September 11, 2019

Planning Department, Environmental Planning
Attn: Jeanie Poling, Sr. Environmental Planner (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 ach 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.

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 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?

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.

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.

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.

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":
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.

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.

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, 1st 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.

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.

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".

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. 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.

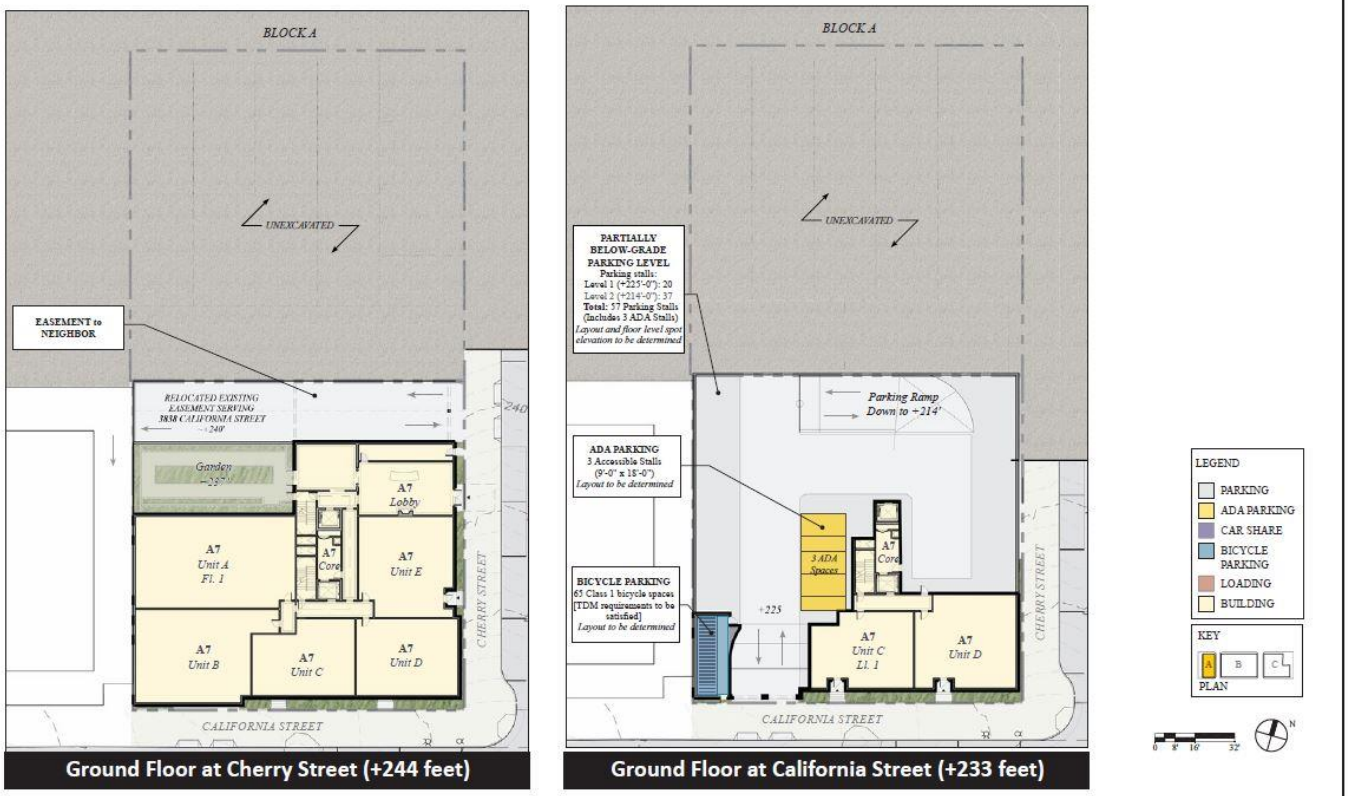
See Page 4.2-39, "Proposed Project Curb Colors and Street Parking, Figure 4.2-6" for additional parking space comments.

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".

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).

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.



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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

SOURCE: RAMSA 2018. *3700 California Street, San Francisco, CA: EE Application—Revision*. June.

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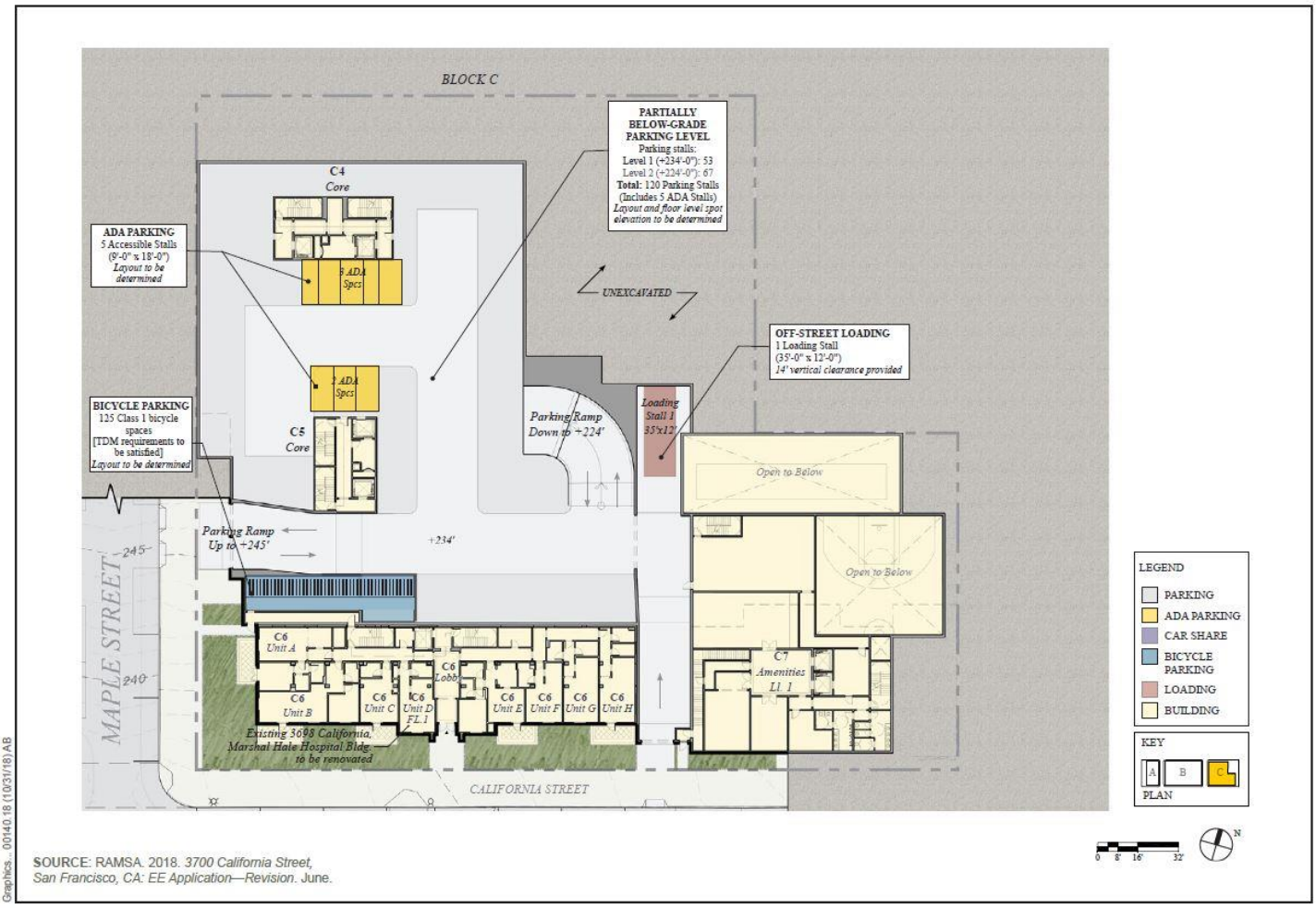
Figure 2-14
Block B Access, Circulation, and Ground-Floor Parking Plan



SOURCE: RAMSA. 2018. *3700 California Street, San Francisco, CA: EE Application—Revision*. June.

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Figure 2-15
Block C Access, Circulation, and Ground-Floor Parking Plan

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.

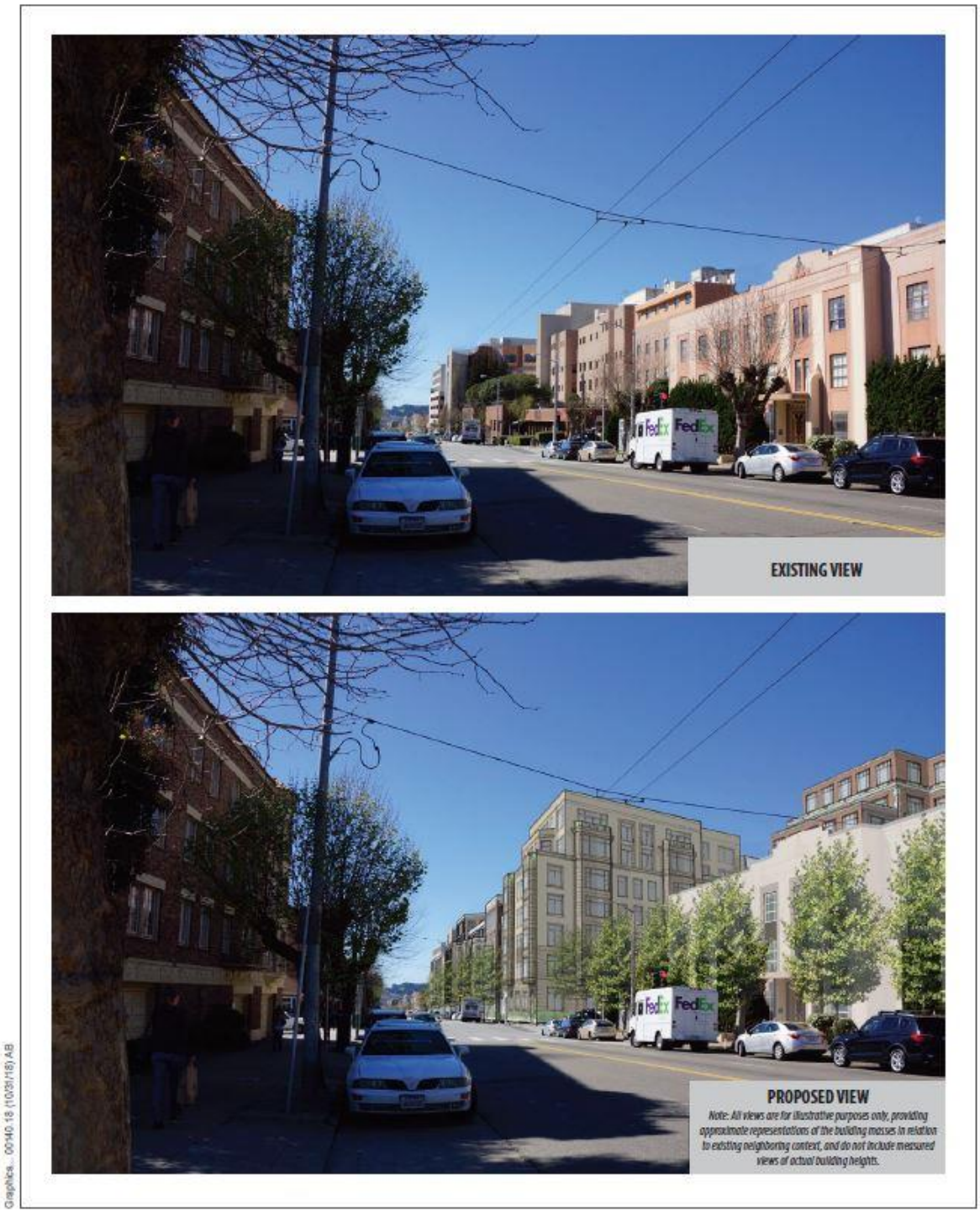

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Figure 2-10
View of Blocks B and C from California Street Looking West

Look at Block B building in this Figure 2-10. See how the 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.

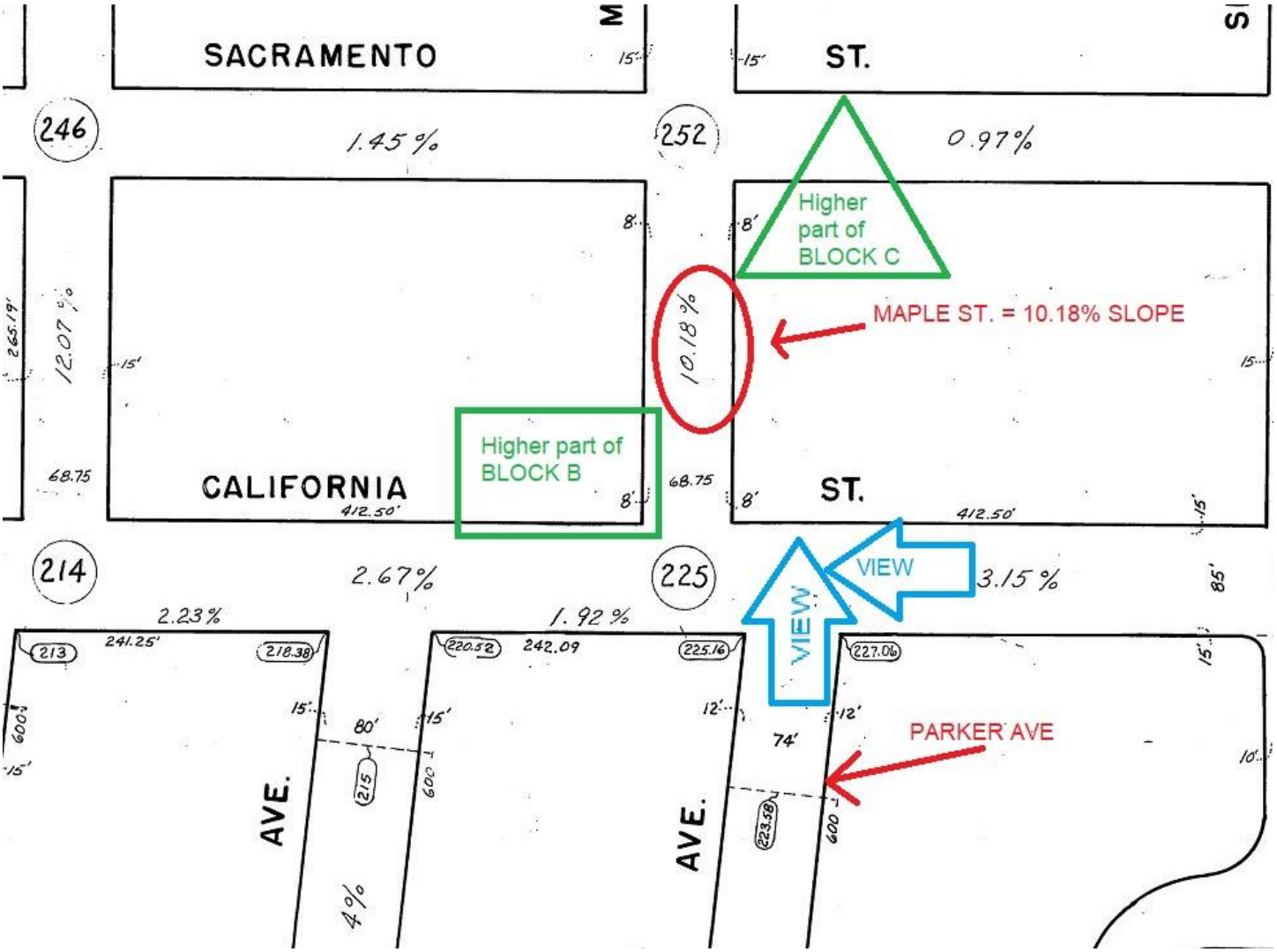

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Figure 2-9
View of Block C from Parker Avenue Looking North

One story lower with stackers would lessen this impact from Parker & California where the low-density 40-X Height and Bulk buildings stand.

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

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.

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?

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…"

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 safety 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.

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.

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).

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."

"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.

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.

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.

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. MITGATION 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.

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.

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).

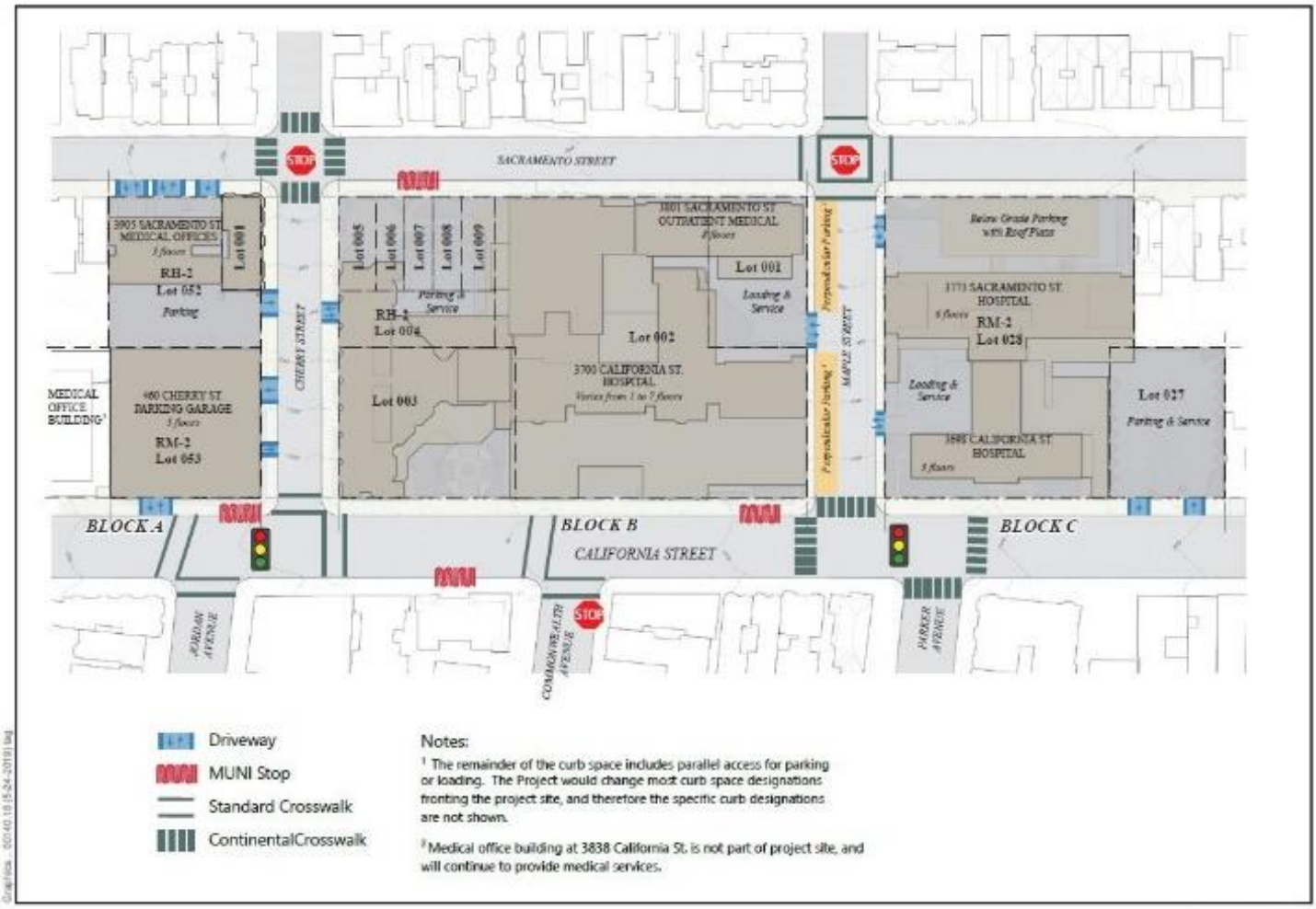

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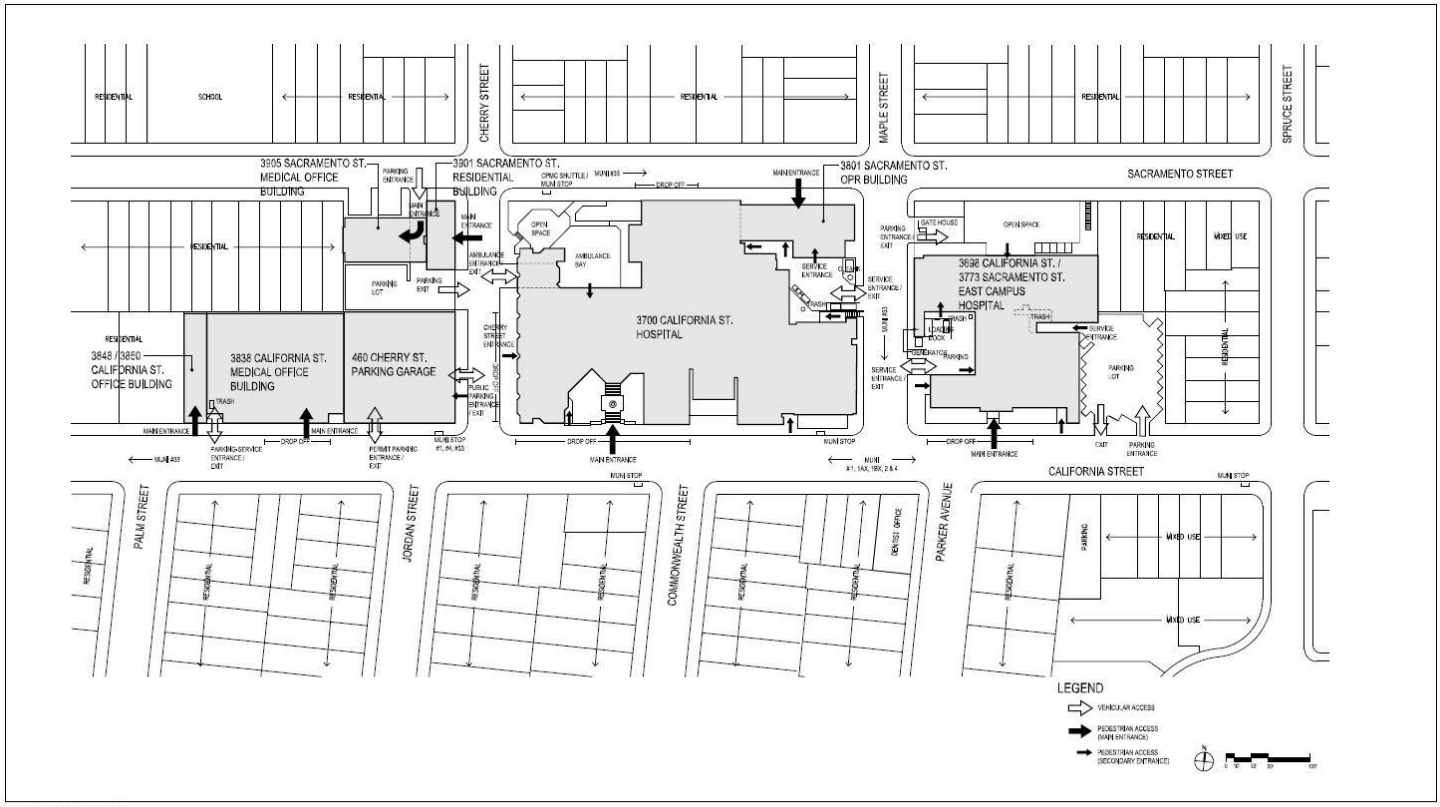
Figure 4.2-2
Existing Site Plan and Access Routes

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 3rd 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.

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.

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.

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.

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.

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.

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.

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[1]	Lot Area	Floors	Roof Height	Building Area (square feet)	Total Number of Units	Parking Spaces	Private Open Space	Common Open Space[3]
Block A								
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[2]	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
Block A Total	35,400			93,500	43	67	12,200	2,900
Block 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	
Block B Total	109, 400			346,200	147	223	26,100	11,500
Block C								
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			
Block C Total	69,000			178,200	83	126	14,500	19,000
Proposed Project Total	213,800			618,200	273	416	52,800	33,400

Notes: Numbers may not sum due to rounding.

SFR = single family residence. MF = multi-family. SFRH = single-family rowhouse (on podium).

[1] Refer to Figure 2-5, p. 2-13, for building locations.

[2] Building A5 is an existing legal nonconforming use.

[3] 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).

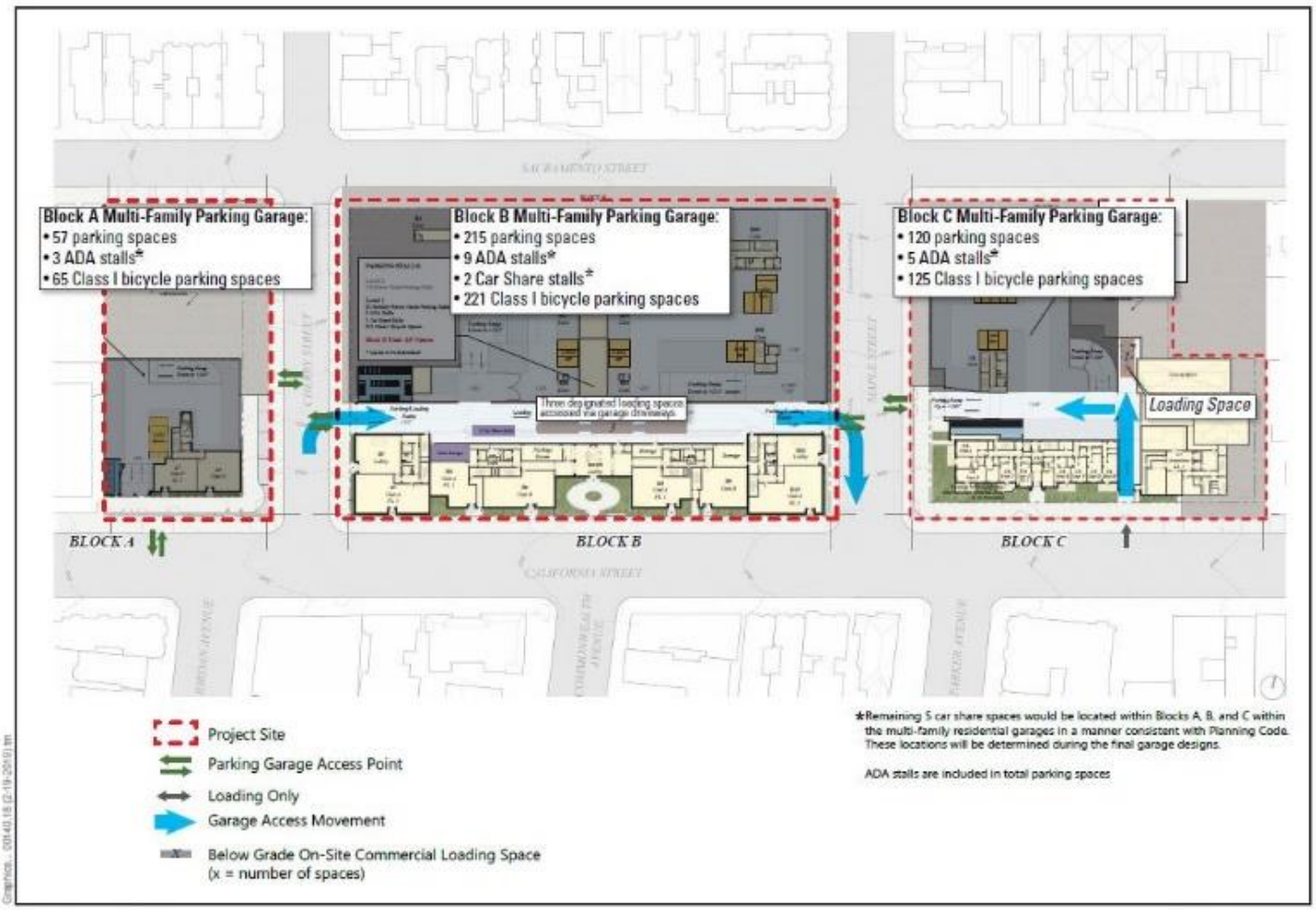


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Figure 4.2-5
Multi-Family Parking Garage and Onsite Loading Access

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.

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.

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.

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…

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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
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.

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:

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.

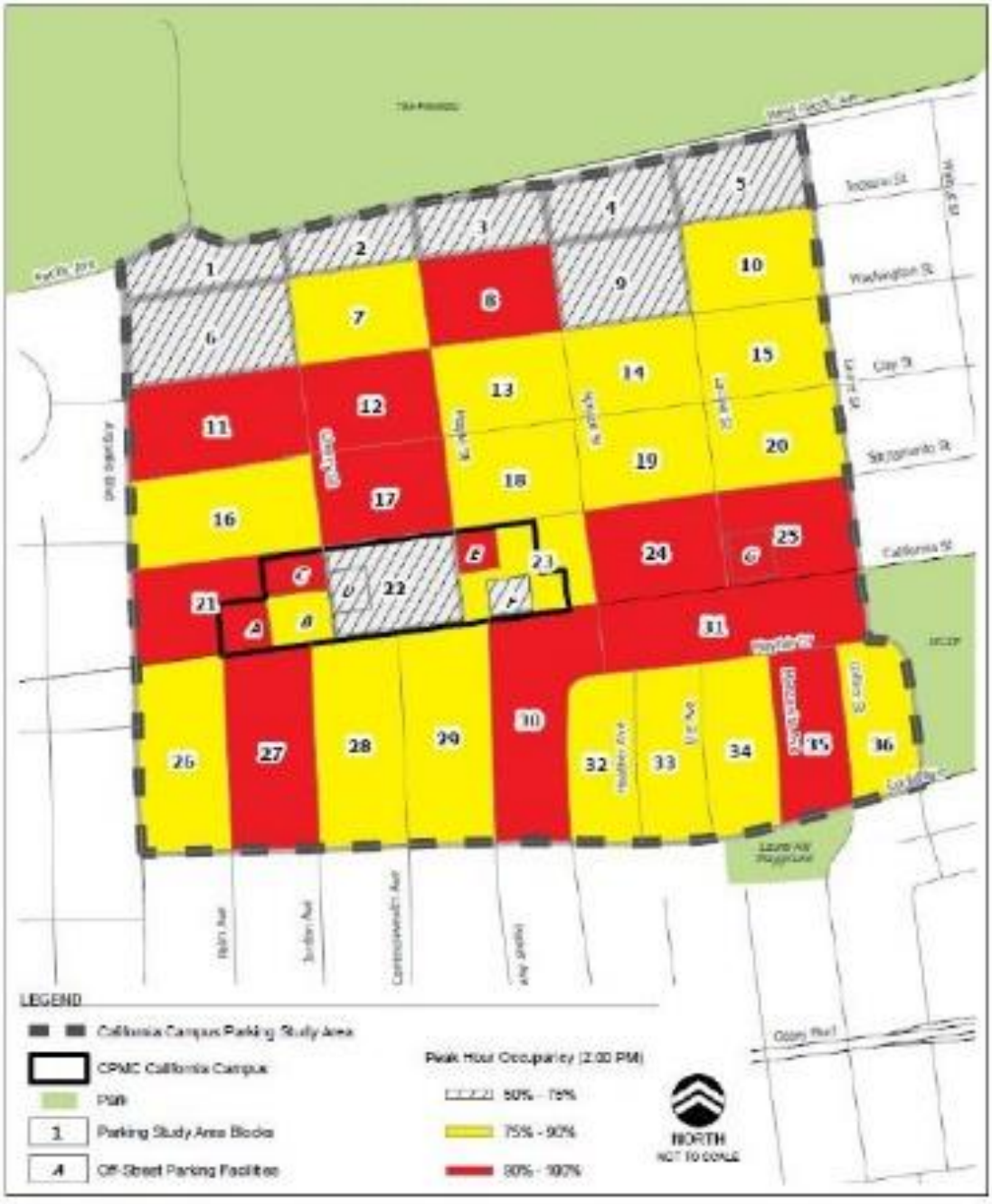
Parking occupancy at the off-street facilities averages about 83 percent occupied between 1 and 5 p.m., with a peak in the midday hours between 1 and 3 p.m. Parking occupancy between 5 and 8 p.m. drops to about 40 percent.

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.

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.

TABLE 4.2-5. PERSON AND VEHICLE TRIP GENERATION BY MODE

	Daily Trips			AM Peak Hour			PM Peak Hour		
Trip Mode	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
Total Person Trips	*2,560*	*1,280*	*1,280*	*363*	*73*	*290*	*442*	*294*	*148*
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.

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?

TABLE 4.2-6. PROJECT TRIP GENERATION

	Daily Trips			AM Peak Hour			PM Peak Hour		
Land Use	Total	In	Out	Total	In	Out	Total	In	Out
Vehicle Trips									
Proposed Project	1,389	694	694	198	40	158	240	160	80
CPMC Trip Credit[a]	-6,262	-3,131	-3,131	-516	-324	-192	-607	-219	-388
Net New Trips	**-4,873**	**-2,437**	**-2,437**	**-318**	**-284**	**-34**	**-367**	**-59**	**-308**
Transit Trips									
Proposed Project	732	366	366	104	21	83	126	84	42
CPMC Trip Credit	-1,494	-747	-747	-121	-78	-43	-140	-50	-90
Net Trips	**-762**	**-381**	**-381**	**-17**	**-57**	**40**	**-14**	**34**	**-48**
Walking Trips									
Proposed Project	108	54	54	15	3	12	18	12	6
CPMC Trip Credit	--[b]	--[b]	--[b]	-7	-6	-1	-12	-2	-9
Net New Trips	**108**	**54**	**54**	**8**	**-3**	**11**	**6**	**10**	**-3**
Other Trips									
Proposed Project	272	136	136	39	8	31	47	31	16
CPMC Trip Credit	-455	-228	-227	-32	-26	-5	-41	-6	-35
Net New Trips	**-183**	**-92**	**-91**	**7**	**-18**	**26**	**6**	**25**	**-19**

Source: Fehr & Peers, 2018; Adavant Consulting, *CPMC EIR*, 2010.

Notes: Totals may not sum precisely because of rounding.

[a] Transit, Walking, and Other categories show person trips, while Vehicle Trips represents the number of vehicles.

[b] 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

	AM Peak Hour		PM Peak Hour	
Driveway Location (side of street)	In	Out	In	Out
Cherry Street				
Block B Garage/Single-Family homes (east)	13	47	47	23
CPMC Trips Removed (both)[a, b]	-66	-38	-44	-77
Net Trips	***-53***	***9***	***3***	***-54***
Maple Street				
Block B Garage (west)	11	39	40	20
Block C Garage (east)	9	45	48	24
CPMC Trips Removed (both)	-40	-24	-28	-48
Net Trips	***-20***	***60***	***60***	***-4***
Sacramento Street				
Single-Family Homes (south)	0	4	4	0
CPMC Trips Removed	-13	-8	-9	-16
Net Trips	***-13***	***-4***	***-5***	***-16***
California Street[c]				
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
Net Trips	***-198***	***-99***	***-117***	***-234***
Total Net Trips	***-284***	***-34***	***-59***	***-308***

Notes:

[a] Existing CPMC driveway vehicle trips are estimated based on the trip distribution and assignment of trips from the 2010 CPMC EIR.

[b] Cherry Street volumes represent the net decrease in CPMC vehicle trips. The easement to the 3838 California garage will remain.

[c] 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.

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.

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.

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.

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:

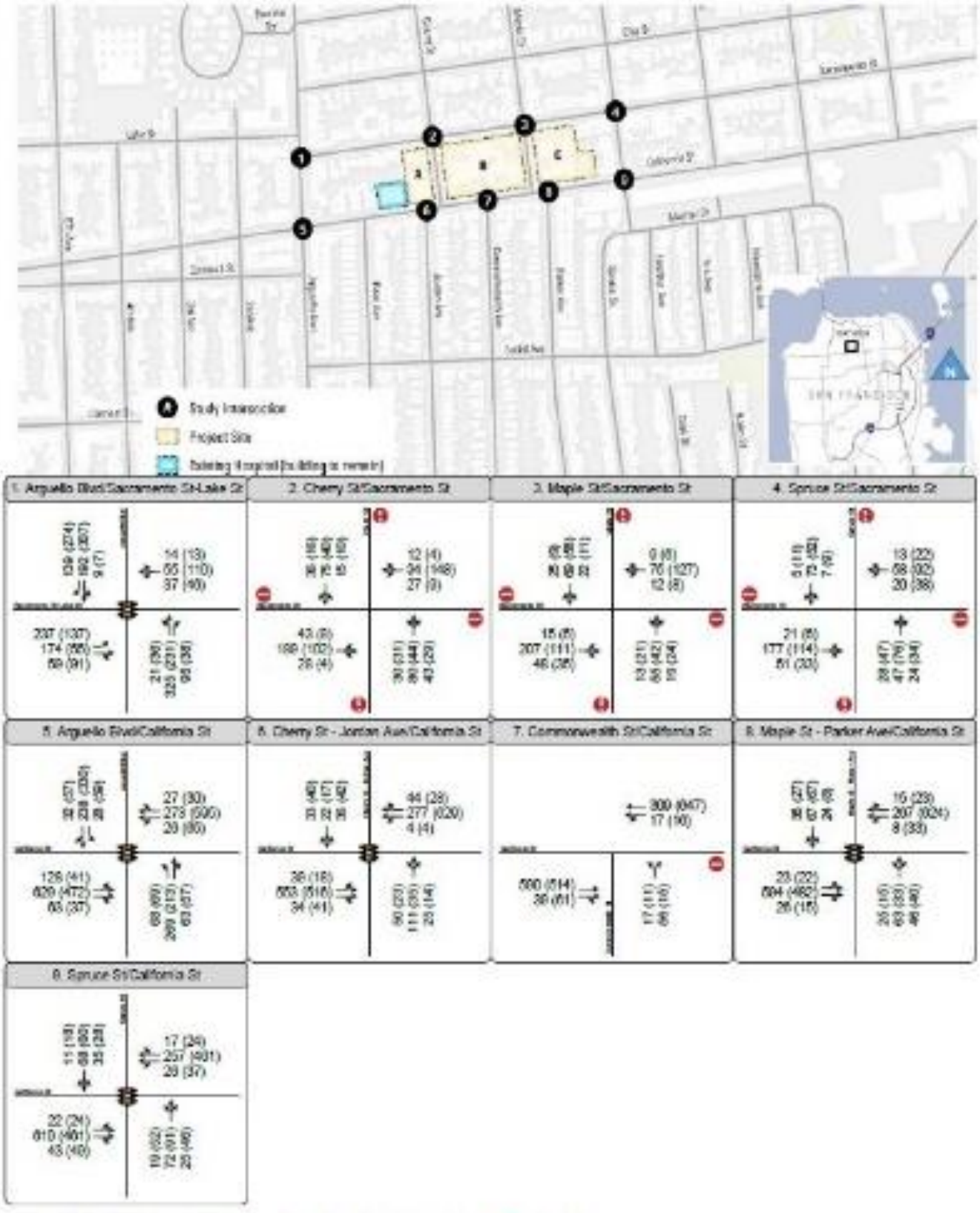


Figure E-1

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

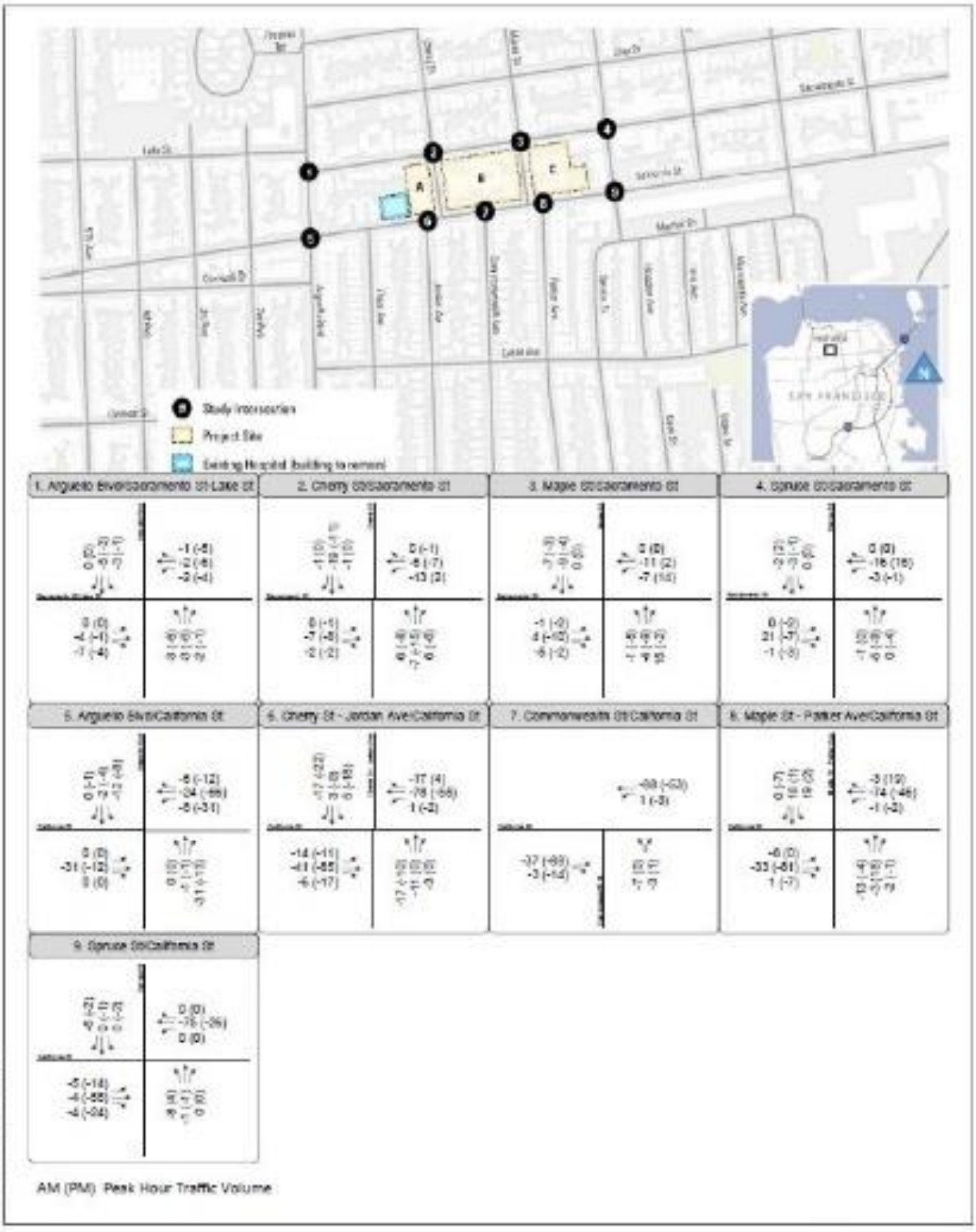
If one looks at the Maple-Parker-California traffic volumes, there is not much improvement from "Existing" intense hospital use which is being converted to residential use, a supposedly less traffic-inducing use.

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.



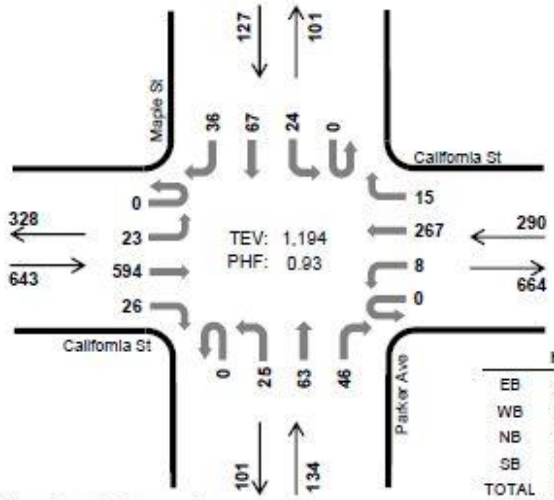
3700 California Street
Case No. 2017-003559ENV

Figure 4.2-8
Peak Hour Traffic Volumes
Net Change in Project Trips

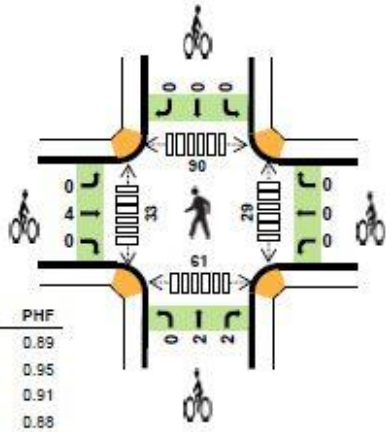
Maple St/Parker Ave
California St

Peak Hour

Date: 04/04/2018
Count Period: 7:00 AM to 9:00 AM
Peak Hour: 7:45 AM to 8:45 AM



	HV %:	PHF
EB	5.0%	0.89
WB	8.6%	0.95
NB	1.5%	0.91
SB	5.5%	0.88
TOTAL	5.5%	0.93



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**	**169**	**6**	**0**	**5**	**67**	**4**	**0**	**8**	**20**	**9**	**0**	**3**	**20**	**5**	**322**	987
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	8	6	1	1	*16*	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***

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.

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 Twitter: @rachelswan

https://www.sfchronicle.com/bayarea/article/Uber-Lyft-account-for-of-traffic-increase-in-13830608.php
Suggest MITIGATOIN 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

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)[1]
Proposed Project[2]	*19*	*1*
CPMC Trip Credit	*-73*	*-4*
Net Loading Demand	-54	-3

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.

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.

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.

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?

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.

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.

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

[45] Block B also provides parking for two of the single-family homes.

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.

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

"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.

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.

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.

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%*.

Roadway Segment	Average Daily Traffic Volumes[a]		
	Existing Daily Volumes	Cumulative 2040 Daily Volume Increases[b]	Percentage Increase Relative to Existing Conditions
Maple Street			
north of California	1,800	500	28%
north of Sacramento	1,980	490	25%
south of Sacramento	2,480	520	21%
Parker Avenue			
south of California	2,030	770	38%
Spruce Street			
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.

[a] 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.

[b] 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.

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.

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
Net Trips	**-183**	**7**	**6**

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.

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

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.

· **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-ofsight 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

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.

· 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.

· 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

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

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.

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.

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 processer. 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.

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.

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 practiable, or five minutes maxiumum.
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.

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 form 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.

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.

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 practiable, or five minutes maxiumum.
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.

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 activates 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.

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.

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

Construction Schedule and Equipment List
3700 California
San Francisco, California

Hauling Trips	Block A			Block B			Block C		
Phase Name	Average Worker Trips	Average Material Trips	Total Hauling Trips	Average Worker Trips	Average Material Trips	Total Hauling Trips	Average Worker Trips	Average Material Trips	Total Hauling Trips
	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*".

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:

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 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.

3700 California Street
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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.

(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.)

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.

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.

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.

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

	Average Daily Emissions from Operation and Construction (lb/day)[a, b, c]			
Year	ROG	NO_X	PM_{10}	$PM_{2.5}$
2021				
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
2022				
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
2023				
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
2024				
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:

[a] 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.

[b] 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.

[c] Average daily construction emissions were added together with average daily operational emissions.

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?

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.

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.

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 capital 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.

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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"?

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.

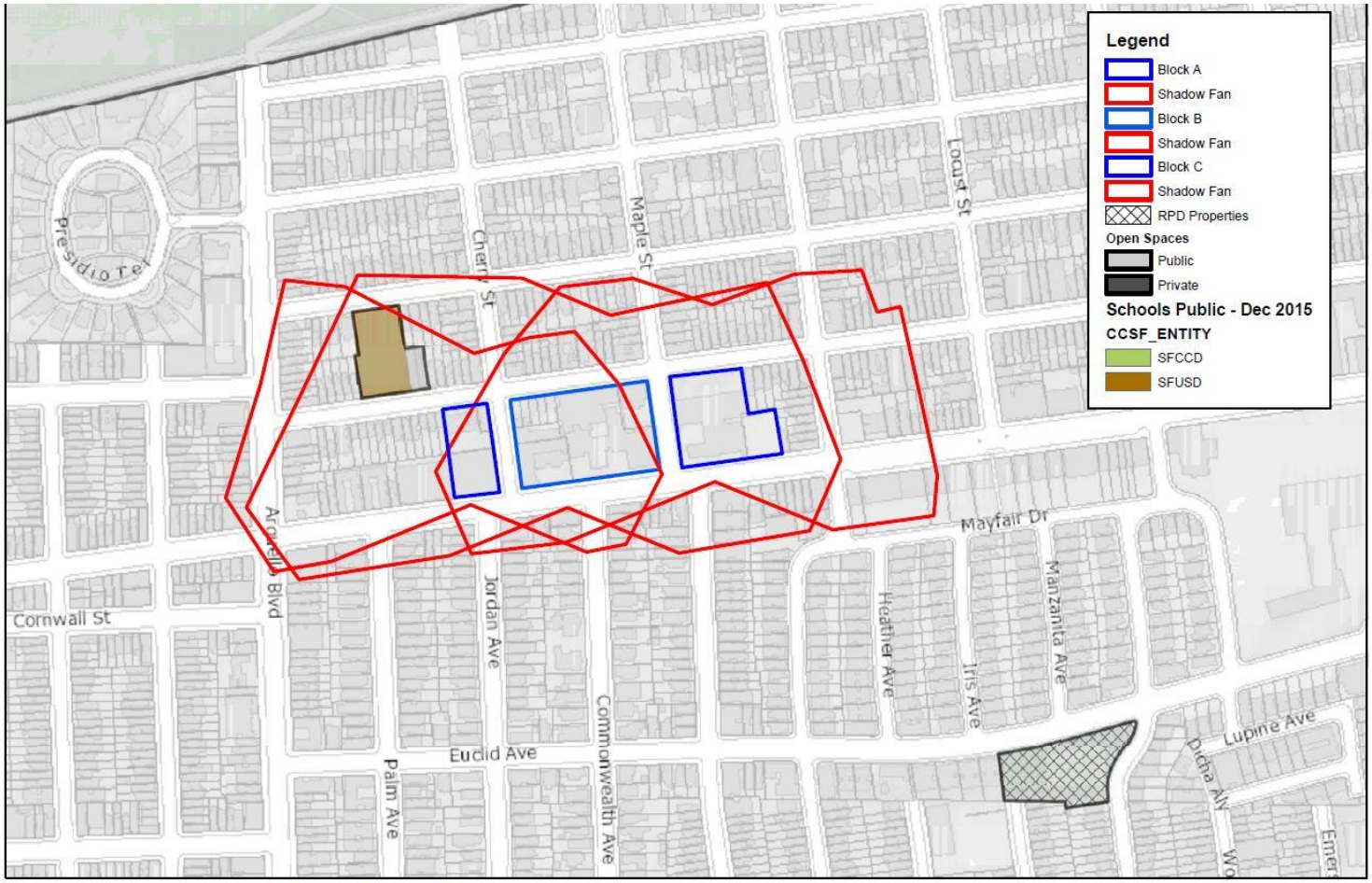
While the DEIR concludes that "This topic will not be discussed in the EIR," and though CEQA addresses shadows only in a narrow application (e.g. on outdoor recreation areas or on public parks), I request the Planning Department to consider all neighborhood impacts prior to approval of the project. This 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 <u>*NOT*</u> 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.



MITIGATION MEASURES additions to text proposed:
NOISE:
<u>Page S-7, Mitigation Measure M-NO-1, "Construction Noise Control"</u>:
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.

* 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?

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.

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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APPENDIX B: Manpower Projection Graphs
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APPENDIX F: Bus & Carpool Matching Form

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, 27th, 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 Manger 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.[1] 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.
	TOTAL	**791**	**481**	

The Replacement Hospital at the St. Luke's Campus

13 separate parking garages/lots have been identified near the St. Luke's Campus.[2] 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.
	TOTAL	**281**	**116**	

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.

---

[1] 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.

[2] 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.[3] 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

[3] 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)[4], 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:

[4] 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.

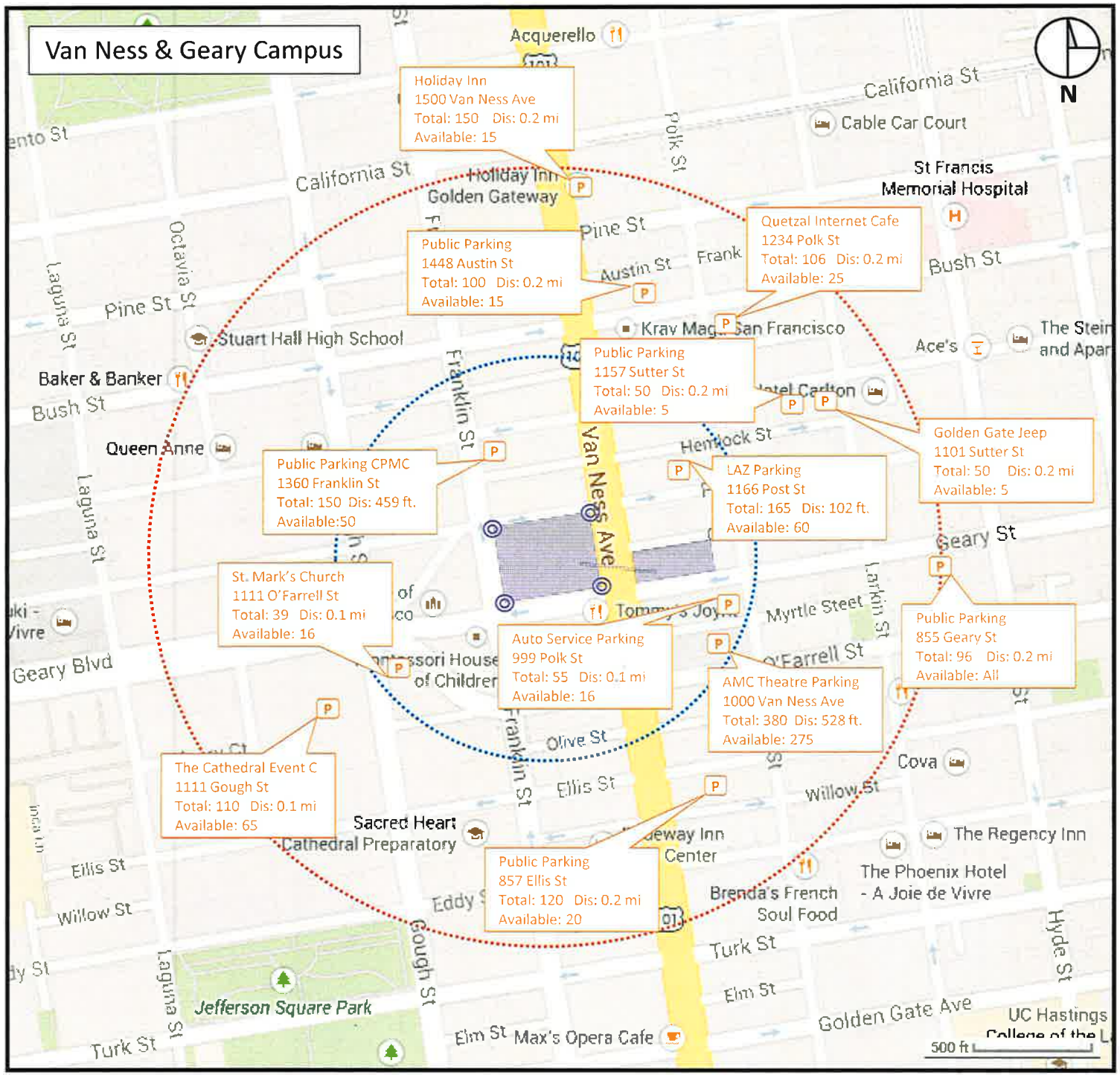
Qualification Criteria

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

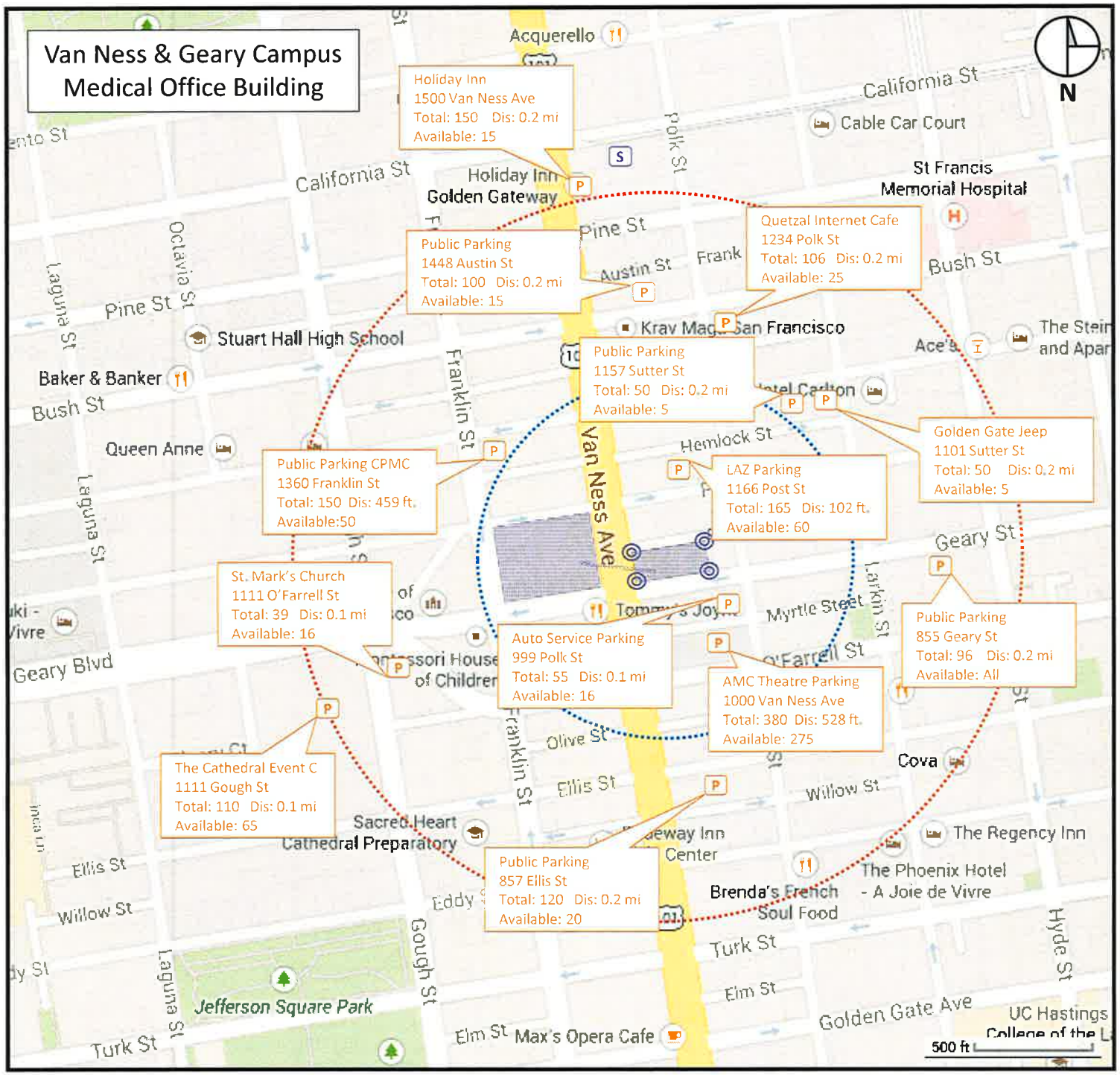


LEGEND	
	Project Site
S	Requires a Shuttle
P	Parking
	Measurement POO
	.125 Mile = 660 Ft
	.25 Mile = 1320 Ft

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 & Geary
BUILDING	All
VERSION	3.1
DATE	April 7, 2014
NUMBER	PL1



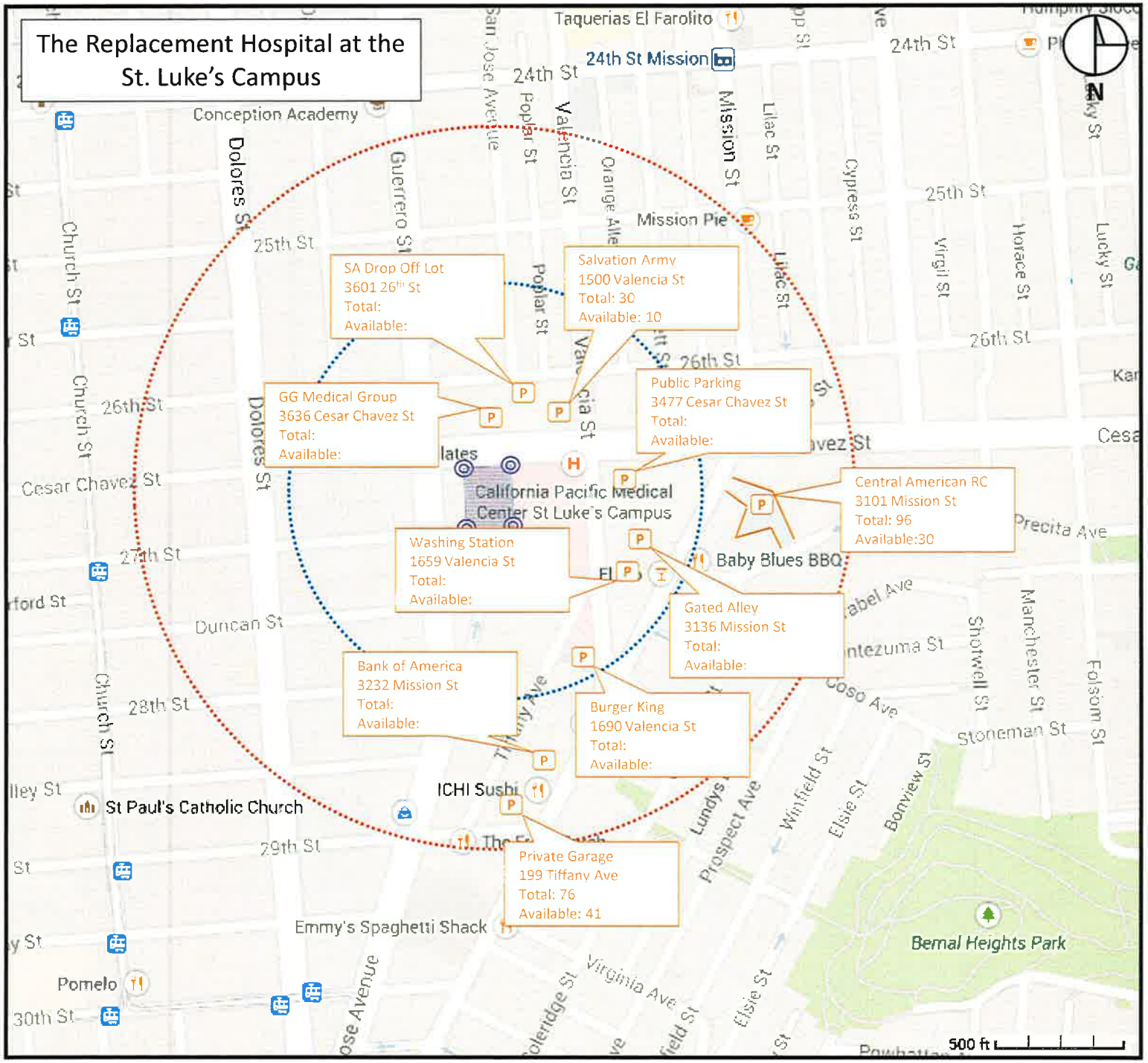
LEGEND	
	Project Site
S	Requires a Shuttle
P	Parking
	Measurement POO
	.125 Mile = 660 Ft
	.25 Mile = 1320 Ft

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

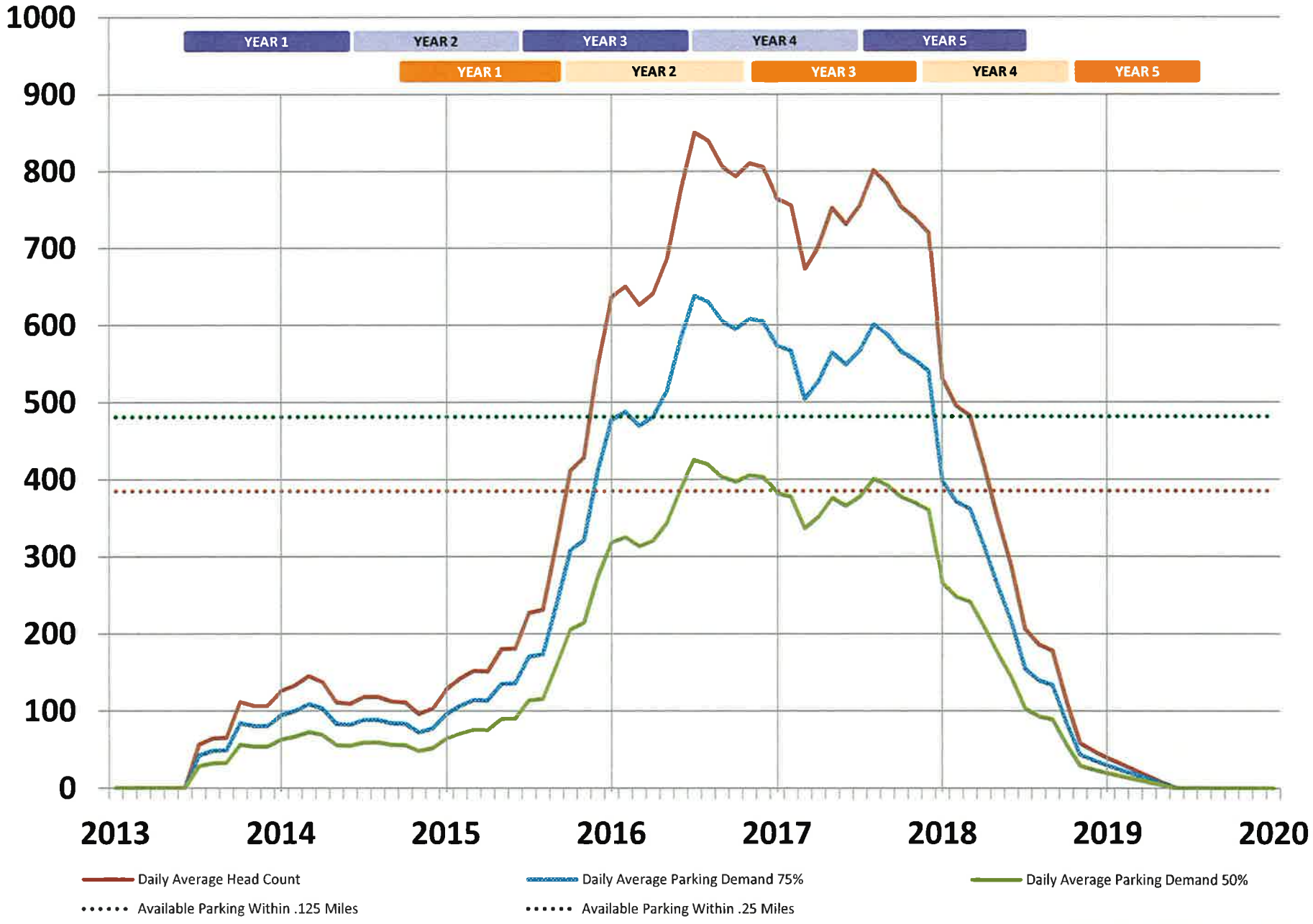
Total available parking spaces identified to date
Spaces located within .125 Miles:
Spaces located within .25 Miles:

SCALE	Not to Scale
CAMPUS	St. Luke's
BUILDING	All
VERSION	3.1
DATE	April 7, 2014
NUMBER	PL1

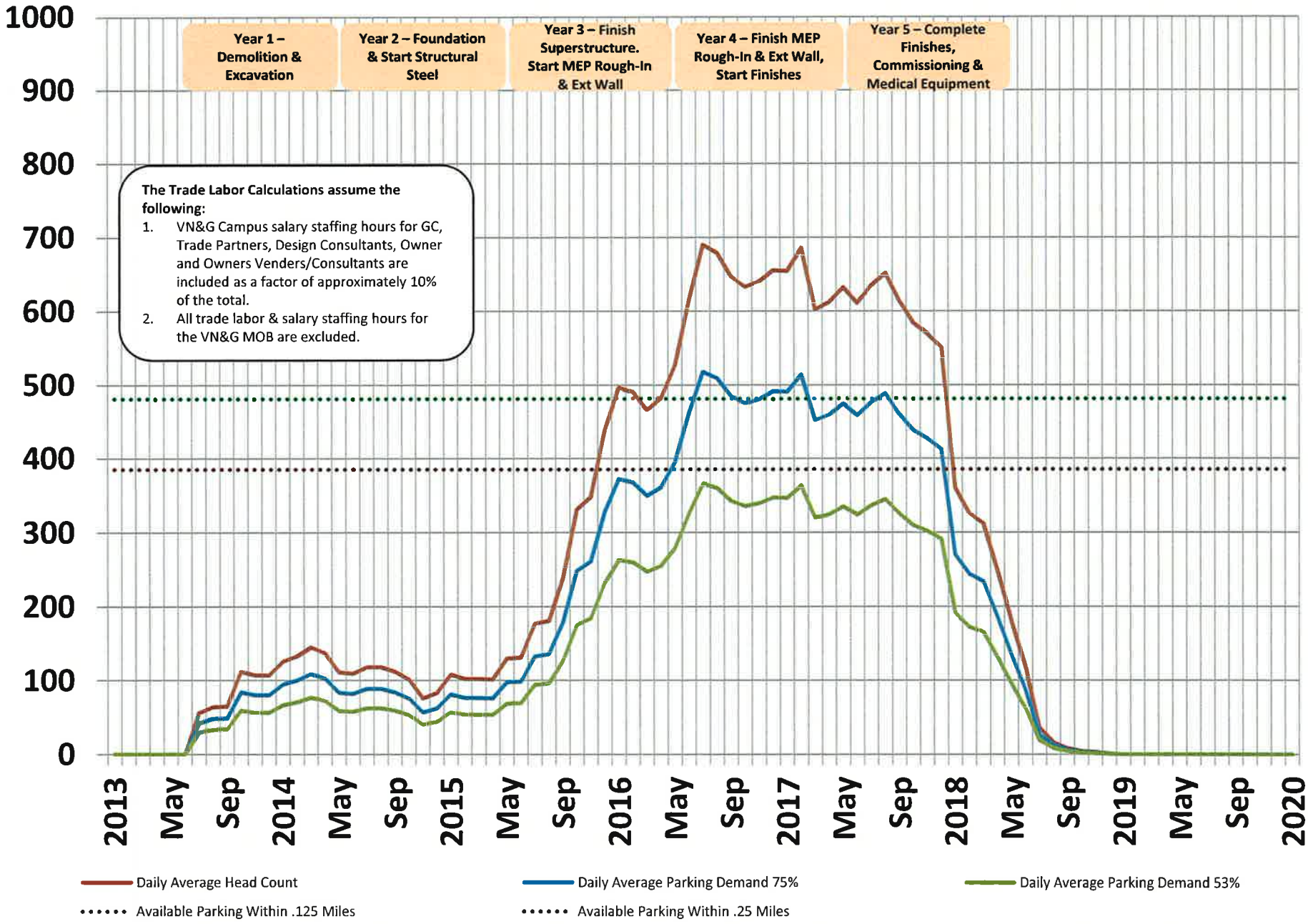
APPENDIX B

Manpower Projection Graphs

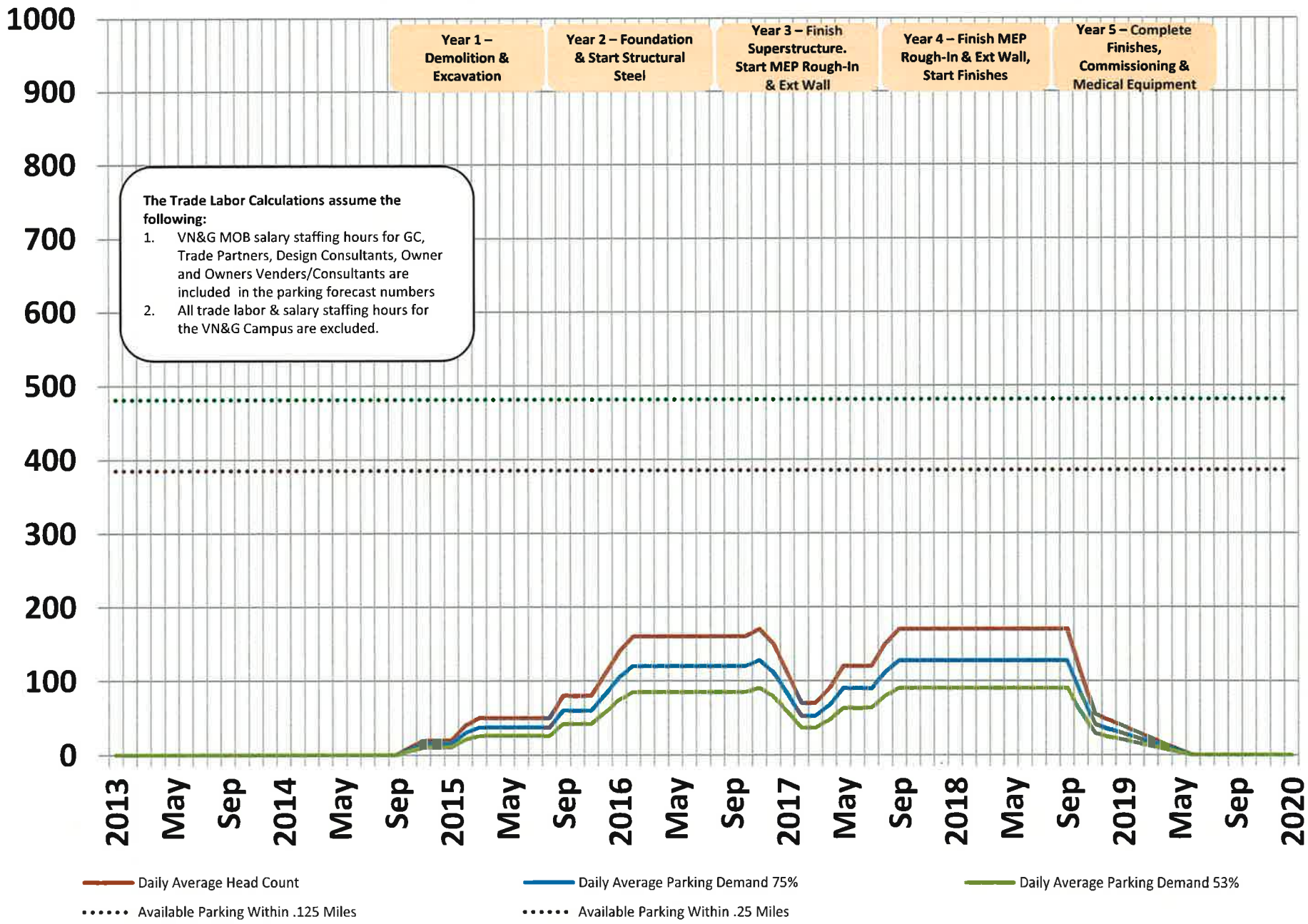
Van Ness & Geary Campus (Hospital and MOB) Manpower Projection



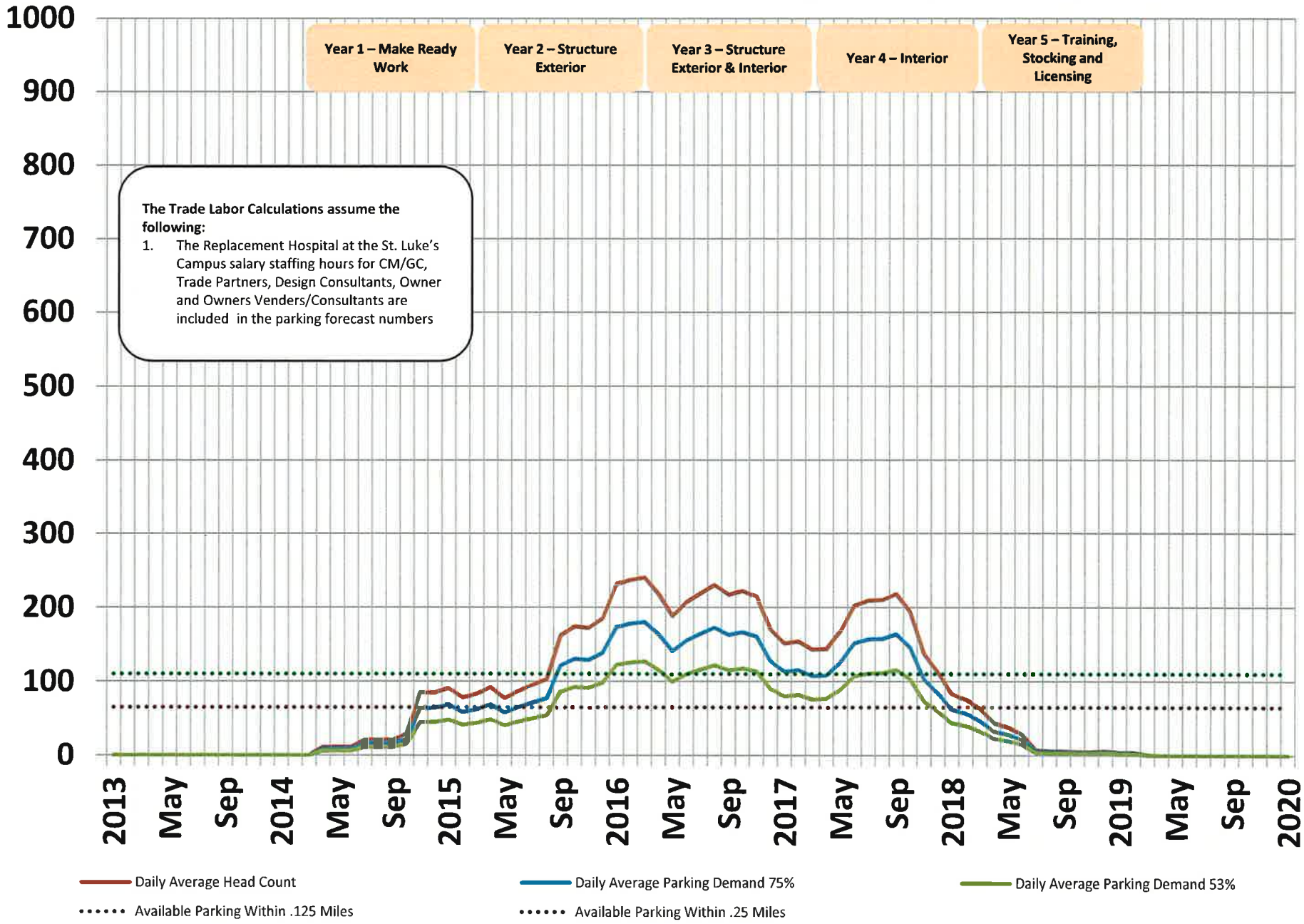
Van Ness & Geary Campus Hospital Manpower Projection



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: _____
Last Name: _____
Company Name: _____
Project Name: _____
Contact Number: _____
Supervisor: _____
Supervisor Number: _____
Start Date: _____
Projected End Date: _____

Vehicle Make: _____
Vehicle Model: _____
Licence Plate: _____
Car Pool: Y N
Names of Passengers: 1)_____
2)_____
3)_____
4)_____
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: _____
Last Name: _____
Company Name: _____
Project Name: _____
Contact Number: _____
Supervisor: _____
Supervisor Number: _____
Start Date: _____
Projected End Date: _____

Vehicle Make: _____
Vehicle Model: _____
Licence Plate: _____
Car Pool: Y N
Names of Passengers: 1)_____
2)_____
3)_____
4)_____
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: _____
Last Name: _____
Company Name: _____
Project Name: _____
Contact Number: _____
Supervisor: _____
Supervisor Number: _____
Start Date: _____
Projected End Date: _____

Vehicle Make: _____
Vehicle Model: _____
Licence Plate: _____
Car Pool: Y N
Names of Passengers: 1)_____
2)_____
3)_____
4)_____
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 th terms listed in the Emergency Transportation Acknowledgement

Name		Date
Print	Sign	

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.

Name	Which Program: Bus, Carpool, or Both?	What City Do You Live In?	Phone Number