



# PLANNING COMMISSION DRAFT MOTION NO. [XXXXXX]

**HEARING DATE:** December 10, 2020

**Record No.:** 2017-004557ENV  
**Project Address:** 550 O'FARRELL STREET  
**Zoning:** RC-4 (Residential-Commercial, High Density) Zoning District  
North of Market Residential Special Use District No. 1  
80-T-130-T Height and Bulk District  
**Block/Lot:** 0318/009  
**Project Sponsor:** Kabir Seth, Sandhill O'Farrell, LLC  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
**Property Owner:** Prabhas Kejriwal, Sandhill O'Farrell, LLC  
832 Southampton Drive  
Palo Alto, CA 94303  
**Staff Contact:** Jennifer McKellar – (628) 652-7563  
[jennifer.mckellar@sfgov.org](mailto:jennifer.mckellar@sfgov.org)

ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED PROJECT THAT WOULD CONSTRUCT A THIRTEEN-STORY-OVER-BASEMENT, 130-FT TALL, MIXED-USE BUILDING (APPROXIMATELY 104,960 SQUARE FEET) WITH 111 DWELLING UNITS (CONSISTING OF 22 AFFORDABLE INCLUSIONARY UNITS), 1,300 SQUARE FEET OF RETAIL OR RESIDENTIAL AMENITY SPACE, AND 156 OFF-STREET BICYCLE PARKING SPACES, AND A PROJECT VARIANT THAT WOULD CONSTRUCT A THIRTEEN-STORY-OVER-BASEMENT, 130-FT TALL, MIXED-USE BUILDING (APPROXIMATELY 106,515 SQUARE FEET) WITH 116 DWELLING UNITS (CONSISTING OF 23 AFFORDABLE INCLUSIONARY UNITS), 1,300 SQUARE FEET OF RETAIL OR RESIDENTIAL AMENITY SPACE, AND 156 OFF-STREET BICYCLE PARKING SPACES, LOCATED AT 550 O'FARRELL STREET, LOT 009 IN ASSESSOR'S BLOCK 0318, WITHIN THE RC-4 (RESIDENTIAL-COMMERCIAL, HIGH DENSITY) ZONING DISTRICT, NORTH OF MARKET RESIDENTIAL SPECIAL USE DISTRICT NO. 1, AND 80-T-130-T HEIGHT AND BULK DISTRICT.

**MOVED,** that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as Case No. 2017-004557ENV, for the 550 O'Farrell Street Project (hereinafter "Project"), based on the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub.

Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

- A. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on March 6, 2019.
  - B. On May 20, 2020, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on May 20, 2020.
  - C. The notice of availability of the DEIR and of the date and time of the public hearing were not posted at the site as they were issued during the 60-day suspension of certain CEQA filing and posting requirements pursuant to Executive Order N-54-20. Nevertheless, the issuance of the NOA complied with the alternative posting requirements stated in the order. The notice also complied with local requirements under the March 23, 2020, Fifth Supplement to the Mayoral Proclamation Declaring the Existence of a Local Emergency Dated February 25, 2020.
  - D. On May 20, 2020, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.
  - E. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on May 20, 2020.
2. The Commission held a duly advertised public hearing on said DEIR on June 25, 2020 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on July 7, 2020.
  3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 48-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Responses to Comments document, published on November 9, 2020, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.
  4. A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Responses to Comments document, all as required by law.
  5. Project EIR files have been made available for review by the Commission and the public. These files are

available for public review at the Department at 49 South Van Ness Avenue, Suite 1400, and are part of the record before the Commission.

6. On December 10, 2020, the Commission reviewed and considered the information contained in the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.
7. The Planning Commission hereby does find that the FEIR concerning File No. 2017-004557ENV reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Responses to Comments document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA and the CEQA Guidelines.
8. The Commission, in certifying the completion of said FEIR, hereby does find that the project and the project variant described in the EIR:
  - A. Will have a significant unavoidable project-specific impact on historic architectural resources.
9. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on December 10, 2020.

Jonas P. Ionin  
Commission Secretary

AYES:

NAYS:

ABSENT:

ADOPTED: December 10, 2020



## MEMO TO THE PLANNING COMMISSION

**HEARING DATE:** December 10, 2020

November 23, 2020

**Case Number:** 2017-004557ENV  
**Project Address:** 550 O'FARRELL ST  
**Zoning:** RC-4 (RESIDENTIAL- COMMERCIAL, HIGH DENSITY) Zoning District  
North of Market Residential Special Use District #1  
80-T-130-T Height and Bulk District  
**Block/Lot:** 0318/009  
**Project Sponsor:** Sandhill O'Farrell, LLC  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
**Staff Contact:** Jennifer McKellar – 628-652-7563  
Jennifer.McKellar@sfgov.org

**Re:** Errata to the Responses to Comments on the Draft EIR document for 550 O'Farrell Street  
(Planning Record No. 2017-004557ENV)

### Errata

The following is a list of errata to the Responses to Comments document referenced above, organized by page number. Deleted text is indicated by ~~strike through~~. Additions are indicated by double underline.

On page RTC-40, under the subheading *Errata*, the following text is incorporated (in numerical page order, DEIR revisions first, and Initial Study revisions second):

DEIR p. S-13, under **Mitigation Measure M-TCR-1: Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program**, the first sentence of the second paragraph is revised as follows to correct a typographical error:

If the ERO in consultation with the project sponsor and the tribal representative determines that preservation is in-place of the TCR is not a sufficient or feasible option then archeological data recovery shall be conducted, as detailed under M-CR-~~52a~~ for this project.



DEIR p. 6-2, the first item is revised as follows to correct a typographical error:

Project Sponsor  
Sandhill O'Farrell LLC  
1160 Battery Street, Suite ~~100250~~  
San Francisco, CA 94111  
Kabir Seth  
Prabhas Kejriwal  
Cyrus Sanandaji

Initial Study p. 146, the first sentence of the first full paragraph is revised as follows to correct a typographical error:

If the ERO in consultation with the project sponsor and the tribal representative determines that preservation—~~in~~—in-place of the TCR is not a sufficient or feasible option then archeological data recovery shall be conducted, as detailed under M-CR-~~52a~~ for this project.

Initial Study p. 154, the last item is revised as follows to correct a typographical error:

Project Sponsor  
Sandhill O'Farrell LLC  
1160 Battery Street, Suite ~~100250~~  
San Francisco, CA 94111  
Kabir Seth  
Prabhas Kejriwal  
Cyrus Sanandaji

# EIR



## RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

### 550 O'Farrell Street Project

CITY AND COUNTY OF SAN FRANCISCO

PLANNING DEPARTMENT  
CASE NO. **2017-004557ENV**

**STATE CLEARINGHOUSE NO. 2019039039**

	Draft EIR Publication Date:	May 20, 2020
	Draft EIR Public Hearing Date:	June 25, 2020
	Draft EIR Public Comment Period:	May 21, 2020 – July 7, 2020
	Responses to Comments Publication Date:	November 9, 2020



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**DATE:** November 9, 2020

**TO:** Members of the Planning Commission and Interested Parties

**FROM:** Lisa Gibson, Environmental Review Officer

**Re:** **Attached Responses to Comments on Draft Environmental Impact Report Case No. 2017-004557ENV: 550 O'Farrell Street Project**

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the planning commission for final EIR certification on December 10, 2020.** The planning commission will receive public testimony on the Final EIR certification at the December 10, 2020 hearing. Please note that the public review period for the Draft EIR ended on July 7, 2020; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The planning commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to commission members or to the president of the commission at 49 South Van Ness Avenue and express an opinion on the Responses to Comments document, or the commission's decision to certify the completion of the Final EIR for this project.

Because of the COVID-19 shelter-in-place order, planning department staff and planning commissioners are working remotely, and the planning commission may have to hold the Final EIR certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at [www.sfplanning.org](http://www.sfplanning.org).

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. To reduce risks to outside service providers, the department is limiting the distribution of hard copy documents. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Jennifer McKellar at 628-652-7563, or [CPC.550OFarrellStEIR@sfgov.org](mailto:CPC.550OFarrellStEIR@sfgov.org).

Thank you for your interest in this project and your consideration of this matter.

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# RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

## 550 O'Farrell Street Project

CITY AND COUNTY OF SAN FRANCISCO PLANNING DEPARTMENT  
CASE NO. **2017-004557ENV**  
STATE CLEARINGHOUSE NO. **2019039039**

Draft EIR Publication Date:	MAY 20, 2020
Draft EIR Public Hearing Date:	JUNE 25, 2020
Draft EIR Public Comment Period:	MAY 21, 2020 TO JULY 7, 2020
Responses to Comments Publication Date:	NOVEMBER 9, 2020



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# 550 O'Farrell Street Project

## Responses to Comments on the Draft Environmental Impact Report

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## A. INTRODUCTION

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### A.1 PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (Draft EIR) for the proposed 550 O'Farrell Street Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) section 21091(d)(2)(A) and (B), the San Francisco Planning Department (planning department) has considered the comments received on the Draft EIR, evaluated the issues raised, and is providing written responses that address each substantive environmental issue that has been raised by the commenters. In accordance with CEQA, the responses to comments focus on addressing physical environmental effects associated with the proposed project or project variant. Such effects include physical impacts or changes attributable to the proposed project or the project variant.

None of the comments received provide new information that warrants recirculation of the Draft EIR. The comments do not identify new significant impacts or a substantial increase in the severity of previously identified impacts. Further, they do not identify any feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR and/or that the project sponsor has not agreed to implement.

The Draft EIR together with this RTC document constitutes the Final EIR for the proposed project in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The Final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code. It is an informational document for use by (1) governmental agencies (such as the City and County of San Francisco) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts and (2) the San Francisco Planning Commission (planning commission) and other City entities (such as the San Francisco Board of Supervisors), where applicable, prior to their decisions to approve, disapprove, or modify the proposed project or project variant. If the planning commission and other City entities approve the proposed project or project variant, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that mitigation measures identified in the Final EIR are implemented.

### A.2 ENVIRONMENTAL REVIEW PROCESS

#### *Notice of Preparation*

The planning department, as lead agency responsible for administering the environmental review of projects within the City and County of San Francisco under CEQA, published a Notice of Preparation (NOP) of an Environmental Impact Report on March 6, 2019, to inform agencies and the general public that the Draft EIR would be prepared based upon the criteria of the state CEQA Guidelines, sections 15064 (Determining Significant Effects) and 15065 (Mandatory

Findings of Significance). A Notice of Availability of the NOP and/or the NOP was sent to the State Clearinghouse, responsible agencies, interested individuals, and organizations, occupants of the project site and adjacent properties, and owners of property within a 300-foot radius of the project site.

### ***Draft EIR Public Review***

The San Francisco Planning Department published a Draft EIR for the proposed project on May 20, 2020, and circulated the Draft EIR to the State Clearinghouse, responsible agencies, and to interested organizations and individuals for a 45-day public review period. To reduce COVID-19 transmission risks to outside service providers, additional paper copies of the Draft EIR were made available for public review upon request only. The planning department also distributed notices of availability of the Draft EIR to local, state, and federal agencies, interested organizations and individuals, and owners and occupants of property within a 300-foot radius of the project site; published notification of its availability in a newspaper of general circulation in San Francisco (*San Francisco Examiner*); and posted the notice of availability at the San Francisco County Clerk's office.

The Draft EIR notice was issued during the 60-day suspension of certain CEQA filing and posting requirements pursuant to Executive Order N-54-20, and its issuance complied with the alternative posting requirements stated in the order. This notice also complied with local requirements under the March 23, 2020 Fifth Supplement to the Mayoral Proclamation Declaring the Existence of a Local Emergency dated February 25, 2020.

During the Draft EIR public review period, the planning department received written comments from three individuals and one organization. As there is a listed historic resource located on the project site, a public hearing was held before the Historic Preservation Commission (HPC) on June 17, 2020, in order for the HPC to provide comments on the Draft EIR for consideration by the planning commission. Due to the COVID-19 emergency, this hearing was held remotely. Subsequent to that hearing, the HPC submitted a comment letter to the planning department.

Attachment A of this RTC document includes copies of the comment letters or emails submitted to the planning department on the Draft EIR.

During the public review period, the planning commission conducted a public hearing to receive oral comments on the Draft EIR on June 25, 2020. Due to the COVID-19 emergency, this hearing was also held remotely. A court reporter accessed the planning commission website to document comments from individuals who spoke at the hearing in real time. The court reporter prepared the hearing transcript to include verbatim comments, presented in Attachment B of this RTC.

### ***Responses to Comments Document and Final EIR***

The comments received on the Draft EIR during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. Under CEQA Guidelines section 15201, members of the public may comment on any aspect of

the proposed project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be “on the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” In addition, “when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” CEQA Guidelines section 15088 specifies that the lead agency is required to respond to the comments on the major environmental issues raised in the comments received during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the Draft EIR in disclosing the significance of the environmental impacts of the proposed project that was evaluated in the Draft EIR.

The planning department distributed this RTC document for review to the planning commission, as well as to the agencies and persons who commented on the Draft EIR. The planning commission will consider the adequacy of the Final EIR—consisting of the Draft EIR and the RTC document—in complying with the requirements of CEQA. If the planning commission finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR under CEQA and will then consider the associated Mitigation Monitoring and Reporting Plan (MMRP) and requested approvals for the proposed project.

Consistent with CEQA Guidelines section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the project’s significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines sections 15091 and 15092). Because the Draft EIR identified one significant adverse impact that cannot be mitigated to a less than-significant level, the planning commission must adopt findings that includes a statement of overriding considerations for that significant and unavoidable impact, should it approve the proposed project or project variant (CEQA Guidelines section 15093(b)). The project sponsor is required to implement the MMRP as a condition of project approval.

Because of the COVID-19 shelter-in-place order, planning department staff and planning commissioners are working remotely, and the planning commission may have to hold the Final EIR certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department’s website at [www.sfplanning.org](http://www.sfplanning.org). To reduce risks to outside service providers, the department is limiting the distribution of hard copy documents. Please contact Jennifer McKellar at 628-652-7563, or [CPC.550OFarrellStEIR@sfgov.org](mailto:CPC.550OFarrellStEIR@sfgov.org), if you still require a hard copy of the RTC document.

### A.3 DOCUMENT ORGANIZATION

A. **Introduction** – This section discusses the purpose of the RTC document, the environmental review process, and the organization of the RTC document.

- B. **List of Persons Commenting** – This section presents the names of persons who submitted comments on the Draft EIR. The list is organized into the following groups: agencies, boards, and commissions; organizations; and individuals.
- C. **Comments and Responses** – This section presents the substantive comments excerpted verbatim from the planning commission public hearing transcript and comment letters. Similar comments have been grouped together by topic area. Following each comment or group of comments on a topic are responses prepared by the planning department, representing the lead agency for this EIR.
- D. **DEIR Revisions** – This section includes changes to the DEIR text noted in the comments and responses, and cites the page numbers where changes are made. To correct a typographical error, this section includes a revised DEIR **Figure 3-1: Uptown Tenderloin Historic District Map**.
- E. **Attachments**

Attachment A – Draft EIR Comment Letters and Emails

Attachment B – Draft EIR Public Hearing Transcript

## B. LIST OF PERSONS COMMENTING

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This RTC document includes responses to all comments received on the Draft EIR, including written comments submitted by letter or email, as well as oral comments presented at the public hearing that was held on June 25, 2020. This section lists all agencies, organizations, and individuals who submitted comments on the Draft EIR. As described in section A above, comments are categorized by individuals as members of the public; individuals representing a governmental agency; and individuals representing non-governmental organizations. **Table RTC-1: Persons Commenting on the Draft EIR During the Public Review Period**, lists the commenters' names, along with the corresponding commenter codes used in section C, Comments and Responses, to denote each set of comments received by category and date received by the planning department. All written and oral comments have been reproduced in Attachment A, Draft EIR Comment Letters. Oral comments given at the planning commission hearing are included in Attachment B, Draft EIR Hearing Transcript.

- Comments from agencies are designated by "A-" and the agency's name or acronym. Where several commenters from the same agency provided comments, the acronym is followed by a number.
- Comments from organizations are designated by "O-" and the organization's name or acronym.
- Comments from individuals are designated by "I-" and the commenter's last name.

**Table RTC-1: Persons Commenting on the EIR during the Public Review Period**

Commenter Codes	Name and Title of Commenter	Agency/Organization	Format	Dates
<i>Federal, State, Regional, and Local Agencies, Boards, and Commissions</i>				
A-HPC-1	Aaron Jon Hyland, FAIA, President	San Francisco Historic Preservation Commission	Letter	June 19, 2020
A-CPC-1	Kathrin Moore, Commissioner	San Francisco Planning Commission	Public Hearing Transcript	June 25, 2020
<i>Organizations</i>				
O-TNDC-1	Gabriella Ruiz, Policy and Planning Manager	Tenderloin Neighborhood Development Corporation	Public Hearing Transcript	June 25, 2020
O-TNDC-2	Gabriella Ruiz, Policy and Planning Manager	Tenderloin Neighborhood Development Corporation	Letter	July 7, 2020
<i>Individuals</i>				
I-Lee-1	Edward Lee	Neighborhood Resident	Email	May 25, 2020
I-Cascio-1	Ric Cascio	Neighborhood Resident	Email	May 26, 2020
I-Franco-1	Daniel Franco	Neighborhood Resident	Public Hearing Transcript	June 25, 2020
I-Rankin-1	William Rankin	Neighborhood Resident	Public Hearing Transcript	June 25, 2020
I-Mann-1	Joseph Mann		Public Hearing Transcript	June 25, 2020
I-Hestor-1	Sue Hestor		Public Hearing Transcript	June 25, 2020
I-Hestor-2	Sue Hestor		Letter	July 7, 2020

## C. COMMENTS AND RESPONSES

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This section presents the substantive comments received on the Draft EIR and Initial Study and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR and Appendix A: Initial Study, with general comments on the EIR, including comments on the merits of the proposed project and project alternatives, grouped together at the end of the section. Comments on specific topics are included under the comments regarding the relevant topical sections of the Draft EIR (DEIR) and Initial Study (IS). The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets).

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<b>Draft EIR</b>	<b>Initial Study</b>
<ul style="list-style-type: none"><li>• Project Description [PD]</li><li>• Historical Architectural Resources [DEIR HAR]</li><li>• Cumulative Impacts on Historic Architectural Resources [C1]</li><li>• Alternatives [DEIR ALT]</li><li>• Mitigation Measures [DEIR MM]</li><li>• Project Completeness [DEIR COMP]</li></ul>	<ul style="list-style-type: none"><li>• Aesthetics [IS VIS]</li><li>• Population and Housing [IS PH]</li><li>• Traffic and Parking [IS TR]</li><li>• Construction Noise [IS NOI]</li><li>• Shadow Impacts [IS SH]</li></ul>
<b>Socioeconomic Concerns</b> [SOCIO]	<b>Community Concerns</b> [Outreach]
<ul style="list-style-type: none"><li>• Economic Equity</li><li>• Racial and Social Equity</li><li>• Displacement</li></ul>	<ul style="list-style-type: none"><li>• Community Outreach</li><li>• Community Benefits Agreement</li></ul>
<b>General Comments</b>	
Project Comment/Design [Project]	

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Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, Population and Housing comments [PH] are listed as IS PH-1, IS PH-2, IS PH-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter's name and the comment identifier described in section B, List of Persons Commenting. The reader is referred to attachments A and B for the full text and context of each comment letter or email, as well as the public hearing transcript. In those attachments, the comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the Draft EIR, as appropriate. Response numbers correspond to the topic code; for example, the response to comment IS PH-1 is presented under Response IS PH-1. The responses may clarify the Draft EIR text or revise or add text to the Final EIR. Revisions to the Draft EIR are shown as indented text. New or revised text, including text changes initiated by planning department staff, is double



underlined; deleted material is shown in ~~strike through~~. (also see section D, Revisions to the Draft EIR.

## C.1 DRAFT EIR

### *Project Description*

#### Comment DEIR PD-1: Façade Restoration

The comments and corresponding responses in this section cover topics in DEIR chapter 2, Project Description. This response addresses the following comment, quoted in full below:

- A-HPC-1, DEIR PD-1

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“The HPC requested that additional information on restoration of the façade be included in the DEIR’s project description section.” (*Aaron Hyland, President, Historic Preservation Commission, Letter, June 19, 2020 [A-HPC-1, DEIR PD-1]*)

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### **Response to DEIR PD-1**

To provide additional information on the retention of the existing façade of 550 O’Farrell Street with the proposed project, the following underlined text is added in DEIR chapter 2, Project Description, p. 2-15, second paragraph:

“The main elevation on O’Farrell Street would be organized in a vertical tripartite division similar to the surrounding buildings that comprise the Uptown Tenderloin Historic District. The base of the building would be the retained façade of the existing 550 O’Farrell Street garage, with plaster finish scored to resemble masonry, and decorative panels. **Figure 2-3: Existing Building Photograph and Building Section**, p. 2-6, also illustrates this façade. New storefront glass and building entrance elements would replace the existing wide garage openings, with new glass in the existing second-floor arched window openings. On the basis of pre-construction assessments, including paint analysis, other existing decorative features, including the gargoyles, the balcony with ogee arches, and the quatrefoil panels on the parapet would be retained, cleaned, and restored as needed. See also Draft EIR **section 3.B, Historic Architectural Resources**, for further description of the existing façade. Level 4 would be set back three to four feet from the façade. The middle section of the building would have deep inset punched windows organized into single and vertically paired doubles, creating an offset fenestration pattern. The top of the building would be set back from the middle section by 2.5 feet.”

For completeness, the following underlined text is added in EIR chapter 3, section B, Historic Architectural Resources, p. 3-24, under **Impact CR-1**:

“The 550 O’Farrell Street garage has been determined to be individually eligible for listing on the CRHR. The proposed project would demolish most of the 550 O’Farrell Street building. The proposed project, a 13-story, 111-unit residential mixed-use building, would retain the garage’s primary façade that contains much of the character-defining features and recognized historic elements of Gothic Revival architecture. The proposed project would incorporate retained elements of the existing façade into the lower floors of the O’Farrell Street frontage. New storefront glass and building entrance elements would replace the existing wide garage openings, with new glass in the existing second-floor arched window openings. On the basis of pre-construction assessments, including paint analysis, other existing decorative features, including the gargoyles, the balcony with ogee arches, and the quatrefoil panels on the parapet would be retained, cleaned, and restored as needed. However, demolition of the remainder of the building would result in a loss of character-defining low-scale, two-story massing, reinforced concrete construction, and the building’s arched wood-truss roof, contributing to a substantial loss of historic building materials and form. Therefore, demolition of most of the existing 550 O’Farrell Street building would have a significant adverse effect on a historic resource.”

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### Comment DEIR HAR-1: Historic Architectural Resources

The comments and corresponding responses in this section cover topics in Draft EIR section 3.B, Historic Architectural Resources. This response addresses the following comment, quoted in full below:

- A-HPC-1, DEIR HAR-1

“The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource.” (*Aaron Hyland, President, Historic Preservation Commission Letter, June 19, 2020 [A-HPC-1, DEIR HAR-1]*)

### Response DEIR HAR-1

The comment is noted. DEIR chapter 3, section B, Historic Architectural Resources, DEIR pp. 3-5 to 3-34 analyzes the proposed project and project variant impacts on historic resources. **Impact CR-1, Demolition of the 550 O’Farrell Street Structure**, DEIR p. 2-34, presents the conclusion that the proposed project or project variant would have a significant unavoidable impact on an historic resource.

### Comment DEIR MM-1: Mitigation Measures

Comments and corresponding responses in this section cover topics in Draft EIR chapter 3, Environmental Setting and Impacts. This response addresses the following comment, quoted in full below:

- A-HPC-1, DEIR MM-1

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“The HPC did not have any comments on the Mitigation Measures and found them to be adequate.” (*Aaron Hyland, President, Historic Preservation Commission, Letter, June 19, 2020 [A-HPC-1, DEIR MM-1]*)

### Response DEIR MM-1

The comment is noted. DEIR chapter 3, section B, Historic Architectural Resources, DEIR pp. 3-24 to 3-27 present mitigation measures M-CR-1, M-CR-2, and M-CR-3 that would reduce, but not avoid, the unavoidable significant impacts on an historic resource of the proposed project or project variant.

### Comment DEIR ALT-1, ALT-2

The comments and corresponding responses in this section cover topics in Draft EIR Chapter 5, *Alternatives*. This response addresses the following comments, quoted in full below:

- A-HPC-1, DEIR ALT-1
- A-HPC-1, DEIR ALT-2

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“HPC members reiterated that this was the first project where a draft of the alternatives went for review by the full HPC, whereas previously draft alternatives were only reviewed by the Architectural Review Committee (ARC). The HPC felt the change in procedure had greatly improved the process by allowing the full HPC to provide comments earlier during the development of alternatives. This change in process also allowed commissioners to give feedback on the design of the project at an earlier phase.” (*Aaron Hyland, President, Historic Preservation Commission Letter, June 19, 2020 [A-HPC-1, DEIR ALT-1]*)

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“The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts. (*Aaron Hyland, President, Historic Preservation Commission Letter, June 19, 2020 [A-HPC-4, DEIR ALT-2]*)”

## Response ALT DEIR-1 and ALT DEIR-2

The comments are noted. DEIR chapter 5, Alternatives, DEIR pp. 5-1 to 5-33 analyzes the No Project Alternative, the Full Preservation Alternative, and a Partial Preservation Alternative. DEIR pp. 5-2 to 5-3 describes that, in April 2019, the Historic Preservation Commission reviewed and provided feedback on the draft alternatives to be analyzed in the DEIR. DEIR p. 5-3 states that:

“This EIR analyzes the proposed project with the retained elements design, which was one of the two partial preservation alternatives reviewed by the commission and subsequently adopted as the proposed project; the project variant in this EIR is a revised design, compared to the main, full demolition project presented to the commission.”

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## Comment DEIR COMP-1: DEIR Completeness

The comments and corresponding responses address the adequacy of the Draft EIR. This response addresses the following comment, quoted in full below:

- A-CPC-1, DEIR COMP-1

“I generally find the Draft EIR complete and accurate. It’s well organized, easy to read, and I found the discussion of the proposed alternative rather convincing, including the one which is analyzed as a proposed alternative with all the pieces that are possible. That is one which I find very well elaborated and convincing and I’m in full support of what is in front of me.” (*Kathrin Moore, Vice President, San Francisco Planning Commission, Planning Commission Hearing Oral Comment, June 25, 2020 [A-CPC, DEIR COMP-1]*)

## Response to DEIR COMP-1

The commenter states that the DEIR is complete and adequate. The comment is noted and no further response is necessary.

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## Comments DEIR CI: Cumulative Historic Resource Impacts

The comments and corresponding responses address cumulative impacts on Historic Architectural Resources in DEIR chapter 3, section, DEIR pp. 3-31 to 3-34. This response addresses the following comment, quoted in full below (bold text is in the original):

- I-Hestor-2, DEIR CI-1

“**Table 3-1** - projects in UTHD -(3-22, 23) needs updating and further information. Have additional projects been proposed?”

**For all approved projects** please provide number of DUs and status. If the housing is owned by a non-profit housing developer, and will keep the units affordable to lower income people, please provide that information.

**145 Leavenworth** and **361 Turk** are the 2 former Golden Gate/Leavenworth YMCA parking lots. After initial attempt to use new group housing on those sites as "new housing units" which would allow 7 residential hotels to **convert all of their residential hotel rooms to TOURIST hotel rooms**. By the time project was approved, use of this provision of Residential Hotel Ordinance was abandoned. But owner of one of those Residential Hotels on 4th St is still pursuing conversion to full tourist use.

Similar information should be provided for recent and proposed projects in Lower Nob Hill District. It would include 824 Hyde - fire destroyed housing - approved for hotel in 2017." (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, CI-1]*)

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## Response DEIR CI-1

The comments refer to **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, DEIR pp. 3-22 and 3-23. That table, as discussed on DEIR p. 3-21, is presented to provide the basis for analysis of potential cumulative impacts on historic resources in the historic district:

"The cumulative analysis for the proposed project or project variant focuses on potential impacts to identified historic districts, as the project is within, and is a contributor to the Uptown Tenderloin Historic District. With respect to vibration impacts on historic resources, the cumulative approach includes cumulative development projects in the vicinity that would have the potential to generate vibration that could potentially cause structural damage to the adjacent historic resource. **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, p. 3-22, provides the addresses of cumulative projects, identifies whether the buildings are contributors to the district, and provides the status of each project and furthermore, identifies which projects include demolitions of existing structures. Of the 18 projects listed in the table, ten are sites with contributory structures, and eight are non-contributory."

DEIR p. 3-20 in section 3.B, Historic Architectural Resources explains cumulative analysis criteria for the proposed project or project variant and focuses on potential impacts to the historic district: demolition of historic resources by building type, and cumulative noise and construction vibration impacts from development within the historic district. The information in Table 3-1 was current as of DEIR publication in May 2020, and includes the type of land uses for the listed cumulative projects. The information is adequate to support the analysis and conclusions of potential cumulative effects on historic resources.

The comment requests information on the type and quantity of housing proposed in the projects in Table 3-1, and similar information for projects in the Lower Nob Hill Apartment Hotel Historic

District. The Nob Hill district is shown in DEIR **Figure 3-1: Uptown Tenderloin Historic District**, DEIR p. 3-15.

The IS includes **Table 1: Cumulative Projects within ¼ mile of Project Site**, IS p. 14. The table lists land use information for those projects, including number of dwelling units. The ¼ mile radius encompasses portions of the Lower Nob Hill Apartment Hotel Historic District north of the 550 O'Farrell Street site. Table 1 supports analysis of potential cumulative impacts for environmental topics in the IS. The IS analyzes cumulative environmental effects for the resources that were determined to be less than significant or would be reduced to less than significant levels with mitigation and therefore were not discussed further in the DEIR. The ¼ mile radius used for Table 1 is adequate for the assessment of potential cumulative physical impact associated with the proposed project and project variant.

The comment requests information about cumulative development throughout the Uptown Tenderloin Historic District and the Lower Nob Hill Apartment Hotel Historic District in relationship to housing costs, availability of affordable housing and residential hotel units, and the conversion of residential hotel rooms to tourist rooms. As discussed below in response **MR-1**, these potential socioeconomic effects are not physical environmental effects and would not lead to any direct or indirect physical environmental effects. **MR-1** notes that under CEQA Guidelines sections 15064(e) and 15131(a) the economic or social effects of a project shall not be treated as significant effects on the environment. Guidelines section 15131(a) further states that "an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes associated with the proposed project."

No further response is necessary.

## C.2 INITIAL STUDY

### Comments on Population and Housing

This response addresses the following comments, quoted in full below:

- I-Hestor-1, IS PH-1
- I-Hestor-1, IS PH-2
- I-Hestor-1, IS PH-3

"This is Sue Hestor. I am following up TNDC's comments. This is an existing neighborhood that the Planning Department sometimes understands is a neighborhood and sometimes doesn't. The map that was shown that had the lavender at the bottom and the gray at the top, it's page 3-15 of

the EIR, shows the top of the area that is located between basically Pine and Geary Street is a lower Nob Hill apartment hotel historic district. That's the area that has residential hotels.

Tenderloin has residential hotels and there's deep housing that exists already in the neighborhood. This area doesn't have so many traditional apartment buildings. It has SROs, and it has residential hotels, and it has other housing that was accommodated by people eating out a lot, and not having kitchens in their building." (*Sue Hestor, Planning Commission Hearing Oral Comment, June 25, 2020 [I-Hestor-1, IS PH-1]*)

"There needs to be a real understanding at the Planning Department about the different types of housing that exist, and who they serve, and what benefits they give to lower income people particularly.

This has not been an area that has had upscale housing for a long time. And now, people want to make a lot of money and turn everything into upscale housing. But the existing residents need to be protected from being pushed out by unthinking development pushed by the Planning Department, or by private developers wanting to make a bit of money." (*Sue Hestor, Planning Commission Hearing Oral Comment, June 25, 2020 [I-Hestor-1, IS PH-2]*)

"So, I'm submitting written comments, but this is an opportunity to start understanding how the city was developed in this area, which doesn't have a whole lot of original single-family housing. Thank you. It doesn't have single-family houses at all. Thank you. Bye." (*Sue Hestor, Planning Commission Hearing Oral Comment, June 25, 2020 [I-Hestor-1, IS PH-3]*)

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### Response IS PH-1, IS PH-2 and IS PH-3

The comments describe existing housing types in the Tenderloin and Lower Nob Hill neighborhoods. Draft EIR (Chapter 3, Environmental Setting and Impacts) section B.3, Historic Architectural Resources, pp. 3-14 to 3-16 discusses the history, architectural character, and land uses in the Uptown Tenderloin Historic District in which the project site is located. **Figure 3-1, Uptown Tenderloin Historic District**, DEIR p. 3-15, depicts the district boundaries, and the Lower Nob Hill Apartment Hotel Historic District to the north. Draft EIR p. 3-14, fourth paragraph, notes that the Uptown Tenderloin Historic District comprises "predominantly residential buildings."

These comments further address potential indirect displacement of existing residents in the project vicinity as a result of the development of market-rate housing and not direct displacement as a result of the proposed project or project variant. The comments address socioeconomic impacts. As discussed in section C.3, Socioeconomic Issues and response **MR-1** below, these socioeconomic effects are not physical environmental effects requiring analysis under CEQA. **MR-1** notes that under CEQA Guidelines sections 15064(e) and 15131(a) the economic or social effects of a project shall not be treated as significant effects on the environment unless there is chain of cause and effect from socioeconomic changes to direct physical changes.

No further response is necessary.

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This response addresses the following comments, quoted in full below (bold text is in the original):

- I-Hestor-2, IS PH-4
- I-Hestor-2, IS PH-5

“As shown on Figure 3-1 (3-14) Project is located in **Uptown Tenderloin Historic District** (UTHD) and on block abutting **Lower Nob Hill Apartment Hotel Historic District** (LNHAHHD). Shaded areas of Lower Nob Hill/Tenderloin Area from Polk to Powell zoned RC. Both of these National Register Districts have been important sources of housing for working and lower income people since the 1906 earthquake.

Historical Context - **UTHD** has historically included non-residential buildings, such as the YMCA at Golden Gate and Leavenworth. Both districts have substantial stock of housing in residential hotels, called **apartment** hotels in **LNHAHHD**. Also Single Room Occupancy (SRO) units. Residents of this housing have traditionally worked in downtown San Francisco, in its hotels and restaurants, in working class jobs. They have also housed elderly persons, people with disabilities. People who live in this area often walk to their jobs.

As residents of older buildings they are "protected" by SF Admin Code Chapter 41 - Residential Hotel Unit Conversion and Demolition Ordinance (1990) AND Chapter 37 - Residential Rent Stabilization and Arbitration Ordinance (1979). Both aim at protecting existing HOUSING and existing RESIDENTS from displacement. If they are not enforced - in particular by the Planning Department and Department of Building Inspection, the housing and residents are driven out - often out of City because they can no longer afford to reside in San Francisco.

The entire lower Nob Hill and Tenderloin areas - and long time lower income tenants - have been dealing with this displacement for over 30 years. (See Ordinances above).

To hotels, quasi-hotels, short term residences, corporate housing. **For-profit** owners of these buildings often want higher income occupants (not residential tenants) and rents. Without effective measures, as upper income tenants come into building such as 550 O'Farrell, pressure is put on nearby buildings and residents. The effects of adding upper income housing on O'Farrell between Leavenworth and Taylor will extend north into the **Lower Nob Hill Apartment Hotel Historic District**.

Apartment hotels ARE Residential Hotels. They were historically major source of housing for people, particularly single women, working downtown.” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS PH-4]*)

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“The Planning Department (including HPC) - and DBI - basically ignore Residential Rent Control and Residential Hotel Ordinance. Plans to alter Residential Hotels are often over-the-counter. Plans for alterations or new construction that affect existing rent-controlled units are glossed over. ADMINISTRATIVE Code provisions are not in **Planning Code**.” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS PH-5]*)

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### Response IS PH-4 and IS PH-5

The commenter makes assertions about development effects on housing costs, availability of affordable housing and residential hotel units, enforcement by the city of the Residential Hotel Unit Conversion and Demolition Ordinance and the Residential Rent Stabilization and Arbitration Ordinance, and indirect displacement. As discussed below in response **MR-1**, these socioeconomic effects are not physical environmental effects of the proposed project or project variant requiring analysis under CEQA. No further response is necessary.

**MR-1** notes that under CEQA Guidelines sections 15064(e) and 15131(a) the economic or social effects of a project shall not be treated as significant effects on the environment. Guidelines section 15131(a) further states that “an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes associated with the proposed project.”

This response addresses the following comment, quoted in full below:

- I-Hestor-2, IS PH-6

“Please provide a brief description of housing and population - similar to that done for UTHD on **3-19** - for Lower Nob Hill District.” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS PH-6]*)

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### Response IS PH-6

Draft EIR Appendix B, Initial Study section E.3 Population and Housing, IS pp. 19-23, describes population and housing conditions and projections on a regional, citywide, and local basis. IS p. 21 presents population changes at the level of the larger neighborhood, on the basis of Census Tract 123.02, which encompasses portions of Lower Nob Hill:

“While the addition of 255 to 267 people would be noticeable to residents of immediately adjacent properties, those numbers would not result in a substantial increase to the population of the larger neighborhood or the City and County of San Francisco. The 2017 U.S. Census indicates that the residential population in Census Tract 123.02 (where the project site is located) is approximately 2,507 persons. The proposed project and project variant would increase the population within Census Tract 123.02 by approximately 1

percent. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,730 persons by 2040. The residential population introduced as a result of the proposed project or the project variant would constitute approximately 0.03 percent of projected citywide growth. This population increase would be accommodated within the planned growth for San Francisco. Overall, the introduction of 111 to 116 new dwelling units to the project site would not directly induce substantial population growth.”

That analysis supports the IS conclusion that the proposed project or project variant would not have a significant adverse effect on population or housing conditions.

The description of development patterns and character of the Uptown Tenderloin Historic District, DEIR section 3.B, Historic Architectural Resources, p. 3-19, cited in the comment, is setting information that supports the analysis of the proposed project or project variant’s potential impacts on historic resources within that district. The DEIR does not require similar information on the Lower Nob Hill Apartment Hotel Historic District to complete the analysis of effects on historic resources because the proposed project is outside that district.

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This response addresses the following comment, quoted in full below (bold text is in the original):

- I-Hestor-2, IS PH-7

“Please read p. 21 sentence which states that employees of any retail establishment on 550 site would be anticipated to live in SF (or nearby communities.) Define ***nearby***. 90 min commute? 120 min commute?” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS PH-7]*)

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### Response IS PH-7

Draft EIR Appendix B, Initial Study section E, Transportation and Circulation, IS pp. 32-47, analyzes travel patterns for the proposed project and project variant. As discussed on IS pp. 34 to 36, the IS analysis uses the vehicle miles travelled (VMT) approach to review transportation impacts. IS **Table 4: Daily Vehicle Miles Traveled**, IS p. 42, shows that, for retail employees, the average daily VMT for traffic analysis zone (TAZ) 771, encompassing the project site is 7.1 miles for existing conditions, and 7.0 miles for cumulative year 2040 conditions. Those average vehicle miles travelled do not indicate excessively long commute travel times for proposed project or project variant employees. Initial Study p. 21 notes that the proposed project or project variant would accommodate three leasing and building employees, and about five retail employees.

### Comment IS VIS-1: Aesthetics/Visual Impacts

The comments and corresponding responses address visual quality impacts from the project. This response addresses the following comment, quoted in full below:

- I-Rankin-1, IS VIS-1

“I live at 665 Geary Street, adjacent to the garage. And it will be a hugely significant negative impact for me and my neighbors. The building proposed is an eyesore. It’s ugly, hideous. Aesthetically it has no value” (*William Rankin, Planning Commission Hearing Oral comment, June 25, 2020 [I-Rankin-1, IS VIS-1]*)

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### Response IS VIS-1

The comment states that design of the proposed project would have negative visual impacts. Draft EIR Appendix B, Initial Study, section E. Evaluation of Environmental Effects, Aesthetics and Parking, IS p. 15 addresses aesthetic effects of the proposed project or the project variant. Consistent with Senate Bill 743 and CEQA section 21099, the aesthetic effects, if any, of residential, mixed-use residential, or employment center projects located in a transit priority area and on an urban infill site are not considered significant impacts on the environment. The proposed project or the project variant would meet those criteria, as noted below. In addition, CEQA states that “the lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers.” City decision-makers can consider aesthetic impacts in their deliberations on the proposed project or the project variant.

As presented on IS p. 15:

*“Aesthetics and Parking*

In accordance with CEQA section 21099, Modernization of Transportation Analysis for Transit Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

The proposed project and project variant meets each of the above criteria; therefore, this initial study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA. Public Resources Code sections 21099(d)(2) and 21099(e) state that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers, that aesthetics impacts do not include impacts on historic or cultural resources, and that public agencies

maintain the authority to establish or adopt thresholds of significance that are more protective of the environment. As such, there will be no change in the planning department's methodology related to design review and historical review."

Draft EIR Appendix B, Initial Study section E.2, Aesthetics, IS pp. 18-19 also cites CEQA section 21099 guidance, and p. 19 states:

"As also noted above, CEQA section 21099(d)(2) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetic impacts do not include impacts on historic or cultural resources. DEIR **chapter 2, section A, Project Description** includes illustrative text and figures for the proposed project and the project variant. DEIR **chapter 3, section B, Historic Architectural Resources**, discusses impacts on historic cultural resources, and changes in the architectural conditions at the site."

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### Comment IS TR-1: Transportation

The comments and corresponding responses regarding the removal of existing parking at the project site. This response addresses the following comment, quoted in full below:

- I-Franco-1, IS TR-1

"Yes, this is Daniel Franco. Actually, I'm here for another topic, but just since you brought it up on this, I merely have to point out that taking away parking in San Francisco right now is super dumb. It's a terrible, short-sighted idea. You need to understand in the COVID nobody's going to be using public transit for years to come, which means you've been spending the last decade taking away parking. Taking away even more now just seems to be incredibly pointless and dumb, and you should rethink that. I am done." (*Daniel Franco, Planning Commission Hearing Oral Comments, June 25, 2020 [I-Franco-1, IS TR-1]*)

### Response IS TR-1

The comment states that the loss of parking with the proposed project or the project variant would have adverse effects on transportation conditions. The comments also address the merits of the project. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

DEIR Appendix B, Initial Study discusses transportation and parking effects of the proposed project or the project variant. IS p. 15 addresses parking impacts under CEQA section 21099, as cited in the response above on aesthetics and visual impacts. As stated on IS p. 15:

"In accordance with CEQA section 21099, Modernization of Transportation Analysis for Transit Oriented Projects, aesthetics and parking shall not be considered in determining

if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.”

The proposed project and project variant meet the criteria of CEQA section 21099; thus, parking was not considered in determining a potential significant effect.

DEIR Appendix B, Initial Study discusses secondary effects of the loss of parking in section E.6, *Transportation and Circulation*, IS pp. 33-47. Impact TR-7, IS p. 44 states:

**“Impact TR-7: The proposed project or project variant would not result in secondary effects associated with a substantial vehicle parking deficit. (Less than Significant)**

*“Proposed Project and Project Variant*

“The proposed project and project variant would demolish the existing 119-space parking garage at the site and would not provide new on-site off-street parking spaces. However, this reduction in off-street parking would not constitute a substantial vehicle parking deficit. Moreover, the proposed project or project variant would be located on an infill site in a transit-rich area with many alternatives to travel by private vehicle. Therefore, secondary effects associated with motorists searching for available parking would not create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or create inadequate access for emergency vehicles; or substantially delay public transit.”

IS p. 47 discusses cumulative secondary parking effects:

**“Impact C-TR-7: The proposed project or project variant, in combination with cumulative development, would not result in secondary effects associated with a substantial vehicle parking deficit. (Less than Significant)**

“The proposed project and project variant would demolish the existing 119-space parking garage at the site and would not provide new on-site off-street parking spaces. However, this reduction in off-street parking would not constitute a substantial vehicle parking deficit. Cumulative development in the vicinity would be in a transit-rich area with many alternatives to private vehicle travel. Therefore, secondary effects associated with cumulative development and motorists searching for available parking would not create potentially hazardous conditions for people walking, bicycling, or driving. Cumulative development would not interfere with accessibility for people walking or bicycling or create inadequate access for emergency vehicles; or substantially delay public transit, Cumulative impacts associated with secondary effects of parking deficits would less than significant.”

DEIR Appendix B, Initial Study adequately addresses potential parking effects, and no further response is necessary.

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### Comment IS NOI-1: Noise Impacts

The comments and corresponding responses addressing noise impacts during construction are discussed in IS section E.7. This response addresses the following comment, quoted in full below:

- I-Rankin-1, IS NOI-1

“And I -- personally, I work from home, so there is no way I would be able to have an income with demolition and construction going on.” (*William Rankin, Planning Commission Hearing Oral comment, June 25, 2020 [I-Rankin-1, IS NOI-1]*)

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### Response IS NOI-1

The comment states that demolition and construction associated with the project would adversely affect the commenter’s work-from-home conditions. Draft EIR Appendix B, Initial Study section E.7, Noise, analyzes construction noise effects with the proposed project or project variant. The IS concludes that, with implementation of mitigation measures, project-related construction activities would not expose individuals to temporary increases in noise levels substantially greater than ambient levels and this impact would be less than significant.

IS p. 55 describes the phasing and duration of project demolition and construction, the types of equipment used during demolition and construction, and the potential noise levels associated with the construction phases and equipment. IS pp. 56-57 states that, while construction noise levels “would not exceed the Federal Transit Administration’s 90 dBA  $L_{eq}$  threshold established for daytime construction activities but would exceed the background noise level at sensitive receptor locations by more than 10 dBA. Therefore, the proposed project would result in a significant construction noise impact.”

The IS further describes a mitigation measure to reduce this impact to less-than-significant levels:

“To reduce construction noise impacts to less-than-significant levels, the project sponsor would be required to incorporate **Mitigation Measure M-NO-1: Construction Noise Controls.**”

**Mitigation Measure M-NO-1**, IS pp. 57-59, lists 18 potential construction noise mitigation steps. In particular, steps 15 and 16 would require that the construction plan include coordination with adjacent residential land uses and provide notification and other communication procedures to minimize noise disturbance:

15. “The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for

coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.”

16. Designate a Construction Manager who shall:

- a. Clearly post his/her name and phone number(s) on signs visible during each phase of the construction program.
- b. Notify area residents of construction activities, schedules, and impacts.
- c. Receive and act on complaints about construction noise disturbances.
- d. Determine the cause(s) and implement remedial measures as necessary to alleviate potentially significant problems related to construction noise.
- e. Request night noise permits from the San Francisco Department of Building Inspection if any activity, including deliveries or staging, is anticipated outside 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.
- f. Notify the planning department’s Development Performance Coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred.”

Draft EIR Appendix B, Initial Study p. 59 then found that:

“Construction noise would also be limited to the extent feasible through compliance with police code sections 2907 and 2908, prohibiting construction equipment noise greater than 80 dBA at 100 feet away from the source. Implementation of **Mitigation Measure M-NO-1** would require shielding or muffling of construction equipment, locating equipment away from residential uses, as feasible, and other construction noise-reduction measures. Those steps would ensure that project-related construction activities would not expose individuals to temporary increases in noise levels substantially greater than ambient levels and this impact would be less than significant.”

Draft EIR Appendix B, Initial Study adequately addresses potential construction noise effects, and no further response is necessary.

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### Comment IS SH-1: Shadow Impacts

The comments and corresponding responses addressing IS section E.11 Shadow. This response addresses the following comment, quoted in full below:

- I-Rankin-1, IS SH-1

“...It will block sunlight for the entire neighborhood.” (*William Rankin, Planning Commission Hearing Oral comment, June 25, 2020 [I-Rankin-1, IS SH-1]*)

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## Response IS SH-1

The comment states that the project would block sunlight and create adverse shadow effects in the neighborhood. Draft EIR Appendix B, Initial Study section E.11, Shadow, IS pp. 95-98 discusses shadow effects and found that the proposed project or project variant would have no shadow effects on public open spaces. With regard to other shadow effects in the surrounding neighborhood, IS p. 95-96 found that those effects would not be a significant impact:

“The proposed project or project variant would shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year. Shadows on streets and sidewalks would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadows above levels that are common and generally expected in a densely developed urban environment. As such, shadows on streets and sidewalks would not be significant effects under CEQA. Although occupants of nearby properties may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.”

Draft EIR Appendix B, Initial Study adequately addresses potential shadow effects, and no further response is necessary.

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## C.3 SOCIOECONOMIC ISSUES

This section includes a Master Response [**MR-1**] that provides comprehensive responses to similar concerns raised by two commenters regarding population, housing, and socioeconomic impacts. As appropriate, responses to individual comments refer to the master response **MR-1** below.

### MASTER RESPONSE - SOCIOECONOMIC IMPACTS [MR-1]

#### *Socioeconomic Effects under CEQA*

CEQA Guidelines section 15064(e) and section 15131(a) address the analysis of socioeconomic effects under CEQA.

Guidelines section 15064(e) states:

“Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the



environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.”

Guidelines section 15131(a) states:

“Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

As discussed in the responses above under CI-1, Cumulative Impacts, and PH-1 through PH-5, Population and Housing, and further in this master response, the proposed project or the project variant would not have socioeconomic effects that would in turn cause physical impacts or conversely, have physical impacts that would in turn cause adverse economic or social effects on people. The Draft EIR therefore does not review socioeconomic effects further.

However, the socioeconomic effects of gentrification and displacement are real and the communities in this neighborhood are affected by it. The planning department and other City agencies understand this and have implemented and will continue to implement initiatives that address racial and social equity and protect and preserve affordable housing resources and tenants. Recent city and departmental actions related to these initiatives are summarized briefly below, followed by a discussion of socioeconomic effects as they relate to CEQA analysis, and responses to individual comments related to socioeconomic effects.

### ***City Actions Related to Racial Equity, Social Equity and Housing***

In 2019, the Planning Commission and Historic Preservation Commission adopted Phase I of the planning department’s Racial and Social Equity Action Plan, which focused on the planning department’s internal functions.<sup>1,2</sup> Phase II of the plan is currently underway and will focus on

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<sup>1</sup> San Francisco Planning Commission Resolution No. 20569. Racial & Social Equity Action Plan, Phase I, adopted November 21, 2019.

<sup>2</sup> San Francisco Historic Preservation Commission Resolution No. 1114. Racial & Social Equity Action Plan, Phase I, adopted December 18, 2019.

strategies and actions to advance racial and social equity outcomes for the planning department's community-facing programs, policies, and processes. The initiative consists of a comprehensive and interactive Policy and Program Inventory that organizes the City's existing portfolio of tools and priorities in one location on the planning department website.<sup>3</sup>

The City's Community Stabilization Initiative<sup>4</sup> was also completed and released in 2019. This multiagency effort seeks to alleviate the impacts of ongoing displacement, prevent future displacement and help vulnerable populations thrive and contribute to the City's economy and culture. The inventory includes an assessment of the City's policies and programs relating to tenant protection and housing stabilization, housing production and preservation, cultural stabilization, and economic development. Policy and program assessment summaries include ideas for future consideration that have the potential to increase community stability.

The Community Equity Team has been working with community members and community-based organizations in the Tenderloin neighborhood for the past five years. The planning department collaborated with community members to develop and provide the Tenderloin Data Project, which shared key demographic, housing, and business-related data. The department was also a contributor to the Tenderloin Development Without Displacement Initiative, which set the foundation for the Community Stabilization Initiative. Today, the department is working with the Tenderloin Community Benefit District, the Central City SRO Collaborative, and Streetwyze on a pilot mapping and data collection project. The purpose of the project is to collect information and fill data gaps regarding open space needs and use, business and purchasing preferences, and life experiences in the neighborhood. The department continues to be a partner in the Tenderloin Vision 2020 Plan.

On June 11, 2020, the Planning Commission adopted a resolution that centers the planning department's work program and resource allocation on racial and social equity; condemns and apologizes for the history of racist, discriminatory and inequitable planning policies that have resulted in racial disparities; directs the department to implement its Racial and Social Equity Action Plan; directs the department to develop proactive strategies to address structural and institutional racism, in collaboration with American Indian community, Black community, and communities of color; directs the department to amend its hiring and promotion practices to ensure that the department's staff reflects the diversity and demographics of the community at all staff levels; recommends that the Board of Supervisors condemn discriminatory government actions and reallocate resources towards expanding access to open space, housing, transportation, and services for American Indian community, Black community, and

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<sup>3</sup> <https://sfplanning.org/press-release/planning-department-stands-black-community>

<sup>4</sup> San Francisco Planning Department, Community Stabilization, <https://sfplanning.org/community-stabilization-strategy#schedule-and-next-steps>, accessed September 24, 2020.

communities of color; and, directs the department to build accountability through metrics and reporting.<sup>5</sup>

On July 15, 2020, the Historic Preservation Commission adopted a similar resolution as the Planning Commission.<sup>6</sup>

The planning department recently created a Community Equity Division composed of three teams dedicated to advancing the department's equity plan, community engagement, and policies and strategies. in response to these resolutions. The work program for the division is under development. The following describes the potential work programs for these three teams. The Equity Plan team will focus on developing, implementing, and reporting on the department's Racial and Social Equity Action Plan. The team's current priority projects may include items such as developing environmental and equity justice policies for inclusion in the General Plan. and racial and social equity impact analysis for regulatory review. The Community Engagement team may focus on community collaboration, strategies, and communications, beginning with the department's HOMES (Housing Outreach Media Engagement Strategies) and MAP2020 (Mission Action Plan) programs. The Policies and Strategies team may focus on key city projects with high equity impact, including the General Plan Housing Element, the (currently) eight cultural districts, and community recovery strategies.

### ***Proposed Project and Project Variant Potential Socioeconomic Effects***

Several comments on the Draft EIR requested analysis of potential project effects on population and housing, asserting that the project, with new market rate housing, would cause gentrification, which in turn would cause potential displacement of residents from existing buildings, lead to adverse impacts on rent-controlled housing, and reduce availability of affordable housing, including residential hotels and single-room occupancy housing. Comments also acknowledged the limitations of CEQA in addressing some of these issues and raised concerns about the application of City policies and codes to protect affordable housing stock. These comments address socioeconomic issues.

Physical environmental impacts would occur as a result of construction and operation of the proposed 550 O'Farrell Street project. Demolition of the two-plus story parking garage and construction of a 13-story mixed-use residential building would result in direct and indirect environmental impacts, as analyzed in the Draft EIR and Appendix B, Initial Study.

Draft EIR section 3.B, Historic Architectural Resources found that the proposed project or project variant would have a significant, unavoidable impact on an individually significant historic resource, the existing 550 O'Farrell Street garage structure. While demolition of the 550 O'Farrell

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<sup>5</sup> San Francisco Planning Commission Resolution No. 20738. Racial & Social Equity Initiative - Centering the Planning Department's Work Program and Resource Allocation on Racial and Social Equity, adopted June 11, 2020.

<sup>6</sup> San Francisco Historic Preservation Commission Resolution No. 1127. Racial & Social Equity Initiative - Centering Preservation Planning on Racial and Social Equity, adopted July 15, 2020.

Street garage would also result in the loss of a contributing structure in the Uptown Tenderloin Historic District, the Draft EIR determined that the proposed project or project variant would not contribute to a substantial adverse cumulative change to the historic district, and cumulative impacts would be less than significant.

The Draft EIR Appendix B, Initial Study analysis of all other environmental topics determined that the proposed project or project variant would have no impact, less-than significant impacts, or less-than-significant impacts with mitigation measures incorporated, as discussed on IS pp. 10-12. Concerning population and housing, IS section E.3, Population and Housing, IS pp. 19-23, determined that the proposed project and the project variant would not remove any existing housing units, would add 111 or 116 housing units (20 per cent of which would be affordable units), respectively, to the City's housing supply, and would make payments totaling over \$1.5 million to the City's Affordable Housing Fund to support other affordable housing developments in the city. (The \$1.5 million payment would be a combination of a partial inclusionary housing fee, because the project would provide 20 percent on-site affordable housing, rather than 25 percent, and the North of Market SUD affordable housing fee assessed on square footage above 80 feet in height per planning code section 263.7).

Initial Study section E.3 further determined that the proposed project and project variant would not result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. As discussed under IS **Impact PH-1**, pp. 20-22, the residential population introduced as a result of the proposed project (255 people) or the project variant (267 people) would constitute approximately 0.03 percent of projected citywide growth by 2040, which would be accommodated within the planned growth for San Francisco. Similarly, the addition of eight retail and building management employees to the project site by the proposed project or project variant would be accommodated within the planned growth for San Francisco.

For these reasons, the Draft EIR concluded that the proposed project or the project variant would not result in the direct displacement of substantial numbers of existing people or housing units or induce substantial population growth, and therefore, would not have a significant impact on population and housing.

As previously discussed under "Socioeconomic Effects under CEQA," potential socioeconomic effects, including those raised by commenters on the Draft EIR, would be subject to review under CEQA if there were a "chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes." None of the comments received on the Draft EIR present any evidence that construction and operation of the proposed project or project variant would (1) result in economic or social changes that would cause a significant adverse physical environmental impact, or (2) cause a physical change that would result in adverse economic or social effects. Moreover, none of the comments raised specific issues about the adequacy or accuracy of the Draft EIR and IS analysis of physical environmental impacts. Therefore, further discussion of potential project-related socioeconomic effects is not required under CEQA.

Nonetheless, plans, policies and approvals applicable to the project are discussed in Draft EIR Appendix B, Initial Study section C, Compatibility with Existing Zoning and Plans, IS pp. 1-9 and Draft EIR section 2.C, Required Project Approvals and Permits, pp. 2-34 to 2-35. Under planning code sections 209.3 and 249.5, new dwelling units are principally permitted in the RC-4 zoning district and North of Market Residential Special Use District. Under section 415, the project sponsor would be required to comply with the City's Residential Inclusionary Affordable Housing Program requirements, which are higher in the North of Market Residential Special Use District than in most other zoning districts. The proposed project or the project variant would meet this heightened affordable housing requirement, as discussed above.

In addition, San Francisco's General Plan, DEIR Appendix B, Initial Study, section C, Compatibility with Existing Zoning and Plans pp. 2 to 3, guides land use decisions by establishing policies for the physical development of the city. The general plan Housing Element (2014) seeks to ensure adequate housing for current and future San Franciscans through objectives and policies that address the city's growing housing demand, focusing on strategies that can be accomplished with the city's limited land supply. In general, the housing element supports projects that increase the city's housing supply (both market-rate and affordable housing), especially in areas that are close to the city's job centers and are well-served by transit, such as the project site. The Housing Element is currently being updated and will reflect values and principles for the future of housing in San Francisco identified by residents: racial and social equity, more housing for all and in all neighborhoods, minimum displacement, and neighborhoods resilient to climate and health crises.

### ***Conclusion***

CEQA requires the review of project effects related to a physical change in the environment. Pursuant to CEQA Guidelines section 15064[e] and 15131(a), social or economic changes resulting from a project shall not be treated as significant effects on the environment. Moreover, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment. Therefore, speculation concerning or evidence of social or economic impacts (e.g., housing affordability, property values, rent levels, neighborhood demographics, etc.) that do not contribute to, or are not caused by, project-related physical impacts on the environment is not substantial evidence of a significant effect on the environment. Nonetheless, the commenters' concerns related to socioeconomic issues that may be associated with the proposed project or project variant, including gentrification, displacement, and housing affordability, are acknowledged. Decision makers may consider these and other issues in their deliberations on approval of the proposed project or project variant.

The following comments address social or economic issues, with brief responses that cite the master response above.

### **Comments IS SOCIO-1 and IS SOCIO-5: Economic Equity**

- O-TNDC-1, IS SOCIO-1
- O-TNDC-2, IS SOCIO-5

“On page 21, in Appendix A, it states that: While the addition of 255 to 267 people would be noticeable to residents of immediately adjacent properties, those numbers would not result in a substantial increase to the population of the larger neighborhood, or the City and County of San Francisco.

“This may be true, but as representatives of the neighborhood we are concerned about the impact that a higher income population may have on the residents. We’d like to see more of a socioeconomic impact analysis of this project on this neighborhood.” (*Gabriella Ruiz, Policy & Planning Manager, TNDC, Oral Comment, June 25, 2020 [O-TNDC-1, IS SOCIO-1]*)

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“On page 21, in Appendix A, it states that: While the addition of 255 to 267 people would be noticeable to residents of immediately adjacent properties, those numbers would not result in a substantial increase to the population of the larger neighborhood, or the City and County of San Francisco.

This may be true, but as representatives of the neighborhood we are concerned about the impact that a higher income population may have on the residents. We’d like to see more of a socioeconomic impact analysis of this project on this neighborhood.

Currently, the CEQA does not require a discussion of a proposed project’s socioeconomic impact unless it results in physical environmental effects. However, socioeconomic information related to minority communities, income, employment, housing status, schools and crime should be included in the EIR to identify and propose mitigation for any environmental justice concerns or social impacts related to a new development. The planning commission should encourage developers to provide quantitative evidence that describes the social impact of their project. If the EIR outlines the non-physical adverse impacts to be expected in the short-term and long-term, city officials can assist the developer in finding ways to mitigate those high social and economic effects. Equally important, a socioeconomic impact analysis would highlight the beneficial impacts to the proposed development that could lead to more positive community engagement. In recent years, cities such as Oakland and Richmond have included socioeconomic impact analyses within the EIR of larger developments. However, these cities and others have not yet required this analysis for all developments. San Francisco has an opportunity to set an example for other cities in the Bay Area.

A socioeconomic impact analysis not only provides valuable information to the city officials but to the community as well. Research has proven that market-rate developments within lower-income neighborhoods can result in displacement in the long-term. For example, an influx of higher-income residents can attract economic investment in higher-end amenities to make a neighborhood more desirable. This could lead to risk factors for gentrification. The possibility of existing residents being displaced is not considered an impact on the physical environment and therefore is not required in the CEQA. However, omitting this crucial information only further exacerbates residents’ fears regarding future housing affordability in their neighborhood. A

socioeconomic analysis would provide substantial evidence to city officials and residents that the proposed project would not cause future displacement, gentrification and other significant social issues.” (*Gabriella Ruiz, Policy & Planning Manager, TNDC, Letter, July 7, 2020 [O-TNDC-2, IS SOCIO-5]*)

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## Response IS SOCIO-1 and IS SOCIO-5

The comments include concerns that development under the proposed project or project variant would have an adverse impact on at-risk populations living in the Tenderloin neighborhood. These include comment topics related to economic inequality, racial and social equity, and displacement. As discussed above in response **MR-1**, the comments address socioeconomic effects that are not physical environmental effects; the proposed project or the project variant would not have socioeconomic effects that would cause physical impacts or conversely, have physical impacts that would cause adverse economic or social effects on people. As such, the socioeconomic concerns raised do not require analysis under CEQA in this Draft EIR, but may be considered by decision makers in their deliberations on whether to approve the proposed project or project variant. The master response also includes information on recent planning commission and planning department actions taken to address these issues. No further response is necessary.

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## Comments SOCIO-2: Racial and Social Equity

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-TNDC-1, IS SOCIO-2
- O-TNDC-2, IS SOCIO-6

“The Commission did unanimously approve the resolution calling for the Planning Department to center racial and social equity in its work by developing strategies to counter structural racism in collaboration with communities of color, and we urge you to apply that to this project.

I look forward to hearing more and thank you so much.” (*Gabriella Ruiz, Policy & Planning Manager, TNDC, Planning Commission Hearing Oral Comment, June 25, 2020 [O-TNDC-1, IS SOCIO-2]*)

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“The commission just unanimously approved a resolution calling for the Planning Department to center racial and social equity in its work by developing strategies to counter structural racism in collaboration with communities of color. By requiring a socioeconomic impact analysis within the EIR, San Francisco would be taking a big step forward in ensuring social equity in the planning and development process. Overall, this tool would help developers plan projects that are sustainable- environmentally, economically and socially. We urge you to apply that to this

project.” (Gabriella Ruiz, Policy & Planning Manager, TNDC, Letter, July 7, 2020 [O-TNDC-2, IS SOCIO 6])

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### **Response IS SOCIO-2 and IS SOCIO-6**

The comments note that the San Francisco Planning Commission recently adopted a resolution that calls for strategies to address racism and social inequities in the department’s work. The comments request that the project include strategies to address social and racial inequity initiatives as they apply to 550 O’Farrell Street in particular.

As noted above in response **MR-1**, social equity and related topics are socioeconomic issues. The proposed project or the project variant would not have socioeconomic effects that would cause physical impacts or conversely, have physical impacts that would cause adverse economic or social effects on people. Therefore, these socioeconomic concerns do not require analysis under CEQA in this Draft EIR. However, the master response also includes information on recent planning commission and planning department actions taken to address these issues.

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### **Comment IS SOCIO-3 and IS SOCIO-4: Displacement**

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- I-Hestor-2, IS SOCIO-3
- I-Hestor-2, IS SOCIO-4

“Initial Study - Appendix A, 4-1 - scoped out real discussion of Population and Housing. The rationale appears to be that housing is housing is housing. THAT IS NOT THE CASE FOR THIS AREA.

Please discuss evolving income levels. Page 20-24 discussion of Population and Housing in Initial Study basically ignores this important ENVIRONMENTAL issue.

What rent is being charged for newly constructed housing in the "larger neighborhood" - the 2 Historic Districts - by for profit developers?

What does Planning consider the percent of income tenants should pay for housing? 30% has long gone by wayside for lower income SF residents.

The PLANNING Department surely maintains keeps that important information. If people who WORK in San Francisco (e.g. retail and people in hospitality industry - hotels and tourism) cannot afford to LIVE in SF, they are forced to find housing OUT of SF. Commuting up to 2 hours - putting demands on roads, transit, to get to those homes - and for construction of those homes in the exurbs. Or even workers may become homeless and put demands on the streets.



These are also PHYSICAL IMPACTS which are measured in environmental documents. The human impacts also cannot be ignored.” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS SOCIO-3]*)

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“Please add mitigation measure to protect existing lower income residents and housing in THIS AREA:

TRAINING requirement for ALL PLANNERS - including preservation planners

MAINTAIN A LIST OF ALL RESIDENTIAL HOTELS and SROS in San Francisco. Protected by Residential Hotel Ordinance. Requirement - check proposed against that list.

RENT CONTROLLED HOUSING - currently residents are thrown to wolves by Plan Dept staff. Said from reviewing 100s of 311 notice plans, many of which affect existing rent-controlled housing.” (*Sue Hestor, Letter, July 7, 2020 [I-Hestor-2, IS SOCIO-4]*)

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### **Response IS SOCIO-3 and IS SOCIO-4**

The comments address income levels, rent control, residential hotels, displacement of current residents, and a request that planning department activities related to review of housing proposals address socioeconomic impacts. As discussed above in response **MR-1**, the comments address socioeconomic effects that are not physical environmental effects; the proposed project or the project variant would not have socioeconomic effects that would cause physical impacts or conversely, have physical impacts that would cause adverse economic or social effects on people. Therefore, these socioeconomic concerns do not require analysis under CEQA in this Draft EIR, but may be considered by decision makers in their deliberations on whether to approve the proposed project or project variant. No further response is necessary.

## **C.4 COMMUNITY CONCERNS**

### **Comments Outreach 1 to 5**

This response addresses the following comments, quoted in full below:

- O-TNDC-1, Outreach-1
- I-Mann-1, Outreach-2
- I-Hestor-1, Outreach-3
- O-TNDC-2, Outreach-4
- O-TNDC-2, Outreach-5

“Hi, my name is Gaby Ruiz and I am the Policy and Planning Manager at TNDC. And as an agency we are supportive of new housing, as long as it brings benefits to the residents currently living in the neighborhood.

I would like to ask for residents and organizations that the developer reached out to in order to truly understand the needs of the community. I invite the project sponsors to reach out to me and other community groups so they have the opportunity to talk more with the community about their vision of the neighborhood.

My colleagues at the Tenderloin People's Congress would love to have this conversation and I would be more than happy to help facilitate this." (*Gabriella Ruiz, Policy & Planning Manager, TNDC, Planning Commission Hearing oral comments, June 25, 2020 [I-TNDC-1, Outreach-1]*)

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"I would suggest, in closing, that as you plan for new ventures and new concepts within communities that you touch base with those community organizations. Thank you." (*Joseph Mann, Planning Commission Hearing Oral Comments, June 25, 2020 [I-Mann-1, Outreach-2]*)

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"I don't have any problem with the garage going away. There's an abundance of garages in this area. And this is a good site to have additional housing. But you need to have outreach that's serious to the people that live there, the people that are represented by organizations like TNDC, and other area organizations" (*Sue Hestor, Planning Commission Hearing Oral Comments, June 25, 2020 [I-Hestor-1, Outreach-3]*)

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"On behalf of Tenderloin Neighborhood Development Corporation (TNDC), I write to follow up on our public comment made at the planning commission hearing on Thursday, June 25, 2020. For over 30 years, TNDC has been preserving and rehabilitating existing buildings in the Tenderloin and surrounding neighborhoods, which have historically served low income and working-class communities. TNDC operates affordable housing in these neighborhoods, and we work with community stakeholders to understand their concerns and raise public awareness on issues that impact their quality of life. As an agency, we are supportive of new housing if it brings benefits to the residents currently living in the neighborhood. After assessing the Draft Environmental Impact Report (EIR), we could not help but notice the lack of community input. There was no indication of whether or not Presidio Bay Ventures (the developer) reached out to community organizations or residents in the Tenderloin neighborhood. As stated at the planning commission, we invite the developer to reach out to us and other community groups, so they can get a better sense of the community's needs. My colleagues at the Tenderloin People's Congress would love to have this conversation and we are more than happy to help facilitate this." (*Gabriella Ruiz, Policy & Planning Manager, TNDC, Letter, July 7, 2020 [O-TNDC-2, Outreach-4]*)

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"Lastly, we would like to request that Presidio Bay Ventures enter into a Community Benefits Agreement. We hope to engage in negotiations as soon as possible in order to ensure that the

developer provides specific benefits to the residents while also minimizing disruption to the neighborhood. In exchange, we will agree to publicly support this project.

### Appendix

*"The below serves as an example of potential language in a Community Benefit Agreement that delineates the framework of continued communication between Presidio Bay Ventures (550 O'Farrell) and the Tenderloin Neighborhood Development Corporation.*

#### *"Periodic Project Meetings*

(a) During the Project's "Construction Period," which shall mean the period of time beginning with Presidio Bay Ventures receipt of building permits for the Project and ending with 550 O'Farrell LLC's receipt of a Certificate of Occupancy for the Project, representatives from 550 O'Farrell LLC, the General Contractor, and TNDC (the "Construction Liaisons") shall meet to discuss the impact of Project construction on residents (the "Construction Period Meetings"). Construction Period Meetings shall occur biweekly, or as mutually agreed by the parties, at a time and location mutually acceptable to the Construction Liaisons, pursuant to any additional requirements discussed in this Agreement.

(b) Following the Construction Period, 550 O'Farrell will appoint a staff liaison (the "Project Liaison") to meet with TNDC to discuss ongoing issues related to operation of the Project (the "Project Operations Meetings"). Project Operations Meetings shall occur monthly at a time and location mutually acceptable to the Project Liaison and TNDC. (Gabriella Ruiz, Policy & Planning Manager, TNDC, Letter, July 7, 2020 [O-TNDC-2, Outreach 5])

### Response Outreach 1 to 5

The comments on community outreach and potential community benefits agreements do not address the content or adequacy of the Draft EIR.

For information, the project sponsor, Sandhill O'Farrell LLC, has undertaken outreach with community organizations and residents. Those steps include several presentations to the Tenderloin Neighborhood Development Corporation and discussions with the Tenderloin Housing Clinic and Market Street for the Masses Coalition of SRO buildings. The project sponsor has conducted outreach to additional community organizations, including District 6 Community Planners and the Tenderloin Museum. The project sponsor has also had phone and email communications with neighborhood residents to address project concerns.

## C.5 GENERAL COMMENTS

### General Project Comments (non-CEQA)

The responses address the following comment, quoted in full below:

- I-Lee-1, Project-1
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#### Comment Project-1

"I would just like to express my support for this housing project in my neighborhood. The Tenderloin/lower Nob Hill district is an ideal location for more condominium housing given its proximity to mass transit and walking distance to downtown. SF is in dire need of more reasonable housing priced for the average worker, not just luxury high rises. This project will focus on that population. Also, as a long time homeowner in this neighborhood, it will be advantageous to have more homeowners in the area, not just renters. We have more "skin in the game" to keep the area safe and clean for families." (*Edward Lee, Email, May 25, 2020 [I-Lee-1, Project-1]*)

#### Response Project-1

The comments express support for the proposed project. The comments do not address the adequacy or completeness of the DEIR. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project. No further response is required.

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#### Comment Project-2

This response addresses the following comments, quoted in full below:

- I-Cascio-1, Project-2
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"My primary concern is that neither of these buildings have what was said to be a crucial requirement: a 50' setback, either at the sidewalk line, or if the buildings rise directly from the sidewalk, then theoretically there was to be a 50' setback at the height of 80', then rising to 130' maximum (similar to the New York setback laws of the early 1900s). Has this requirement been deleted for some reason?" (*Ric Cascio, Email May 26, 2020 [I-Cascio-1, Project-2]*)

#### Response Project-2

The comment states that the proposed project or project variant should have a 50-foot setback at the 80-foot height above the street. IS section C, Compatibility with Existing Zoning and Plans, p. 5, discusses San Francisco planning code height and bulk requirements applicable to the project site:

### “Height and Bulk Controls

The project site is within an 80-130-T Height and Bulk District. This district allows for an 80-foot base height limit, with special exceptions from the base height of 80 feet up to 130 feet. The proposed project or project variant would be 130 feet high, measured from the top of the curb to the top of the roof. Mechanical screening and rooftop elements such as elevator penthouses are exempt from the building height limit per section 260(b)(1)(B). The exempt rooftop elements would extend the building height to up to 146 feet. As noted above, the proposed project or project variant would seek to increase the maximum allowed diagonal dimension of 125 feet at the setback height, established in section 132.2, to 13[0] feet.”

The planning commission, under section 132.2, can require an upper story setback of up to 20 feet if necessary to maintain the prevailing streetwall along a street. The planning department has determined that the subject block of O’Farrell Street does not have a prevailing streetwall that would require the proposed project or project variant to incorporate an upper story building setback.

Draft EIR chapter 2, Project Description, section 2.C, Required Project Approvals and Permits notes that the proposed project or project variant would request planning commission approval of a five-foot exceedance of the maximum diagonal dimension at the setback height, as listed on DEIR p. 2-34:

“Approval of a conditional use authorization to exceed building bulk limits (Planning Code section 270); the project would seek to increase the maximum allowed diagonal dimension at the setback height established pursuant to Planning Code section 132.2 from 125 feet to 130 feet.”

The comments express an opinion on the project design. The comments do not address the adequacy or completeness of the DEIR. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project. No further response is necessary.

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### **Comment Project-3**

This response addresses the following comment, quoted in full below:

- I-Cascio-1, Project-3
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“Also, my aesthetic comment is that the 550 O’Farrell building, when viewed from the sides, looks like an ugly storage facility, lacking fenestration and any interest whatsoever. How can anyone in their right minds consider this architecture to be ‘consistent with existing buildings.’ The

answer is that they don't and belong South of Market, not on O'Farrell Street." (*Ric Cascio, Email May 26, 2020 [I-Cascio-1, Project-3]*)

### Response Project-3

The comments state objections to the design and the overall project. The comments do not address the adequacy or completeness of the DEIR. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

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### Comment Project-4

This response addresses the following comment, quoted in full below:

- A-HPC-1, Project-4
- 
- "The HPC stated that bringing the draft alternatives for review earlier on in the EIR process allowed for them to be studied by the project team much earlier in the process of review. This saved the project sponsor time and money and ultimately led to a better project.
  - HPC commissioners agreed that use of the retained elements guidelines was successfully applied to this project.
  - Commissioners felt the location of the addition's massing was appropriate because it matched the surrounding size and scale and location of other contributing residential buildings within the Uptown Tenderloin National Register historic district by aligning with the surrounding street wall.
  - Commissioners commented they would like to see further analysis of the existing building to inform the restoration of the façade, possibly paint analysis to determine the original finish and color of the building.
  - Commissioners also debated the adequacy of the vertical hyphen (along with definition of the term). While some commissioners expressed a desire to see a deeper setback, others cautioned against a hyphen that would be set too far back and make the building look top heavy. Commissioners agreed the design of the hyphen should be studied more fully as the full-size drawings were developed.
  - The HPC expressed full support of the proposed project. The HPC was clear that they did not support the project variant." (*Aaron Jon Hyland, President, Historic Preservation Commission, Letter, June 19, 2020 [A-HPC-1, Project-4]*)
-

### **Response Comment Project-4**

The comments address certain design details and express support for the proposed project. The comments do not address the adequacy or completeness of the DEIR. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

---

### **Comment Project-5 and Project-6**

This response addresses the following comments, quoted in full below:

- I-Rankin-1, Project-5
  - I-Mann-1-Project-6
- 

“And I just hope that you would come up with a better design. It’s a cookie cutter building. It looks to be done on the cheap. And it’s good for no one but the developer. We need parking in the neighborhood. We need character in the neighborhood. We need diversity in the neighborhood. And this project will be a disaster.” (*William Rankin, Planning Commission Hearing Oral Comment, June 25, 2020 [I-Rankin-1, Project-5]*)

“Oh, I’m sorry. I would like to second both the last caller and the previous caller that it sounds like this is a cookie cutter type of proposal.” (*James Mann, Planning Commission Hearing Oral Comment, June 25, 2020 [I-Mann-1, Project-6]*)

---

### **Response Project-5 and Project-6**

The comments state objections to the design and the overall project. The comments do not address the adequacy or completeness of the DEIR. Those comments are noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

## D. DRAFT EIR REVISIONS

---

The following revisions to the text of the Draft EIR reflect changes identified in section C, Comments and Responses, which clarify information in the DEIR. For each change, new language is double underlined. The changes are organized in the order of the DEIR table of contents.

This section also includes minor corrections to the Draft EIR, noted in Errata below.

### D.1 CHAPTER 2, PROJECT DESCRIPTION

To provide additional information on the retention of the existing façade of 550 O'Farrell Street with the proposed project, the following underlined text is added in DEIR chapter 2, Project Description, p. 2-15, second paragraph:

"The main elevation on O'Farrell Street would be organized in a vertical tripartite division similar to the surrounding buildings that comprise the Uptown Tenderloin Historic District. The base of the building would be the retained façade of the existing 550 O'Farrell Street garage, with plaster finish scored to resemble masonry, and decorative panels. **Figure 2-3: Existing Building Photograph and Building Section**, p. 2-6, also illustrates this façade. New storefront glass and building entrance elements would replace the existing wide garage openings, with new glass in the existing second-floor arched window openings. On the basis of pre-construction assessments, including paint analysis, other existing decorative features, including the gargoyles, the balcony with ogee arches, and the quatrefoil panels on the parapet would be retained, cleaned, and restored as needed. See also EIR section 3.B, Historic Architectural Resources, for further description of the existing façade. Level 4 would be set back three to four feet from the façade. The middle section of the building would have deep inset punched windows organized into single and vertically paired doubles, creating an offset fenestration pattern. The top of the building would be set back from the middle section by 2.5 feet.

### D.2 CHAPTER 3, ENVIRONMENTAL SETTING AND IMPACTS

The following underlined text is added in DEIR chapter 3, section B, Historic Architectural Resources, p. 3-24, under **Impact CR-1**:

The 550 O'Farrell Street garage has been determined to be individually eligible for listing on the CRHR. The proposed project would demolish most of the 550 O'Farrell Street building. The proposed project, a 13-story, 111-unit residential mixed-use building, would retain the garage's primary façade that contains much of the character-defining features and recognized historic elements of Gothic Revival architecture. The proposed project would incorporate retained elements of the existing façade into the lower floors of the O'Farrell Street frontage. New storefront glass and building entrance elements would



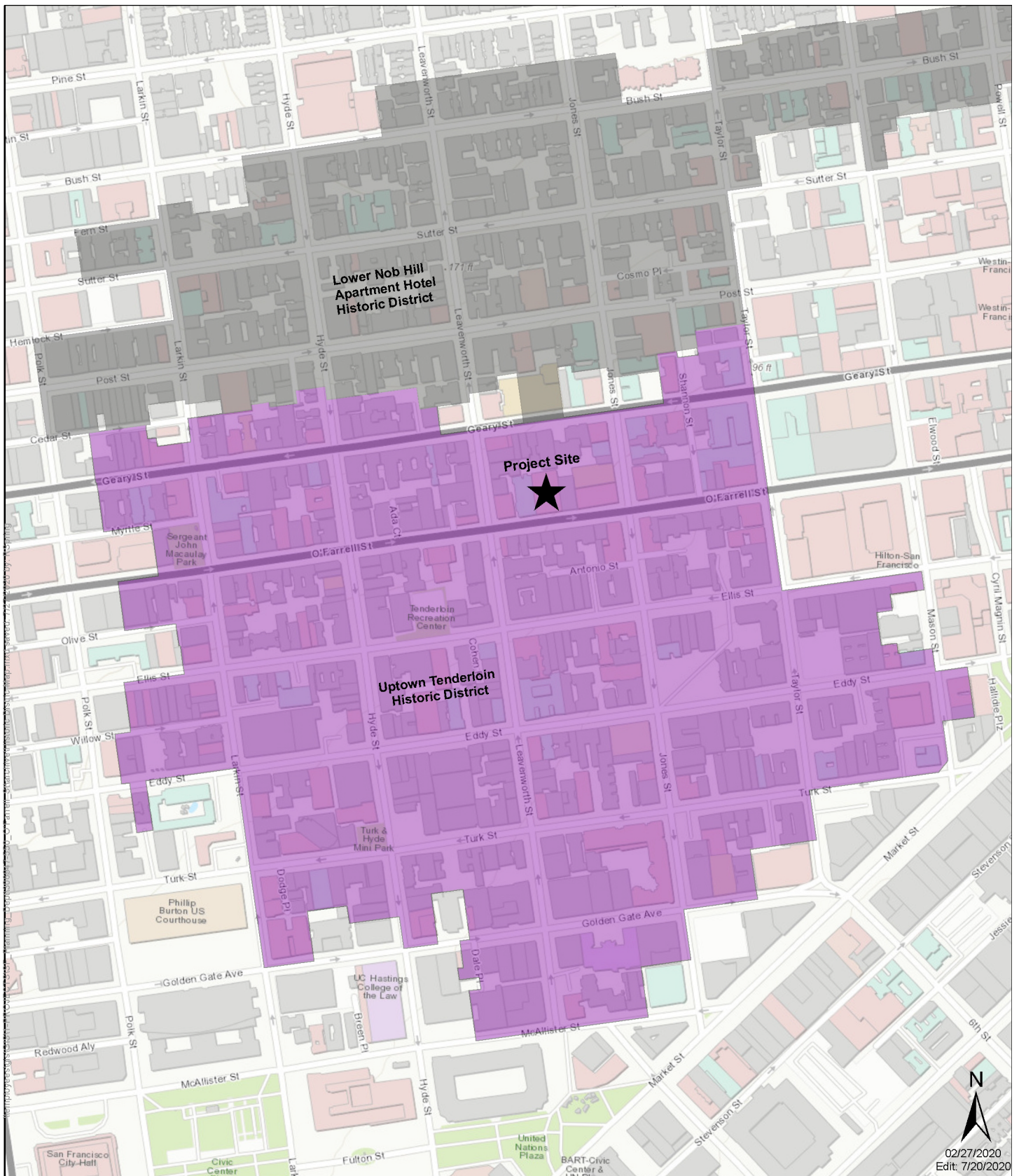
replace the existing wide garage openings, with new glass in the existing second-floor arched window openings. On the basis of pre-construction assessments, including paint analysis, other existing decorative features, including the gargoyles, the balcony with ogee arches, and the quatrefoil panels on the parapet would be retained, cleaned, and restored as needed. However, demolition of the remainder of the building would result in a loss of character-defining low-scale, two-story massing, reinforced concrete construction, and the building's arched wood-truss roof, contributing to a substantial loss of historic building materials and form. Therefore, demolition of most of the existing 550 O'Farrell Street building would have a significant adverse effect on a historic resource.

### ***Errata***

To correct a typographical error, a misspelling of Nob Hill in DEIR **Figure 3-1, Uptown Tenderloin Historic District Map**, DEIR p. 3-15; revised Figure 3-1 is included below.

DEIR p. 3-16, first paragraph, first sentence is revised to correct the middle initial of the 550 O'Farrell Street architect:

"The architect was William H. Crim."



SOURCE: City and County of San Francisco Planning Department

# 550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 3-1: Uptown Tenderloin Historic District Map (Revised)

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## **SECTION E: Attachments**

- A. Draft EIR Comment Letters and Emails
- B. Draft EIR Public Hearing Transcript

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## **ATTACHMENT A**

### **Draft EIR Comment Letters and Emails**

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**From:** [Edward Lee](#)  
**To:** [CPC.550OFarrellStEIR](#)  
**Subject:** 550 O"Farrell  
**Date:** Monday, May 25, 2020 8:15:11 PM

---

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

Hello,

I would just like to express my support for this housing project in my neighborhood. The Tenderloin/lower Nob Hill district is an ideal location for more condominium housing given its proximity to mass transit and walking distance to downtown. SF is in dire need of more reasonable housing priced for the average worker, not just luxury high rises. This project will focus on that population. Also, as a long time homeowner in this neighborhood, it will be advantageous to have more homeowners in the area, not just renters. We have more "skin in the game" to keep the area safe and clean for families.

I-Lee-1  
Project-1

Respectfully,

Edward Lee  
545 Leavenworth #4





**From:** [Ric Cascio](#)  
**To:** [CPC.550OFarrellStEIR](#)  
**Subject:** Comment on Above Building(s)  
**Date:** Tuesday, May 26, 2020 12:03:09 AM

---

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

Dear Ms. McKellar:

I live at 631 O'Farrell St, and have for 33 years. I have reviewed the designs of the two proposed buildings at 550 O'Farrell and the one up the street on the site of the former church.

My primary concern is that neither of these buildings have what was said to be a crucial requirement: a 50' setback, either at the sidewalk line, or if the buildings rise directly from the sidewalk, then theoretically there was to be a 50' setback at the height of 80', then rising to 130' maximum (similar to the New York setback laws of the early 1900s).

I-Cascio-1  
Project-2

Has this requirement been deleted for some reason?

Also, my aesthetic comment is that the 550 O'Farrell building, when viewed from the sides, looks like an ugly storage facility, lacking fenestration and any interest whatsoever. How can anyone in their right minds consider this architecture to be "consistent with existing buildings." The answer is that they don't and belong South of Market, not on O'Farrell Street.

I-Cascio-2  
Project-3

Sincerely

Ric Cascio  
631 O'Farrell Street, Suite 1503  
San Francisco, CA 94109  
415-563-8432i' m





# SAN FRANCISCO PLANNING DEPARTMENT

Letter  
A-HPC

June 19, 2020

Ms. Lisa Gibson  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, 4<sup>th</sup> Floor  
San Francisco, CA 94103

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

Dear Ms. Gibson,

On June 17, 2020, the Historic Preservation Commission (HPC) held a public hearing in order for the commissioners to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed 550 O'Farrell Street Project (2017-004557ENV). As noted at the hearing, public comment provided at the June 17, 2020 hearing, will not be responded to in the Responses to Comments document. After discussion, the HPC arrived at the comments below on the DEIR:

- HPC members reiterated that this was the first project where a draft of the alternatives went for review by the full HPC, whereas previously draft alternatives were only reviewed by the Architectural Review Committee (ARC). The HPC felt the change in procedure had greatly improved the process by allowing the full HPC to provide comments earlier during the development of alternatives. This change in process also allowed commissioners to give feedback on the design of the project at an earlier phase.
- The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource.
- The HPC did not have any comments on the Mitigation Measures and found them to be adequate.
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts.
- The HPC requested that additional information on restoration of the façade be included in the DEIR's project description section.

A-HPC-1  
(DEIR  
ALT-1)

A-HPC-1  
(DEIR HAR-1)

A-HPC-1  
(DEIR MM-1)

A-HPC-1  
(DEIR ALT-2)

A-HPC-1  
(DEIR PD-1)

Proposed project – The HPC expressed support for the proposed project and reiterated the fact that it was one of the draft alternatives they saw in April 2019. Commissioners wanted the Planning Commission to know that use of one of the draft alternatives as the proposed project indicated a significant improvement in the alternatives process. The HPC had the following comments on the proposed project:

- The HPC stated that bringing the draft alternatives for review earlier on in the EIR process allowed for them to be studied by the project team much earlier in the process of review. This saved the project sponsor time and money and ultimately led to a better project.
- HPC commissioners agreed that use of the retained elements guidelines was successfully applied to this project.
- Commissioners felt the location of the addition's massing was appropriate because it matched the surrounding size and scale and location of other contributing residential buildings within the Uptown Tenderloin National Register historic district by aligning with the surrounding street wall.
- Commissioners commented they would like to see further analysis of the existing building to inform the restoration of the façade, possibly paint analysis to determine the original finish and color of the building.
- Commissioners also debated the adequacy of the vertical hyphen (along with definition of the term). While some commissioners expressed a desire to see a deeper setback, others cautioned against a hyphen that would be set too far back and make the building look top heavy. Commissioners agreed the design of the hyphen should be studied more fully as the full-size drawings were developed.
- The HPC expressed full support of the proposed project. The HPC was clear that they did not support the project variant.

A-HPC-1  
(Project-4)

The HPC appreciates the opportunity to participate in review of this environmental document.

Sincerely,



Aaron Jon Hyland, FAIA, President  
Historic Preservation Commission



July 7, 2020

Letter  
O-TNDC

Jennifer McKellar  
Environmental Planner  
San Francisco Planning  
Submitted via [CPC.550OFarrellStEIR@sfgov.org](mailto:CPC.550OFarrellStEIR@sfgov.org)

**Re: 550 O'Farrell**

Dear Jennifer,

On behalf of Tenderloin Neighborhood Development Corporation (TNDC), I write to follow up on our public comment made at the planning commission hearing on Thursday, June 25, 2020.

For over 30 years, TNDC has been preserving and rehabilitating existing buildings in the Tenderloin and surrounding neighborhoods, which have historically served low-income and working-class communities. TNDC operates affordable housing in these neighborhoods, and we work with community stakeholders to understand their concerns and raise public awareness on issues that impact their quality of life.

As an agency, we are supportive of new housing if it brings benefits to the residents currently living in the neighborhood. After assessing the Draft Environmental Impact Report (EIR), we could not help but notice the lack of community input. There was no indication of whether or not Presidio Bay Ventures (the developer) reached out to community organizations or residents in the Tenderloin neighborhood. As stated at the planning commission, **we invite the developer to reach out to us and other community groups**, so they can get a better sense of the community's needs. My colleagues at the Tenderloin People's Congress would love to have this conversation and we are more than happy to help facilitate this.

O-TNDC-2  
(Outreach-4)

On page 21 in Appendix A, it states, "While the addition of 255 to 267 people would be noticeable to residents of immediately adjacent properties, those numbers would not result in a substantial increase to the population of the larger neighborhood or the City and County of San Francisco." This may be true, but as representatives of the neighborhood, we are concerned about the impact that a higher income population may have on the residents. **We'd like this project's EIR to include a socio-economic impact analysis on the neighborhood.**

O-TNDC-2  
(SOCIO-5)

Currently, the CEQA does not require a discussion of a proposed project's socioeconomic impact unless it results in physical environmental effects. However, socioeconomic information related to minority communities, income, employment, housing status, schools and crime should be included in the EIR to identify and propose mitigation for any environmental justice concerns or social impacts related to a new development. The planning commission should encourage developers to provide quantitative evidence that describes the social impact of their project. If the EIR outlines the non-physical adverse impacts to be expected in the short-term and

TENDERLOIN  
NEIGHBORHOOD  
DEVELOPMENT  
CORPORATION

201 EDDY STREET  
SAN FRANCISCO  
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INFO@TNDC.ORG  
WWW.TNDC.ORG



O:\General\Community Issues\Land Use & Development\550 O'Farrell\CPC 550 O'Farrell.docx

long-term, city officials can assist the developer in finding ways to mitigate those high social and economic effects. Equally important, a socioeconomic impact analysis would highlight the beneficial impacts to the proposed development that could lead to more positive community engagement. In recent years, cities such as Oakland and Richmond have included socioeconomic impact analyses within the EIR of larger developments. However, these cities and others have not yet required this analysis for all developments. San Francisco has an opportunity to set an example for other cities in the Bay Area.

A socioeconomic impact analysis not only provides valuable information to the city officials but to the community as well. Research has proven that market-rate developments within lower-income neighborhoods can result in displacement in the long-term. For example, an influx of higher-income residents can attract economic investment in higher-end amenities to make a neighborhood more desirable. This could lead to risk factors for gentrification. The possibility of existing residents being displaced is not considered an impact on the physical environment and therefore is not required in the CEQA. However, omitting this crucial information only further exacerbates residents' fears regarding future housing affordability in their neighborhood. A socioeconomic analysis would provide substantial evidence to city officials and residents that the proposed project would not cause future displacement, gentrification and other significant social issues.

O-TNDC-2  
(SOCIO-5  
cont)

The commission just unanimously approved a resolution calling for the Planning Department to center racial and social equity in its work by developing strategies to counter structural racism in collaboration with communities of color. By requiring a socioeconomic impact analysis within the EIR, San Francisco would be taking a big step forward in ensuring social equity in the planning and development process. Overall, this tool would help developers plan projects that are sustainable-environmentally, economically and socially. We urge you to apply that to this project.

O-TNDC-2  
(SOCIO-6)

Lastly, **we would like to request that Presidio Bay Ventures enter into a Community Benefits Agreement.** We hope to engage in negotiations as soon as possible in order to ensure that the developer provides specific benefits to the residents while also minimizing disruption to the neighborhood. In exchange, we will agree to publicly support this project.

O-TNDC-2  
(Outreach-5)

Please do not hesitate to contact me at [gruiz@tndc.org](mailto:gruiz@tndc.org) should you have any questions.

Sincerely,

Gabriella Ruiz  
Policy and Planning Manager  
Tenderloin Neighborhood Development Corporation

cc: Don Falk, CEO [dfalk@tndc.org](mailto:dfalk@tndc.org)  
Whitney Parra, Housing Development Intern [wparra@tndc.org](mailto:wparra@tndc.org)

## **Appendix**

*The below serves as an example of potential language in a Community Benefit Agreement that delineates the framework of continued communication between Presidio Bay Ventures (550 O'Farrell) and the Tenderloin Neighborhood Development Corporation.*

### Periodic Project Meetings

(a) During the Project's "Construction Period," which shall mean the period of time beginning with Presidio Bay Ventures receipt of building permits for the Project and ending with 550 O'Farrell LLC's receipt of a Certificate of Occupancy for the Project, representatives from 550 O'Farrell LLC, the General Contractor, and TNDC (the "Construction Liaisons") shall meet to discuss the impact of Project construction on residents (the "Construction Period Meetings"). Construction Period Meetings shall occur biweekly, or as mutually agreed by the parties, at a time and location mutually acceptable to the Construction Liaisons, pursuant to any additional requirements discussed in this Agreement.

(b) Following the Construction Period, 550 O'Farrell will appoint a staff liaison (the "Project Liaison") to meet with TNDC to discuss ongoing issues related to operation of the Project (the "Project Operations Meetings"). Project Operations Meetings shall occur monthly at a time and location mutually acceptable to the Project Liaison and TNDC.

O-TNDC-2  
(Outreach-5  
cont)





## SUE C. HESTOR

Attorney at Law

870 Market Street, Suite 1128 San Francisco, CA 94102

office (415) 362-2778 cell (415) 846-1021

[hestor@earthlink.net](mailto:hestor@earthlink.net)

July 7, 2010

Jennifer McKellar  
Environmental Review  
1650 Mission St 4th fl  
San Francisco CA 94103

550 O'Farrell St DEIR Comments

As shown on Figure 3-1 (3-14) Project is located in **Uptown Tenderloin Historic District** (UTHD) and on block abutting **Lower Nob Hill Apartment Hotel Historic District** (LNHAHHD). Shaded areas of Lower Nob Hill/Tenderloin Area from Polk to Powell zoned RC. Both of these National Register Districts have been important sources of housing for working and lower income people since the 1906 earthquake.

Historical Context - **UTHD** has historically included non-residential buildings, such as the YMCA at Golden Gate and Leavenworth. Both districts have substantial stock of housing in residential hotels, called **apartment** hotels in **LNHAHHD**. Also Single Room Occupancy (SRO) units. Residents of this housing have traditionally worked in downtown San Francisco, in its hotels and restaurants, in working class jobs. They have also housed elderly persons, people with disabilities. People who live in this area often walk to their jobs.

As residents of older buildings they are "protected" by SF Admin Code Chapter 41 - Residential Hotel Unit Conversion and Demolition Ordinance (1990) AND Chapter 37 - Residential Rent Stabilization and Arbitration Ordinance (1979). Both aim at protecting existing HOUSING and existing RESIDENTS from displacement. If they are not enforced - in particular by the Planning Department and Department of Building Inspection, the housing and residents are driven out - often out of City because they can no longer afford to reside in San Francisco.

I-Hestor-2  
(IS PH-4)

The entire lower Nob Hill and Tenderloin areas - and long time lower income tenants - have been dealing with this displacement for over 30 years. (See Ordinances above)

To hotels, quasi-hotels, short term residences, corporate housing. **For-profit** owners of these buildings often want higher income occupants (not residential tenants) and rents. Without effective measures, as upper income tenants come into building such as 550 O'Farrell, pressure is put on nearby buildings and residents. The effects of adding upper income housing on O'Farrell between Leavenworth and Taylor will extend north into the **Lower Nob Hill Apartment Hotel Historic District**.

Apartment hotels ARE Residential Hotels. They were historically major source of housing for people, particularly single women, working downtown.

Please provide a brief description of housing and population - similar to that done for UTHD on **3-19** - for Lower Nob Hill District.

I-Hestor-2  
(IS PH-6)

**Table 3-1** - projects in UTHD -(3-22, 23) needs updating and further information. Have additional projects been proposed?

**For all approved projects please provide number of DUs and status.** If the housing is owned by a non-profit housing developer, and will keep the units affordable to lower income people, please provide that information.

**145 Leavenworth** and **361 Turk** are the 2 former Golden Gate/Leavenworth YMCA parking lots. After initial attempt to use new group housing on those sites as "new housing units" which would allow 7 residential hotels to **convert all of their residential hotel rooms to TOURIST hotel rooms**. By the time project was approved, use of this provision of Residential Hotel Ordinance was abandoned. But owner of one of those Residential Hotels on 4th St is still pursuing conversion to full tourist use.

I-Hestor-2  
(DEIR CI-1)

Similar information should be provided for recent and proposed projects in **Lower Nob Hill District**. It would include 824 Hyde - fire destroyed housing - approved for hotel in 2017.

**Initial Study - Appendix A, 4-1** - scoped out real discussion of Population and Housing. The rationale appears to be that housing is housing is housing. THAT IS NOT THE CASE FOR THIS AREA.

**Please discuss evolving income levels.** Page 20-24 discussion of Population and Housing in Initial Study basically ignores this important ENVIRONMENTAL issue.

What rent is being charged for newly constructed housing in the "larger neighborhood" - the 2 Historic Districts - by for profit developers?

I-Hestor-2  
(SOCIO-3)

What does Planning consider the percent of income tenants should pay for housing? 30% has long gone by wayside for lower income SF residents.

The PLANNING Department surely maintains keeps that important information. If people who WORK in San Francisco (e.g. retail and people in hospitality industry - hotels and tourism) cannot afford to LIVE in SF, they are forced to find housing OUT of SF. Commuting up to 2 hours - putting demands on roads, transit, to get to those homes - and for construction of those homes in the exurbs. Or even workers may become homeless and put demands on the streets.

These are also PHYSICAL IMPACTS which are measured in environmental documents. The human impacts also cannot be ignored.

Please read p.21 sentence which states that employees of any retail establishment on 550 site would be anticipated to live in SF (or nearby communities.) Define **nearby**. 90 min commute?. 120 min commute?

I-Hestor-2  
(IS PH-7)

The Planning Department (including HPC) - and DBI - basically ignore Residential Rent Control and Residential Hotel Ordinance. Plans to alter Residential Hotels are often over-the-counter. Plans for alterations or new construction that affect existing rent-controlled units are glossed over. ADMINISTRATIVE Code provisions are not in **Planning Code**.

I-Hestor-2  
(IS PH-5)

Please add mitigation measure to protect existing lower income residents and housing in THIS AREA:

I-Hestor-2  
(SOCIO-4)

TRAINING requirement for ALL PLANNERS - including preservation planners

MAINTAIN A LIST OF ALL RESIDENTIAL HOTELS and SROS in San Francisco. Protected by Residential Hotel Ordinance. Requirement - check proposed against that list.

RENT CONTROLLED HOUSING - currently residents are thrown to wolves by Plan Dept staff. Said from reviewing 100s of 311 notice plans, many of which affect existing rent controlled housing. Can proposed project be constructed without intruding on rent controlled unit/s?

I-Hestor-2  
(SOCIO-4  
cont)

Sue Hestor

---

<sup>i</sup> Misspelled *Nobb* Hill



## **ATTACHMENT B**

### **Draft EIR Public Hearing Transcript**

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APPEARANCES

COMMISSIONERS PRESENT

Joel Koppel, President

Kathrin Moore, Vice President

Deland Chan

Sue Diamond

Frank Fung

Theresa Imperial

Milicent Johnson

STAFF PRESENT:

Jonas P. Ionin, Secretary

Jennifer Barbour McKellar

Justin Greving

PUBLIC COMMENT

Daniel Franco

Gabriella Ruiz, TNDC

William Rankin, Neighborhood

Resident Joseph Mann, Juvenile Hall

Sue Hestor

INDEX

PAGE

E.     **REGULAR CALENDAR**

1

2017-004557ENV                   (J. MCKELLAR: (415) 575-8754)

550 O'FARRELL STREET - Review and Comment on the Draft Environmental Impact Report - The project site is located on the north side of O'Farrell Street in the block bounded by Geary, O'Farrell, Leavenworth and Jones Streets, Assessor's Block 0318, Lot 009 (District 4). The proposed project would demolish most of the existing two-story-over-basement, 40-foot-tall, 35,400 gross-square-foot (gsf) building, built in 1924, which operates as a public parking garage and is an individually eligible historic resource and a contributory building to the National Register-listed Uptown Tenderloin Historic District. The proposed project would retain the existing O'Farrell Street façade and construct 111 residential units in a 13-story-over-basement, mixed-use residential building with 1,300 square feet (sf) of ground-floor retail or residential amenity space, and 156 bicycle parking spaces at the ground and basement levels, accessible from O'Farrell Street. A project variant is also proposed that would demolish the existing building and construct 116 residential units in a 13-story-over-basement, mixed-use residential amenity space, and 156 bicycle parking spaces at the ground and basement levels, accessible from O'Farrell Street. The proposed project and the project variant do not propose any vehicle parking. The project site is within the Residential-Commercial, High Density (R-C-4) Use District, North of Market Residential Special Use District No. 1, and 80-T-130-T Height and Bulk Districts.

*Preliminary Recommendation: Review and Comment*

Public Comment

14

P R O C E E D I N G S

1:45 P.M.

SECRETARY IONIN: That will place us on Item 11 for Case No. 2017-004557ENV, at 550 O'Farrell Street. This is the Draft Environmental Impact Report.

Is staff prepared to make your presentation?

MS. MCKELLAR: Yes, we are.

SECRETARY IONIN: Before you begin, Jennifer, I would like to introduce the Commission to Jennifer McKellar, who joined the Planning Department in 2016 as an Environmental Planner.

She's originally from Canada. And Jennifer completed an undergraduate degree in chemistry, as well as economics, before spending eight years working in the private sector.

During this time Jennifer had the opportunity to live and work in different cities which inspired her to complete a master of public administration in environmental services at -- excuse me, in environmental science and policy at Columbia University, with an eye on transitioning to the public sector.

After working in the environmental sectors in various roles, Jennifer joined the San Francisco Planning Department as an Environmental Planner. Jennifer performs environmental review of development projects under the

1 California Environmental Quality Act and contributes to  
2 broader department initiatives within the Air Quality  
3 Analysis Team, and the Racial and Social Equity Team.  
4 Welcome Jennifer.

5 MS. MCKELLAR: Thank you. Good afternoon  
6 President Koppel and Members of the Commission, I'm  
7 Jennifer McKellar, Planning Department staff and EIR  
8 Coordinator for the 550 O'Farrell Street project, or the  
9 proposed project.

10 I am joined today by my colleagues Tania Sheyner,  
11 Principal Environmental Planner; Justin Greving, Senior  
12 Preservation Planner; Allison Vanderslice, Principal  
13 Preservation Planner, and Maia Small, Architecture and  
14 Design Manager.

15 Members of the project sponsor team are also  
16 present.

17 I will now attempt to share my presentation and  
18 continue from there.

19 SECRETARY IONIN: Jenn, there appears to be some  
20 background noise from your computer, I think. I don't  
21 know, it's a squeal and I don't know if there's anything  
22 you can do about it, but it's coming across pretty strong.

23 MS. MCKELLAR: No, I'm not sure what the source  
24 would be.

25 SECRETARY IONIN: All right, go ahead.

1 MS. MCKELLAR: Shall I just continue?

2 SECRETARY IONIN: Yes.

3 MS. MCKELLAR: Okay, maybe I'll just try turning  
4 off some things.

5 SECRETARY IONIN: Much better, thank you.

6 MS. MCKELLAR: Oh, great. Okay.

7 The item before you is the review and comment on  
8 the 550 O'Farrell Street Project Draft Environmental Impact  
9 Report or Draft EIR. The purpose of today's hearing is to  
10 take public comments on the adequacy, accuracy, and  
11 completeness of the Draft EIR, pursuant to the California  
12 Environmental Quality Act, or CEQA, and San Francisco's  
13 local procedures for implementing CEQA.

14 No approval action on this document is request at  
15 this time.

16 The public review period for the proposed  
17 project's Draft EIR began on May 21, 2020 and will continue  
18 through 5:00 p.m. on July 7, 2020.

19 I will now provide you with a brief overview of  
20 the proposed project and a project variant, both of which  
21 were analyzed in the Draft EIR.

22 The project site is comprised of a single,  
23 approximately 11,800-square-foot parcel that fronts  
24 O'Farrell Street in the Downtown/Civic Center neighborhood.  
25 The project site is developed with one building, a public

1 parking garage, which was constructed in 1924 and designed  
2 in the Gothic Revival architectural style by the master  
3 architect William C. Crim, Jr. The building is  
4 individually eligible for listing in the California  
5 Register of Historical Resources under Criterion 3, as a  
6 good example of this style of architecture.

7           The existing building is also a contributing  
8 resource to the National Register-listed Uptown Tenderloin  
9 Historic District, which is significant under Criterion A  
10 for its association with the development of hotel and  
11 apartment life in San Francisco during a critical period of  
12 change, and under Criterion C for its distinctive mix of  
13 building types that served a new urban population of office  
14 and retail workers.

15           Based on this, the 550 O'Farrell Street building  
16 and the Uptown Tenderloin National Register Historic  
17 District are historical resources for the purposes of CEQA.

18           Pardon me.

19           The proposed project would demolish most of the  
20 existing building, but would retain its existing façade.  
21 The proposed project would construct an approximately  
22 105,000-square-foot, 13-story, 130-foot-tall mixed-use  
23 building with 11 dwelling units and 1,300 square feet of  
24 retail or residential amenity space. Approximately 22 of  
25 the 111 dwelling units would be affordable inclusionary

1 units.

2           The Draft EIR also analyzed a project variant  
3 which would fully demolish the existing building and  
4 construct a new, approximately 106,500-square-foot, 13-  
5 story, 130-foot-tall mixed-use building with 116 dwelling  
6 units, and 1,300 square feet of retail or residential  
7 amenity space. Approximately 23 of the 116 dwelling units  
8 would be affordable inclusionary units.

9           The Draft EIR concluded that both the proposed  
10 project and the project variant would result in a  
11 substantial adverse change to the significance of the  
12 individual historic resource at 550 O'Farrell Street, which  
13 would result in a significant unavoidable impact. Both the  
14 proposed project and project variant were determined to  
15 have a less-than-significant impact on the Uptown  
16 Tenderloin Historic District. Other impacts to historic  
17 architectural resources were found to be less than  
18 significant or less than significant with mitigation for  
19 both the proposed project and the variant.

20           The Draft EIR also found that project and project  
21 variant impacts related to archeological and tribal  
22 cultural resources, human remains, noise, vibration and air  
23 quality could be mitigated to a less than significant  
24 level. All other impacts associated with the proposed  
25 project and the project variant were found to be less than

1 significant.

2           Two mitigation measures have been identified for  
3 the significant and unavoidable impact to the individual  
4 historic architectural resource resulting from the proposed  
5 project. The first measure requires the project sponsor to  
6 undertake Historic American Building Survey-like  
7 documentation and a video recordation of the building. The  
8 second measure requires a permanent display of  
9 interpretative materials concerning the history and  
10 architectural features of 550 O'Farrell and its  
11 relationship with the Uptown Tenderloin Historic District.

12           While these mitigation measures would reduce the  
13 proposed project's impact on the historic resource at 550  
14 O'Farrell Street, this impact would remain significant and  
15 unavoidable.

16           Three mitigation measures have been identified  
17 for the significant and unavoidable impact to historic  
18 architectural resources resulting from the project variant.  
19 The first two are identical to those identified for the  
20 proposed project. The third measure is applicable only to  
21 the project variant and would require the project sponsor  
22 to consult with planning department preservation staff to  
23 determine whether any character-defining features of 550  
24 O'Farrell could be salvaged during demolition, and that the  
25 project sponsor shall make a good faith effort to salvage



1 materials to be used as part of the interpretative program.

2           Similar to the proposed project, while these  
3 mitigation measures would reduce the project variant's  
4 impact on the historic resource at 550 O'Farrell Street,  
5 this impact would remain significant and unavoidable.

6           To address the significant and unavoidable impact  
7 of the proposed project on the individual historic  
8 resource, the Draft EIR analyzed three alternatives to the  
9 proposed project.

10           The No Project Alternative would keep the  
11 existing building as a parking garage and would not  
12 construct any residential units on the site.

13           The Full Preservation Alternative would retain  
14 and rehabilitate the front portion of the existing building  
15 and construct a 4-story addition. The first two stories of  
16 the addition would be set back from the main façade by 30  
17 feet, and the upper two stories would be set back  
18 approximately 67 feet from the primary façade.

19           The Partial Preservation Alternative would  
20 construct a new 13-story building with an 18-foot setback  
21 from the primary façade of the existing building.

22           The preservation alternatives were developed in  
23 consultation with the Historic Preservation Commission, or  
24 HPC, whose members provided feedback during the April 17,  
25 2019 hearing. The HPC recommended the project sponsor

1 explore putting more height on the full preservation  
2 alternative and increase the setback above the retained  
3 façade of one of the partial preservation alternatives.  
4 HPC feedback was incorporated into the revised set of  
5 alternatives, which were analyzed in the Draft EIR.

6 Additionally, the project sponsor, with direction  
7 from the Planning Department, decided to convert one of the  
8 draft partial preservation alternatives into the proposed  
9 project, and the originally proposed project was modified  
10 to be the project variant.

11 In terms of impact, the No Project Alternative  
12 would reduce impacts to a less than significant level, but  
13 would not meet any -- oh, pardon me, that's actually  
14 incorrect.

15 The No Project Alternative would actually have no  
16 impact and it would not meet any project objectives.

17 The Full Preservation Alternative would avoid  
18 significant impacts to historic resources, require no  
19 mitigation measures, and meet some of the project  
20 objectives.

21 The Partial Preservation Alternative would have  
22 similar impacts to the proposed project and reduced impacts  
23 compared to the project variant. However it would not  
24 avoid the significant impact related to demolition of 550  
25 O'Farrell and mitigation measures would be similar to the

1 proposed project. The alternative would meet most of the  
2 project objectives.

3 A hearing to receive the Historic Preservation  
4 Commission's comments on the Draft EIR was held on June 17,  
5 2020. I have provided you with a copy of the HPC's letter,  
6 which I will summarize now.

7 At the hearing, the HPC found the analysis of  
8 historic resources in the Draft EIR to be adequate and  
9 accurate, concurred with the finding that the proposed  
10 project would result in a significant, unavoidable impact  
11 to the identified historic resource; determined the  
12 identified mitigation measures to be adequate; and agreed  
13 that the Draft EIR analyzed a reasonable and appropriate  
14 range of preservation alternatives to address historic  
15 resource impacts.

16 The HPC also noted that this was the first  
17 project where a draft of the alternatives was reviewed by  
18 the full HPC, instead of members of the Architectural  
19 Review Committee, and that this change in procedure greatly  
20 improved the process by allowing the full HPC to provide  
21 design comments earlier during the development of  
22 alternatives.

23 Finally, the HPC expressed full support of the  
24 proposed project and requested that additional information  
25 on restoration of the façade be included in the Draft EIR's

1 project description section.

2 Today, the planning department is seeking  
3 comments on the adequacy and accuracy of the information  
4 contained in the Draft EIR. For members of the public who  
5 wish to speak, please state your name for the record.  
6 Please speak slowly and clearly so that the court reporter  
7 can make an accurate transcript of today's proceedings.

8 Staff is not here to answer comments today.  
9 Comments will be transcribed and responded to in writing in  
10 the Response to Comments document, which will respond to  
11 all relevant verbal and written comments received during  
12 the public comment period and make revisions to the Draft  
13 EIR as appropriate.

14 Those who are interested in commenting on the  
15 Draft EIR in writing by mail or email may submit their  
16 comments Jennifer McKellar, EIR Coordinator, at 1650  
17 Mission Street, Suite 400, San Francisco, or to the email  
18 provided, by 5:00 p.m. on July 7, 2020.

19 We anticipate publication of the Response to  
20 Comments document at the end of this year, followed by the  
21 IR certification hearing in early 2021.

22 Unless the Commissioners have questions, I  
23 respectfully suggest that the public hearing on this item  
24 be opened.

25 SECRETARY IONIN: Thank you, Jennifer. We should

1 open this up for public comment.

2 (Operator instructions)

3 SECRETARY IONIN: Members of the public, this is  
4 your opportunity to comment on the Draft EIR regarding its  
5 accuracy and adequacy. Press one, then zero to --

6 (Operator remarks)

7 MR. FRANCO: Hello, can you hear me  
8 okay? SECRETARY IONIN: We can.

9 MR. FRANCO: Yes, this is Daniel Franco.

10 Actually, I'm here for another topic, but just since you  
11 brought it up on this, I merely have to point out that  
12 taking away parking in San Francisco right now is super  
13 dumb. It's a terrible, short-sighted idea. You need to  
14 understand in the COVID nobody's going to be using public  
15 transit for years to come, which means you've been spending  
16 the last decade taking away parking. Taking away even more  
17 now just seems to be incredibly pointless and dumb, and you  
18 should rethink that. I am done.

19 (Operator remarks)

20 MS. RUIZ: Hi, my name is Gaby Ruiz and I am the  
21 Policy and Planning Manager at TNDC. And as an agency we  
22 are supportive of new housing, as long as it brings  
23 benefits to the residents currently living in the  
24 neighborhood.

25 I would like to ask for residents and

I-Franco-1  
(IS TR-1)

O-TNDC-1  
(Outreach-1)

O-TNDC-1  
(Outreach-1  
cont)

1 organizations that the developer reached out to in order to  
2 truly understand the needs of the community. I invite the  
3 project sponsors to reach out to me and other community  
4 groups so they have the opportunity to talk more with the  
5 community about their vision of the neighborhood.

6 My colleagues at the Tenderloin People's Congress  
7 would love to have this conversation and I would be more  
8 than happy to help facilitate this.

O-TNDC-1  
(SOCIO-1)

9 On page 21, in Appendix A, it states that: While  
10 the addition of 255 to 267 people would be noticeable to  
11 residents of immediately adjacent properties, those numbers  
12 would not result in a substantial increase to the  
13 population of the larger neighborhood, or the City and  
14 County of San Francisco.

15 This may be true, but as representatives of the  
16 neighborhood we are concerned about the impact that a  
17 higher income population may have on the residents. We'd  
18 like to see more of a socioeconomic impact analysis of this  
19 project on this neighborhood.

O-TNDC-1  
(SOCIO-2)

20 The Commission did unanimously approve the  
21 resolution calling for the Planning Department to center  
22 racial and social equity in its work by developing  
23 strategies to counter structural racism in collaboration  
24 with communities of color, and we urge you to apply that to  
25 this project.

O-TNDC-1  
(SOCIO-2  
cont)

1 I look forward to hearing more and thank you so  
2 much.

3 (Operator remarks)

I-Rankin-1  
(IS VIS-1)

4 MR. RANKIN: Hello, my name is William Rankin. I  
5 live at 665 Geary Street, adjacent to the garage. And it  
6 will be a hugely significant negative impact for me and my  
7 neighbors. The building proposed is an eyesore. It's

I-Rankin-1  
(IS SH-1)

8 ugly, hideous. Aesthetically it has no value. It will

9 block sunlight for the entire neighborhood. And I --

I-Rankin-1  
(IS NOI-1)

10 personally, I work from home, so there is no way I would be  
11 able to have an income with demolition and construction  
12 going on.

I-Rankin-1  
Project-5)

13 And I just hope that you would come up with a  
14 better design. It's a cookie cutter building. It looks to  
15 be done on the cheap. And it's good for no one but the  
16 developer. We need parking in the neighborhood. We need  
17 character in the neighborhood. We need diversity in the  
18 neighborhood. And this project will be a disaster.

19 Thank you. And that's all I have to say.

20 (Operator remarks)

21 SECRETARY IONIN: Caller, are you --

22 MR. MANN: Yes, I do. I would like to second.

23 Hello?

I-Mann-1  
Project-6

24 SECRETARY IONIN: Yes, go ahead, Caller.

25 MR. MANN: Oh, I'm sorry. I would like to second

I-Mann-1  
(Project-6  
cont)

1 both the last caller and the previous caller that it sounds  
2 like this is a cookie cutter type of proposal. Has the  
3 agency reached out to the community and spoken to them  
4 about the demographics and what is about to take place  
5 around them?

I-Mann-1  
(Outreach-2)

6 I would suggest, in closing, that as you plan for  
7 new ventures and new concepts within communities that you  
8 touch base with those community organizations. Thank you.  
9 I'm Joseph Mann at Juvenile Hall.

10 (Operator remarks)

11 SECRETARY IONIN: Caller, are you prepared to  
12 submit your testimony? Caller? You may need to press  
13 star, then 6 to unmute your telephone.

14 Okay, let's go to the next caller.

15 (Operator remarks)

16 SECRETARY IONIN: Hello Caller, are you prepared  
17 to submit your testimony? Hello?

18 All right, let's go to the next caller.

19 (Operator remarks)

I-Hestor-1  
(IS PH-1)

20 MS. HESTOR: This is Sue Hestor. I am following  
21 up TNDC's comments. This is an existing neighborhood that  
22 the Planning Department sometimes understands is a  
23 neighborhood and sometimes doesn't. The map that was shown  
24 that had the lavender at the bottom and the gray at the  
25 top, it's page 315 of the EIR, shows the top of the area



1 that is located between basically Pine and Geary Street is  
2 a lower Nob Hill apartment hotel historic district. That's  
3 the area that has residential hotels.

I-Hestor-1  
(IS PH-1  
cont)

4 Tenderloin has residential hotels and there's  
5 deep housing that exists already in the neighborhood. This  
6 area doesn't have so many traditional apartment buildings.  
7 It has SROs, and it has residential hotels, and it has  
8 other housing that was accommodated by people eating out a  
9 lot, and not having kitchens in their building.

10 There needs to be a real understanding at the  
11 Planning Department about the different types of housing  
12 that exist, and who they serve, and what benefits they give  
13 to lower income people particularly.

I-Hestor-1  
(IS PH-2)

14 This has not been an area that has had upscale  
15 housing for a long time. And now, people want to make a  
16 lot of money and turn everything into upscale housing. But  
17 the existing residents need to be protected from being  
18 pushed out by unthinking development pushed by the Planning  
19 Department, or by private developers wanting to make a bit  
20 of money.

I-Hestor-1  
(Outreach-3)

21 I don't have any problem with the garage going  
22 away. There's an abundance of garages in this area. And  
23 this is a good site to have additional housing. But you  
24 need to have outreach that's serious to the people that  
25 live there, the people that are represented by

I-Hestor-1  
(Outreach-3  
cont)

1 organizations like TNDC, and other area organizations.

2 So, I'm submitting written comments, but this is

I-Hestor-1  
(IS PH-3)

3 an opportunity to start understanding how the city was

4 developed in this area, which doesn't have a whole lot of

5 original single-family housing. Thank you. It doesn't

6 have single-family houses at all. Thank you. Bye.

7 (Operator remarks)

8 SECRETARY IONIN: Very good, Commissioners, the  
9 matter is now before you.

10 If there are no comments from the Commissioners  
11 -- Commissioner Moore.

A-CPC-1  
Moore  
(DEIR  
COMP-1)

12 COMMISSIONER MOORE: I generally find the Draft  
13 EIR complete and accurate. It's well organized, easy to  
14 read, and I found the discussion of the proposed  
15 alternative rather convincing, including the one which is  
16 analyzed as a proposed alternative with all the pieces that  
17 are possible. That is one which I find very well  
18 elaborated and convincing and I'm in full support of what  
19 is in front of me.

20 (Thereupon Item 11 concluded at 2:07 p.m.)

21 --oOo--

22

23

24

25

CERTIFICATE OF REPORTER

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 8th day of July, 2020.




ELISE HICKS, IAPRT CERT\*\*2176

**TRANSCRIBER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 8th day of July, 2020.



---

Barbara Little  
Certified Transcriber  
AAERT No. CET\*\*D-520

