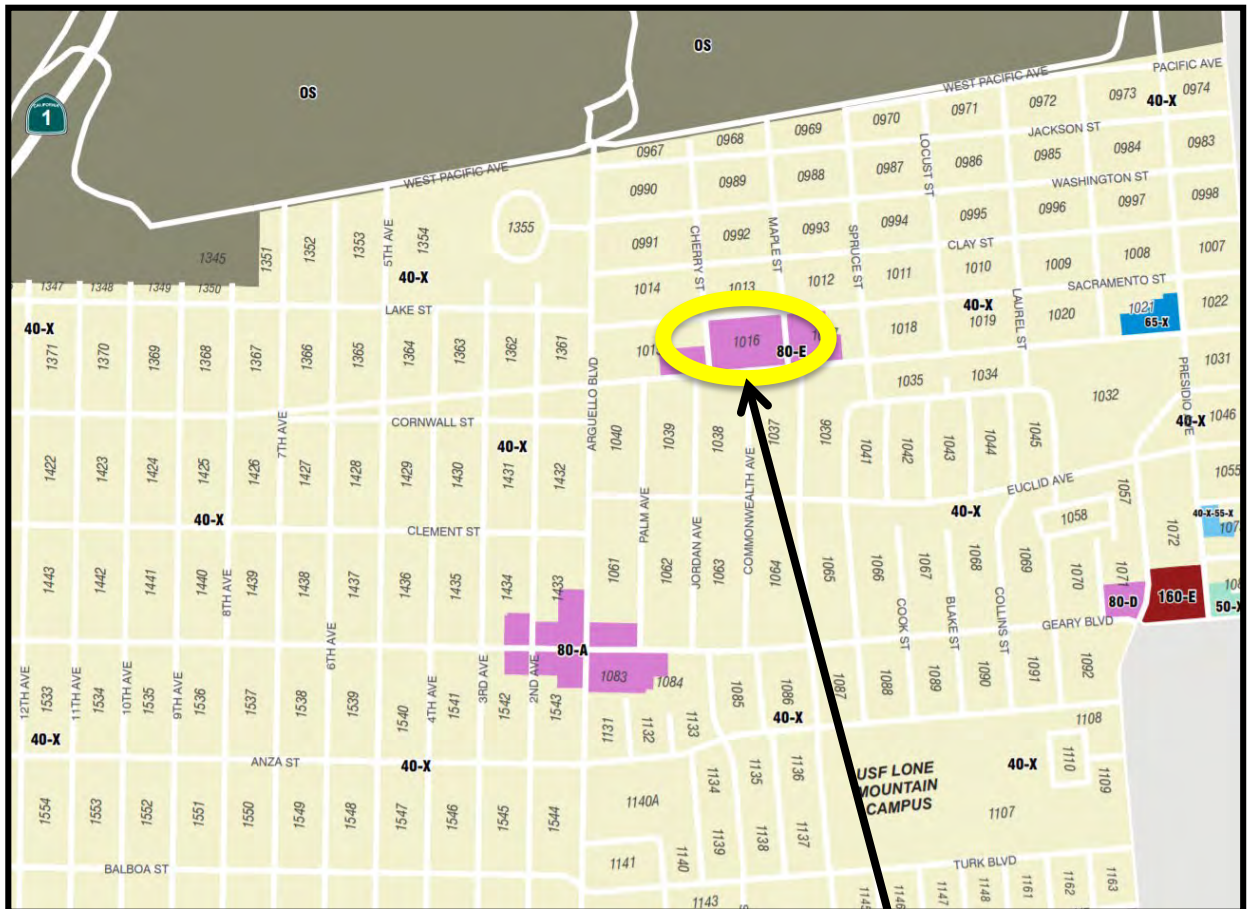


Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# Height & Bulk Map



**SUBJECT PROPERTY**

SAN FRANCISCO  
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Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Aerial Photo

(looking north)



**SUBJECT PROPERTY**

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**PLANNING DEPARTMENT**



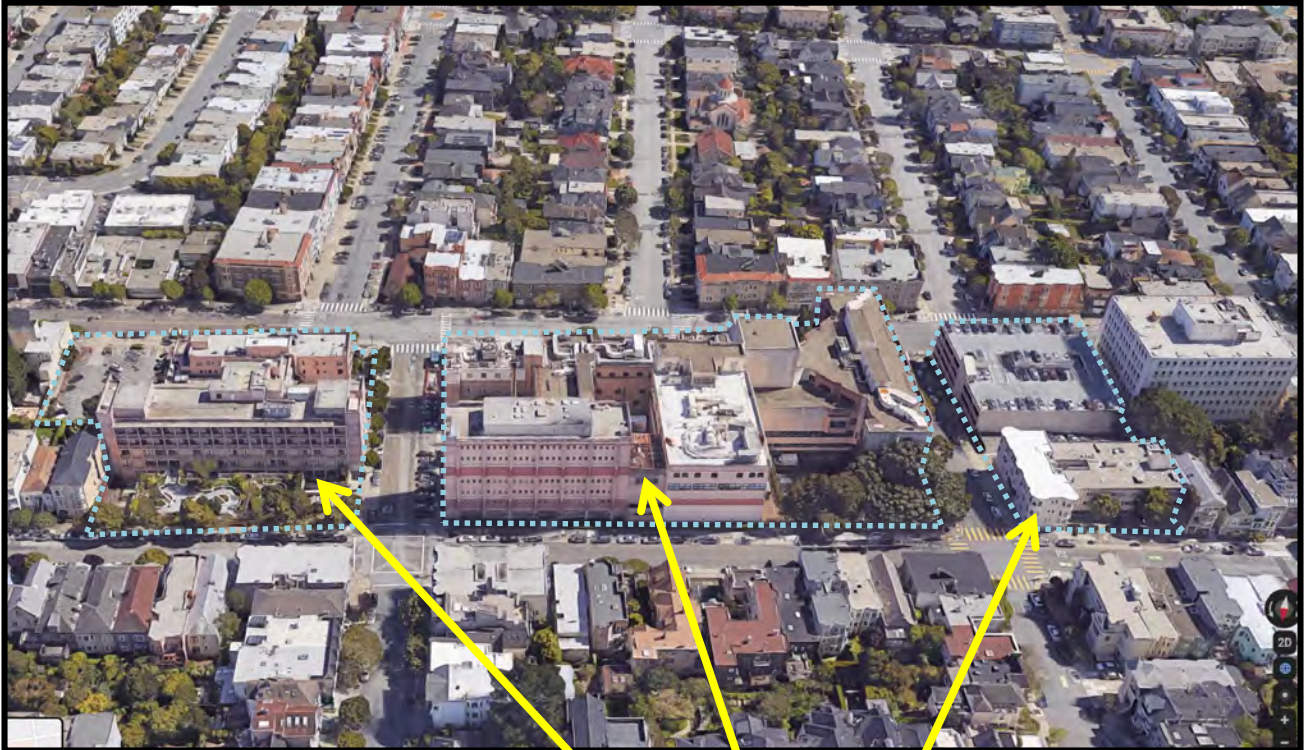
Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# Site Photo

(looking south)



**SUBJECT PROPERTY**

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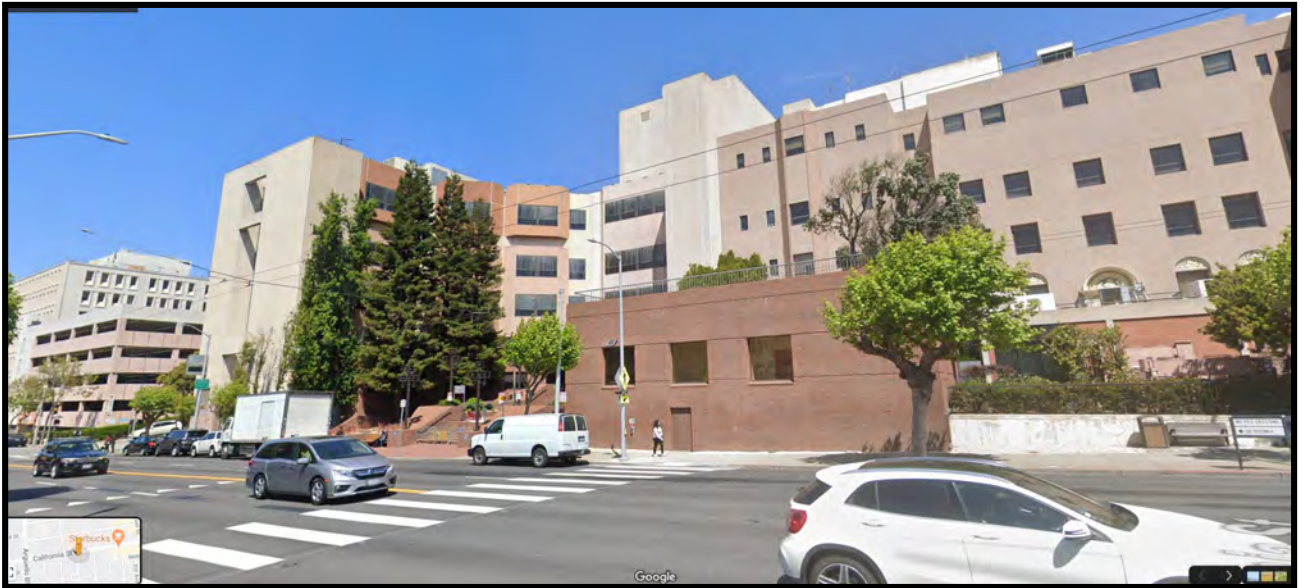


Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Site Photo

(looking northwest)



SAN FRANCISCO  
**PLANNING DEPARTMENT**



Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# Site Photo

(looking northeast)



SAN FRANCISCO  
**PLANNING DEPARTMENT**



Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Site Photo

(looking southwest)



SAN FRANCISCO  
**PLANNING DEPARTMENT**



Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# Site Photo

(looking southeast)



SAN FRANCISCO  
**PLANNING DEPARTMENT**



Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# **Exhibit F:**

## **Project Sponsor Brief**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



# REUBEN, JUNIUS & ROSE, LLP

Tuija Catalano  
tcatalano@reubenlaw.com

February 18, 2020

## Delivered Via Messenger

President Joel Koppel  
Planning Commission  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Re: 3700 California – CU/PUD Application and EIR Certification**  
**Planning Dept. Case No. 2017-03559ENV/CUA**  
**Brief in Support of the Project**  
**Hearing Date: February 27, 2020**  
Our File No.: 6730.11

Dear President Koppel and Commissioners:

Our office represents TMG Partners, the project sponsor (“**Project Sponsor**”) for the redevelopment of the CPMC California Campus at 3700 California Street, Assessor’s Block 1015, Lots 001, 027 and 028, Block 1016, Lots 001-009, and Block 1017, Lots 051 and 052 (the “**Project Site**”). Please accept this brief on behalf of the Project Sponsor in support of the Project.

The Project results in a number of benefits to the immediate neighborhood and the City overall, including the following:

- Redevelopment of the existing CPMC Sutter California Campus Project with a zoning compliant residential project designed through unique 3-yr community visioning process, that reflects neighborhood site planning goals, and was endorsed by key neighborhood groups that participated in the process;
- Proposal of a project that is consistent with Development Agreement between CPMC and the City that required site development proposal to be determined by an intensive community process with a neighborhood Vision Advisory Committee (VAC);
- Creation of a carefully designed and detailed project with a scale and pattern that fits into the existing neighborhood, including construction of 31 new buildings of varying sizes, rooflines, setbacks, etc.;
- Project designed by Robert AM Stern Architects as a high-quality development that embodies traditional regional architectural styles in a variety of building sizes;
- Construction of a significant number of residential units in a neighborhood that has seen relatively little new residential development with a total of 273 units;
- Family-focused design with 70% of the units containing 2 or more bedrooms, the entire Project adding 582 bedrooms<sup>1</sup> into the City’s housing supply, and design and landscape features that are family-friendly;

San Francisco Office  
One Bush Street, Suite 600, San Francisco, CA 94104  
tel: 415-567-9000 | fax: 415-399-9480

Oakland Office  
456 8th Street, 2<sup>nd</sup> Floor, Oakland, CA 94607  
tel: 510-257-5589

www.reubenlaw.com

<sup>1</sup> Project’s 16 studio units have been counted as containing one bedroom each for this calculation.

- Improvement of the pedestrian experience with active street edges, walk-ups and residential entries, widened sidewalks, retention and addition of street trees including a greater variety of species to support improved habitat, and building setbacks that allow for landscaped street frontages;
- Inclusion of an adequate amount of parking (mostly below-grade in existing excavated areas), based on neighborhood requests and Project objective to provide housing for families with bicycle parking in excess of code; and
- Construction to a LEED Gold standard.

**A. PROJECT SITE AND DESCRIPTION**

The Project Site consists of majority of the CPMC campus at 3700 California Street in the Presidio Heights neighborhood. The Site contains approx. 214,000 sf of lot area, over 750,000 sf of existing buildings, 439 parking stalls on more than 4.9 acres. The site includes 14 existing parcels on one full city block (Block 1016, Lots 001–009, aka “Block B”) and portions of two other blocks (Block 1015, Lots 001, 052, and 053, aka “Block A”, and Block 1017, Lots 027 and 028, aka “Block C”). The existing 14 lots on the project site would be merged and subdivided into 16 parcels. The Project Site is located south of Sacramento Street and north of California Street, on both sides of Cherry and Maple Streets.

Approx. 83% of the Project Site is zoned for the RM-2 (Residential, Mixed – Moderate Density) district, with the remaining portions in the RH-2 (Residential, House – Two Family) district. Majority of the Project site is located in an 80-E height and bulk district, with the exception of two lots that cover approximately 8% of the Project Site and are in a 40-X height and bulk district.

The Project proposes:

- demolition of five of the six existing hospital buildings, including an accessory off-street parking garage;
- renovation and adaptive re-use of the older portion of the Marshal Hale hospital building at 3698 California Street to residential use;
- retention and renovation of the existing 9-unit residential building at 401 Cherry Street; and
- construction of 31 new residential buildings, including accessory amenity spaces.

The Project would contain 273 dwelling units, including 9 existing units, based on a design, pattern and scale that is appropriate and fitting for the existing neighborhood in 33 separate buildings each with unique architecture, roof lines, setbacks, and materials.

The new buildings will vary in height from 3 to 7 stories (i.e. 36’ to 80’ over below-grade parking. Below grade parking allows Project street frontages to be improved for pedestrians with generous setbacks, wide sidewalks, landscaping, street trees and lighting, and other improvements to the public realm. A total of 416 parking spaces would be provided below grade. The Project also includes shared onsite amenity space and approx. 88,100 sf of private and common open space areas.

The Project has been designed to comply with the existing RH-2 and RM-2 zoning controls, and no rezoning is requested. The Project is seeking approval of a Conditional Use (“CU”) authorization and a Planned Unit Development (“PUD”) application, with some exceptions in order to provide for the optimal design and project for an almost 5-acre site.

**B. COMMUNITY AND NEIGHBORHOOD SUPPORT**

Unlike many other projects that are designed by the project team and presented to neighborhood groups thereafter, the Project was created designed in a robust 3-year interactive community-based design process with neighborhood groups and leaders. The 2013 Development Agreement for the CPMC Van Ness project, did not provide any specific development controls for the California Campus (i.e. the Project Site), rather it required that future planning for the site be done interactively with a Visioning Advisory Committee (“VAC”) that included participation by nine (9) key neighborhood organizations in regularly scheduled meetings for the purpose of providing community direction for the redevelopment of the site.

The Project Sponsor complied with the Development Agreement process requirements, and developed the Project through this interactive planning process with the VAC and interested project neighbors that included in-home and community meetings, neighborhood association meetings, a community survey, and meetings of the VAC. The outcome is a Project that is supported by the neighborhood organizations, including Presidio Heights Association of Neighbors, Jordan Park Improvement Association, Laurel Heights Improvement Association, Pacific Heights Residents Association and Laurel Village Merchants Association.

Support letters from neighborhood organizations and neighbors are included in your packets.

**C. CONDITIONAL USE AUTHORIZATION**

The Project requires a conditional use (“CU”) authorization for building heights that exceed 50’ in an RM-district. This CU requirement under Pl. Code Sec. 253 does not restrict height, but instead provides an opportunity for the Commission to review the proposed buildings relative to the applicable height and bulk designation, proposed building setbacks and bulk dimensions, in order to ensure that the buildings are appropriately scaled. Much of the Project Site is zoned for the 80-E height a bulk district. None of the proposed buildings exceed the 80’ height limit, and in fact, only four (4) buildings (out of a total of 33 buildings) are proposed with a height of 80’. Five (5) additional buildings are proposed with heights ranging from 57’ to 65’, and thus also exceed the 50’ threshold and require a CU. In sum, the CU only applies to approx. 27% of the Project’s buildings, and none exceed the applicable bulk dimensions.

The Project team evaluated the placement of buildings with varying heights very carefully, taking into consideration neighborhood design goals and revisions, topography, existing heights for the hospital buildings, transitions into existing neighborhood architecture, and street locations and perspectives, in to ensure optimal locations for taller (and shorter) buildings. All of the taller buildings that are subject to the CU requirement are provided with a number of design features to

ensure compatibility and scale appropriateness, such as varying ground level front setbacks, differentiation of materials, varying rooflines, upper floor setbacks and features such as balconies and pilasters.

Overall, the Project, including the 9 buildings that exceed 50' in height, are necessary and desirable in order to redevelop the prior hospital site with 31 new buildings and 273 new dwelling units. The proposed size, placement, massing and design of the proposed buildings is compatible with the neighborhood and will result in a development that is also beneficial for the City as a whole.

#### **D. PLANNED UNIT DEVELOPMENT APPLICATION**

The development of the Project as a Planned Unit Development ("PUD") under Planning Code Sec. 304 is optional, and is available for larger sites (of more than ½ acre) in order to ensure an integrated, stable and desirable development despite its larger size. The PUD process allows for modifications to certain Code requirements in order to produce an outstanding design.

The Project extends over three (3) blocks and covers almost 5 acres of land. The project will include over 33 separate buildings scaled to transition into surrounding buildings with a variety of building heights and footprints extend into what might be viewed as yard area under a more typical smaller site proposal. The RH-2 and RM-2 zoning designations are usually applied to the more traditional 25' x 100' lots. The PUD modifications for the Project are requested in order to apply the more traditional zoning controls to the proposed lot configurations. For example, Block B will include a large lot that has street frontage on all four (4) streets surrounding the block, with buildings heights scaled to transition into the neighborhood and units flowing into the center of the block and thus application of the traditional rear yard setback requirement is practically impossible and would not result in a desirable design consistent with the neighborhood's vision for the property.

The granting of the requested PUD modifications will result in a better, more compatible design than what could be achieved with strict compliance with some of the Code requirements. Specifically, the Project is requesting modification from the following requirements: rear yard setback (Sec. 134), dwelling unit exposure (Sec. 140), street frontage and moderation of building fronts (Sec. 144 and 144.1), and building height measurement (Sec. 260 and 261). The requested modifications are shown in the detailed diagrams that are included in the architectural drawings, and each modification is necessary only for a smaller number of buildings.

#### **E. CONCLUSION**

The proposed Project has been years in the making and is as much the neighborhood's project as it is the Project Sponsor's project. CPMC Sutter's decision to end hospital uses at the California Campus presented a unique opportunity to redevelop the site with housing and to design a compatible and fitting project on a large site that extends over three blocks, and their development agreement for new hospital locations required that the Campus be designed through a neighborhood visioning process. Starting with the VAC community visioning process and the Project Sponsor's decision to engage RAMSA (Robert A.M. Stern Architects) to design the



project, the focus has been on creating a project that is responsive to and fits into the existing neighborhood, concurrently to providing much needed housing and specifically family housing to the City.

We respectfully ask the Commission to certify the EIR and approve the conditional use authorization and planned unit development application for the Project on February 27, 2020. Thank you for your consideration.

Very truly yours,

**REUBEN, JUNIUS & ROSE, LLP**



Tuija I. Catalano

cc: Vice President Kathrin Moore  
Commissioner Sue Diamond  
Commissioner Frank Fung  
Commissioner Maria Theresa Imperial  
Commissioner Milicent Johnson  
Commissioner Dennis Richards  
Jonas P. Ionin, Commission Secretary  
John Rahaim, Planning Director  
Christopher May, Project Planner  
Matt Field, TMG Partners  
Denise Pinkston, TMG Partners

# **Exhibit G:**

## **Inclusionary Affordable Housing Affidavit**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028

# COMPLIANCE WITH THE INCLUSIONARY AFFORDABLE HOUSING PROGRAM



San Francisco  
**Planning**

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

Date: October 24, 2018

To: Applicants subject to Planning Code Section 415 and 419: *Inclusionary Affordable Housing Program*

From: San Francisco Planning Department

Re: **Compliance with the Inclusionary Affordable Housing Program**

All projects that include 10 or more dwelling units must participate in the *Inclusionary Affordable Housing Program* contained in Planning Code Sections 415 and 419. Every project subject to the requirements of Planning Code Section 415 or 419 is required to pay the Affordable Housing Fee. A project may be eligible for an Alternative to the Affordable Housing Fee. All projects that can demonstrate that they are eligible for an Alternative to the Affordable Housing Fee must provide necessary documentation to the Planning Department and Mayor's Office of Housing and Community Development.

**At least 30 days before the Planning Department and/or Planning Commission can act on the project**, this Affidavit for Compliance with the Inclusionary Affordable Housing Program must be completed. Please note that this affidavit is required to be included in Planning Commission packets and therefore, must comply with packet submittal guidelines.

The inclusionary requirement for a project is determined by the date that the Environmental Evaluation Application (EEA) or Project Application (PRJ) was deemed complete by the Department ("EEA/PRJ accepted date"). There are different inclusionary requirements for smaller projects (10-24 units) and larger projects (25+ units). Please use the attached charts to determine the applicable requirement. Charts 1-3 include two sections. The first section is devoted to projects that are subject to Planning Code Section 415. The second section covers projects that are located in the Urban Mixed Use (UMU) Zoning District and certain projects within the Mission Neighborhood Commercial Transit District that are subject to Planning Code Section 419. Please use the applicable form and contact Planning staff with any questions.

For projects with complete EEA's/PRJ's accepted on or after January 12, 2016, the Inclusionary Affordable Housing Program requires the provision of on-site and off-site affordable units at a mix of income levels. The number of units provided at each income level depends on the project tenure, EEA/PRJ accepted date, and the applicable schedule of on-site rate increases. Income levels are defined as a percentage of the Area Median Income (AMI), for low-income, moderate-income, and middle-income units, as shown in Chart 5. Projects with a complete EEA accepted prior to January 12, 2016 must provide the all of the inclusionary units at the low income AMI. **Any project with 25 units or more and with a complete EEA accepted between January 1, 2013 and January 12, 2016 must obtain a site or building permit by December 7, 2018, or will be subject to higher Inclusionary Housing rates and requirements. Generally, rental projects with 25 units or more be subject to an 18% on-site rate and ownership projects with 25 units or more will be subject to a 20% on-site rate.**

**Summary of requirements.** Please determine what requirement is applicable for your project based on the size of the project, the zoning of the property, and the date that a complete Environmental Evaluation Application (EEA) or complete Project Application (PRJ) was submitted deemed complete by Planning Staff. Chart 1-A applies to all projects throughout San Francisco with EEA's accepted prior to January 12, 2016, whereas Chart 1-B specifically addresses UMU (Urban Mixed Use District) Zoning Districts. Charts 2-A and 2-B apply to rental projects and Charts 3-A and 3-B apply to ownership projects with a complete EEA/PRJ accepted on or after January 12, 2016. Charts 4-A and 4-B apply to three geographic areas with higher inclusionary requirements: the North of Market Residential SUD, SOMA NCT, and Mission Area Plan.

The applicable requirement for projects that received a first discretionary approval prior to January 12, 2016 are those listed in the "EEA accepted before 1/1/13" column on Chart 1-A.

### CHART 1-A: Inclusionary Requirements for all projects with Complete EEA accepted before 1/12/2016

	Complete EEA Accepted: →	Before 1/1/13	Before 1/1/14	Before 1/1/15	Before 1/12/16
<b>On-site</b>					
10-24 unit projects		12.0%	12.0%	12.0%	12.0%
25+ unit projects		12.0%	13.0%	13.5%	14.5%
<b>Fee or Off-site</b>					
10-24 unit projects		20.0%	20.0%	20.0%	20.0%
25+ unit projects at or below 120'		20.0%	25.0%	27.5%	30.0%
25+ unit projects over 120' in height *		20.0%	30.0%	30.0%	30.0%

\*except buildings up to 130 feet in height located both within a special use district and within a height and bulk district that allows a maximum building height of 130 feet, which are subject to the requirements of 25+ unit projects at or below 120 feet.

### CHART 1-B: Requirements for all projects in UMU Districts with Complete EEA accepted before 1/12/2016

Please note that certain projects in the SOMA Youth and Family SUD and Western SOMA SUD also rely upon UMU requirements.

	Complete EEA Accepted: →	Before 1/1/13	Before 1/1/14	Before 1/1/15	Before 1/12/16
<b>On-site UMU</b>					
Tier A 10-24 unit projects		14.4%	14.4%	14.4%	14.4%
Tier A 25+ unit projects		14.4%	15.4%	15.9%	16.4%
Tier B 10-24 unit projects		16.0%	16.0%	16.0%	16.0%
Tier B 25+ unit projects		16.0%	17.0%	17.5%	18.0%
Tier C 10-24 unit projects		17.6%	17.6%	17.6%	17.6%
Tier C 25+ unit projects		17.6%	18.6%	19.1%	19.6%
<b>Fee or Off-site UMU</b>					
Tier A 10-24 unit projects		23.0%	23.0%	23.0%	23.0%
Tier A 25+ unit projects		23.0%	28.0%	30.0%	30.0%
Tier B 10-24 unit projects		25.0%	25.0%	25.0%	25.0%
Tier B 25+ unit projects		25.0%	30.0%	30.0%	30.0%
Tier C 10-24 unit projects		27.0%	27.0%	27.0%	27.0%
Tier C 25+ unit projects		30.0%	30.0%	30.0%	30.0%
<b>Land Dedication in UMU or Mission NCT</b>					
Tier A 10-24 unit < 30K		35.0%	35.0%	35.0%	35.0%
Tier A 10-24 unit > 30K		30.0%	30.0%	30.0%	30.0%
Tier A 25+ unit < 30K		35.0%	40.0%	42.5%	45.0%
Tier A 25+ unit > 30K		30.0%	35.0%	37.5%	40.0%
Tier B 10-24 unit < 30K		40.0%	40.0%	40.0%	40.0%
Tier B 10-24 unit > 30K		35.0%	35.0%	35.0%	35.0%
Tier B 25+ unit < 30K		40.0%	45.0%	47.5%	50.0%
Tier B 25+ unit > 30K		35.0%	40.0%	42.5%	45.0%
Tier C 10-24 unit < 30K		45.0%	45.0%	45.0%	45.0%
Tier C 10-24 unit > 30K		40.0%	40.0%	40.0%	40.0%
Tier C 25+ unit < 30K		45.0%	50.0%	52.5%	55.0%
Tier C 25+ unit > 30K		40.0%	45.0%	47.5%	50.0%



## CHART 2-A: Inclusionary Requirements for Rental projects with Complete EEA/PRJ accepted on or after 1/12/16

**Complete EEA/PRJ Accepted BEFORE: →**

	1/1/18	1/1/19	1/1/20	1/1/21	1/1/22	1/1/23	1/1/24	1/1/25	1/1/26	1/1/27	1/1/28
<b>On-site</b>											
10-24 unit projects	12.0%	12.5%	13.0%	13.5%	14.0%	14.5%	15.0%	15.0%	15.0%	15.0%	15.0%
25+ unit projects	18.0%	19.0%	20.0%	20.5%	21.0%	21.5%	22.0%	22.5%	23.0%	23.5%	24.0%
<b>Fee or Off-site</b>											
10-24 unit projects	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
25+ unit projects	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%

## CHART 2-B: Requirements for Rental Projects in UMU Districts with Complete EEA/PRJ accepted on or after 1/12/16

Please note that certain projects in the SOMA Youth and Family SUD and Western SOMA SUD also rely upon UMU requirements.

**Complete EEA/PRJ Accepted BEFORE: →**

	1/1/18	1/1/19	1/1/20	1/1/21	1/1/22	1/1/23	1/1/24	1/1/25	1/1/26	1/1/27	1/1/28
<b>On-site UMU</b>											
Tier A 10-24 unit projects	14.4%	14.4%	14.4%	14.4%	14.4%	14.5%	15.0%	15.0%	15.0%	15.0%	15.0%
Tier A 25+ unit projects	18.0%	19.0%	20.0%	20.5%	21.0%	21.5%	22.0%	22.5%	23.0%	23.5%	24.0%
Tier B 10-24 unit projects	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%
Tier B 25+ unit projects	18.0%	19.0%	20.0%	20.5%	21.0%	21.5%	22.0%	22.5%	23.0%	23.5%	24.0%
Tier C 10-24 unit projects	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%
Tier C 25+ unit projects	19.6%	19.6%	20.0%	20.5%	21.0%	21.5%	22.0%	22.5%	23.0%	23.5%	24.0%
<b>Fee or Off-site UMU</b>											
Tier A 10-24 unit projects	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%
Tier A 25+ unit projects	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier B 10-24 unit projects	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%
Tier B 25+ unit projects	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier C 10-24 unit projects	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%
Tier C 25+ unit projects	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
<b>Land Dedication in UMU or Mission NCT</b>											
Tier A 10-24 unit < 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier A 10-24 unit > 30K	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier A 25+ unit < 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier A 25+ unit > 30K	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier B 10-24 unit < 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier B 10-24 unit > 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier B 25+ unit < 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier B 25+ unit > 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier C 10-24 unit < 30K	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%
Tier C 10-24 unit > 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier C 25+ unit < 30K	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%
Tier C 25+ unit > 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%

**CHART 3-A: Inclusionary Requirements for Owner projects with Complete EEA/PRJ accepted on or after 1/12/16****Complete EEA/PRJ Accepted BEFORE: →**

	1/1/18	1/1/19	1/1/20	1/1/21	1/1/22	1/1/23	1/1/24	1/1/25	1/1/26	1/1/27	1/1/28
<b>On-site</b>											
10-24 unit projects	12.0%	12.5%	13.0%	13.5%	14.0%	14.5%	15.0%	15.0%	15.0%	15.0%	15.0%
25+ unit projects	20.0%	21.0%	22.0%	22.5%	23.0%	23.5%	24.0%	24.5%	25.0%	25.5%	26.0%
<b>Fee or Off-site</b>											
10-24 unit projects	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
25+ unit projects	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%

**CHART 3-B: Requirements for Owner Projects UMU Districts with Complete EEA/PRJ accepted on or after 1/12/16**

Please note that certain projects in the SOMA Youth and Family SUD and Western SOMA SUD also rely upon UMU requirements.

**Complete EEA/PRJ Accepted BEFORE: →**

	1/1/18	1/1/19	1/1/20	1/1/21	1/1/22	1/1/23	1/1/24	1/1/25	1/1/26	1/1/27	1/1/28
<b>On-site UMU</b>											
Tier A 10-24 unit projects	14.4%	14.4%	14.4%	14.4%	14.4%	14.4%	15.0%	15.0%	15.0%	15.0%	15.0%
Tier A 25+ unit projects	20.0%	21.0%	22.0%	22.5%	23.0%	23.5%	24.0%	24.5%	25.0%	25.5%	26.0%
Tier B 10-24 unit projects	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%	16.0%
Tier B 25+ unit projects	20.0%	21.0%	22.0%	22.5%	23.0%	23.5%	24.0%	24.5%	25.0%	25.5%	26.0%
Tier C 10-24 unit projects	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%	17.6%
Tier C 25+ unit projects	20.0%	21.0%	22.0%	22.5%	23.0%	23.5%	24.0%	24.5%	25.0%	25.5%	26.0%
<b>Fee or Off-site UMU</b>											
Tier A 10-24 unit projects	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%	23.0%
Tier A 25+ unit projects	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%
Tier B 10-24 unit projects	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%
Tier B 25+ unit projects	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%
Tier C 10-24 unit projects	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%
Tier C 25+ unit projects	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%
<b>Land Dedication in UMU or Mission NCT</b>											
Tier A 10-24 unit < 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier A 10-24 unit > 30K	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier A 25+ unit < 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier A 25+ unit > 30K	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Tier B 10-24 unit < 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier B 10-24 unit > 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier B 25+ unit < 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier B 25+ unit > 30K	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%	35.0%
Tier C 10-24 unit < 30K	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%
Tier C 10-24 unit > 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%
Tier C 25+ unit < 30K	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%	45.0%
Tier C 25+ unit > 30K	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%

**CHART 4-A: Inclusionary Requirements for Rental projects with Complete EEA/PRJ accepted on or after 1/12/16 located in the North of Market Residential Special Use District, the Mission Area Plan, or the SOMA Neighborhood Commercial Transit District.**

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-site</b>											
10-24 unit projects	12.0%	12.5%	13.0%	13.5%	14.0%	14.5%	15.0%	15.0%	15.0%	15.0%	15.0%
25+ unit projects*	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%
<b>Fee or Off-site</b>											
10-24 unit projects	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
25+ unit projects	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-Site: Rental Projects - North of Market Residential SUD; Mission Plan Area; SOMA NCT with 25+ units</b>											
INCLUSIONARY RATE	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%
Low Income (55% AMI)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%
Moderate Income (80% AMI)	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%
Middle Income (110% AMI)	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%

**CHART 4-B: Inclusionary Requirements for Owner projects with Complete EEA/PRJ accepted on or after 1/12/16 located in the North of Market Residential Special Use District, the Mission Area Plan, or the SOMA Neighborhood Commercial Transit District.**

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-site</b>											
10-24 unit projects	12.0%	12.5%	13.0%	13.5%	14.0%	14.5%	15.0%	15.0%	15.0%	15.0%	15.0%
25+ unit projects*	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%
<b>Fee or Off-site</b>											
10-24 unit projects	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
25+ unit projects	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-Site: Ownership Projects - North of Market Residential SUD; Mission Plan Area; SOMA NCT with 25+ units</b>											
INCLUSIONARY RATE	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%	27.0%
Low Income (80% AMI)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%
Moderate Income (105% AMI)	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%
Middle Income (130% AMI)	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%

## CHART 5: Income Levels for Projects with a complete EEA/PRJ on or after January 12, 2016

Projects with complete EEA Application on or after January 12, 2016 are subject to the Inclusionary rates identified in Charts 2 and 3. For projects that propose on-site or off-site Inclusionary units, the Inclusionary Affordable Housing Program requires that inclusionary units be provided at three income tiers, which are split into three tiers. Annual increases to the inclusionary rate will be allocated to specific tiers, as shown below. Projects in the UMU Zoning District are not subject to the affordability levels below. Rental projects with 10-24 units shall provide all of the required Inclusionary units with an affordable rent at 55% Area Median Income (AMI), and ownership projects with 10-24 units shall provide all of the required Inclusionary units at sales price set at 80% AMI.

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-Site: Rental Projects with 25+ units</b>											
INCLUSIONARY RATE	18.0%	19.0%	20.0%	20.5%	21.0%	21.5%	22.0%	22.5%	23.0%	23.5%	24.0%
Low Income (55% AMI)	10.0%	11.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Moderate Income (80% AMI)	4.0%	4.0%	4.0%	4.25%	4.5%	4.75%	5.0%	5.25%	5.5%	5.75%	6.0%
Middle Income (110% AMI)	4.0%	4.0%	4.0%	4.25%	4.5%	4.75%	5.0%	5.25%	5.5%	5.75%	6.0%

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>On-Site: Ownership Projects with 25+ units</b>											
INCLUSIONARY RATE	20.0%	21.0%	22.0%	22.5%	23.0%	23.5%	24.0%	24.5%	25.0%	25.5%	26.0%
Low Income (80% AMI)	10.0%	11.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Moderate Income (105% AMI)	5.0%	5.0%	5.0%	5.25%	5.5%	5.75%	6.0%	6.25%	6.5%	6.75%	7.0%
Middle Income (130% AMI)	5.0%	5.0%	5.0%	5.25%	5.5%	5.75%	6.0%	6.25%	6.5%	6.75%	7.0%

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>Off-Site: Rental Projects with 25+ units</b>											
INCLUSIONARY RATE	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%
Low Income (55% AMI)	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%
Moderate Income (80% AMI)	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%
Middle Income (110% AMI)	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%

<b>Complete EEA/PRJ Accepted BEFORE: →</b>	<b>1/1/18</b>	<b>1/1/19</b>	<b>1/1/20</b>	<b>1/1/21</b>	<b>1/1/22</b>	<b>1/1/23</b>	<b>1/1/24</b>	<b>1/1/25</b>	<b>1/1/26</b>	<b>1/1/27</b>	<b>1/1/28</b>
<b>Off-Site: Ownership Projects with 25+ units</b>											
INCLUSIONARY RATE	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%
Low Income (80% AMI)	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%	18.0%
Moderate Income (105% AMI)	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%
Middle Income (130% AMI)	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%



**AFFIDAVIT**

# COMPLIANCE WITH THE INCLUSIONARY AFFORDABLE HOUSING PROGRAM

**PLANNING CODE SECTION 415, 417 & 419**



**San Francisco  
Planning**

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

1/27/2020  
Date

I, Matt Field  
do hereby declare as follows:

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

3700 California Street

Address

1015/001, 052 & 052; 1016/001-009; 1017/027 & 028

Block / Lot

The subject property is located within the following Zoning District:

RH-2 and RM-2

Zoning District

40-X and 80-E

Height and Bulk District

n/a

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:

2017-003559CUA

Planning Case Number

2019.1224.0616-0646; 2019.1224.0649 & 2019.1224.0653

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:

Christopher May

Planner Name

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

March 17, 2017

Date

The project contains 273\* total dwelling units and/or group housing rooms.

*\*264 new units and 9 existing units*

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 units for the life of the project. The applicable fee rate 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:

33% (fee rate per Chart 3A)

*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.

620,550 gsf (not including 7,041 gsf for existing 9 units)

*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 notify 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.

**H** 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:					
<b>TOTAL UNITS:</b>	SRO / Group Housing:	Studios:	One-Bedroom Units:	Two-Bedroom Units:	Three (or more) Bedroom Units:
273*	0	16*	67	91	99

\*with 264 new units and 9 existing (1BR) units.

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):  % of the unit total.

Number of Affordable Units to be Located ON-SITE:					
<b>TOTAL UNITS:</b>	SRO / Group Housing:	Studios:	One-Bedroom Units:	Two-Bedroom Units:	Three (or more) Bedroom Units:
<b>LOW-INCOME</b>	Number of Affordable Units	% of Total Units		AMI Level	
<b>MODERATE-INCOME</b>	Number of Affordable Units	% of Total Units		AMI Level	
<b>MIDDLE-INCOME</b>	Number of Affordable Units	% of Total Units		AMI Level	

☐ **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:					
<b>TOTAL UNITS:</b>	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:	
<b>AMI LEVELS:</b>	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 residential 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****TMG Partners***Company Name***Matt Field***Name (Print) of Contact Person***100 Bush Street, 26th floor***Address***415-772-5900***Phone / Fax***San Francisco, CA 94102***City, State, Zip***mfield@tmgpartners.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:***Matt Field, President**

Executed on this day in:

*Location:***San Francisco***Date:***1/27/2020****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), Title:*

# **Exhibit H:**

## **Anti-Discriminatory Housing Affidavit**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028



**SAN FRANCISCO  
PLANNING  
DEPARTMENT**

**Planning Department  
1650 Mission Street  
Suite 400  
San Francisco, CA  
94103-9425**

**T: 415.558.6378  
F: 415.558.6409**

# **SUPPLEMENTAL INFORMATION PACKET FOR**

# **Anti-Discriminatory Housing Policy**

Pursuant to Administrative Code Section 1.61, certain housing projects must complete and submit a completed Anti-Discriminatory Housing Policy form as part of any entitlement or building permit application that proposes an increase of ten (10) dwelling units or more.

Planning Department staff is available to advise you in the preparation of this application. Call (415)558-6377 for further information.

## **WHEN IS THE SUPPLEMENTAL INFORMATION FORM NECESSARY?**

Administrative Code Section 1.61 requires the Planning Department to collect an application/form with information about an applicant's internal anti-discriminatory policies for projects proposing an increase of ten (10) dwelling units or more.

## **WHAT IF THE PROJECT SPONSOR OR PERMITTEE CHANGE PRIOR TO THE FIRST ISSUANCE OF CERTIFICATE OF OCCUPANCY?**

If the permittee and/or sponsor should change, they shall notify the Planning Department and file a new supplemental information form with the updated information.

## **HOW IS THIS INFORMATION USED?**

The Planning Department is not to review the responses other than to confirm that all questions have been answered. Upon confirmation, the information is routed to the Human Rights Commission.

For questions about the Human Rights Commission (HRC) and/or the Anti-Discriminatory Housing Policy, please call (415) 252-2500 or email [hrc.info@sfgov.org](mailto:hrc.info@sfgov.org).

All building permit applications and/or entitlements related to a project proposing 10 dwelling units or more will not be considered complete until all responses are provided.

## **WHAT PART OF THE POLICY IS BEING REVIEWED?**

The Human Rights Commission will review the policy to verify whether it addresses discrimination based on sexual orientation and gender identity. The policy will be considered incomplete if it lacks such protections.

## **WILL THE ANSWERS TO THE QUESTIONS EFFECT THE REVIEW OF MY PROJECT?**

The Planning Department's and Planning Commission's processing of and recommendations or determinations regarding an application shall be unaffected by the applicant's answers to the questions.

## **INSTRUCTIONS:**

The attached supplemental information form is to be submitted as part of the required entitlement application and/or Building Permit Application. This application does not require an additional fee.

Answer all questions fully and type or print in ink. Attach additional pages if necessary.

Please see the primary entitlement application or Building Permit Application instructions for a list of necessary materials required.

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**FOR MORE INFORMATION:**  
Call or visit the San Francisco Planning Department

**Central Reception**  
1650 Mission Street, Suite 400  
San Francisco CA 94103-2479

TEL: **415.558.6378**  
FAX: **415 558-6409**  
WEB: **<http://www.sfplanning.org>**

**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.*



# SUPPLEMENTAL INFORMATION FOR Anti-Discriminatory Housing Policy

## 1. Owner/Applicant Information

PROPERTY OWNER'S NAME: TMG Partners R.E., LLC (attn: Matt Field)	
PROPERTY OWNER'S ADDRESS: 100 Bush Street, 26th Floor San Francisco, CA 94104	TELEPHONE: ( 415 ) 772-5900 EMAIL: mfield@tmgpartners.com

APPLICANT'S NAME: <div style="text-align: right;">Same as Above <input checked="" type="checkbox"/></div>	
APPLICANT'S ADDRESS:	TELEPHONE: (   ) EMAIL:

CONTACT FOR PROJECT INFORMATION: Tuija Catalano / Reuben, Junius & Rose, LLP <div style="text-align: right;">Same as Above <input type="checkbox"/></div>	
ADDRESS: One Bush Street, Suite 650 San Francisco, CA 94102	TELEPHONE: ( 415 ) 567-9000 EMAIL: tcatalano@reubenlaw.com

COMMUNITY LIAISON FOR PROJECT (PLEASE REPORT CHANGES TO THE ZONING ADMINISTRATOR): TBD - Not yet decided <div style="text-align: right;">Same as Above <input type="checkbox"/></div>	
ADDRESS:	TELEPHONE: (   ) EMAIL:

## 2. Location and Project Description

STREET ADDRESS OF PROJECT: 3700 California Street		ZIP CODE: 94118
CROSS STREETS: Cherry, Maple and Sacramento		
ASSESSORS BLOCK/LOT: See below /	ZONING DISTRICT: RH-2 and RM-2	HEIGHT/BULK DISTRICT: 40-X and 80-E
PROJECT TYPE: (Please check all that apply) <input checked="" type="checkbox"/> New Construction <input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Alteration <input type="checkbox"/> Other: _____	EXISTING DWELLING UNITS:  9 (to be retained)	PROPOSED DWELLING UNITS:  273 NET INCREASE:  +264

Block/Lot: 1015/001, 052 & 053; 1016/001-009; 1017/027 & 028.

## 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](mailto: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.

TMG 3800 California LLC, a Delaware limited liability company

By: TMG Partners R.E., LLC, a Delaware limited liability company

Its: Manager

Signature: \_\_\_\_\_

Date: 1/29/2020

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

Matt Field / President

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 I:**

## **First Source Hiring Affidavit**

Conditional Use/PUD Hearing  
**Case Number 2017-003559CUA**  
3700 California St

Block/Lot 1015/001, 052 & 053; 1016/001-009;  
1017/027 & 028





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)	
3700 California Street		1015/001, 052 & 053; 1016/001-009; 1017/027 & 028.	
BUILDING PERMIT APPLICATION NO.	CASE NO. (IF APPLICABLE)	MOTION NO. (IF APPLICABLE)	
2019.1224.0616.0646; 2019.1224.0649; and 2019.1224.0653	2017-003559CUA		
PROJECT SPONSOR	MAIN CONTACT	PHONE	
TMG Partners	Denise Pinkston	415-772-5900	
ADDRESS			
100 Bush Street, 26th floor			
CITY, STATE, ZIP		EMAIL	
San Francisco, CA 94104		dpinkston@tmgpartners.com	
ESTIMATED RESIDENTIAL UNITS	ESTIMATED SQ FT COMMERCIAL SPACE	ESTIMATED HEIGHT/FLOORS	ESTIMATED CONSTRUCTION COST
273 (incl. 9 existing)	0	35'-80' / 3-7 floors	\$300M
ANTICIPATED START DATE			
2021			

#### Section 2: First Source Hiring Program Verification

CHECK ALL BOXES APPLICABLE TO THIS PROJECT	
<input checked="" type="checkbox"/>	Project is wholly Residential
<input type="checkbox"/>	Project is wholly Commercial
<input type="checkbox"/>	Project is Mixed Use
<input checked="" type="checkbox"/>	A: The project consists of ten (10) or more residential units;
<input type="checkbox"/>	B: The project consists of 25,000 square feet or more gross commercial floor area.
<input type="checkbox"/>	C: Neither 1A nor 1B apply.
NOTES:	
<ul style="list-style-type: none"><li>If you checked C, this project is <u>NOT</u> subject to the First Source Hiring Program. Sign Section 4: Declaration of Sponsor of Project and submit to the Planning Department.</li><li>If you checked A or B, your project <u>IS</u> 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.</li><li>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 <a href="http://www.workforcedevelopmentsf.org">www.workforcedevelopmentsf.org</a></li><li>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.</li></ul>	

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	TRADE/CRAFT	ANTICIPATED JOURNEYMAN WAGE	# APPRENTICE POSITIONS	# TOTAL POSITIONS
Abatement Laborer	80	6	28	Laborer	85	16	81
Boilermaker		0	0	Operating Engineer	120	4	41
Bricklayer	110	1	6	Painter	96	14	70
Carpenter	96	26	268	Pile Driver	120	1	14
Cement Mason	110	8	78	Plasterer	96	5	54
Drywall/Latherer	96	3	27	Plumber and Pipefitter	137	10	69
Electrician	138	10	95	Roofer/Water proofer	90	6	41
Elevator Constructor	234	2	13	Sheet Metal Worker	126	4	39
Floor Coverer	96	6	39	Sprinkler Fitter	125	2	18
Glazier	115	2	10	Taper	96	4	24
Heat & Frost Insulator	92	1	6	Tile Layer/ Finisher	96	14	97
Ironworker	98	14	94	Other:		0	0
<b>TOTAL:</b>			<b>664</b>	<b>TOTAL:</b>			<b>548</b>

All # of positions above are expressed as full time equivalent (FTE)

- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
|  | YES                                 | NO                                  |
| 1. Will the anticipated employee compensation by trade be consistent with area Prevailing Wage?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2. Will the awarded contractor(s) participate in an apprenticeship program approved by the State of California's Department of Industrial Relations? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 3. Will hiring and retention goals for apprentices be established?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 4. What is the estimated number of local residents to be hired?  |                                     | <u>32</u>                           |

### Section 4: Declaration of Sponsor of Principal Project

PRINT NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	EMAIL	PHONE NUMBER
Matt Field / President	mfield@tmgpartners.com	415-772-5900
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)		1/27/2020 (DATE)
<b>FOR PLANNING DEPARTMENT STAFF ONLY:</b> PLEASE EMAIL AN ELECTRONIC COPY OF THE COMPLETED AFFIDAVIT FOR FIRST SOURCE HIRING PROGRAM TO OEWD'S CITYBUILD PROGRAM AT <a href="mailto:CITYBUILD@SFGOV.ORG">CITYBUILD@SFGOV.ORG</a>		
Cc: Office of Economic and Workforce Development, CityBuild Address: 1 South Van Ness 5th Floor San Francisco, CA 94103 Phone: 415-701-4848 Website: <a href="http://www.workforcedevelopmentsf.org">www.workforcedevelopmentsf.org</a> Email: <a href="mailto:CityBuild@sfgov.org">CityBuild@sfgov.org</a>		