

FILE NO: 170284

Petitions and Communications received from March 6, 2017, through March 13, 2017, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on March 21, 2017.

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From the Office of the Controller, regarding research and analysis of SF's Vision Zero Plan to eliminate traffic deaths. Copy: Each Supervisor. (1)

From the Department of Public Health, pursuant to Administrative Code, Section 10.170-1(F), submitting a State grant line budget revision. Copy: Each Supervisor. (2)

From the Clerk of the Board, reporting that the following individuals submitted a Form 700 Statement: (3)

Noelle Duong - Legislative Aide - Assuming
Arthur Louie - Budget and Legislative Analyst - Annual
Alisa Somera - Legislative Deputy - Annual

From the Office of the Mayor, pursuant to Charter, Section 3.100(18), submitting the following appointment: (4)

Jonathan Beauford - Juvenile Probation Commission - term ending
January 15, 2021.

From the Planning Department, submitting a Notice of Availability for a Responses to Comments Document on 1500 Mission St. Project. Copy: Each Supervisor. (5)

From the California Office of Historic Preservation, pursuant to Federal Regulations 36 CFR Part 60.6(c), submitting a notice of a meeting regarding the Historic Places Nomination of Henry Geilfuss House. Copy: Each Supervisor. (6)

From Michael Koch, regarding the Public Defender's Deportation Defense Unit. File No. 161289. Copy: Each Supervisor. (7)

From Dave Warner, regarding the Bay Area Quality Control Plan. File No. 170115. Copy: Each Supervisor. (8)

From SPUR, regarding the Stationless Bikeshare Program. File No. 170160. Copy: Each Supervisor. (9)

From Dennis Hong, expressing various concerns. File Nos. 170163, 170128, and 170145. Copy: Each Supervisor. (10)

From Christine Moran, regarding the prevention of pet stores from selling animals in San Francisco. Copy: Each Supervisor. (11)

From concerned citizens, regarding reservations and tolls on Lombard Street. 5 letters.
Copy: Each Supervisor. (12)

From Isabella Hendry, regarding the Day Without Woman. Copy: Each Supervisor. (13)

From Airbnb, submitting updated data on One Host, One Home policy. Copy: Each
Supervisor. (14)

From concerned citizens, regarding the "Comfort Women" statue. 3 letters. Copy: Each
Supervisor. (15)

From James J. Ludwig, regarding the Chronicle article "Traffic Pulls Ahead". Copy: Each
Supervisor. (16)

From: Reports, Controller (CON)
Sent: Friday, March 10, 2017 1:49 PM
Subject: Issued: Focus on Enforcement: Insights from research and analysis in support of SF's Vision Zero Plan to eliminate traffic deaths

Focus on Enforcement draws on a wide body of research, which shows that high visibility police enforcement is an effective way to deter dangerous, and often deadly, road behaviors. The report analyzes the most recent collision data available (2013-2015) to consider how the San Francisco Police Department can enhance the deterrent effect by varying the location of its operations.

The analysis finds that speeding is generally the most prevalent cause of collisions across the City's ten police districts. This finding underscores the importance of the City's efforts to obtain state legislative approval for a pilot program to implement Automated Speed Enforcement (Assembly Bill 342). The analysis also finds that while speeding is a prevalent collision factor across the City, there are differences among the districts with respect to other factors that lead to death and severe injury. The report encourages the SFPD to refine its current approach to be more responsive to the underlying causes of collisions in each district and to work with the community to identify safety concerns beyond this analysis and collaborate on solutions.

The report offers nine recommendations, highlights a variety of effective enforcement strategies and discusses traffic enforcement in relation to important issues like procedural justice and social equity. The report also includes a web application with interactive collision maps to inform the SFPD's enforcement approach in support of Vision Zero, the City's goal to eliminate traffic deaths by 2024.

To view the full report, please visit our Web site at:
<http://openbook.sfgov.org/webreports/details3.aspx?id=2424>

To view the collision maps on the companion site, please visit <http://sfcontroller.org/collisiondata>.

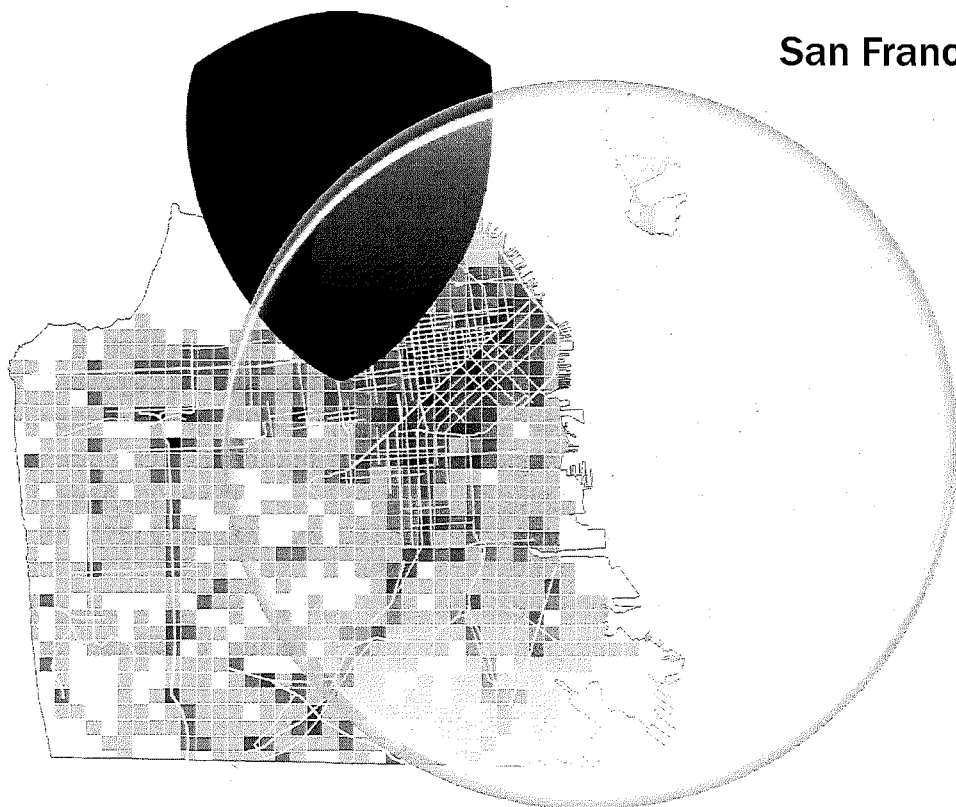
This is a send-only e-mail address.

For questions about the report, please contact Corina Monzón corina.monzon@sfgov.org or Joe Lapka joe.lapka@sfgov.org

Follow us on Twitter @SFController

Focus on Enforcement

Insights from research and analysis in support of
San Francisco's Vision Zero plan to eliminate traffic deaths



Joe Lapka
Corina Monzón
Peg Stevenson

3/10/2017

In support of  **VISION
ZERO
SF**

Office of the Controller
City Services Auditor | City Performance



Acknowledgments

Thanks to all who work each day to improve the safety and accessibility of our transportation system, and special thanks to those below whose guidance, insight, and cooperation contributed greatly to this report.

Michael Alexander, SFPD
Mikail Ali, SFPD
Carla Beak, Controller's Office
Kate Breen, SFMTA
Cathy DeLuca, Walk San Francisco
Joseph Engler, SFPD
Scott Heidohrn, SFPD
Julian Hill, SFPD
Mari Hunter, SFMTA
John Knox White, SFMTA

Janice Li, San Francisco Bicycle Coalition
Karen Li, SFPD
Greg McEachern, SFPD
David Lazar, SFPD
Tom Maguire, SFMTA
Ann Mannix, SFPD
Devan Morris, SFDPH
Tim Oberzeir, SFPD
Kevin O'Donnell, SFPD
Ricardo Olea, SFMTA

Michal Olkiewicz, SFPD
Robert O'Sullivan, SFPD
Daniel Perea, SFPD
Claire Phillips, Controller's Office
James Shahamiri, SFMTA
Leroy Thomas, SFPD
Wesley Villaruel, SFPD
David Weinzimmer, Controller's Office
Megan Wier, SFDPH

In memory of Priscilla "Precy" Moreto

About the Controller's Office

The City Services Auditor (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that was approved by voters in November 2003. CSA is comprised of two units – Audits and City Performance. Under Appendix F to the Charter, CSA has broad authority to:

- Report on the level and effectiveness of San Francisco's public services and benchmark the City to other public agencies and jurisdictions.
- Conduct financial and performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of processes and services.
- Operate a whistleblower hotline and website and investigate reports of waste, fraud, and abuse of city resources.
- Ensure the financial integrity and improve the overall performance and efficiency of city government.

For more information, please contact:

Corina Monzón
Office of the Controller
City and County of San Francisco
(415) 554-5003 | corina.monzon@sfgov.org

or

Joe Lapka
Office of the Controller
City and County of San Francisco
(415) 554-7528 | joe.lapka@sfgov.org

To download the report, visit:
<http://sfcontroller.org/>

To access the district collision maps, visit:
<http://sfcontroller.org/collisiondata>

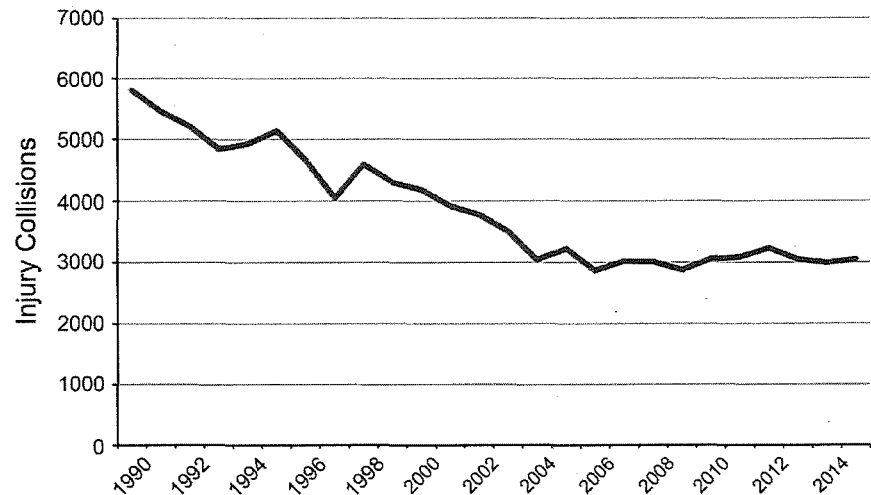
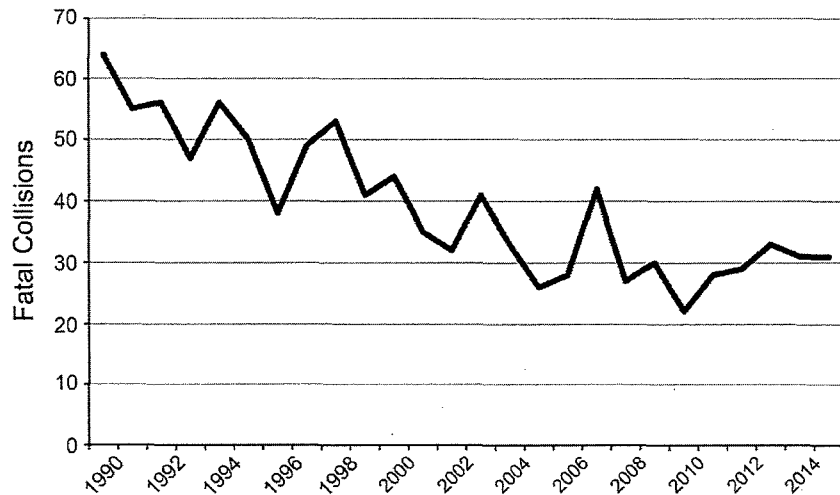
Introduction

According to data from the National Highway Traffic Safety Administration’s National Center for Statistics and Analysis (2016, August), 35,092 people lost their lives in crashes on US roadways in 2015. Although fatalities are down nationally from more than 42,000 ten years ago, the total in 2015 represents an increase of 7.2% over the previous year and this is the largest per-centage increase in nearly 50 years. Even more troubling, the numbers for the first six months of 2016 show an even higher increase (10.4%) from the comparable period in 2015. Locally, the statistics are just as concerning. A recent report from the San Francisco Municipal Transportation Agency (SFMTA) shows that the number of fatal and injury collisions has stagnated since around 2004 following steady decreases throughout the 1990s and early 2000s. Approximately 30 people continue to die on San Francisco’s streets each year and hundreds more are severely

injured. These deaths and injuries are both unacceptable and preventable.

Adopted in 2014, the Vision Zero policy represents the City’s commitment to build safer streets, educate the public on traffic safety, enforce traffic laws, and implement other changes to eliminate traffic deaths by 2024. As we reaffirm our commitment to safe streets through the development of a new two-year plan, now is an opportune time to think critically about what can be done to set the number of fatal and injury collisions back on their downward trend. Accordingly, this report considers how the San Francisco Police Department (SFPD) may refine how it deploys its traffic enforcement resources in support of Vision Zero and how it measures its progress in that regard.

Fatal and Injury Collisions in San Francisco (1990 – 2015)



Data source for charts: Adapted from SFMTA (2016)

Boudette (2016)

Recommendations:

1. The SFPD should seek out opportunities to extend its enforcement presence beyond the HIN so as to create the impression among the driving public that violations of the law, wherever they occur, will be detected. The selection of alternative sites should be data driven and should consider vulnerable populations at sites such as schools and senior centers. The online collision maps we have developed as a companion to this report can be used for such a purpose.
2. The SFPD should modify its Focus on the Five strategy so that it is better suited to the unique environment of each police district and allows for an appropriately varied response to the problem of traffic collisions. We recommend structuring the goal such that:
 - a) each district is individually responsible for meeting its own district-based target; and
 - a) the districts are jointly responsible for a department-wide goal (i.e., 100% of the districts should meet their target each month).
3. In implementing the recommendations of the Department of Justice, the SFPD should utilize the City's Vision Zero Action Strategy as a framework for working collaboratively with the community to understand traffic violence and jointly develop strategies to address it. As appropriate, the SFPD may additionally consider incorporating specific community concerns into its Focus on the Five goals.
4. The SFPD should develop and publicly report on measures related to procedural justice and social equity in traffic enforcement.
5. Consistent with our recommendations that the SFPD broaden the spatial extent of its traffic enforcement activities and the range of illegal behaviors on which it focuses, the SFPD should similarly ensure that the temporal scope of its operations is sufficient to deter illegal driving behaviors at all times throughout the day and over the course of a week.
6. The SFPD should consider the feasibility of measuring the level of effort it dedicates to traffic enforcement if it wishes to further explore the relationship between the level of policing and the rates of traffic collisions or violations in San Francisco.
7. In evaluating the Safe Speeds SF campaign, the City should not only evaluate its effectiveness in reducing average vehicle speeds and the number of speeding vehicles, but it should also evaluate its impact on the SFPD's resources and consider how sustainable the program is over the long term.

continued on next page...

Recommendations:

8. In light of scientific research which shows that effective traffic enforcement programs should be based on proactive rather than reactive measures, and given the proven efficacy of automated speed enforcement in preventing fatal and serious injury collisions, the City and County of San Francisco should continue to advance the use of automated speed enforcement as a tool for encouraging people to drive at safe speeds.

 9. The SFPD should work quickly to implement its eCitation and eStops initiatives, which will enable officers to issue citations electronically and provide for the electronic collection of data on the race and ethnicity of those who are stopped. In implementing these initiatives, the SFPD should work with its Vision Zero partner agencies to ensure the new systems will support quality data analyses.
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Deterrence Theory



The Haddon Matrix

The Haddon Matrix is a model of the human, environmental, and vehicular factors that define the frequency and severity of traffic injuries. The model divides the crash sequence into three phases; the grid cells at the intersection of each crash phase and collision factor represent different opportunities to prevent traffic collisions or mitigate their impacts.

This model highlights the importance of a comprehensive systems approach to preventing traffic fatalities, and it clearly illustrates the important role that enforcement has in encouraging safe behavior on the part of road users.

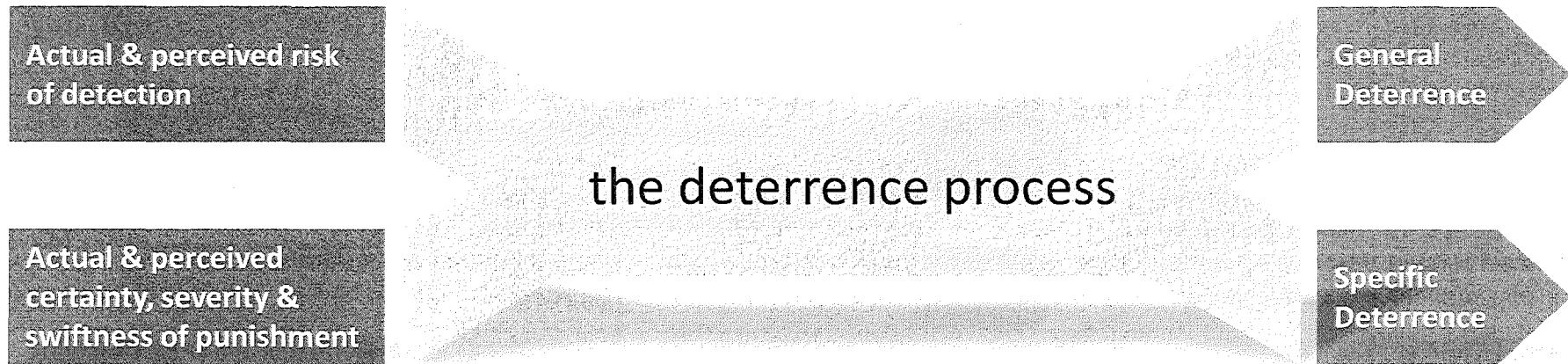
CRASH PHASE		FACTORS		
		HUMAN	VEHICLES & EQUIPMENT	ENVIRONMENT
Pre-Crash	Preventing crashes	<ul style="list-style-type: none"> • Information • Attitudes & behaviors • Police enforcement 	<ul style="list-style-type: none"> • Roadworthiness • Lighting • Braking & handling 	<ul style="list-style-type: none"> • Road design & layout • Speed limits • Pedestrian facilities
Crash	Preventing injuries during a crash	<ul style="list-style-type: none"> • Use of restraints 	<ul style="list-style-type: none"> • Occupant restraints • Other safety devices • Crash-protective design 	<ul style="list-style-type: none"> • Crash-protective roadside objects
Post-crash	Sustaining life	<ul style="list-style-type: none"> • First-aid skill • Access to medics 	<ul style="list-style-type: none"> • Ease of access • Fire risk 	<ul style="list-style-type: none"> • Rescue facilities • Congestion

The Deterrence Effect

The concept of **deterrence** refers to the enforcement of laws and the threat of legal punishment as a way to discourage people from committing illegal acts. The perceived risk of detection is considered one of the most important factors in determining the effectiveness of law enforcement as a means of deterring illegal road behavior. If people believe there is a low probability that

traffic offenses will be detected and punished, it is unlikely that traffic enforcement will have a significant deterrent effect.

It is generally accepted that traffic enforcement results in two types of deterrence: general deterrence and specific deterrence.



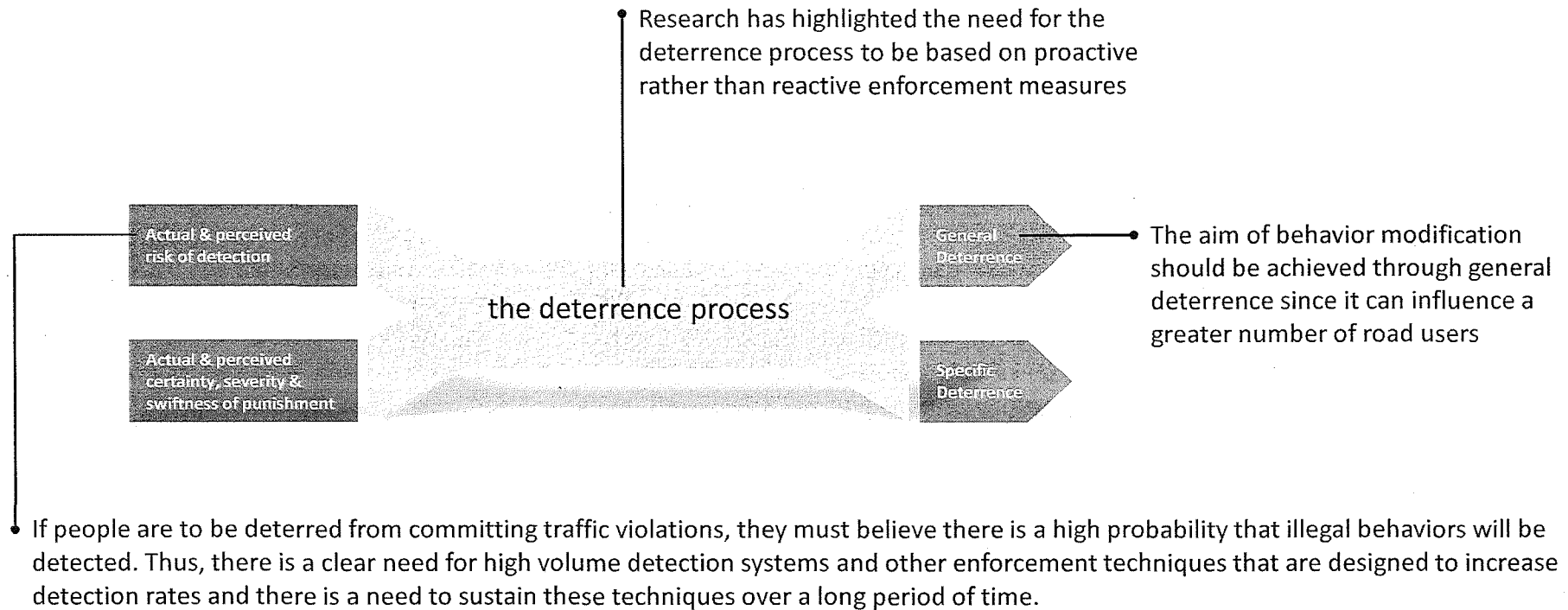
General Deterrence

- Influences the road behavior of the public at large
- Results from high visibility enforcement activities and a belief that there is a real risk of detection and punishment when traffic laws are broken

Specific Deterrence

- Influences the road behavior of convicted offenders due to previous detection and punishment

Research Findings on the Deterrence Effect

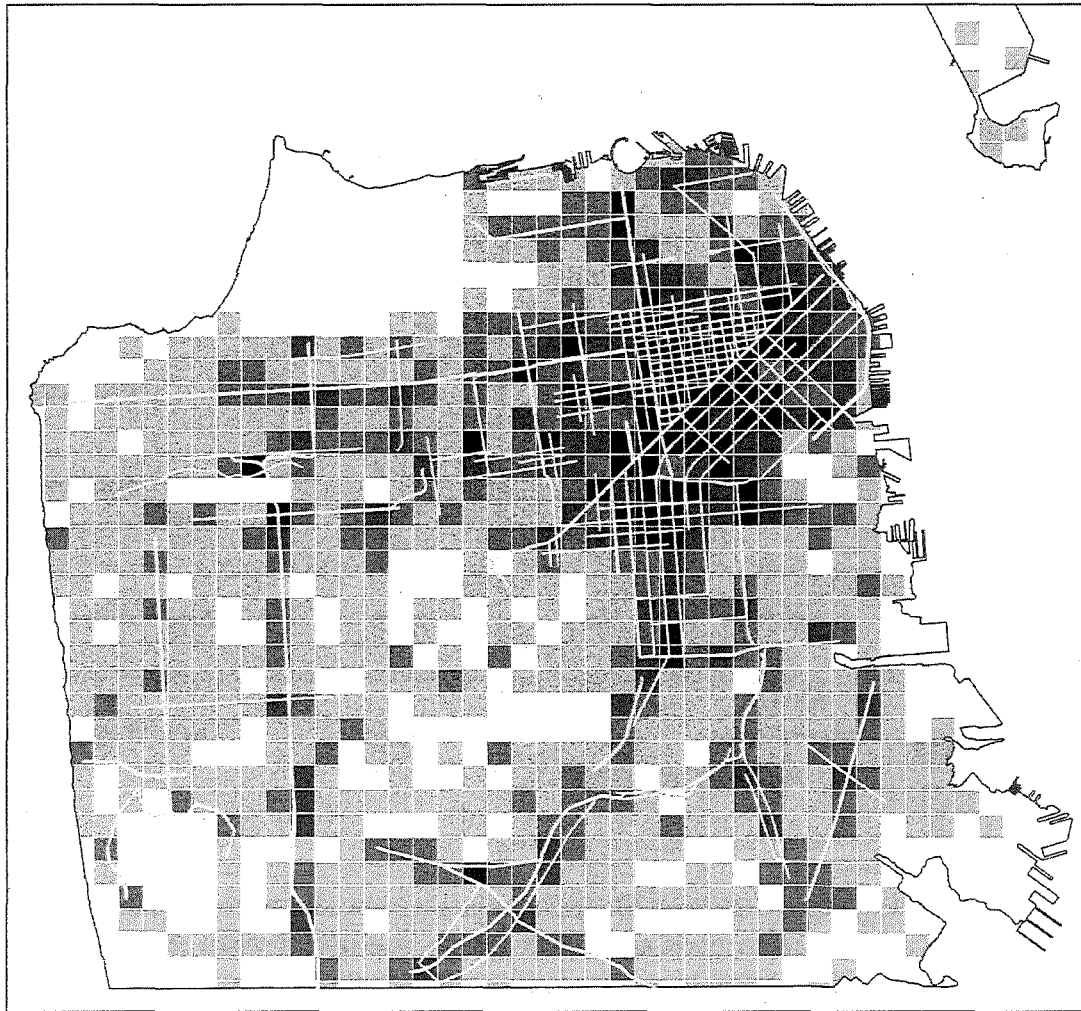


Deterrence theory suggests that traffic enforcement is most effective when the driving public perceives that they are likely to be caught and held accountable. Thus, contemporary interventions to prevent traffic collisions seek to increase the perceived risk of detection of illegal behavior among road users.

Collision Data



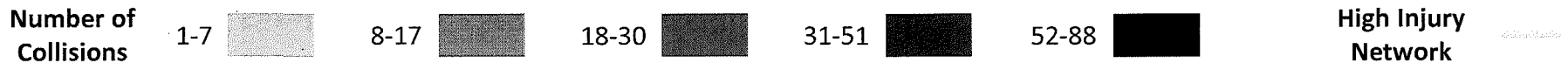
**Collision Data Pertaining to the
Spatial Extent of Enforcement**



Fatal, Severe Injury & Non-severe Injury Collisions (2013-2015)

9,133 fatal, severe injury, and non-severe injury collisions occurred in San Francisco from 2013-2015.

Shown in yellow, the High Injury Network (HIN) was developed using years of data to identify where the most investments in engineering, education and enforcement should be focused to have the biggest impact in reducing fatalities and severe injuries. Accordingly, the SFPD currently focuses its enforcement activities on the locations on the HIN where most collisions occur. While such targeted traffic enforcement at focused locations has been shown to decrease vehicle speeds and the number of speeding vehicles in some situations, the SFPD should be careful not to neglect the majority of the roads that are not part of the HIN and it should avoid concentrating its enforcement operations to such an extent that they become predictable, and thus less effective.

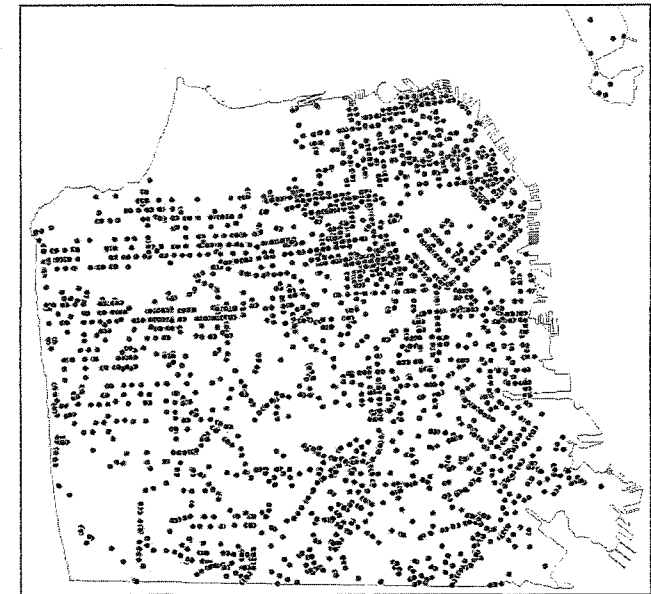


Collision Data Pertaining to the Spatial Extent of Enforcement

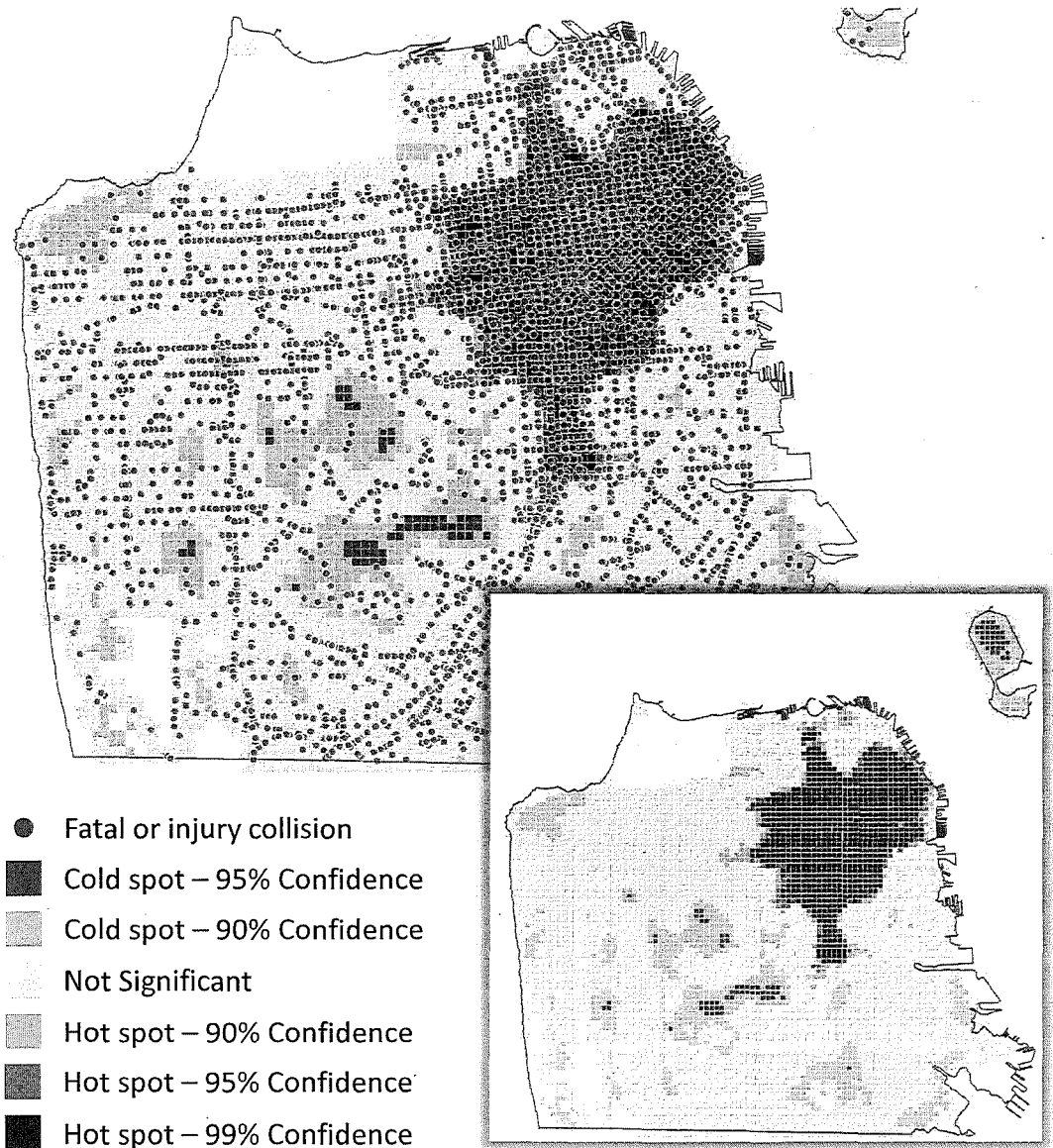
Distribution of Fatal & Injury Collisions (2013-2015)

A sizeable fraction of fatal and injury collisions occur outside of the Vision Zero HIN. The City’s goal of eliminating traffic fatalities by 2024 requires enforcement strategies that deter illegal and unsafe driving behaviors not only on the 12% of city streets that make up the HIN but everywhere throughout the City.

Road Segment	Collision Severity			
	Fatal	Severe Injury	Non-severe Injury	All Fatal & Injury
High Injury Network	60% 56	64% 386	61% 5,129	61% 5,571
Non-High Injury Network	39% 37	35% 209	38% 3,247	38% 3,493
Unknown	1% 1	1% 4	1% 64	1% 69
	100% 94	100% 599	100% 8,440	100% 9,133



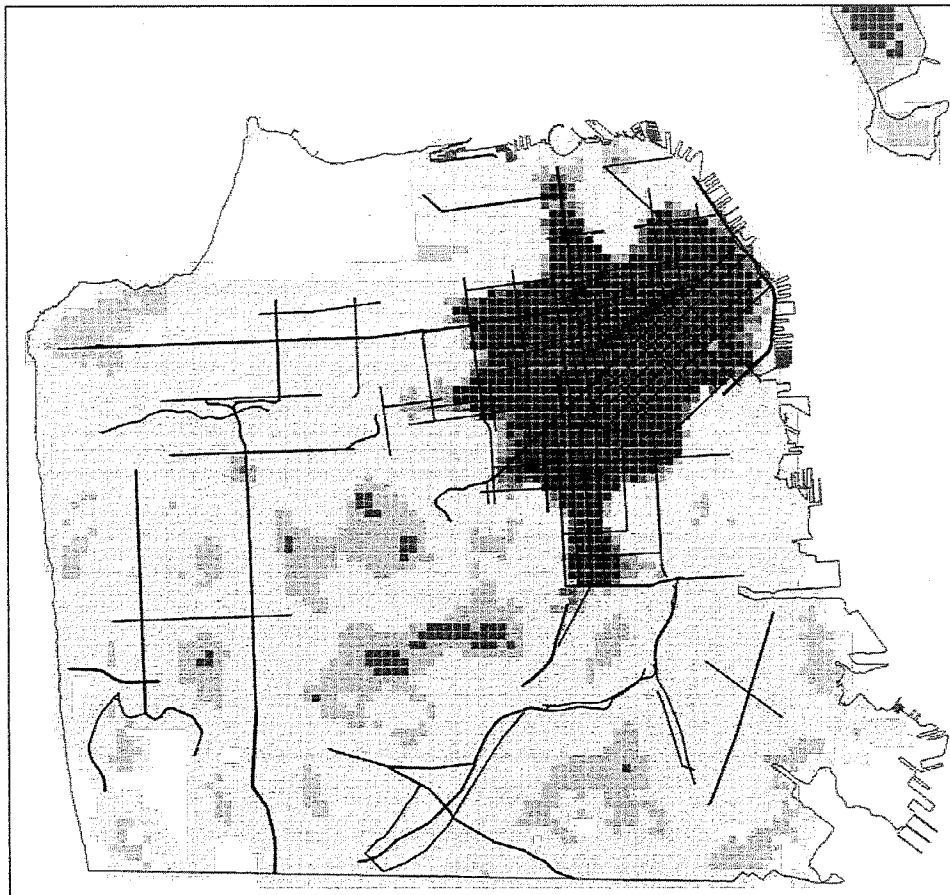
● Collisions not on the HIN



Hot Spot Analysis (2013-2015)

A hot spot analysis further illustrates the rationale for potentially broadening the scope of enforcement beyond the HIN.

In a hot spot analysis, the city is divided into a grid and statistical tests are used to determine if the number of collisions in each grid cell is higher or lower than would be expected if the collisions were randomly distributed. Areas shaded in red have significantly more collisions than expected and areas shaded in blue have significantly fewer collisions than expected. The confidence level signifies how certain we can be about these estimates. For example a confidence level of 99% means that there is only 1 in 100 chance that the observed number of collisions at a particular location could have occurred randomly. Areas shaded in gray do not have a statistically significant number of collisions (either high or low).



Hot Spot Results with the High Injury Network (2013-2015)

Based on the 2013-2015 data, our analysis reveals a large hot spot in the upper right quadrant of the city. Note that portions of the HIN lie in areas that, from a statistical standpoint, do not have an unexpectedly high or low number of incidents.¹

It is also necessary to consider the practical reality that not every site within the road network lends itself to manned enforcement operations. Given this, and the fact that the HIN comprises only 12% of the City's streets, too great a focus on the HIN could lead to operations that are predictable, and thus less effective. This leads us to the following conclusion:

Recommendation 1

The SFPD should seek out opportunities to extend its enforcement presence beyond the HIN so as to create the impression among the driving public that violations of the law, wherever they occur, will be detected. The selection of alternative sites should be data driven and should consider vulnerable populations at sites such as schools and senior centers. The online collision maps we have developed as a companion to this report can be used for such a purpose.

Notes: 1. While portions of the HIN are not within the statistically significant hot spots shown here, much of the HIN is within the large hot spot in the northeast quadrant of the City. Furthermore, it is also important to keep in mind that the HIN was developed using a different methodology that considered corridor level patterns.

Research Findings

Our recommendation that the SFPD seek to broaden the spatial scope of its enforcement activities is supported by a wide body of research in the field of traffic policing and crash prevention:

Traffic Law Enforcement: A Review of the Literature

Zaal, 1994, p. ix

“Traditional vehicle based enforcement methods should focus on increasing the visibility and **unpredictability** of traffic policing operations.” [emphasis added]

The Effectiveness of Traffic Policing in Reducing Traffic Crashes

Bates, Soole & Watson, 2012, p. 99

“While it has typically been argued that operations should predominantly target peak times and locations, the importance of random operations at non-peak times and locations has also been identified as essential to facilitating the unpredictability of enforcement efforts. **The development of effective programmes can also be optimized by adopting intelligence-led enforcement strategies, although this should not result in enforcement operations that are predictable.**” [emphasis added]

Methodological Approach to Spatiotemporal Optimization of Rural Freeway Enforcement in Florida

Carrick, Bejleri & Ouyang, 2014, p. 8

“A problem-oriented approach would identify times and locations where the number or rate of crashes was highest and then apply traffic enforcement to that location, much like hot spot identification. There is a role for such special enforcement efforts, **but to dedicate all resources in that way would neglect the realities of patrol allocation...and the value of general deterrence.**” [emphasis added]

Research Findings

Additional conclusions from the Transportation Research Board (TRB) of the National Academy of Sciences:

***A Guide for Addressing
Unsignalized Intersection
Collisions***

TRB 2003, p. V-95

“The major potential difficulty with a program [involving targeted enforcement to reduce stop sign violations] is the **potential for diverting police officers from more productive work if the locations for stop sign enforcement are not selected carefully.**” [emphasis added]

***A Guide for Reducing
Speeding-Related Crashes***

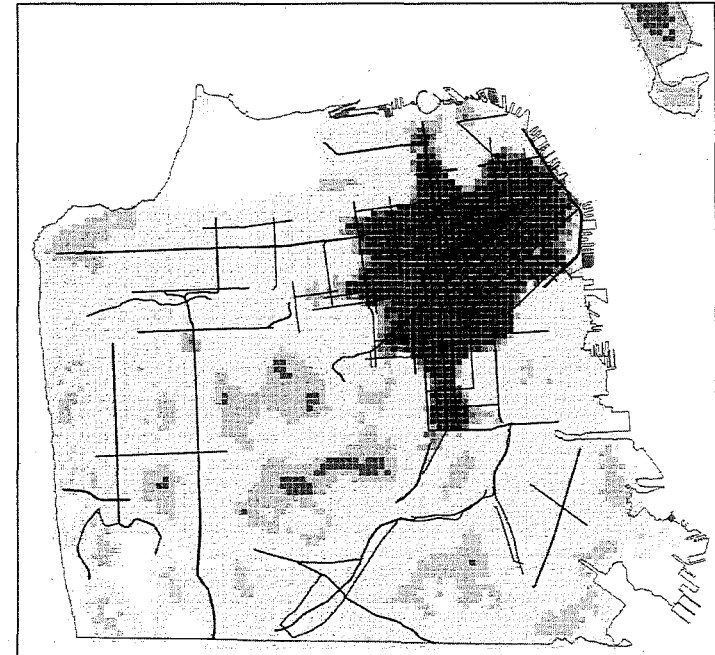
TRB 2009, p. V-30

“...the deterrent effect of law enforcement presence is often location specific for **most drivers on urban roads (less than 40 mph)**, in that they decrease travel speeds at locations where they know or think law enforcement might be present (based on previous experiences), but speed up after the enforcement zone. This can have a negative impact, as drivers may choose to travel different routes where law enforcement presence is less common. **This emphasizes the importance of reevaluating the areas in need of law enforcement on a regular basis. As drivers choose different routes, based on law enforcement presence, speeding may become an issue at other locations. This should be monitored and adjustments in enforcement made as needed.** This also indicates a need for a greater number of law enforcement, if an area-wide problem exists.” [emphasis added]

A Note about the High Injury Network

Although we recommended earlier that the SFPD seek out opportunities to expand its enforcement presence beyond the HIN where it is reasonable to do so, we wish to emphasize the important role that the HIN has played over the last several years and should continue to play with respect to traffic enforcement and the other components of the Vision Zero strategy.

As previously mentioned, the HIN was developed by the San Francisco Department of Public Health in collaboration with the SFMTA based on several years of data in order to identify corridors with high concentrations of injuries to road users of all types.¹ The resulting network is particularly useful in identifying specific locations in the road network that can benefit from safety improvements, in ascertaining the nature of the necessary improvements, and in prioritizing the work to be done. However, the road improvements that we implement to prevent traffic collisions must by their very nature be installed at fixed locations. In contrast, enforcement-related safety measures seek to deter dangerous, and often deadly, behaviors that can occur virtually anywhere road users may travel.



From an enforcement perspective, the data presented in this section show that to a certain extent, traffic collisions represent an area-wide problem, which demands an area-wide solution. That said, many parts of the HIN include corridors where high volumes of drivers, bicyclists, and pedestrians come together in close proximity and our point is not to dissuade the SFPD from deploying its resources there. Rather, our intent simply is to encourage the SFPD to think creatively about how it can vary its operations so as to maximize the general deterrent effect of enforcement on the HIN and everywhere else.

Notes: 1. The HIN was initially developed with data through 2012 and it is currently being updated with data through 2015.

**Collision Data Pertaining
to Dangerous Road
User Behaviors**

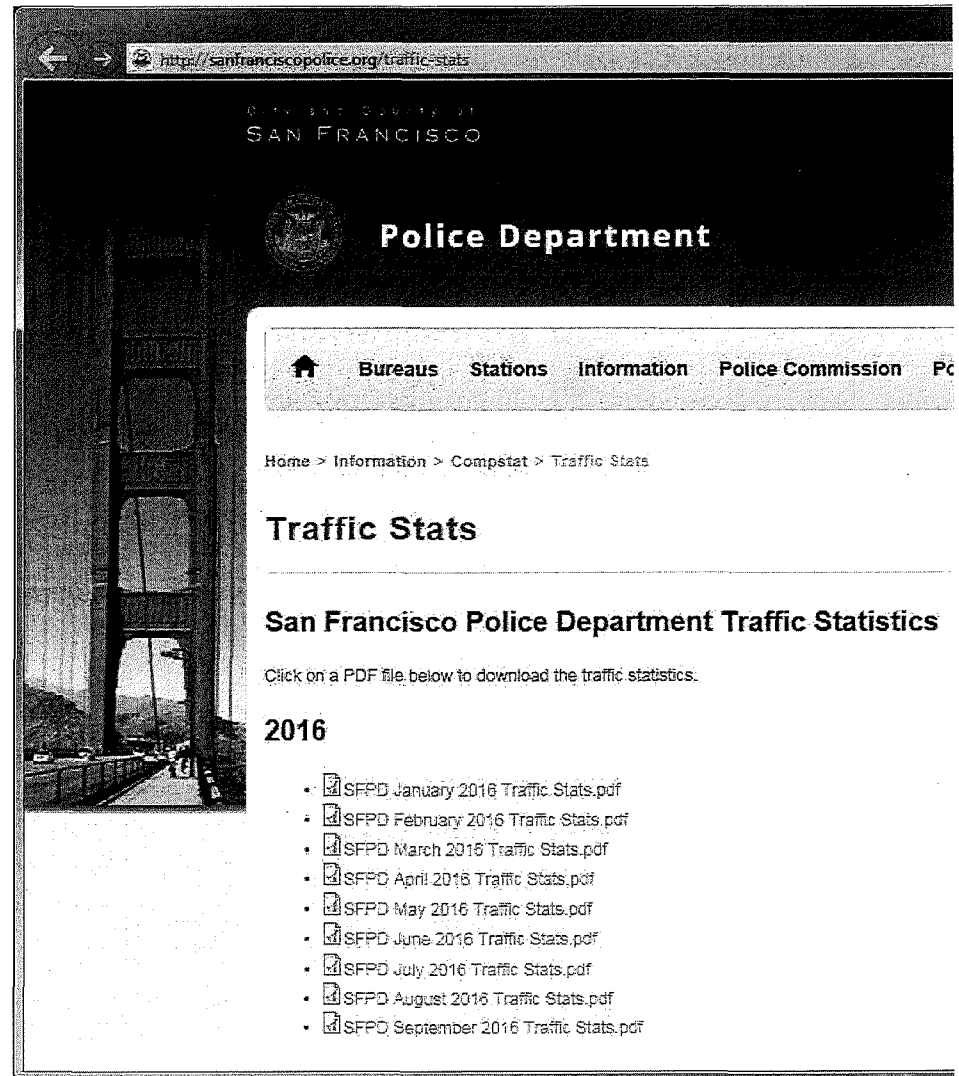
Adoption of Focus on the Five

In 2012, the SFMTA analyzed collision data over a five year period and found that the top five causes of collisions in the City were:

- Driving at an unsafe speed for the conditions of the roadway,
- Vehicular failure to stop at a limit line, crosswalk, or intersection at a red light,
- Failure to yield to pedestrians at a crosswalk,
- Failure to yield while making a left or U-turn, and
- Failure to stop before the limit line, crosswalk, or intersection at a STOP sign.

Based on this analysis, the SFPD adopted a strategy known as Focus on the Five, which established a goal that half of its citations be for one of these five violations.

The SFPD publishes monthly traffic statistics on its website at <http://sanfranciscopolice.org/traffic-stats>.



The screenshot shows a web browser window with the URL <http://sanfranciscopolice.org/traffic-stats>. The page header includes the City and County of San Francisco logo and the text "Police Department". A navigation menu contains links for "Bureaus", "Stations", "Information", "Police Commission", and "PC". The breadcrumb trail reads "Home > Information > Compstat > Traffic Stats". The main heading is "Traffic Stats". Below this, the text reads "San Francisco Police Department Traffic Statistics" and "Click on a PDF file below to download the traffic statistics." Under the heading "2016", there is a list of nine PDF files for each month from January to September.

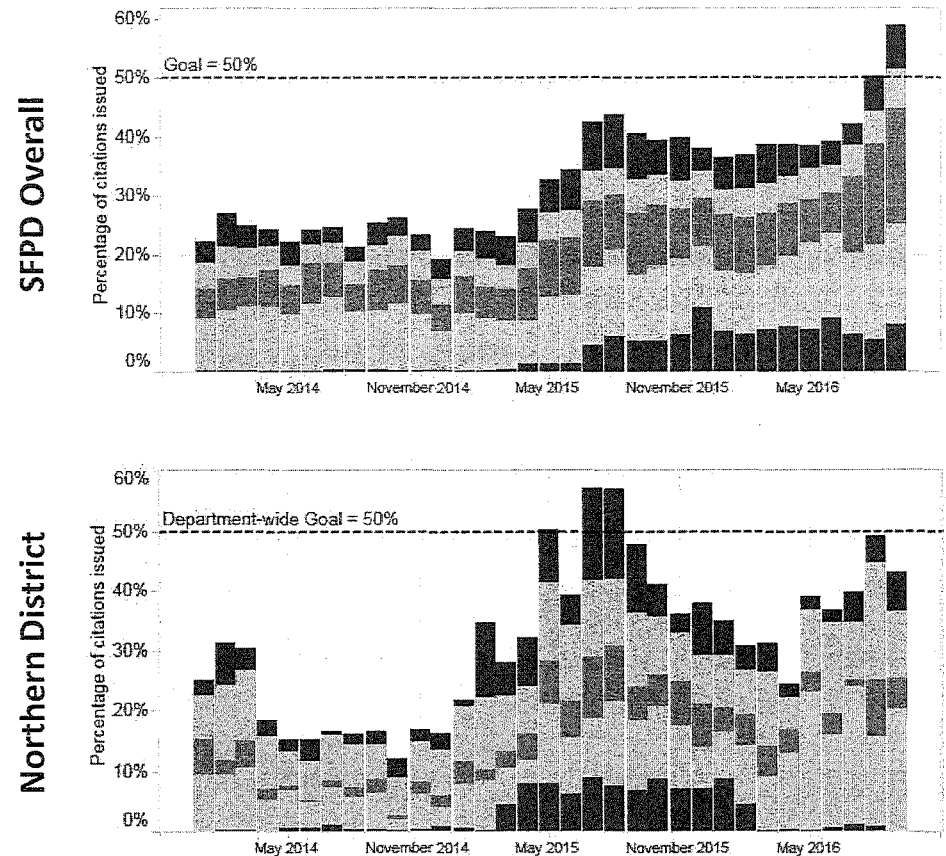
Month	File Name
January	SFPD January 2016 Traffic Stats.pdf
February	SFPD February 2016 Traffic Stats.pdf
March	SFPD March 2016 Traffic Stats.pdf
April	SFPD April 2016 Traffic Stats.pdf
May	SFPD May 2016 Traffic Stats.pdf
June	SFPD June 2016 Traffic Stats.pdf
July	SFPD July 2016 Traffic Stats.pdf
August	SFPD August 2016 Traffic Stats.pdf
September	SFPD September 2016 Traffic Stats.pdf

Benefits and Limitations of the Focus on the Five Strategy

Data gathered over the course of our analysis suggest that the Focus on the Five campaign has played an important role in encouraging the SFPD to direct more of its traffic enforcement resources toward road user behaviors that result in severe injury or death. This focus has no doubt improved the safety of our streets. At the same time, however, performance data published on a monthly basis by the Controller’s Office reveals that while a few individual police districts have had success in attaining this goal, other districts and the SFPD as a whole have struggled to meet it.

The SFPD’s general inability to meet this goal is not for a lack of effort – the department has maintained a firm commitment to Focus on the Five for the last several years and the number of traffic citations it has issued has remained relatively steady in the last couple of years (129,597 citations were issued in 2014 and 120,133 were issued in 2015). Rather, it is possible that the difficulty the SFPD has had meeting this goal is due to limitations that are inherent to the goal itself. Most notably, the multitude of factors that contribute to collisions (e.g., road characteristics and conditions, traffic controls, traffic speeds, traffic and pedestrian volumes, and a variety of human-related factors) are not necessarily the same from one police district to another. The Tenderloin police district serves as a simple example of these differences. With a single STOP sign in the entire district, officers who work in the Tenderloin are unlikely to issue a large number of citations for that Focus on the Five component.

Percentage of “Focus on the Five” Citations¹



Notes: 1. Effective September 2016, the percentage of citations for the top five causes of collisions is calculated as a percentage of traffic citations. Before September 2016, this calculation was as a percentage of all citations.

Sharpening the Focus on the Five

In the book *Policing and Security in Practice: Challenges and Achievements* (2012), experts in the field of policing and traffic collisions stress two important points related to the nature of traffic enforcement:

“...there is increasing awareness that paying attention to causes lends credence to the need for a varied response to crime so that actions taken are fit for their purpose and are more likely to have an effect.” [emphasis added]

“...enforcement operations need to be tailored to the specific driving context and driving environment, such that a ‘one-size-fits-all’ approach is unlikely to be effective.” [emphasis added]

In its current form, the Focus on the Five strategy largely is a one-size-fits-all approach that unnecessarily constrains officers to focusing on a limited set of driving behaviors, which do not necessarily correspond to the main causes of collisions in their own districts. Based on the insights above and other findings in the body of research on effective policing, we recommend that the SFPD modify its Focus on the Five strategy so that it is better suited to the unique environment of each police district and allows for an appropriately varied response to the problem of traffic collisions.

Recommendation 2

The SFPD should modify its Focus on the Five strategy so that it is better suited to the unique environment of each police district and allows for an appropriately varied response to the problem of traffic collisions.

Methodology for Identifying Priority Behaviors in each District

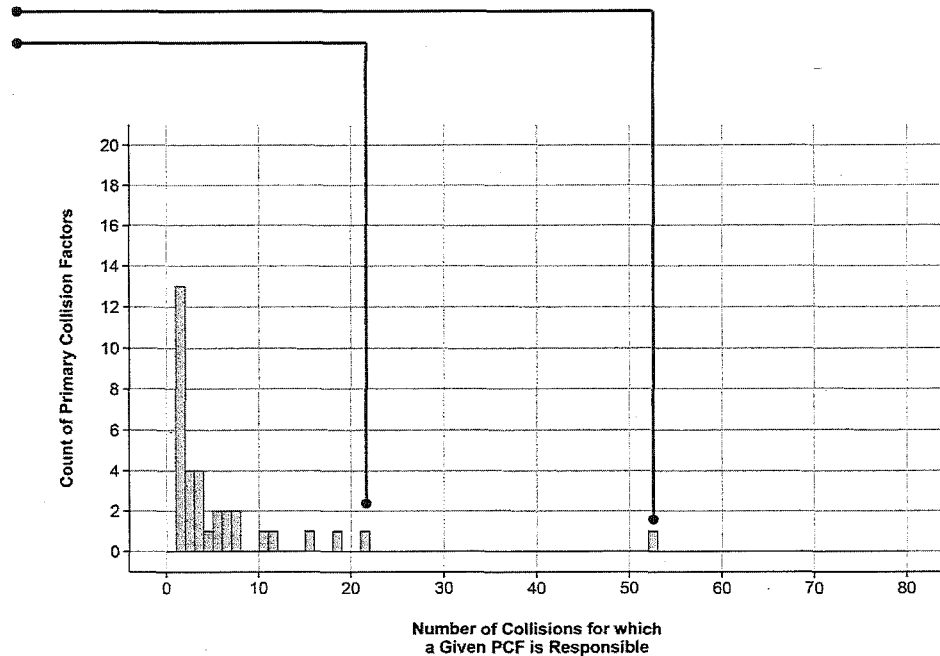
- 1 Count the number of fatal and injury collisions (excluding collisions involving only a complaint of pain) for which each primary collision factor (PCF) is responsible and rank order them

Example: Bayview Police District

Tabular Format

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	52
22107	Unsafe turn or lane change prohibited	21
21950(a,c)	Driver to yield right-of-way at crosswalks	18
23152	Driving under the influence of alcohol or drug	15
21453(a,c)	"Red" signal - vehicular responsibilities	12
22450(a)	Failure to stop at STOP sign	10
21801(a,b)	Violation of right-of-way - left turn	7
21955	Crossing between controlled intersections (Jaywalking)	7
21658(a,b)	Lane straddling/failure to use specified lanes	6
21802(a,b)	Violation of right-of-way - entering through highway	6
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	5
22106	Unsafe starting or backing on highway	5
21453(d)	"Red" signal - pedestrian responsibilities	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	3
21650	Failure to keep to right side of road	3

Graphical Format



Methodology for Identifying Priority Behaviors in each District

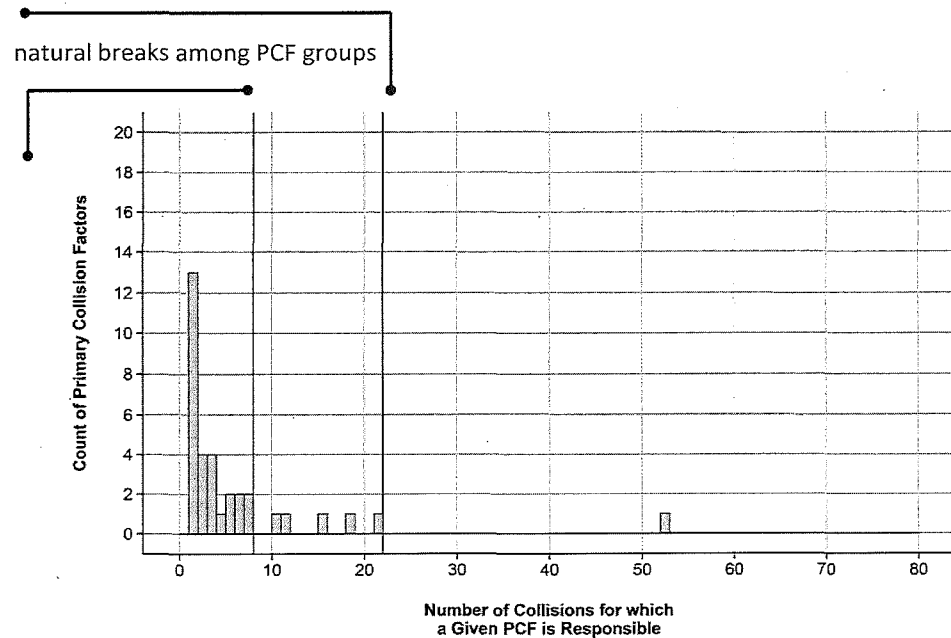
- 2 Perform a data clustering analysis to determine the best arrangement of these values into three different groups (high, medium, low prevalence) using a method known as “Jenks natural breaks optimization”

Example: Bayview Police District

Tabular Format

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	52
22107	Unsafe turn or lane change prohibited	21
21950(a,c)	Driver to yield right-of-way at crosswalks	18
23152	Driving under the influence of alcohol or drug	15
21453(a,c)	"Red" signal - vehicular responsibilities	12
22450(a)	Failure to stop at STOP sign	10
21801(a,b)	Violation of right-of-way - left turn	7
21955	Crossing between controlled intersections (Jaywalking)	7
21658(a,b)	Lane straddling/failure to use specified lanes	6
21802(a,b)	Violation of right-of-way - entering through highway	6
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	5
22106	Unsafe starting or backing on highway	5
21453(d)	"Red" signal - pedestrian responsibilities	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	3
21650	Failure to keep to right side of road	3

Graphical Format



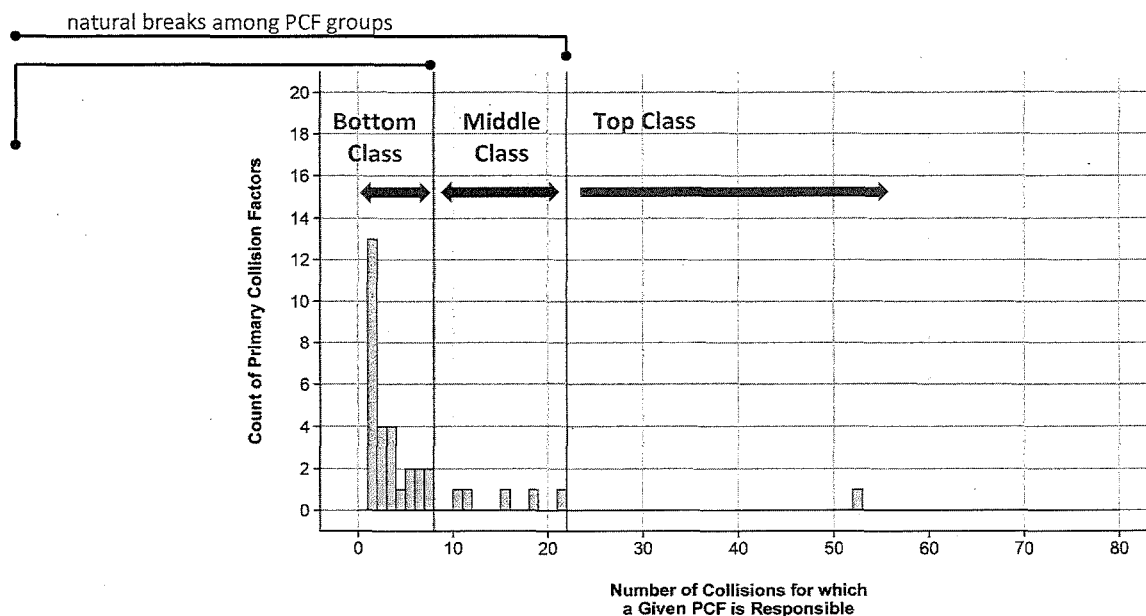
Methodology for Identifying Priority Behaviors in each District

After counting the number of collisions for which each collision factor is responsible (step 1 of our analysis), the question still remains as to where the SFPD should focus its efforts. For example, should the SFPD focus on the top factor alone or should it focus on additional factors in the list? Also, if the SFPD should focus on more than just the top factor, how far down the list should it go?

The purpose of the Jenks natural breaks optimization (step 2 of the analysis) is to divide the data into three groups or “classes” such that each class contains data points with similar values. In the case of the Bayview District (shown below), the top class is

comprised of one primary collision factor (listed in the table as “Unsafe speed for prevailing conditions”), while the middle class is comprised of five other primary collision factors. The resulting classes from this analysis are indicative of the relative significance of the various factors in each district. In this case, we are recommending that the SFPD focus on the primary collision factors that fall in the top two classes in each district in order to maximize the safety benefits of its traffic enforcement efforts. Pages 33 through 43 contain charts that show the percentage of collisions comprised by the top two classes in each police district.

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	52
22107	Unsafe turn or lane change prohibited	21
21950(a,c)	Driver to yield right-of-way at crosswalks	18
23152	Driving under the influence of alcohol or drug	15
21453(a,c)	"Red" signal - vehicular responsibilities	12
22450(a)	Failure to stop at STOP sign	10
21801(a,b)	Violation of right-of-way - left turn	7
21955	Crossing between controlled intersections (Jaywalking)	7
21658(a,b)	Lane straddling/failure to use specified lanes	6
21802(a,b)	Violation of right-of-way - entering through highway	6
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	5
22106	Unsafe starting or backing on highway	5
21453(d)	"Red" signal - pedestrian responsibilities	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	3
21650	Failure to keep to right side of road	3



Collision Data Pertaining to Dangerous Road User Behaviors

Results of PCF Clustering Analysis (2013-2015; fatal and injury collisions excluding those with only a complaint of pain)

The table below summarizes the results of our district-level PCF analysis.¹ The cells shaded in blue represent the primary collision factors that emerged from the clustering analysis in the top two classes for each district.² Compared to the current Focus on the

Five strategy, the potential number of priority primary collision factors has expanded in all districts. Some districts, like the Central and Tenderloin have as many as twelve priority PCFs.

PCF	Description	District ¹										Count
		Bayview	Central	Ingleside	Mission	Northern	Park	Richmond	Southern	Taraval	Tenderloin	
22350	Unsafe speed for prevailing conditions	x	x	x	x	x	x	x	x	x	x	10
21950(a,c)	Driver to yield right-of-way at crosswalks	x	x	x	x	x	x	x	x	x	x	10
21453(a,c)	"Red" signal - vehicular responsibilities	x	x	x	x	x	x	x	x	x	x	10
22107	Unsafe turn or lane change prohibited	x	x	x	x	x	x	x	x	x	x	10
23152	Driving under the influence of alcohol or drug	x	x	x	x	x		x	x	x		8
21801(a,b)	Violation of right-of-way - left turn		x	x	x	x		x	x	x		7
22517	Opening door on traffic side when unsafe		x		x	x		x	x		x	6
21658(a,b)	Lane straddling/failure to use specified lanes		x				x	x	x	x	x	6
21955	Crossing between controlled intersections (Jaywalking)		x		x		x		x		x	5
21954(a)	Pedestrians must yield right-of-way outside of crosswalks		x		x				x	x	x	5
22450(a)	Failure to stop at STOP sign	x		x		x				x		4
22106	Unsafe starting or backing on highway		x				x				x	3
21703	Following too closely prohibited						x			x		2
21802(a,b)	Violation of right-of-way - entering through highway							x		x		2
21453(d)	"Red" signal - pedestrian responsibilities					x					x	2
21950(b)	Pedestrian right-of-way at crosswalks regulated		x								x	2
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals										x	1
22101(d)	Violating special traffic control markers								x			1
Count		6	12	7	9	9	8	9	11	11	12	

Notes: 1. San Francisco is comprised of ten police districts. See Appendix A for a map of the SFPD district boundaries.
 2. See Appendix D for district-level data regarding the number of collisions associated with each of these factors.

Aligning the Results of the PCF Clustering Analysis with Vision Zero Principles and the Effective Use of Traffic Enforcement Resources

Vision Zero SF represents a commitment by the City and our community partners to end traffic fatalities and ensure the safety of all road users regardless of characteristics such as income level, race, ethnicity, age, gender, or ability. Inherent in our promise to protect the right that every individual has to move safely through the City is a closely held value of *social equity* – a term that, in its broadest sense, “denotes the spirit and the habit of fairness, justness, and right dealing” with others. A separate but related concept is that of procedural justice, which suggests that how people regard the justice system depends more on the perceived fairness of the *process* rather than to the perceived fairness of the actual *outcome*. Therefore as we proceed in our current efforts to achieve the Vision Zero goal and as we devise new strategies in pursuit of it, we should consider whether these efforts promote a procedurally just system and we ought to ask ourselves a question that David Hart (then a professor of business ethics at the University of Washington) posed more than 40 years ago: “Does this service enhance social equity?”

Nowhere is this question more relevant today than in the field of law enforcement. At first glance the analysis of primary collision factors presented on the preceding page may seem at odds with it – specifically, the results of our clustering analysis include pedestrian violations in seven out of the ten police districts including the Central, Mission, and Tenderloin districts, which have higher concentrations of disadvantaged populations than other areas of the City. At a national level, our jails already have a higher percentage of racial minorities and low-income, homeless, and mentally ill people than are found in the general community and in

no way are we suggesting that the SFPD should take actions that would further criminalize these populations. To do so would undoubtedly cause more harm than good and it certainly would not enhance social equity or help achieve Vision Zero.

As explained in a 2016 study by Fleisher, Wier, and Hunter, Vision Zero is a road safety policy that seeks to eliminate fatalities and serious injuries for all modes of transportation. This policy approach is based on the fundamental premise that we cannot prevent all collisions from occurring, but we can reduce the risk of chronic health impairment or death by addressing three key elements of the road system – roads and roadsides, vehicles, and speed. Fleisher, Wier, and Hunter go on to explain that Vision Zero is also notable in part for its perspective on the issue of responsibility for road safety. Whereas the responsibility for road safety has traditionally been placed on individual road users, Vision Zero emphasizes the role that engineers, public health officials, and other system designers have in implementing countermeasures to ensure that the road network is inherently safer. With this perspective in mind and in light of the aforementioned considerations around equity and procedural justice, the ongoing efforts of the SFPD to build greater trust with the community, and the research presented earlier on general deterrence, we believe it would be inappropriate to incorporate pedestrian related offenses of the Vehicle Code into an enforcement related goal. Instead, we encourage the City and the Vision Zero community to pursue other education, engineering and policy interventions that can more effectively address these issues.

Further Expansion of the Priority Behaviors Beyond the Clustering Analysis

The data clustering analysis presented earlier identifies the most pertinent collision factors in each district based on the last three years of available data. Although we just explained why the pedestrian related factors should not be incorporated into an enforcement related goal, there are other reasons that the list of behaviors on which the SFPD focuses should be expanded beyond what emerged from our analysis. For example, driving under the influence of alcohol or drugs (CVC § 23152) appears in the top two groups of primary collision factors in eight out of the ten police districts but this is a behavior which the SFPD ought to deter everywhere. Furthermore, texting while driving (CVC § 23123.5(a)) and talking on the phone with a non-hands free device (CVC § 23123(a)) are technically not considered to be

primary collision factors for statewide collision investigation and reporting purposes so these behaviors do not appear in the collision data but we nevertheless know that they contribute to collisions. According to data from the National Highway Traffic Safety Administration, for example, ten percent of fatal crashes and eighteen percent of injury crashes in 2014 were reported as distraction affected crashes. As the result, the SFPD should unquestionably continue its efforts to curb these dangerous behaviors.

The table on the following page reflects a revised set of district-specific factors based on these considerations and the discussion on page 30.

Recommended Collision Factors and Vehicle Code Violations for Focused Enforcement

Based on the foregoing analysis and considerations, we recommend that the SFPD focus its enforcement efforts on the following factors in each respective district. The pie charts in the pages that follow show that by focusing on this relatively small

set of factors, the SFPD can address the underlying cause of a significant portion of the collisions that have occurred in the three-year period under study.

PCF	Description	District ¹									
		Bayview	Central	Ingleside	Mission	Northern	Park	Richmond	Southern	Taraval	Tenderloin
● 22350	Unsafe speed for prevailing conditions	x	x	x	x	x	x	x	x	x	x
● 21950(a,c)	Driver to yield right-of-way at crosswalks	x	x	x	x	x	x	x	x	x	x
● 21453(a,c)	"Red" signal - vehicular responsibilities	x	x	x	x	x	x	x	x	x	x
22107	Unsafe turn or lane change prohibited	x	x	x	x	x	x	x	x	x	x
23152	Driving under the influence of alcohol or drug	x	x	x	x	x	x	x	x	x	x
● 21801(a,b)	Violation of right-of-way - left turn		x	x	x	x		x	x	x	
22517	Opening door on traffic side when unsafe		x		x	x		x	x		x
21658(a,b)	Lane straddling/failure to use specified lanes		x				x	x	x	x	x
● 22450(a)	Failure to stop at STOP sign	x		x		x				x	
22106	Unsafe starting or backing on highway		x				x				x
21703	Following too closely prohibited						x			x	
21802(a,b)	Violation of right-of-way - entering through highway							x		x	
22101(d)	Violating special traffic control markers								x		
23123(a)	Driving while using a wireless telephone not configured for hands-free use	x	x	x	x	x	x	x	x	x	x
23123.5(a)	Driving while using a wireless device to send, read, or write text communication unless the device is used in a hands-free and voice-operated manner	x	x	x	x	x	x	x	x	x	x
	Count	8	11	9	9	10	10	11	11	12	10

● Current Focus on the Five Factors



Factors resulting from the clustering analysis²

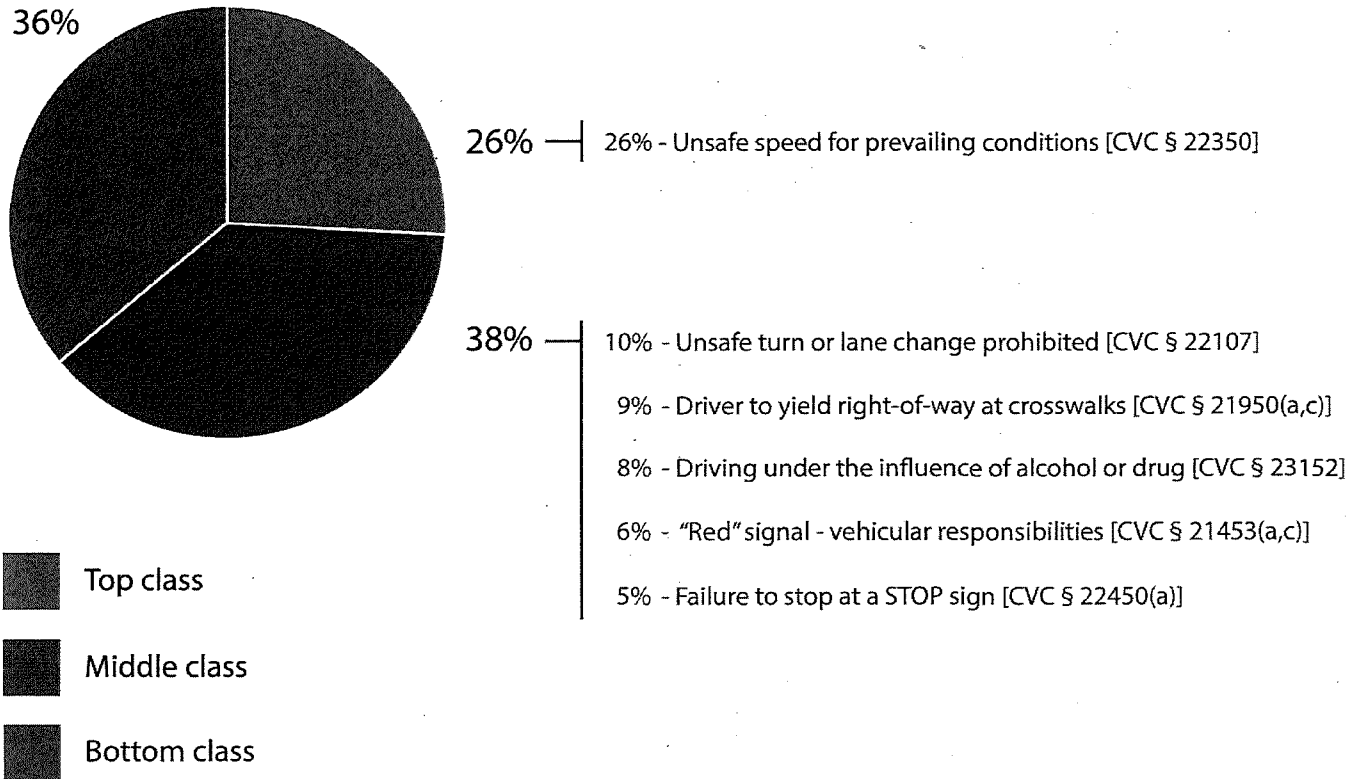


Expanded factors

Notes: 1. San Francisco is comprised of ten police districts. See Appendix A for a map of the SFPD district boundaries.
 2. See Appendix D for district-level data regarding the number of collisions associated with each of these factors.

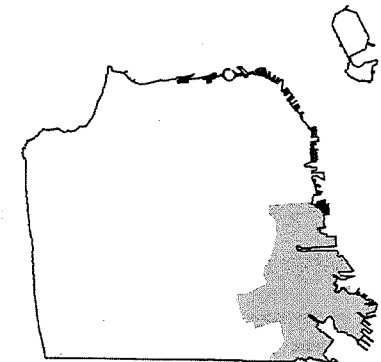
Distribution of the Primary Collision Factors in the Bayview District

The top two classes of collision factors¹ account for 64% of collisions with known primary factors^{2,3}



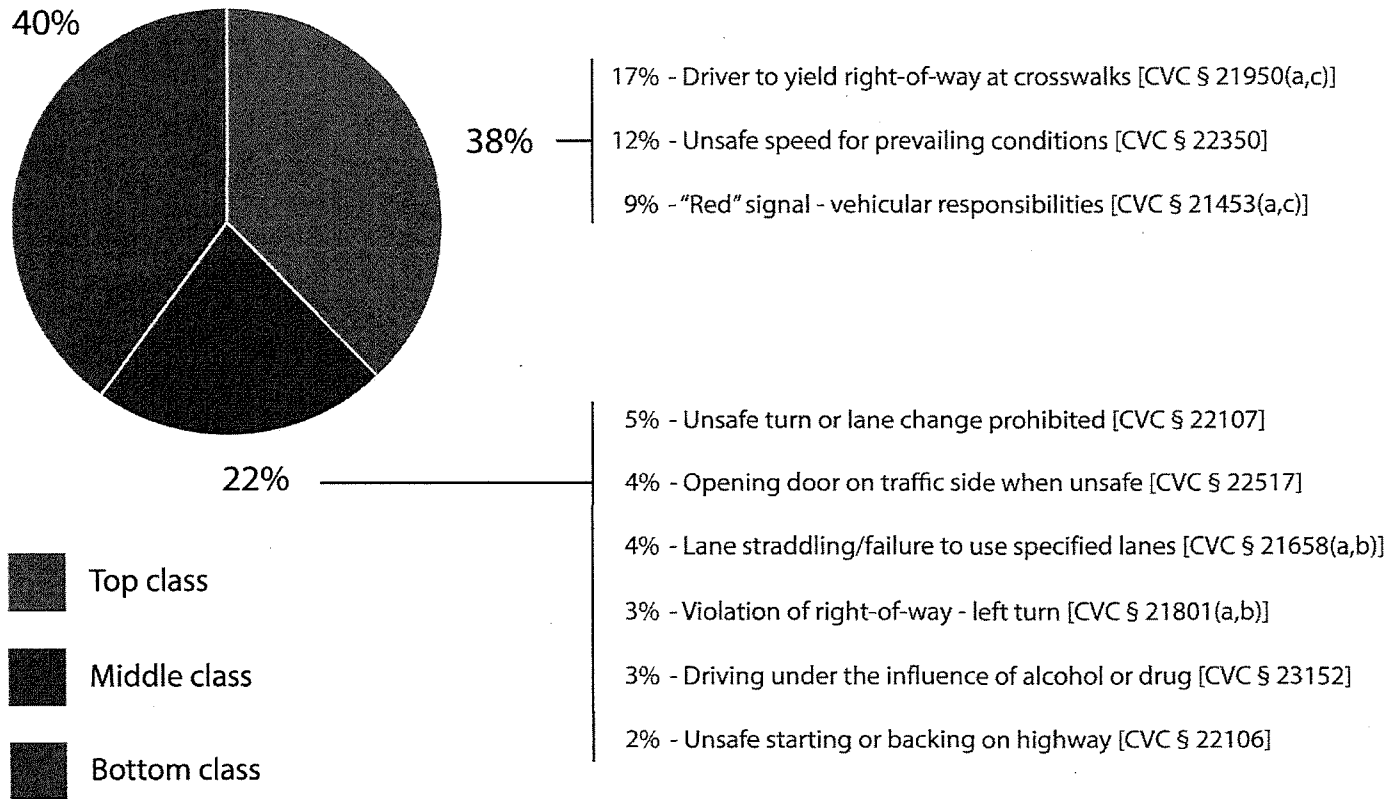
- Top class
- Middle class
- Bottom class

- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding

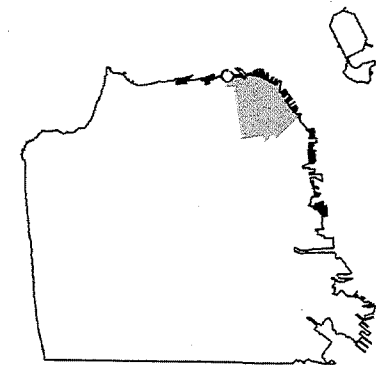


Distribution of the Primary Collision Factors in the Central District

The top two classes of collision factors¹ account for 60% of collisions with known primary factors^{2,3}

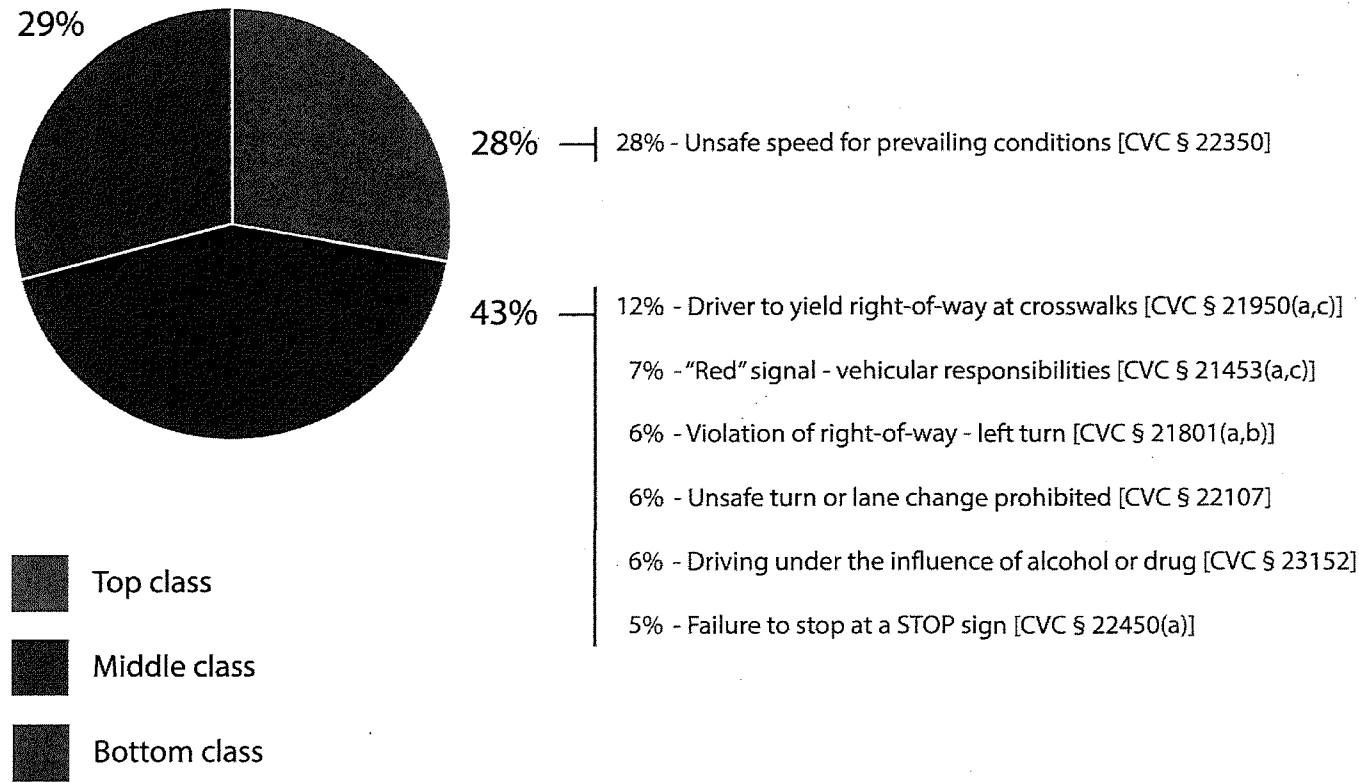


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding

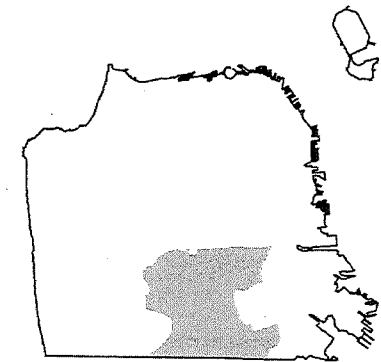


Distribution of the Primary Collision Factors in the Ingleside District

The top two classes of collision factors¹ account for 71% of collisions with known primary factors^{2,3}

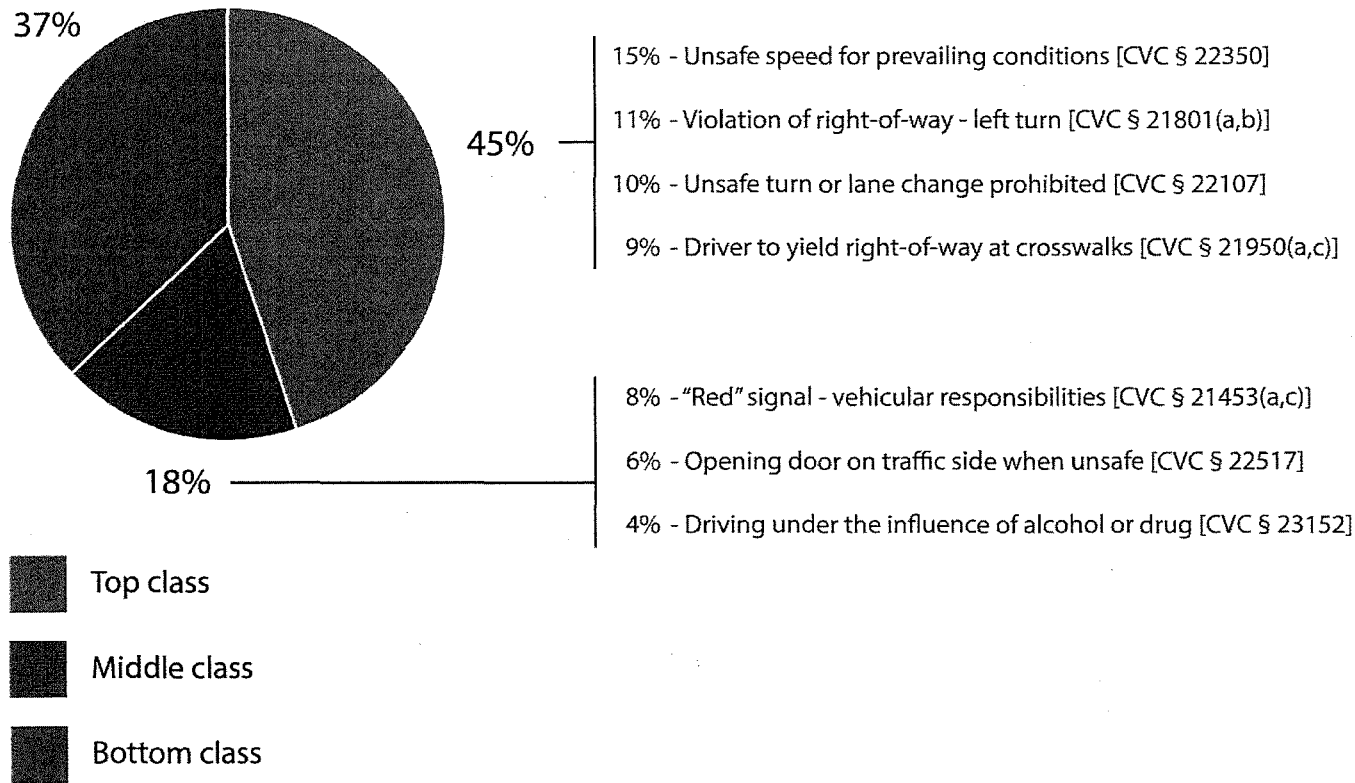


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding

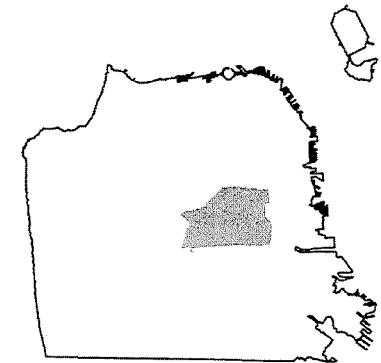


Distribution of the Primary Collision Factors in the Mission District

The top two classes of collision factors¹ account for 63% of collisions with known primary factors^{2,3}

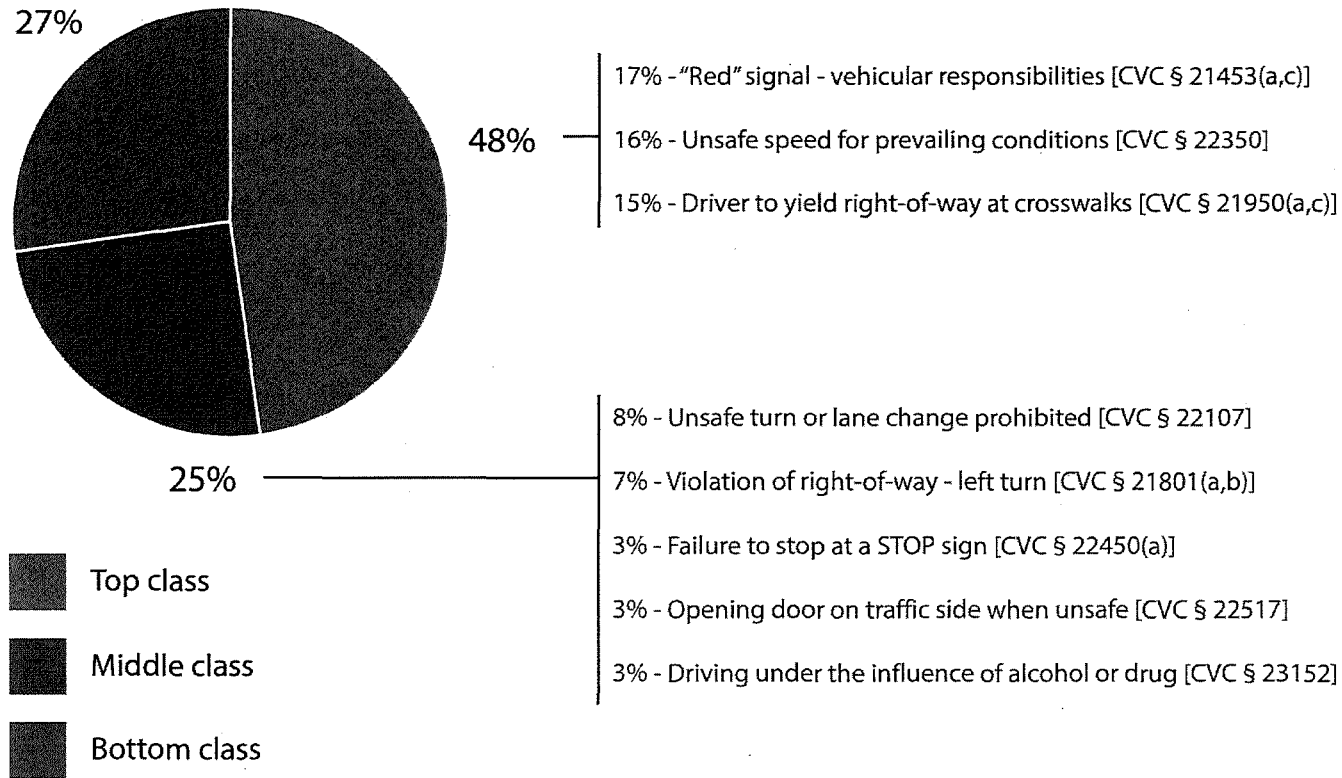


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding



Distribution of the Primary Collision Factors in the Northern District

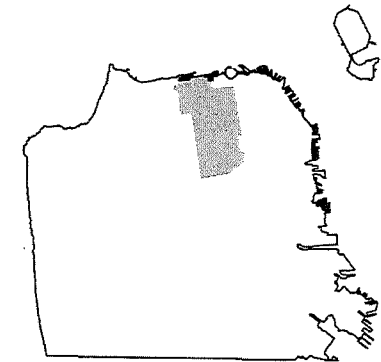
The top two classes of collision factors¹ account for 73% of collisions with known primary factors^{2,3}



- Top class
- Middle class
- Bottom class

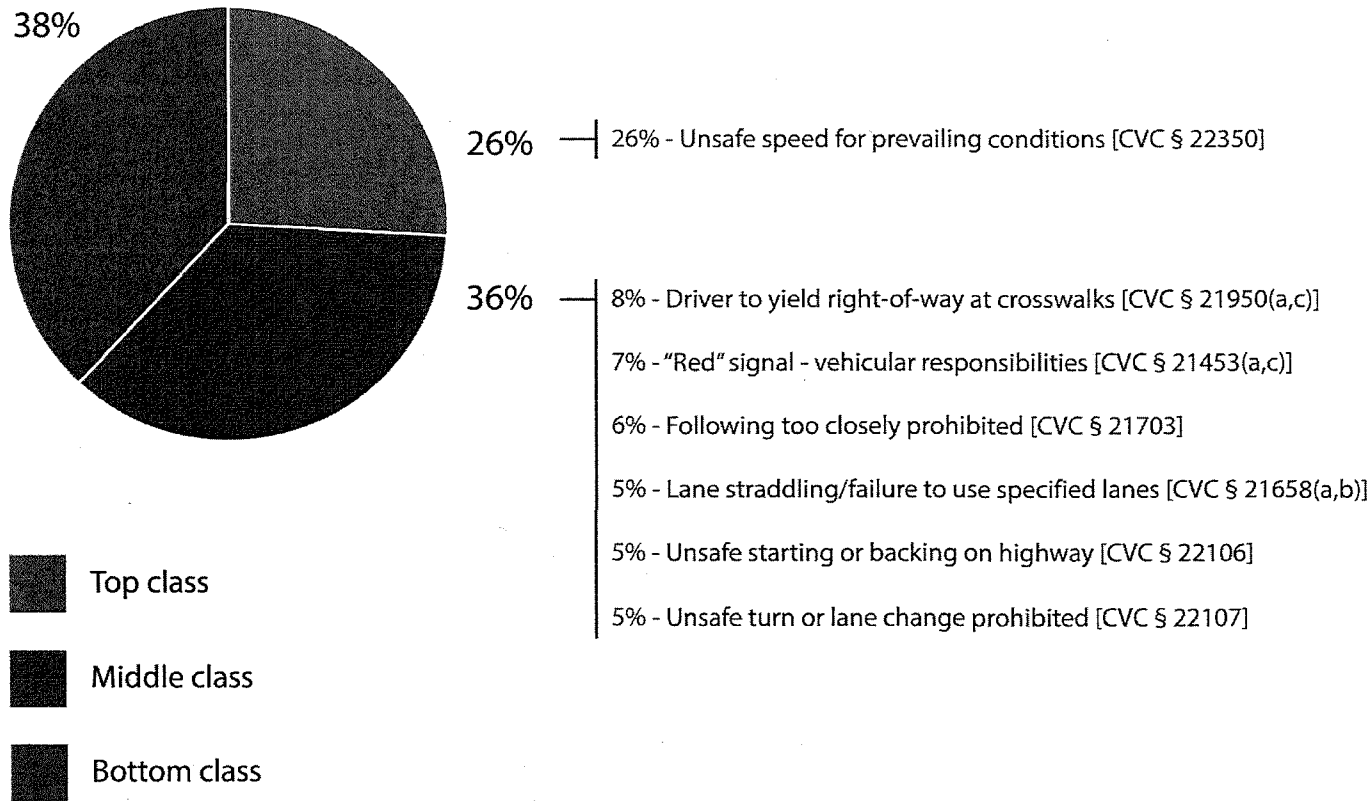
Notes:

1. Excluding pedestrian violations of the California Vehicle Code
2. Excluding complaint of pain cases
3. Some totals may be slightly off due to rounding



Distribution of the Primary Collision Factors in the Park District

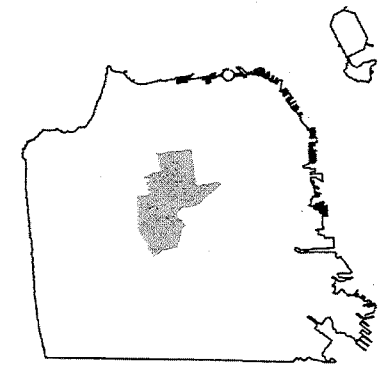
The top two classes of collision factors¹ account for 62% of collisions with known primary factors^{2,3}



- Top class
- Middle class
- Bottom class

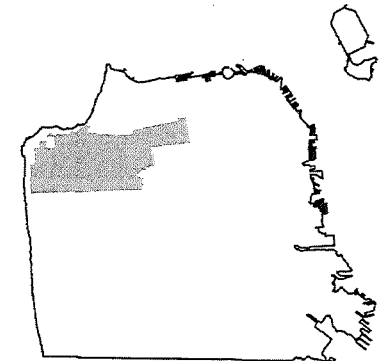
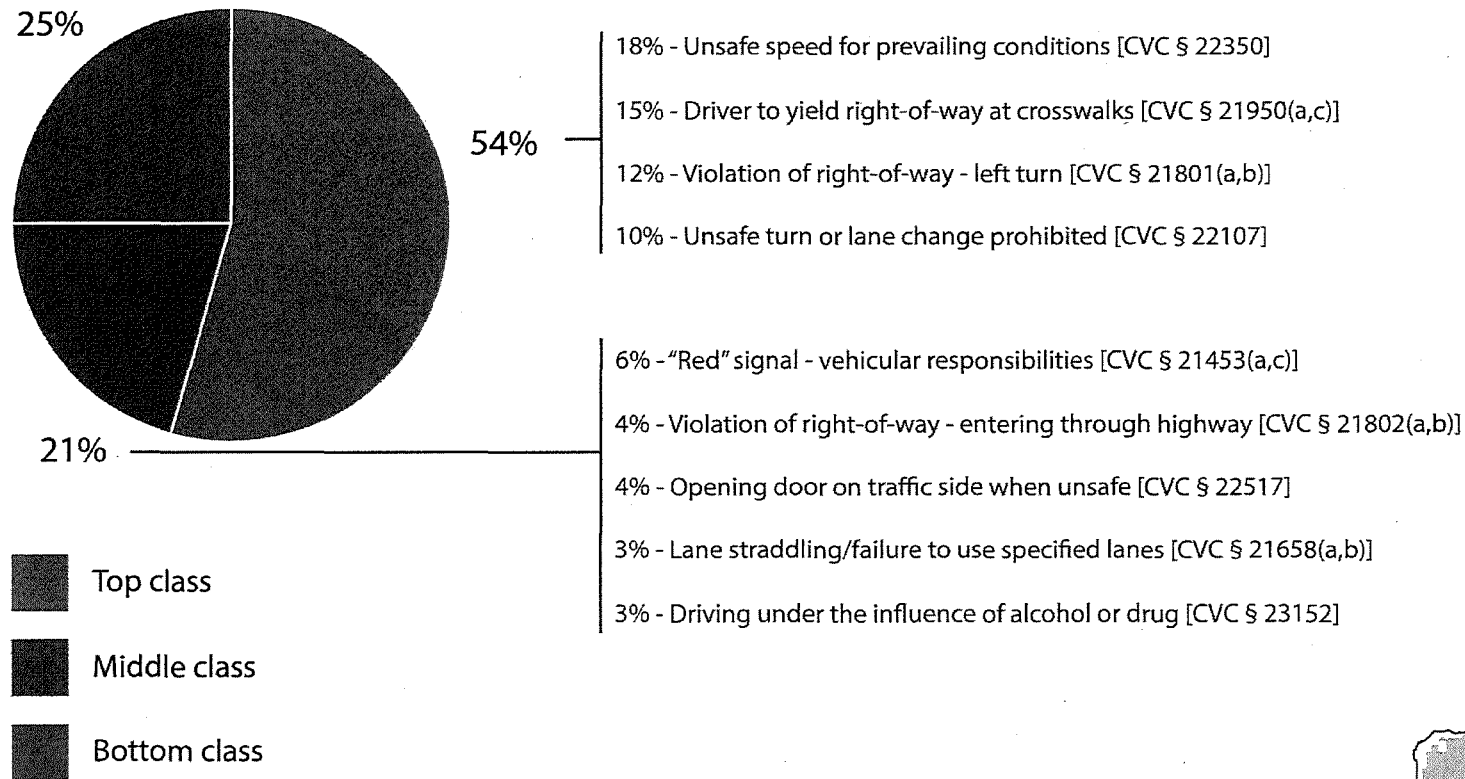
Notes:

1. Excluding pedestrian violations of the California Vehicle Code
2. Excluding complaint of pain cases
3. Some totals may be slightly off due to rounding



Distribution of the Primary Collision Factors in the Richmond District

The top two classes of collision factors¹ account for 75% of collisions with known primary factors^{2,3}

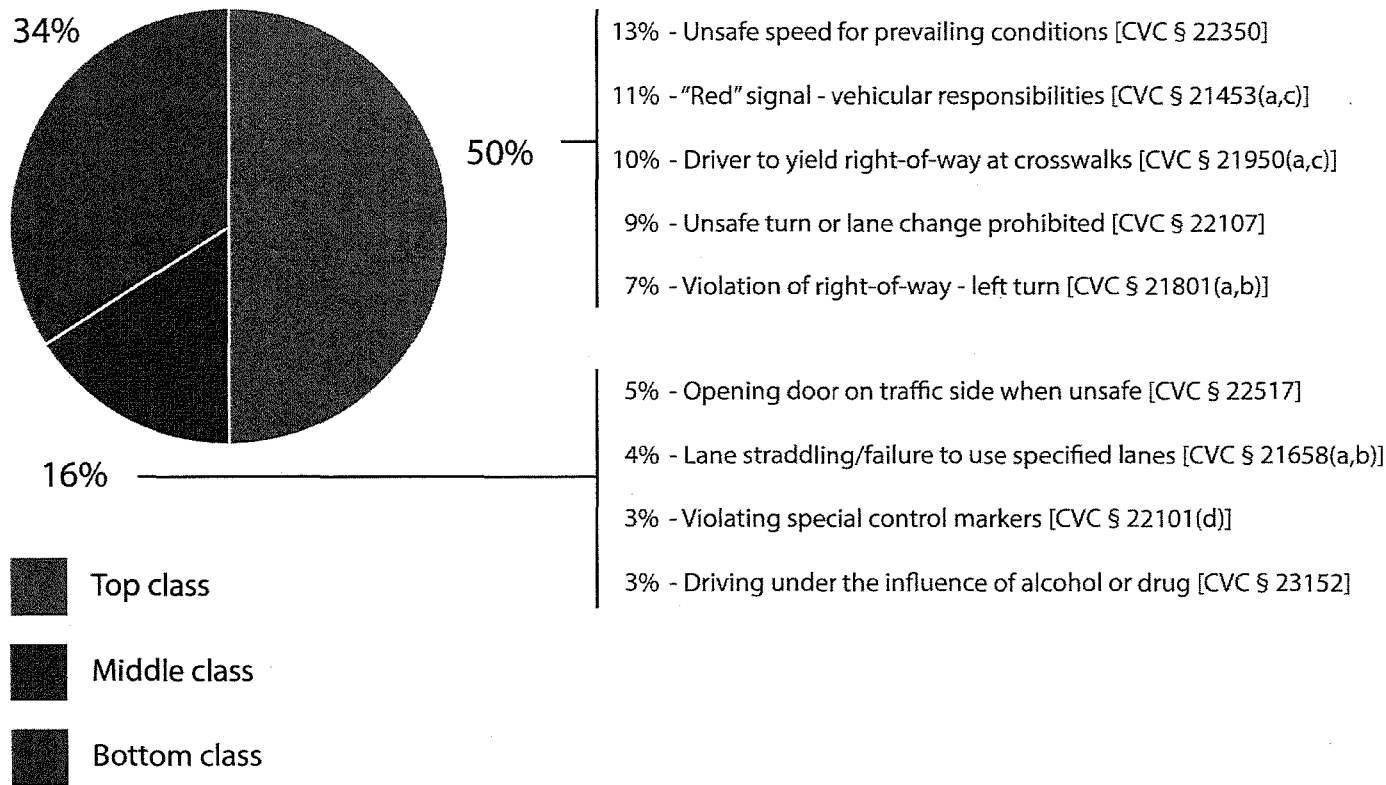


Notes:

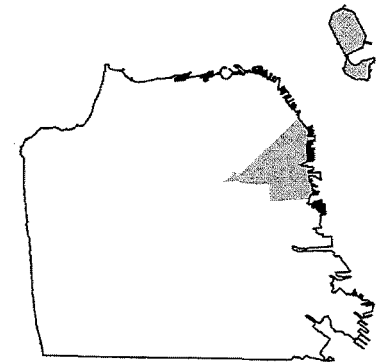
1. Excluding pedestrian violations of the California Vehicle Code
2. Excluding complaint of pain cases
3. Some totals may be slightly off due to rounding

Distribution of the Primary Collision Factors in the Southern District

The top two classes of collision factors¹ account for 66% of collisions with known primary factors^{2,3}

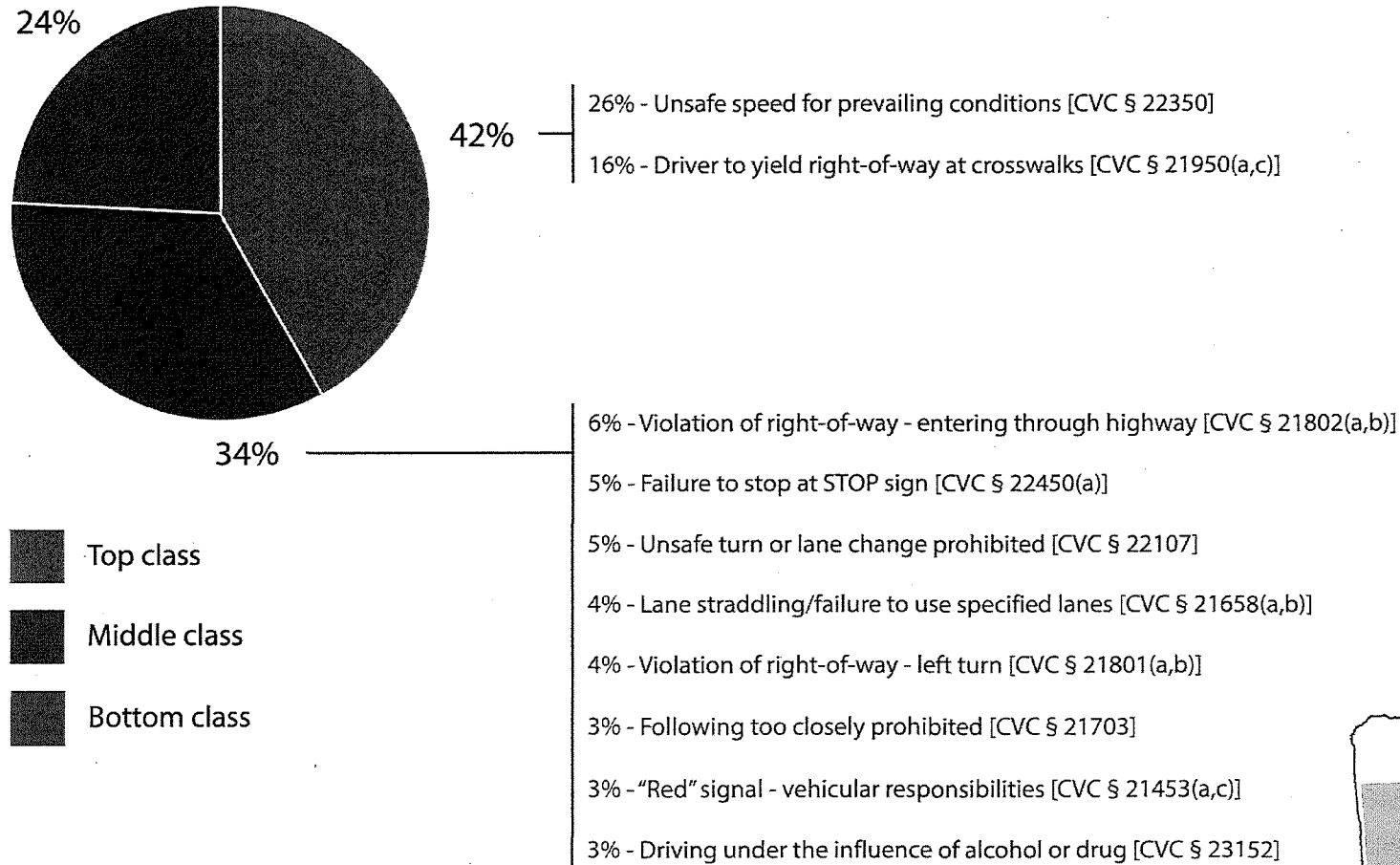


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding



Distribution of the Primary Collision Factors in the Taraval District

The top two classes of collision factors¹ account for 76% of collisions with known primary factors^{2,3}

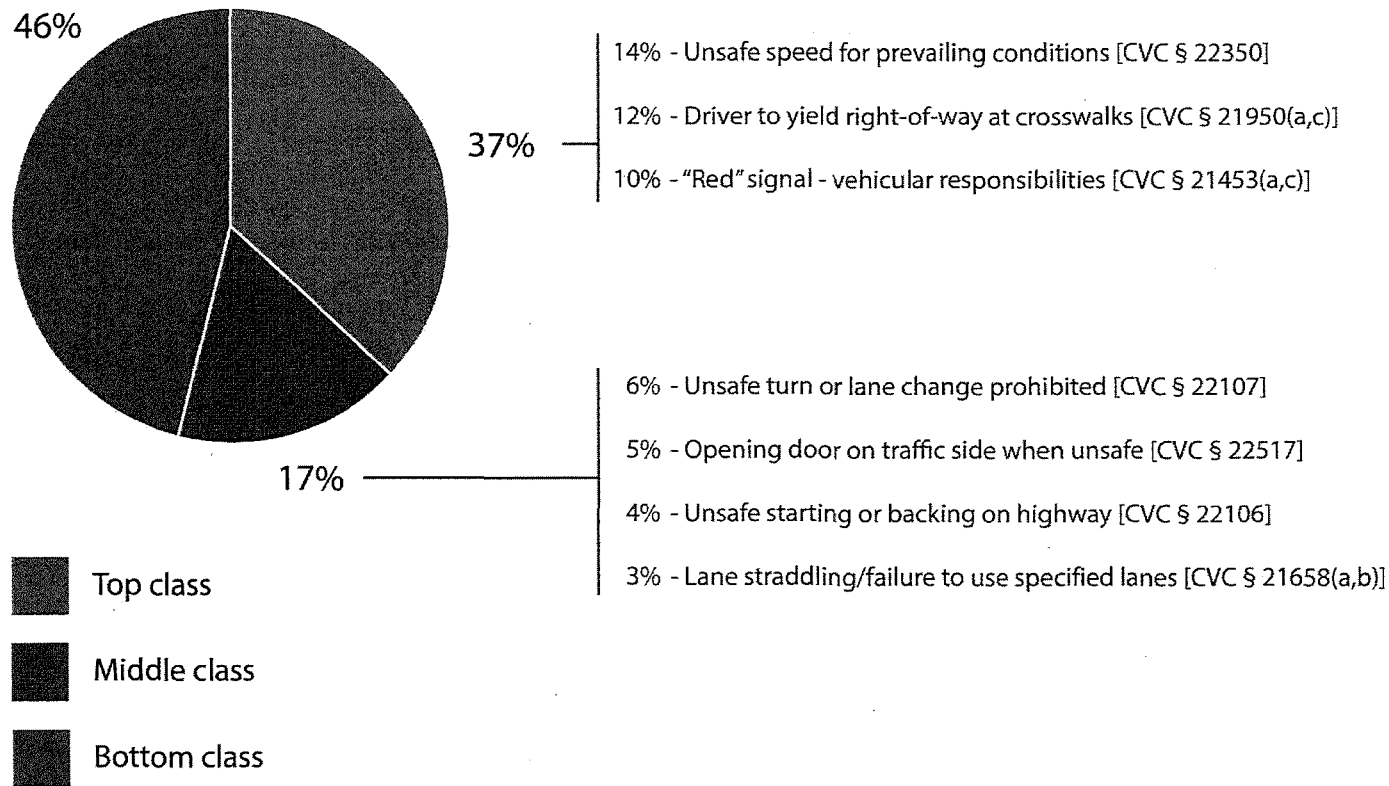


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding

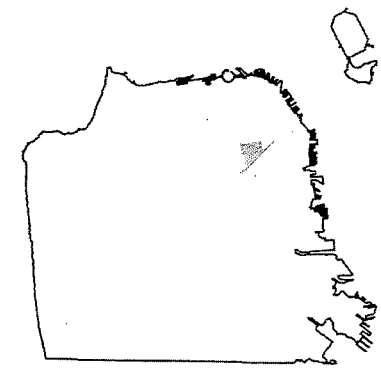


Distribution of the Primary Collision Factors in the Tenderloin District

The top two classes of collision factors¹ account for 54% of collisions with known primary factors^{2,3}

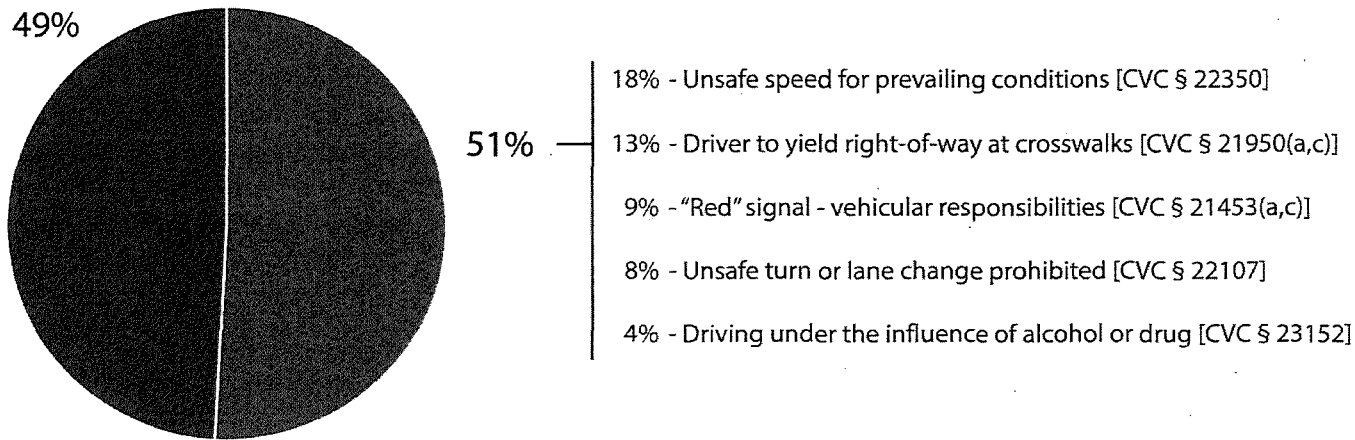


- Notes:**
1. Excluding pedestrian violations of the California Vehicle Code
 2. Excluding complaint of pain cases
 3. Some totals may be slightly off due to rounding



Distribution of the Primary Collision Factors for the Traffic Company

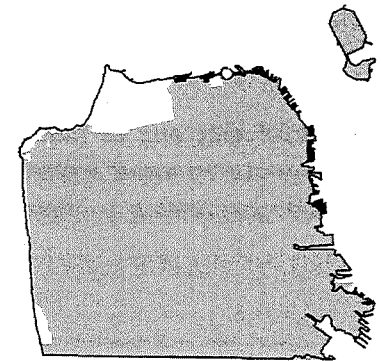
On page 46 we suggest that the Traffic Company focus on the set of collision factors that are common across all districts. As a result, the classes of collision factors for the Traffic Company are not defined in the same way as they are for the district stations. In this case, the “top class” or common set of factors¹ accounts for 51% of collisions with known primary factors.^{2,3}



- Top class
- Middle class
- Bottom class

Notes:

1. Excluding pedestrian violations of the California Vehicle Code
2. Excluding complaint of pain cases
3. Some totals may be slightly off due to rounding



Focus on the Five

Education is a major component of the Vision Zero SF strategy and much has been done to inform the public of Vision Zero and the Focus on the Five strategy. To maintain consistency in its messaging and outreach efforts, the SFPD could adopt the more complete list of vehicle code violations below but still retain the Focus on the Five name, with the “Five” instead referring to the five groups of dangerous road user behaviors below.

1. Speeding and Speed-related Violations

- CVC §21703 – Following too closely prohibited
- CVC §22350 – Unsafe speed for prevailing conditions

2. Right-of-Way Violations

- CVC §21453(a,c) – “Red” signal – vehicular responsibilities
- CVC §21950(a,c) – Driver to yield right-of-way at crosswalks
- CVC §21801(a,b) – Violation of right-of-way – left turn
- CVC §21802(a,b) – Violation of right-of-way – entering through highway
- CVC §22450(a) – Failure to stop at a STOP sign

3. Impaired & Distracted Driving

- CVC §23152 – Driving under the influence of alcohol or drug
- CVC §23123(a) – Driving while using a wireless telephone not configured for hands-free use¹
- CVC §23123.5(a) – Driving while using a wireless device to send, read, or write text communication unless the device is used in a hands-free and voice-operated manner¹

4. Turning, Lane Change and Stopping/Starting Violations

- CVC §22107 – Unsafe turn or lane change prohibited
- CVC §21658(a,b) – Lane straddling/failure to use specified lanes
- CVC §22101(d) – Violating special traffic control markers
- CVC §22517 – Opening door on traffic side when unsafe
- CVC §22106 – Unsafe starting or backing on highway

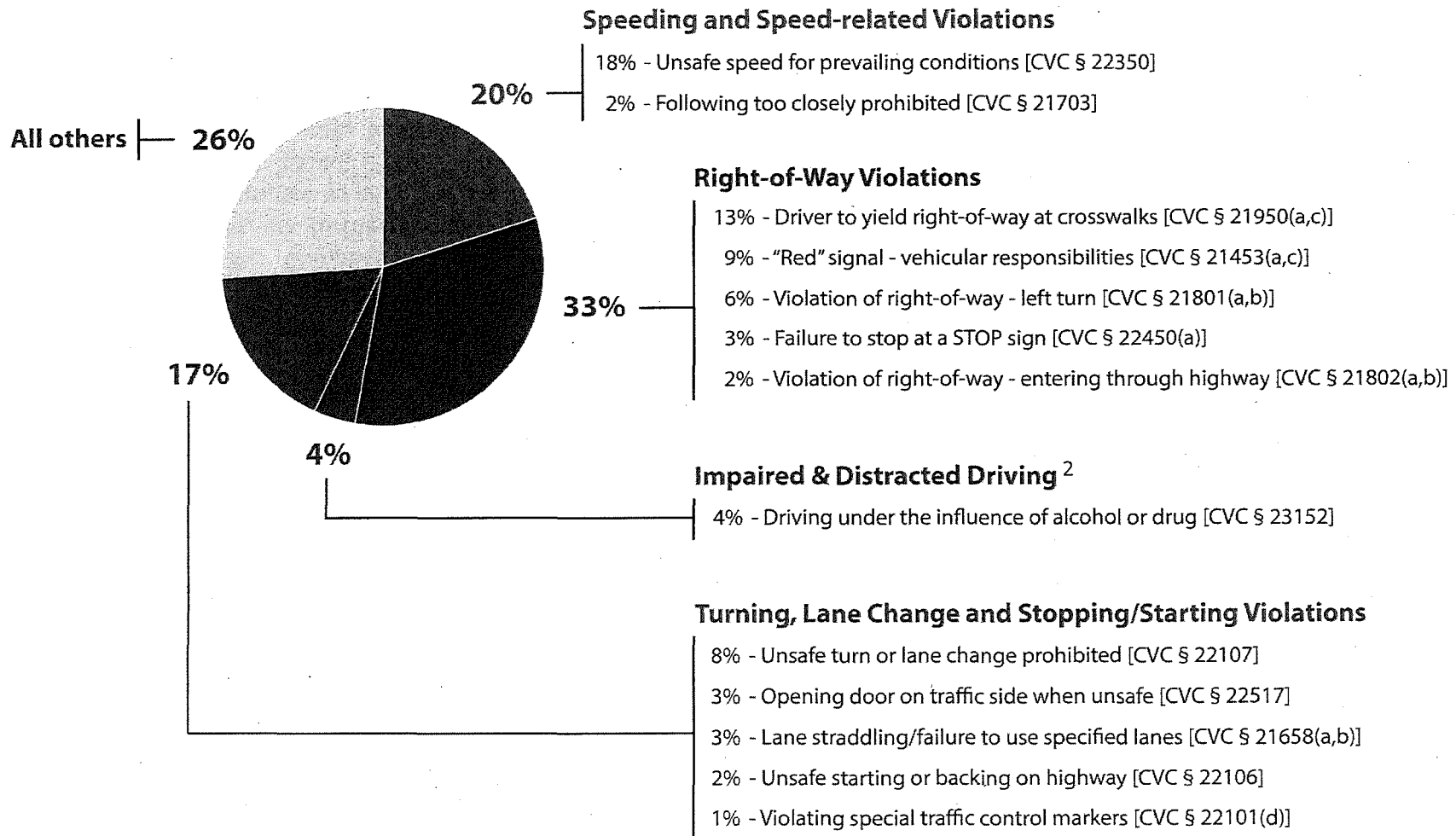
5. Community Priorities

1-2 additional district-specific factors based on community input
(see pages 47-48 for further discussion)

Notes: 1. These offenses are considered “Other Associated Factors” rather than “Primary Collision Factors” for purposes of collision reporting.

Distribution of the Primary Collision Factors Recommended for Focused Enforcement

The thirteen collision factors we are recommending for focused enforcement collectively account for approximately 74% of collisions with known primary factors¹



Notes:

1. Excluding complaint of pain cases
2. Texting while driving [CVC § 23123.5(a)] and talking on the phone with a non-hands free device [CVC § 23123(a)] are not considered to be PCFs for collision reporting purposes and therefore do not appear in this data

Considerations regarding Focus on the Five Implementation

Our recommendation to sharpen the Focus on the Five strategy raises a number of potential questions about how it may actually be implemented. Some of these questions are discussed below:

1. How would the new goal(s) be structured?

We suggest that each police district establish its own Focus on the Five target based on the list of vehicle code violations on page 32. For example, the Bayview district's Focus on the Five goal would be based on eight factors – namely violations of CVC §§ 22350, 21950(a,c), 21453(a,c), 22107, 23152, 22450(a), 23123(a), and 23123.5(a) – while the Ingleside district's goal would be based on nine factors – violations of CVC §§ 22350, 21950(a,c), 21453(a,c), 22107, 23152, 21801(a,b), 22450(a), 23123(a), and 23123.5(a).

Because the Traffic Company conducts its enforcement operations city-wide, we further suggest that it focus on the behaviors that are common to all of the districts – CVC §§ 22350, 21950(a,c), 21453(a,c), 22107, 23152, 23123(a), and 23123.5(a). These seven factors generally lend themselves to the type of special enforcement operations typically conducted by the Traffic Company whereas district officers have an opportunity to focus on a slightly broader set of factors while out on routine patrols.

In addition to the individual district goals, the SFPD could also establish a department-wide goal that 100% of the districts and the Traffic Company meet their individual targets each month. Thus under this structure, each district station and the Traffic

Company would have their own specific targets and they would all be jointly responsible for performance at a department level.

2. At what level should the targets be set?

The current Focus on the Five framework stipulates that 50% of all traffic citations be for one of five specific violations of the vehicle code. Given the proposed expansion in the number of factors, the SFPD could potentially increase its target beyond 50%. However, at this time we are refraining from recommending changes to the level of the target as we do not have sufficient data on which to base such a recommendation. As discussed later on in the report, limitations in the quality of the SFPD's citation data prevented us from analyzing it for this project and that same data would be necessary to inform any proposed changes to the 50% threshold. The Controller's Office could revisit this question once the SFPD has implemented its eCitation initiative and a sufficient amount of data is collected.¹

Notes: 1. As an initial point of reference, the thirteen primary collision factors listed on pages 32 and 44 comprise approximately 74% of the fatal and injury cases (excluding complaint of pain cases) from 2013-2015.

Considerations regarding Focus on the Five Implementation

3. How would the community priorities be determined?

In response to concerns arising from officer-involved shootings and other recent controversies involving the SFPD, Mayor Lee and former police chief Greg Suhr requested that the US Department of Justice (DOJ) Office of Community Oriented Policing Services (COPS) conduct an independent assessment of the SFPD's policies, activities, and operations. After a months-long review process, the reform team uncovered "concerning deficiencies in every operational area assessed" (p. vi). Among other issues, the DOJ noted that it saw avenues for the SFPD to develop strategic partnerships with community based groups but that it missed key opportunities to do so and the DOJ specifically mentioned Vision Zero in this context.

A report issued by the COPS team in October 2016 contains 94 findings and 272 recommendations focused on improving trust between the SFPD and the community through improvements in transparency, professionalism, and accountability. Following the release of this report, Mayor Lee issued a statement committing the SFPD to accepting and implementing all of the recommendations, including one that calls on the SFPD to form strategic partnerships on key community issues in order to develop co-produced policing plans. In the course of implementing this recommendation from the DOJ, it is our recommendation that the SFPD utilize the City's Vision Zero plan and this analysis as a framework for working collaboratively with the community to understand the issue of traffic violence and jointly develop strategies to address it. Such strategies could be based in part on the safety concerns community members have in each district,

which are not necessarily reflected in the results of our analysis. For example, some Vision Zero stakeholders we have spoken with have expressed concerns about the frequency at which they see cars blocking the bike lanes in certain neighborhoods, while others have noted that they feel vulnerable and exposed when forced to walk outside of a crosswalk when a vehicle is blocking the box at an intersection.

As Walk San Francisco underscored in its recent *Street Score 2016* report, the potential exists for developing more innovative solutions by coupling the City's quantitative data with qualitative data from community members who travel their streets every day. This sentiment is also echoed in the soon to be released 2017-2018 Vision Zero SF Action Strategy, which recognizes the need to improve engagement with our neighbors and obtain more feedback from people who have thus far been underrepresented in the process. Consistent with these points of view, the Focus on the Five framework we are suggesting here leaves room for the SFPD to incorporate public input into its performance goals to the extent that safety concerns beyond those identified by our analysis are raised with the SFPD during its public engagement processes and to the extent the SFPD believes those issues deserve focused attention. Accordingly, we recommend that the SFPD utilize the City's Vision Zero action strategy as a framework for working collaboratively with the community to develop strategies to address traffic violence and consider incorporating specific community concerns into its Focus on the Five goals.

Considerations regarding Focus on the Five Implementation

3. How would the community priorities be determined? (continued)

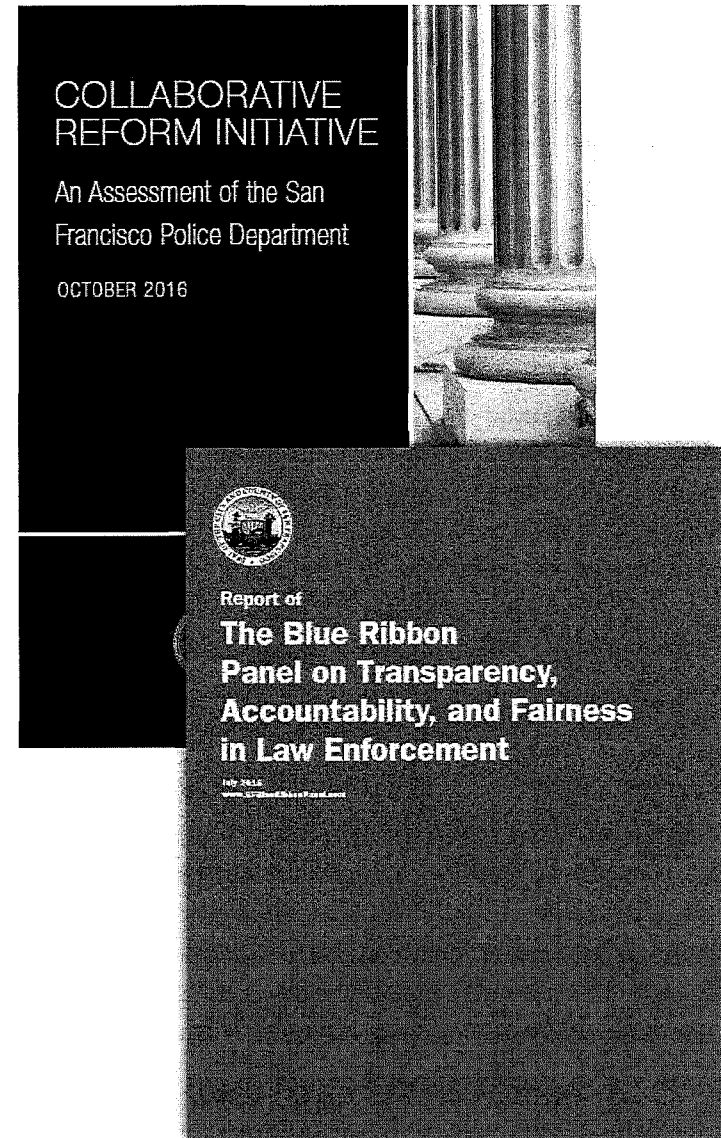
Furthermore, the assessment report issued by the US DOJ's COPS team emphasizes that if the SFPD is to rebuild community trust it must engage with the public. Based on Mayor Lee's and the SFPD's recent commitments to implementing 479 recommendations it has received over the last 18 months from the Blue Ribbon Panel, US DOJ, Civil Grand Jury, and other sources, we additionally recommend that the SFPD develop and publicly report on measures related to procedural justice and social equity in traffic enforcement.

Recommendation 3

In implementing the recommendations of the DOJ, the SFPD should utilize the City's Vision Zero Action Strategy as a framework for working collaboratively with the community to understand traffic violence and jointly develop strategies to address it. As appropriate, the SFPD may additionally consider incorporating specific community concerns into its Focus on the Five goals.

Recommendation 4

The SFPD should develop and publicly report on measures related to procedural justice and social equity in traffic enforcement.



Considerations regarding Focus on the Five Implementation

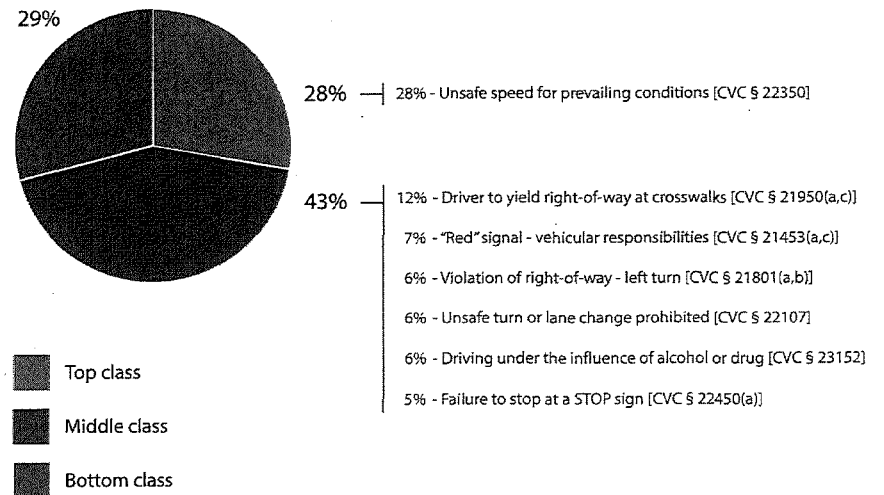
4. Would increasing the number of vehicle code violations make the Focus on the Five campaign unfocused?

No. As the table on page 32 shows, the factors that contribute to the greatest number of traffic collisions are not necessarily the same from one police district to another and by conducting our analysis at the police district level, we have achieved greater alignment between the collision data and the deployment of the SFPD’s traffic enforcement resources.

Under the framework that we are suggesting, the number of factors on which a given company would focus ranges from seven for the Traffic Company to twelve in the Taraval district. While such an expansion may seem drastic compared to the current goal, it is important to keep in mind that the city-wide list of collision factors in Appendix D contains no less than 91 different items, and the Uniform Bail and Penalty Schedules published by the California Judicial Council (2017) identifies many times that number of potential traffic violations under the whole of the California Vehicle Code. Thus, with district-level goals based on seven or even twelve different factors, the SFPD will still be focused on a relatively small fraction of the offenses that road users may commit. Moreover, the charts on pages 33 through 43 illustrate how such a small expansion in focus can potentially yield significant safety benefits. For example, the chart for the Ingleside District (also shown at right) shows that speeding (CVC § 22350) accounted for 28% of the fatal and injury collisions from 2013 through 2015 (excluding complaint of pain cases). We acknowledge that this speaks to the importance of focusing on speed in particular. However, we must also

acknowledge that the goal of Vision Zero is to eliminate all traffic deaths, not just those related to speed. And by prioritizing a mere six additional factors out of potentially hundreds (i.e., the six factors that make up the “middle class” in our grouping analysis), officers in the Ingleside District can address more than 70% of the most serious collisions in their jurisdiction. Similar arguments can be made for the other SFPD districts as shown in the preceding charts.

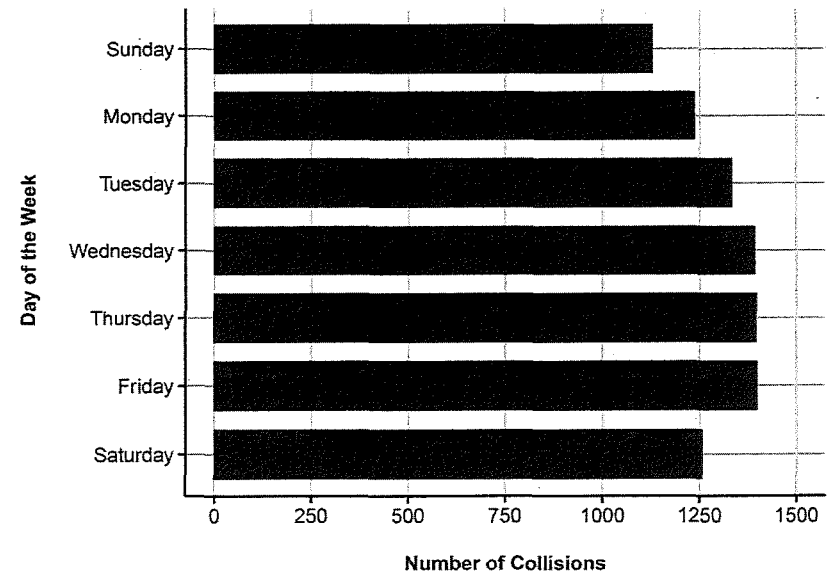
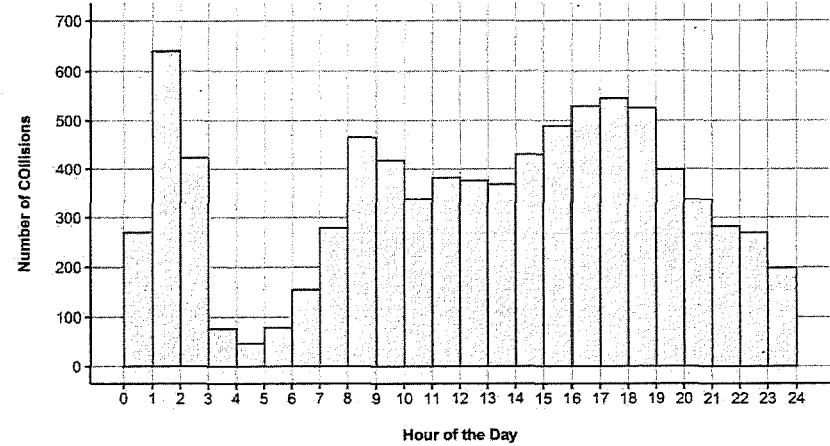
Percentage of Fatal and Injury Collisions in the Ingleside District



**Collision Data Pertaining to
the Time of Enforcement**

When Collisions Occur – Time of the Day and Day of the Week (2013-2015)

In general, the data indicate that collisions typically occur at all hours of the day but there are spikes during the morning and evening commutes as well as during the 1 o'clock hour in the early morning; there is also a noticeable dip from 3:00 am to 6:00 am. The data also show that collisions are equally spread among the days of the week.



Recommendation 5

Consistent with our recommendations that the SFPD broaden the spatial extent of its traffic enforcement activities and the range of illegal behaviors on which it focuses, the SFPD should similarly ensure that the temporal scope of its operations is sufficient to deter illegal driving behaviors at all times throughout the day and over the course of a week.

Strategies for Maximizing General Deterrence



Increased Enforcement Activity

Increased Enforcement Activity

Case Study: Enhanced Traffic Enforcement as a Simple and Effective Injury Prevention Program

To investigate whether an enhanced traffic enforcement program can reduce motor vehicle crashes, injury collisions, and fatalities, a pilot project was conducted in Fresno, CA using grant funding from the California State Office of Traffic Safety. During program implementation, the traffic division of the Fresno Police Department increased from 20 to 84 officers. Data were collected for the year before program onset (2002), during the first year (2003) and the year after full implementation (2004).

- Analysis showed that the number of **moving violation citations** issued within the city of Fresno **increased significantly**, with 6% of the population receiving citations in 2002 and 17% in 2004.
- At the same time, **injury collisions decreased significantly**, **fatalities from collisions decreased twofold**, and **speed related fatalities decreased threefold**.
- **Similar decreases were not seen elsewhere throughout the county** where the enhanced enforcement program was not implemented.

Conclusions

“This is a **simple, easily implemented injury prevention program with immediate and potentially on-going benefit**” [emphasis added]

“For the community to realize long-term benefit from the [enhanced] enforcement program, it will **need to be on-going and permanent.**” [emphasis added]

Increased Enforcement Activity

Additional research findings regarding the level of enforcement activity:

The Effectiveness of Traffic Policing in Reducing Traffic Crashes

Bates, Soole & Watson, 2012, p. 98

“Arguably the most common feature of successful programs is high, sustained levels of enforcement conducted with the aim of increasing the perceived risk of detection...” [emphasis added]

Traffic Law Enforcement: A Review of the Literature

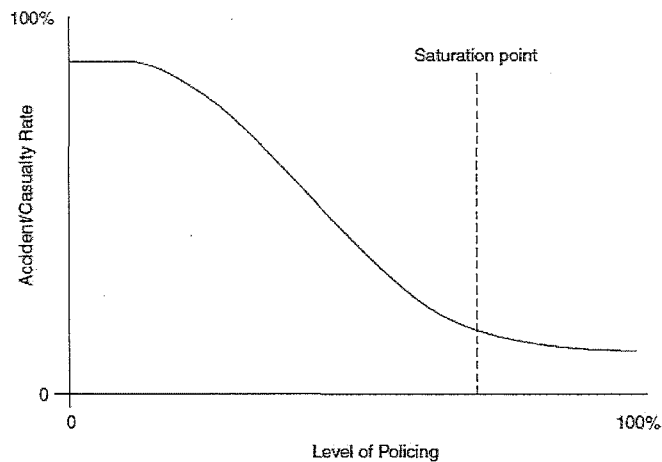
Zaal, 1994, pp. 10, 12

“One recognized means of increasing perceived detection risk is to increase the actual level of enforcement activity.” [emphasis added]

“The large volume of literature relating to the deterrence based approach to traffic law enforcement suggests that, in order to be effective, policing activities need to be structured so as to pose a meaningful and immediate deterrence threat to the would-be traffic offender. One of the fundamental problems hindering this process, which has been consistently identified in the research literature, is the inability of authorities to maintain the necessary high levels of enforcement. One of the main factors contributing to this situation is insufficient policing resources.” [emphasis added]

Increased Enforcement Activity

The question of how much enforcement activity is necessary in order to achieve a desired reduction in the number of collisions or traffic violations is difficult to answer.



Source: Reproduced from Elliott & Broughton (2005)

It is theorized that the relationship between these variables follows an S-shaped curve. Collisions or violations should be at their highest with zero enforcement, and the number should drop (slowly at first) as road users become aware of the police presence. However, at some point (the “saturation point”) additional increases in enforcement activity would begin to have less of an impact because collisions are caused by a number of different factors, which may or may not be related to violations of traffic laws.

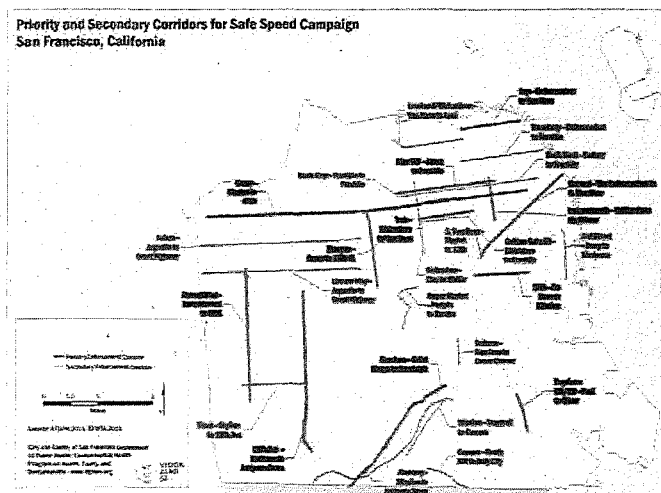
Further research would be needed to determine where San Francisco currently lies on this curve but the results of such a study could be helpful in determining the optimal level of enforcement given the costs and the expected benefits.

Recommendation 6

The SFPD should consider the feasibility of measuring the level of effort it dedicates to traffic enforcement if it wishes to further explore the relationship between the level of policing and the rates of traffic collisions or violations in San Francisco.

Safe Speeds SF Campaign

On September 29, 2016, the SFPD, SFMTA, and SFDPH launched a year-long joint effort to increase speed enforcement along twelve priority corridors and fourteen secondary corridors throughout the City. Funded by a \$2 million state grant, the campaign will use newly acquired LIDAR speed detection units and will dedicate an additional 132 hours per week to speed enforcement. The program will also include education and outreach in the affected areas as well as an evaluation of its effectiveness.



Elsewhere in this report we noted that effective enforcement programs are marked by high rates of detection, which are sustained over a long period of time. We expect that while it is in place over the next year, the new Safe Speeds SF campaign will go a long way to increase public awareness of the dangers of speeding and it will in fact deter drivers from engaging in this unsafe behavior. However, research tells us that the effect of the campaign may be short lived once it is stopped and in order for the benefits to persist, the effort must be ongoing. Thus in addition to evaluating the effectiveness of the campaign in reducing average vehicle speeds or the number of speeding vehicles, we recommend that the City also carefully evaluate the implications such an effort would have on the SFPD's resources should the campaign extend beyond the one-year pilot period.

Recommendation 7

In evaluating the Safe Speeds SF campaign, the City should not only evaluate its effectiveness in reducing average vehicle speeds and the number of speeding vehicles, but it should also evaluate its impact on the SFPD's resources and consider how sustainable the program is over the long term.

Automated Speed Enforcement

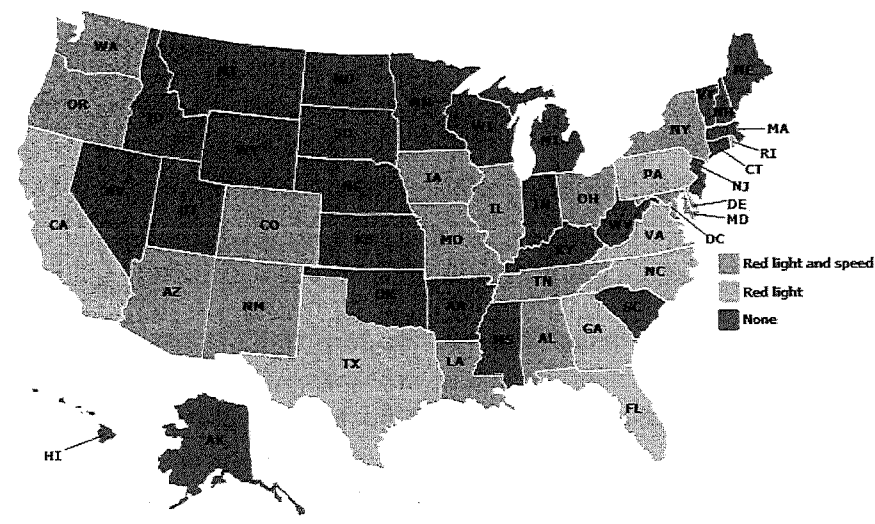
Automated Speed Enforcement

Automated speed enforcement (ASE) is a method of traffic enforcement that uses speed sensors and cameras to detect and identify vehicles that travel faster than a defined threshold. Images captured by ASE cameras are processed and reviewed for validity, and violations are reviewed and verified prior to issuance of a citation. Although the use of this technology is currently not allowed in the state of California, the Vision Zero Two-Year Action Strategy calls for its advancement at the state level as it has a number of advantages:

1. It substantially increases the probability of detection at the site of its use and thus serves as an effective deterrent.
2. It increases the continuity and efficiency of policing operations. When a motorist is stopped by the roadside for a speeding offense, enforcement activity typically “pauses” while the officer issues a citation. During this pause, other motorists who speed through the enforcement site go undetected. Automated speed enforcement eliminates this pause in enforcement.
3. It frees up valuable, and often limited, police resources for other aspects of traffic enforcement or other activities that require manned operations.

4. It facilitates enforcement at road locations that are not amenable to manned operations.
5. It produces conclusive evidence that an offense has occurred and thus increases the fairness and objectivity of enforcement.

States that allow the use of Automated Enforcement



Automated Speed Enforcement

Performance Data on the Effectiveness of Automated Speed Enforcement

A review conducted by The Cochrane Collaboration of 35 prior studies revealed a number of road safety benefits with respect to the effectiveness of speed enforcement detection devices. In particular, they found:

- reductions in average vehicle speeds by up to 15%, and
- reductions of up to 65% in the proportion of speeding vehicles.

Moreover, all studies with documented crash outcomes reported reductions in the vicinity of enforcement locations. Notably:

- fatal and serious injury crashes were reduced by up to 44%,
- injury crashes were reduced by up to 50%, and
- crashes overall were reduced by up to 49%.

These research findings are consistent with the results of a survey of several jurisdictions conducted by the San Francisco Controller's Office in 2015. In particular:

- Between December 2012 and December 2014, **Seattle reported a 64% decrease in the average number of traffic citations** with its fixed camera program in place,
- Chicago reported a **31% reduction in speeding vehicles** with the use of ASE, and
- Authorities in **Portland, Oregon reported a 53% reduction in fatalities** since inception of their program and **Washington, D.C. reported a 70% reduction.**

Automated Speed Enforcement

Additional research findings regarding the level of enforcement activity:

Traffic Law Enforcement: A Review of the Literature

Zaal, 1994, pp. 10, 12

“[Researchers] highlight the need for the deterrence process to be based on **pro-active rather than reactive enforcement measures and stress the use of intensive, long term, high volume detection systems (advocating the use of automated enforcement devices) as a possible means of achieving this objective.**” [emphasis added]

“...the problem with traditional enforcement methods is that the limited policing resources available, as compared to the relatively high number of speeding motorists, results in a low perceived risk of apprehension.... Drivers soon realise that at anyone time only a small part of the entire traffic network is subject to enforcement, and hence, the risk of apprehension is extremely low...

...solutions to this problem have focused on the development of enforcement strategies which increase the level of deterrence without substantial increases in existing policing resources.... **Enforcement strategies based upon the use of automated speed detection technology have been consistently identified as the most effective way of achieving these objectives...**” [emphasis added]

Automated Speed Enforcement

Recommendation 8

In light of scientific research which shows that effective traffic enforcement programs should be based on proactive rather than reactive measures, and given the proven efficacy of automated speed enforcement in preventing fatal and serious injury collisions, the City and County of San Francisco should continue to advance the use of automated speed enforcement as a tool for encouraging people to drive at safe speeds.

Targeted Enforcement

Targeted Enforcement

Targeted enforcement refers to the use of crash, citation, and other data to identify specific times or locations where traffic crashes or offenses are most likely to occur and thus where a department will focus its enforcement operations. The rationale behind such a strategy is that it is practically impossible for a department to police the entire road network within its jurisdiction and that the most efficient use of the available resources calls for their deployment to the locations within the network where the greatest reductions in collisions are needed.

However, earlier in this report we cited a body of research, which suggests that in some circumstances, a targeted approach to traffic enforcement can be counterproductive to a department's goals – for example when it is relied on so extensively that enforcement becomes predictable, when enforcement sites are not carefully selected, and when traffic incidents are spread across a wide area. For all of these reasons we recommended that the SFPD seek out opportunities to extend its enforcement presence beyond the HIN.

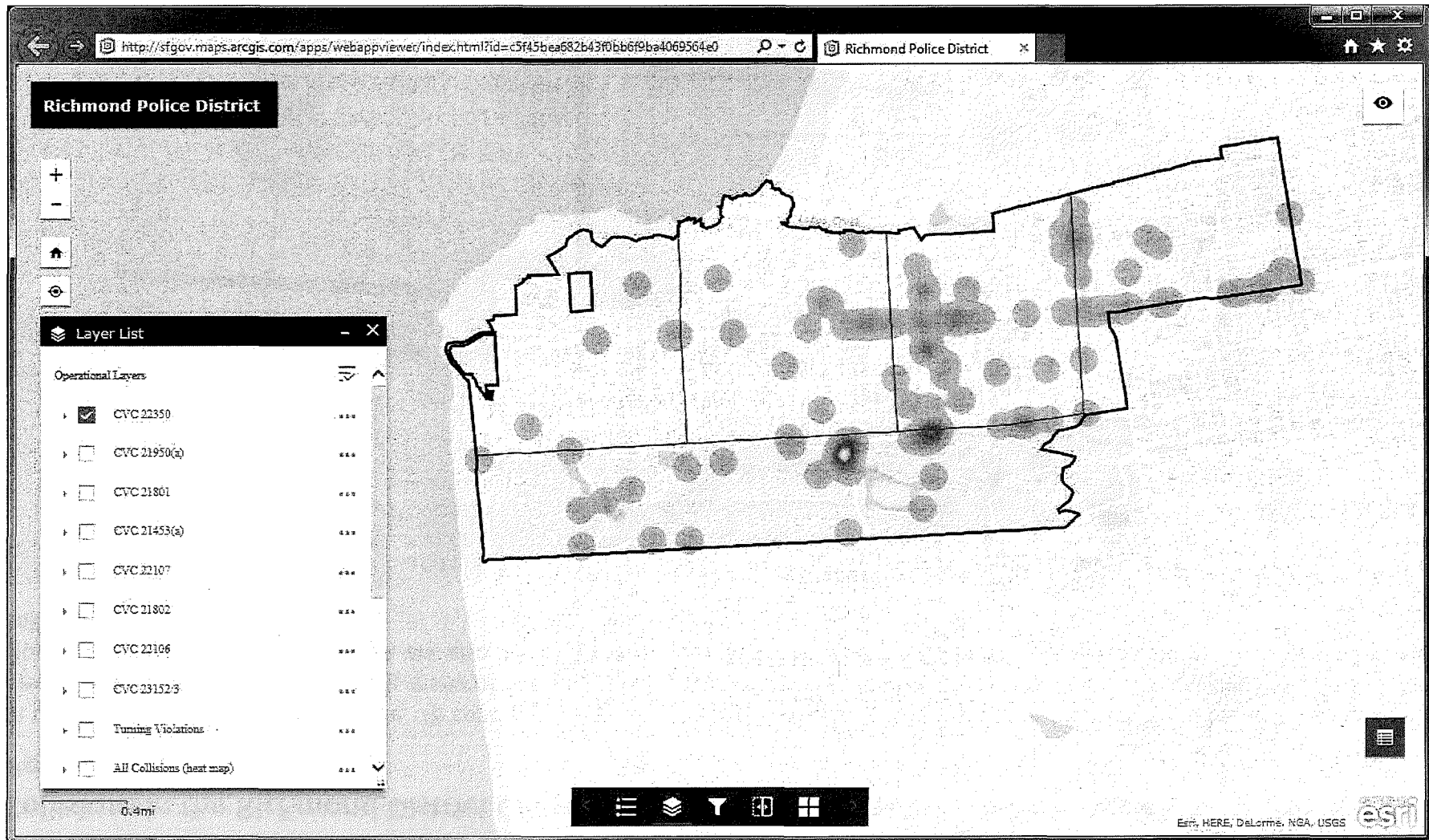
In an effort to balance this recommendation with the practical reality that the SFPD must still target its limited resources on select locations to some degree, we have created an online resource that can assist the SFPD in selecting alternative enforcement sites in a data driven manner at both the district and sector levels. Additionally, other City staff and the public can use these maps to explore the collision data in greater depth and identify locations that may benefit from interventions other than enforcement. This online application is available at <http://sfcontroller.org/collisiondata>. Eventually, this functionality could be incorporated into SF DPH's TransBASE system, which serves as a central repository for all public health-related transportation data in San Francisco.



SF Road Network

Strategies for Maximizing General Deterrence

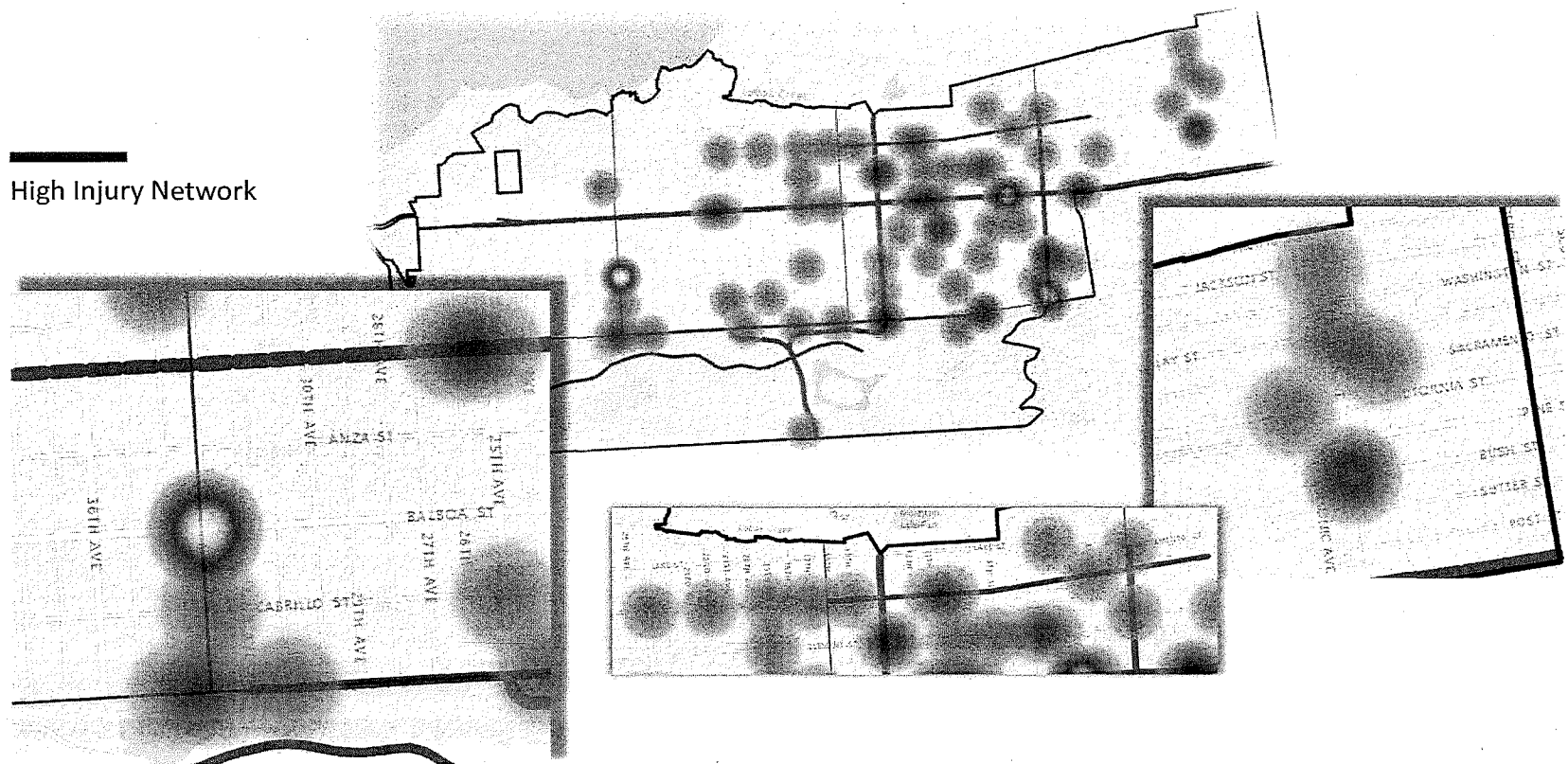
Online Tool for Exploring District-level Collision Data



Strategies for Maximizing General Deterrence

Collisions in the Richmond District Caused by a Driver's or Bicyclist's Failure to Yield to a Crossing Pedestrian

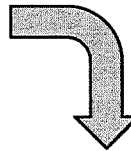
In the Richmond District, for example, 78 collisions occurred from 2013 to 2015 when a driver or bicyclist failed to yield to a crossing pedestrian. As the heat map reveals, many of these occurred at points along the HIN (shown in blue) although there is one notable cluster that is not on the HIN. There are also additional areas not on the HIN that may warrant increased attention even though the collisions are slightly more sparse.



Strategies for Maximizing General Deterrence

Results of PCF Clustering Analysis

PCF	Description	Mission
22350	Unsafe speed for prevailing conditions	x
21950(a,c)	Driver to yield right-of-way at crosswalks	x
21453(a,c)	"Red" signal - vehicular responsibilities	x
22107	Unsafe turn or lane change prohibited	x
23152	Driving under the influence of alcohol or drug	x
21801(a,b)	Violation of right-of-way - left turn	x
22517	Opening door on traffic side when unsafe	x
21658(a,b)	Lane straddling/failure to use specified lanes	
21955	Crossing between controlled intersections (Jaywalking)	x
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	x
22450(a)	Failure to stop at STOP sign	
22106	Unsafe starting or backing on highway	
21703	Following too closely prohibited	
21802(a,b)	Violation of right-of-way - entering through highway	
21453(d)	"Red" signal - pedestrian responsibilities	
21950(b)	Pedestrian right-of-way at crosswalks regulated	
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	
22101(d)	Violating special traffic control markers	
Count		9



The top two classes of PCFs for each district have been incorporated into the online maps



Random Deployment

Random Deployment

Random deployment refers to the random allocation of stationary policing methods throughout a road network. Underlying this approach is the idea that it increases a driver's perceived risk that traffic offenses will be observed by police because drivers are unable to predict where and when enforcement will occur. Like targeted enforcement, random deployment has the added advantage that it can be carried out with varying levels of resources.

Performance Data on the Effectiveness of Random Deployment

A literature review conducted by TRL Limited on behalf of Transport for London cites several studies, which suggest that random deployment can have desirable effects:

- Edwards & Brackett (1978) evaluated the effectiveness of random deployment along 27 km of rural road and observed a **3 mph reduction in mean speeds**.
- Brackett & Beecher (1980) conducted an 18-month study in which speeding behavior on 24 experimental roads was compared to 24 control roads in Texas. A **9% reduction in the proportion of speeding vehicles** was observed across the experimental road group.
- A 1988 study in Australia (Leggett) on three stretches of rural highway over a two year period showed a **58% reduction in fatal and serious collisions** compared to a 4.2% reduction in control areas.
- A program implemented in Queensland, Australia was **estimated to reduce fatal collisions in urban areas by 26%, serious injury collisions by 21%, and minor injury collisions by 13%**.

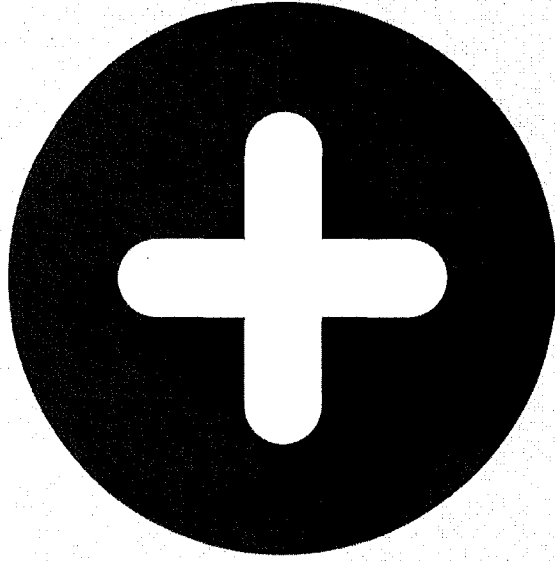
Saturation Patrols

Saturation Patrols

Saturation is a strategy in which a large number of officers conduct enforcement within a relatively small geographic area. Often used to address the problem of driving under the influence (DUI), saturation patrols can drastically increase the probability that offenders in a particular area will be detected and apprehended. At the same time, however, such operations can be resource-intensive, particularly when they are coordinated with other departments (e.g., the California Highway Patrol). Also, research suggests that the impact of such short term, high intensity 'blitzes' may be short lived after the saturation event has ended.

As reported in Zaal (1994), some researches have suggested that a saturation type of approach could be used to mitigate the shortcomings of other strategies such as targeted enforcement. In particular, they suggest stationing two or more units a short distance apart from each other at the same time in order to create a perception among road users of increased enforcement activity and create uncertainty about the presence of additional officers further down the road. In addition, such a strategy may help to alleviate the pause in enforcement that occurs when an officer issues a citation to an offending road user.

Additional Considerations



Collection and Maintenance of Traffic Stop and Citation Data

The Controller's Office embarked on this project in response to a desire by the SFMTA and DPH to better understand the spatial and temporal relationship between enforcement activity and collisions. The initial aim of the project was to analyze historical citation data in order to shed light on important questions like how extensive the SFPD's traffic enforcement presence is throughout the City, the degree to which the SFPD's traffic enforcement activities are concentrated in certain areas, and how the SFPD's activities and the resulting citations relate to the HIN. However, our ability to spatially analyze the SFPD's citation data is currently limited by the lack of standardization in the way that location information is initially captured in a citation when one is issued. Notably, most citations in the city are issued using a paper form, and the issuing officer may describe the location of an offense in any number of ways. In addition, although the SFPD's Traffic Company currently uses electronic handheld devices to issue traffic citations, the location information is entered in those devices as free text as well. The resulting variability in the way that citations are completed makes it virtually impossible to use automated methods to convert the location information into geographic coordinates for analysis. In fact, even after obtaining several hundred records of sample data from the Northern District and manually reviewing each one individually, we were still unable to ascertain the location of the offense in a large number of cases. Given these issues, it is difficult to consider questions about the effectiveness of traffic enforcement in San Francisco in depth.

The collection of complete and accurate stop data is also important from a resource management perspective. For example, citations alone do not reflect the total level of effort the SFPD dedicates to traffic enforcement because some stops result in a warning rather than a citation. Currently, officers are required to complete an E-585 traffic stop incident report to record all vehicle stops whether they result in a warning or a citation, but the assessment recently conducted by the US Department of Justice found that the E-585 data is not complete. In particular, while the E-585 form states whether a stop resulted in a citation, it does not specify the nature of the offense. It is also not practical to link E-585 forms to any associated citations. In addition, the US DOJ found that the SFPD does not routinely and consistently collect data for cyclist and pedestrian stops.

continued on next page...

Collection and Maintenance of Traffic Stop and Citation Data (continued)

As the recent assessment by the US DOJ illustrates, the importance of collecting and maintaining complete and reliable traffic stop data goes beyond the issue of traffic safety alone. These data are also crucial for identifying potential racial and ethnic disparities in officer initiated traffic stops, and ultimately in building a foundation of trust with the community. For all of the foregoing reasons, we recommend that the SFPD work quickly to implement its eCitation and eStops¹ initiatives. In doing so, the SFPD should work with its Vision Zero partner agencies to ensure these systems will support quality data analyses.

Once the eCitation and eStops applications have been implemented and more complete data are available, the Controller's Office could conduct additional analysis to further inform deployment of the SFPD's resources and to support the Vision Zero action strategy.

Recommendation 9

The SFPD should work quickly to implement its eCitation and eStops initiatives and in doing so, it should work with its Vision Zero partner agencies to ensure they will support quality data analyses.

Notes: 1. eStops is a mobile application in development to replace the current paper-based E-585 traffic stop incident reports and include all encounters.

Migration of Collision Reporting to the SFPD's Crime Data Warehouse

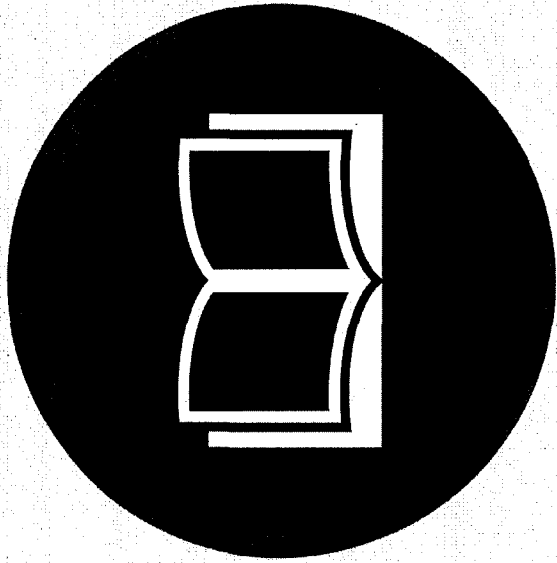
While the SFPD's collision data are substantially better than its citation data, the collision data are not without their own issues and limitations. In particular, when analyzing the primary collision factors for this project, we found inconsistencies in the way the primary collision factors are coded. For example, violations of CVC 21453(a) (failure to stop at a red light) were most often recorded as "21453 A", but notations such as "21453 A0", "21453 AVC", and "21453 AX" were also used. In addition, we found numerous cases where the primary collision factor column referred to nonexistent sections of the California Vehicle Code and to sections of the CVC that are not valid primary collision factors. Finally, we found cases where a valid section of the CVC was referenced but a necessary reference to the appropriate subsection of the code was missing. These inconsistencies made our analysis considerably more time consuming and they introduced a greater potential for error. In addition, a December 22, 2016 memorandum from DPH to the SFPD outlines numerous other data quality issues that DPH and the SFMTA have encountered; both agencies have spent a significant amount of time attempting to resolve these issues over the last several months.

We understand that SFPD senior management has made a decision recently to migrate its collision reporting functions to the department's Crime Data Warehouse (CDW). Because the CDW is significantly more robust than the system that the department currently uses and it can be designed to address many of the issues that we have observed, we believe this move will greatly enhance the quality of the data and our collective ability to analyze it, and we look forward to working with the SFPD to carry out this initiative. Beyond that, however, the SFPD may also want to consider whether its officers could benefit from periodic re-training in the area of collision reporting and investigation. As we understand it, the police academy curriculum includes a 40-hour Basic Traffic Collision Investigation course but this may be the only training a typical officer receives in this area over his or her entire career. While it may not be necessary for every officer to repeat the entire 40-hour class, a condensed refresher training may help to yield more complete and accurate collision reports.

Implications of the Hot Spot Analyses with Respect to City-wide Resource Allocation within the SFPD

Both the hot spot analysis shown on page 17 and the emerging hot spot analysis provided in Appendix C are notable in that while a statistically significant concentration of collisions covers much of the northeast quadrant of the city, there are few hot spots elsewhere throughout the city. Based on these results, some may question how much of the SFPD's resources should be dedicated to preventing collisions in the northeast section of the city over other areas. Such questions are important and indeed worth considering but they are also complex. How resources are allocated among the district stations and the number of officers that should be assigned to patrol functions depend on many factors such as the number of calls for service in a particular area, officer response times, crime rates, and geography among others. Such considerations are beyond the scope of this report.

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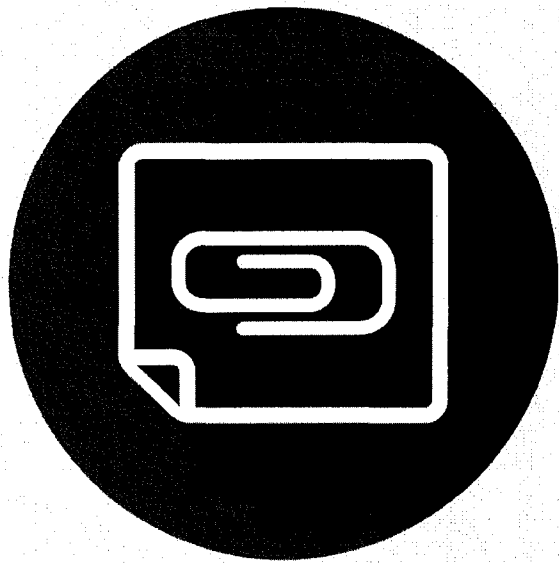
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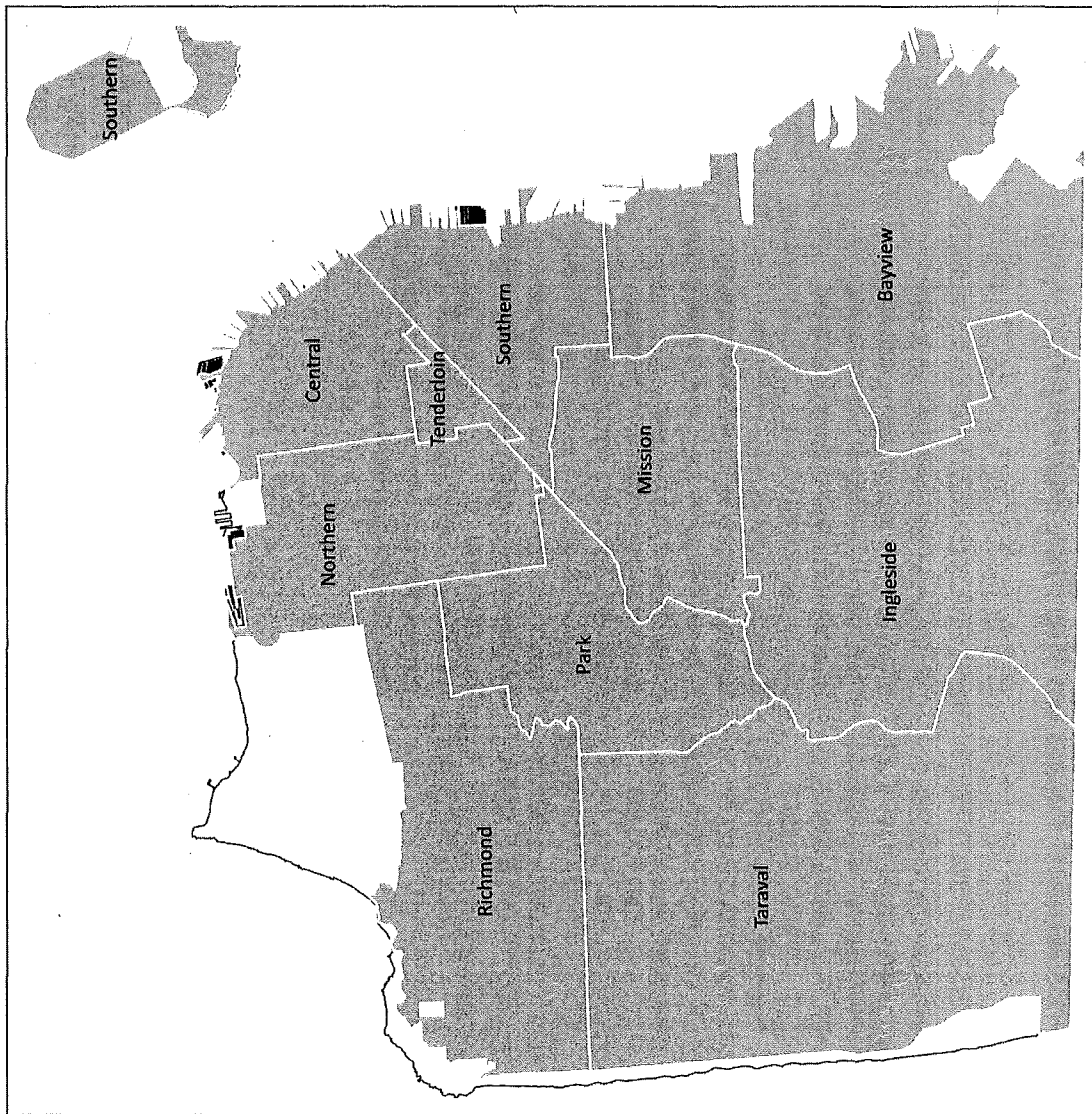
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Appendices

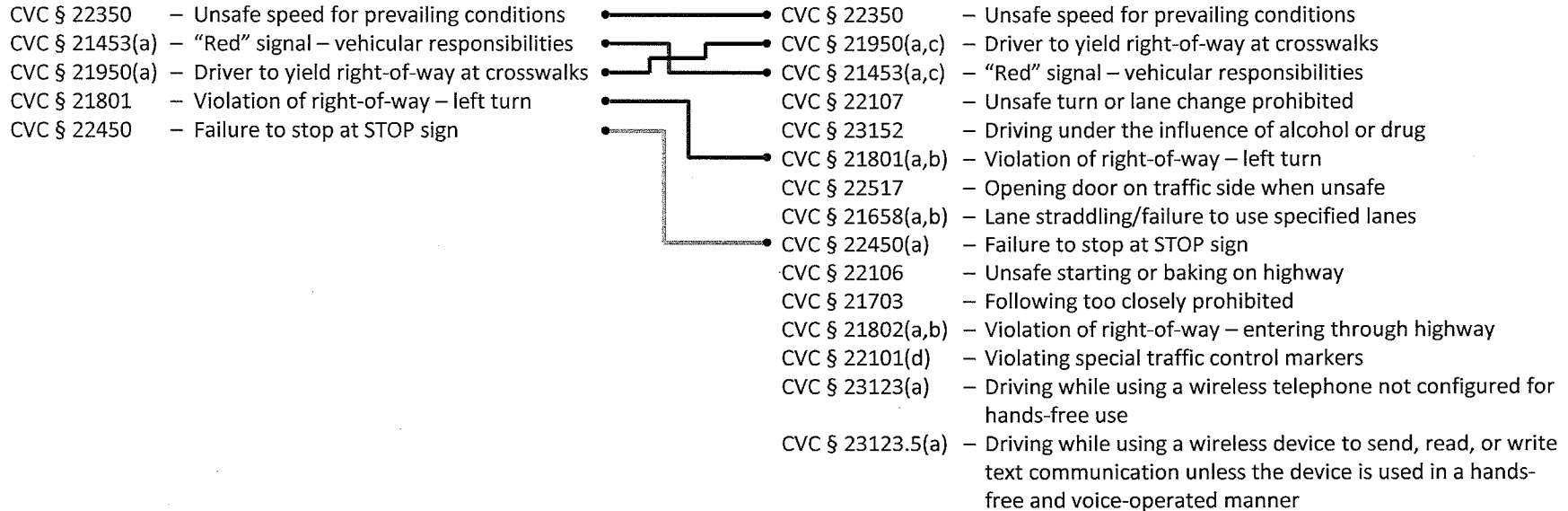


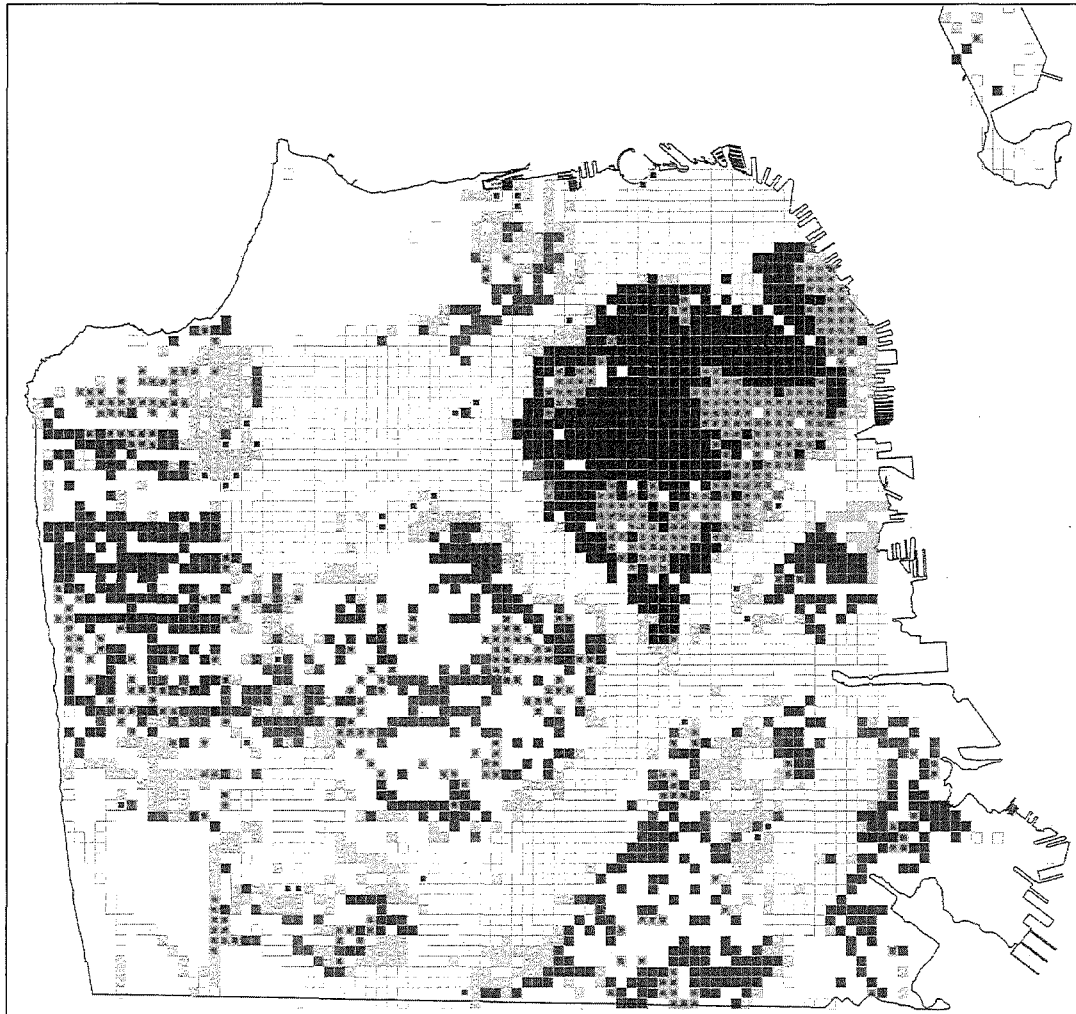
Appendix A

San Francisco Police Department District Boundaries



Comparison between the Current and Recommended Focus on the Five Behaviors





Emerging Hot Spot Analysis (2005-2015)

The hot spot analysis presented on pages 17 and 18 is limited to data from 2013 through 2015 and for the purposes of that analysis, the data from all three years are considered together as a whole. However, for long-term planning purposes, it may also be useful to consider how hot and cold spots change over time. An emerging hot spot analysis analyzes trends in the data to find new, intensifying, diminishing, and sporadic hot and cold spots.

- | | |
|-----------------------|------------------------|
| New Hot Spot | New Cold Spot |
| Consecutive Hot Spot | Consecutive Cold Spot |
| Intensifying Hot Spot | Intensifying Cold Spot |
| Persistent Hot Spot | Persistent Cold Spot |
| Diminishing Hot Spot | Diminishing Cold Spot |
| Sporadic Hot Spot | Sporadic Cold Spot |
| Oscillating Hot Spot | Oscillating Cold Spot |
| Historical Hot Spot | Historical Cold Spot |
| No trend detected | |

Description of Emerging Hot Spot Classifications

- **No Pattern Detected** – Does not fall into any of the hot or cold spot patterns defined below.
- **New Hot Spot** – A location that is a statistically significant hot spot for the final time step and has never been a statistically significant hot spot before.
- **Consecutive Hot Spot** – A location with a single uninterrupted run of statistically significant hot spot bins in the final time-step intervals. The location has never been a statistically significant hot spot prior to the final hot spot run and less than ninety percent of all bins are statistically significant hot spots.
- **Intensifying Hot Spot** – A location that has been a statistically significant hot spot for ninety percent of the time-step intervals, including the final time step. In addition, the intensity of clustering of high counts in each time step is increasing overall and that increase is statistically significant.
- **Persistent Hot Spot** – A location that has been a statistically significant hot spot for ninety percent of the time-step intervals with no discernible trend indicating an increase or decrease in the intensity of clustering over time.
- **Diminishing Hot Spot** – A location that has been a statistically significant hot spot for ninety percent of the time-step intervals, including the final time step. In addition, the intensity of clustering in each time step is decreasing overall and that decrease is statistically significant.
- **Sporadic Hot Spot** – A location that is an on-again then off-again hot spot. Less than ninety percent of the time-step intervals have been statistically significant hot spots and none of the time-step intervals have been statistically significant cold spots.
- **Oscillating Hot Spot** – A statistically significant hot spot for the final time-step interval that has a history of also being a statistically significant cold spot during a prior time step. Less than ninety percent of the time-step intervals have been statistically significant hot spots.
- **Historical Hot Spot** – The most recent time period is not hot, but at least ninety percent of the time-step intervals have been statistically significant hot spots.

Description of Emerging Hot Spot Classifications

- **New Cold Spot** – A location that is a statistically significant cold spot for the final time step and has never been a statistically significant cold spot before.
- **Consecutive Cold Spot** – A location with a single uninterrupted run of statistically significant cold spot bins in the final time-step intervals. The location has never been a statistically significant cold spot prior to the final cold spot run and less than ninety percent of all bins are statistically significant cold spots.
- **Intensifying Cold Spot** – A location that has been a statistically significant cold spot for ninety percent of the time-step intervals, including the final time step. In addition, the intensity of clustering of low counts in each time step is increasing overall and that increase is statistically significant.
- **Persistent Cold Spot** – A location that has been a statistically significant cold spot for ninety percent of the time-step intervals with no discernible trend, indicating an increase or decrease in the intensity of clustering of counts over time.
- **Diminishing Cold Spot** – A location that has been a statistically significant cold spot for ninety percent of the time-step intervals, including the final time step. In addition, the intensity of clustering of low counts in each time step is decreasing overall and that decrease is statistically significant.
- **Sporadic Cold Spot** – A location that is an on-again then off-again cold spot. Less than ninety percent of the time-step intervals have been statistically significant cold spots and none of the time-step intervals have been statistically significant hot spots.
- **Oscillating Cold Spot** – A statistically significant cold spot for the final time-step interval that has a history of also being a statistically significant hot spot during a prior time step. Less than ninety percent of the time-step intervals have been statistically significant cold spots.
- **Historical Cold Spot** – The most recent time period is not cold, but at least ninety percent of the time-step intervals have been statistically significant cold spots.

Appendix D

PCF Grouping Analysis Results - City-wide

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	526
21950(a,c)	Driver to yield right-of-way at crosswalks	362
21453(a,c)	"Red" signal - vehicular responsibilities	262
22107	Unsafe turn or lane change prohibited	221
21801(a,b)	Violation of right-of-way - left turn	185
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	108
23152	Driving under the influence of alcohol or drug	105
21955	Crossing between controlled intersections (Jaywalking)	104
22517	Opening door on traffic side when unsafe	95
21658(a,b)	Lane straddling/failure to use specified lanes	89
22450(a)	Failure to stop at STOP sign	77
22106	Unsafe starting or backing on highway	65
21802(a,b)	Violation of right-of-way - entering through highway	56
21453(d)	"Red" signal - pedestrian responsibilities	52
21950(b)	Pedestrian right-of-way at crosswalks regulated	47
21703	Following too closely prohibited	46
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	38
21755(a)	Unsafe passing on right shoulder	36
21750	Overtaking and passing unsafely	28
21804(a,b)	Entering highway from alley or driveway	28
21650	Failure to keep to right side of road	27
21956(a)	Pedestrian on roadway prohibited	26
22100(a,b)	Turn at intersection from wrong position	25
22101(d)	Violating special traffic control markers	24
21800(a-d)	Violation of right-of-way	19
21650.1	Bicycle to travel in same direction as vehicles	14
21657	Driving against one-way traffic patterns	12
22103	Illegal U-turn in residential district	12
21202(a)	Bicyclist at less than normal speed must keep to the right	11
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	11
22102	Illegal U-turn in business district	11
21663	Driving on sidewalk prohibited	9
21201(a-d)	Equipment requirements for bicycles	8
21451(a,b)	"Green" signal - vehicular responsibilities	8
22515	Leaving vehicle unattended without setting the breaks or stopping the motor	6

Appendix D

PCF	Description	Count
21453(b)	"Red" signal - vehicular responsibilities with right turn	5
21717	Turning across bicycle lane	5
22400(a,b)	Minimum speed law - impeding traffic flow	5
21209(a)	Motor vehicle in bicycle lane prohibited	4
21461(a)	Driver failure to obey signs/signals	4
21751	Passing without sufficient clearance	4
21954(b)	Failure of driver to exercise due care for safety of pedestrian on roadway	4
20002(a)	Hit and run - property damage	3
21200.5	Bicyclist riding under the influence	3
21461.5	Pedestrian failure to obey signs/signals	3
21651(a)	Driving across dividing section on freeway prohibited	3
21752(a,b,d)	Driving left of center - limited view/within 100 feet of bridge, viaduct, tunnel/within 100 feet or when traversing intersection - prohibited	3
21754	Improper passing on right prohibited	3
21756(a-c)	Unsafe passing of standing streetcar, trolley coach, or bus safety zones	3
21803(a,b)	Violation of "Yield" sign	3
21806(a,b)	Failure to yield to emergency vehicle	3
21952	Failure to yield right-of-way on sidewalk to pedestrian	3
22105	Illegal U-turn on highway without unobstructed view	3
22109	Sudden stopping without signaling	3
22500	Stopping, standing, parking in prohibited locations	3
23123(a)	Driving while using a wireless telephone not configured for hands-free use	3
7.2.12	Bicycle riding restricted	3
21208(a,b)	Riding outside bicycle lane prohibited	2
21211(a,b)	Illegally impeding bicycle lanes	2
21451(c,d)	"Green" signal - pedestrian responsibilities	2
21712(a)	Allowing riding on portion of vehicle not designed for passenger use prohibited	2
21760(b,c,d)	Improper passing of a bicycle - Three Feet for Safety Act	2
21951	Overtaking vehicles stopped for pedestrians	2
22108	Signal required before turning or changing lanes	2
22348(a)	Driving in excess of the posted speed limit	2

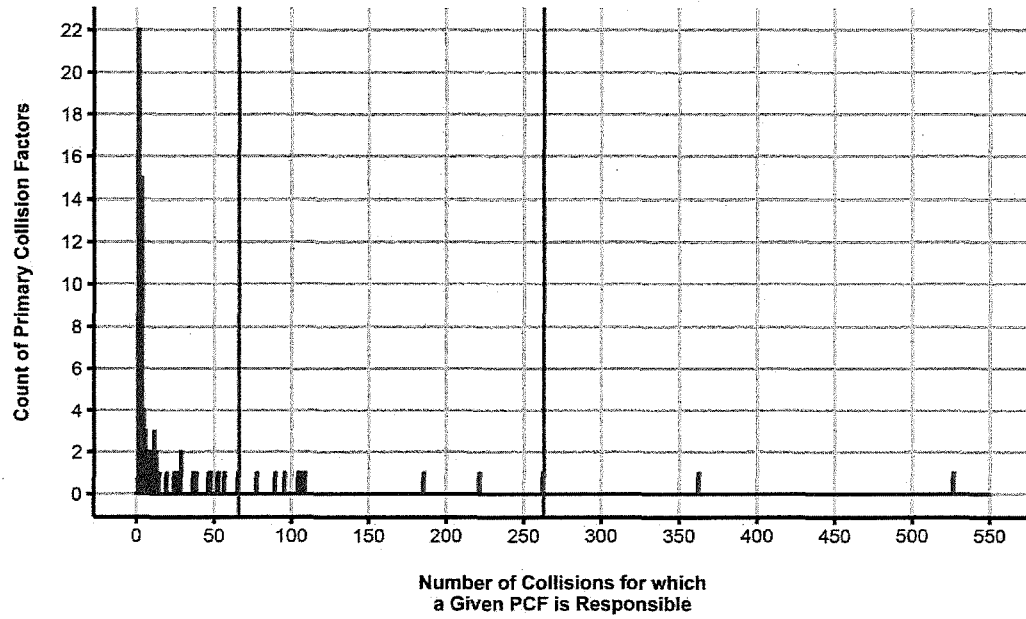
PCF Grouping Analysis Results - City-wide (continued)

PCF	Description	Count
22352(a)(2)	Operating vehicle in excess of 15 MPH at freeway intersection with no clear field of vision	2
22526(a,b)	Blocking intersection (gridlock) prohibited	2
23109(a-c)	Engaging in or abetting a speed contest or exhibition of speed	2
7.2.35	Parking on grades	2
21106(b)	Use of crosswalks where prohibited by sign	1
21200(a)	Bicycle riding - general rights and responsibilities	1
21204(b)	Riding bicycle on other than a permanent seat	1
21210	Bicycle parked - impeding pedestrian traffic prohibited	1
21281	Improperly equipped assistive mobility device	1
21452(b)	Failure of pedestrian to properly respond to signal of yellow light or arrow	1
21457(a)	Actions required at flashing red signal	1
21462	Failure to obey a traffic control signal	1
21463	No person shall illegally operate signals	1
21651(c)	Willfully driving wrong way on divided highway and causing injury or death	1
21660	Failure of approaching vehicles to pass to the right	1
21708	Running over unprotected fire/chemical hose prohibited	1
21753	Failure to yield to overtaking vehicle	1
21968	Motorized skateboard prohibited	1
22100.5	U-Turn at controlled intersection	1
22351(a,b)	Driving in excess of prima facie speed limits established in VC 22352	1
22360	Violation of local speed limits between business and residence districts	1
24252(a-c)	Maintenance of lamps and devices required	1
2800(a)	Refusal to obey a peace officer	1
2800.2(a)	Fleeing a peace officer - reckless driving	1
7.2.13	Non-motorized user-propelled vehicle - unspecified violation	1
7.2.13(b)	Riding a non-motorized user-propelled vehicle in the roadway	1

PCF Grouping Analysis Results - City-wide (continued)

**PCF Grouping Analysis Results
- City-wide**

Distribution of Primary Collision Factors



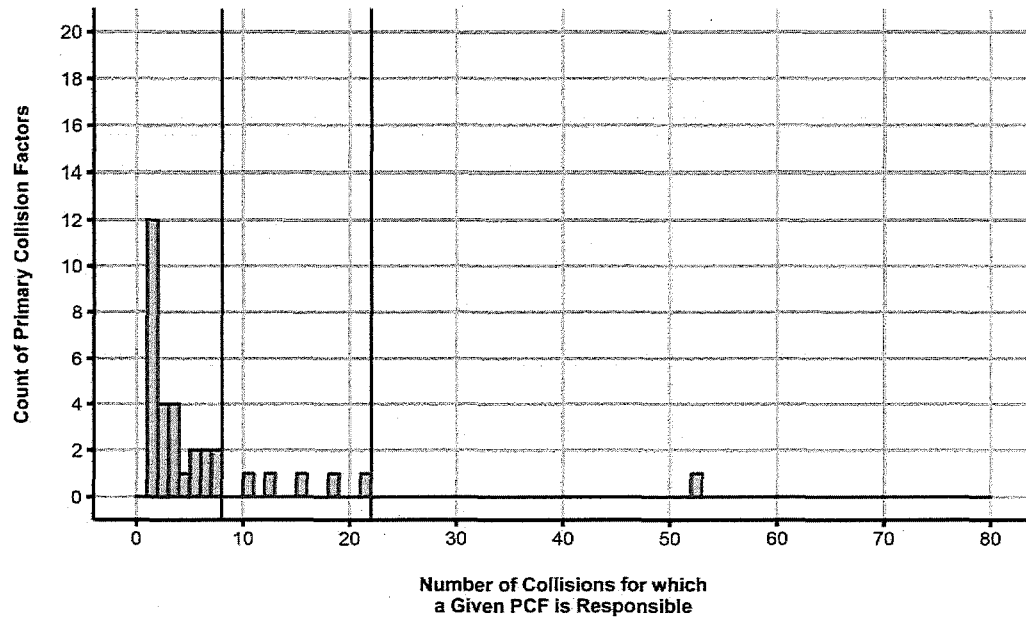
Appendix D

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	52
22107	Unsafe turn or lane change prohibited	21
21950(a,c)	Driver to yield right-of-way at crosswalks	18
23152	Driving under the influence of alcohol or drug	15
21453(a,c)	"Red" signal - vehicular responsibilities	12
22450(a)	Failure to stop at STOP sign	10
21801(a,b)	Violation of right-of-way - left turn	7
21955	Crossing between controlled intersections (Jaywalking)	7
21658(a,b)	Lane straddling/failure to use specified lanes	6
21802(a,b)	Violation of right-of-way - entering through highway	6
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	5
22106	Unsafe starting or backing on highway	5
21453(d)	"Red" signal - pedestrian responsibilities	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	3
21650	Failure to keep to right side of road	3
21750	Overtaking and passing unsafely	3
21755(a)	Unsafe passing on right shoulder	3
21201(a-d)	Equipment requirements for bicycles	2
21800(a-d)	Violation of right-of-way	2
21804(a,b)	Entering highway from alley or driveway	2
21956(a)	Pedestrian on roadway prohibited	2
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21461(a)	Driver failure to obey signs/signals	1
21651(a)	Driving across dividing section on freeway prohibited	1
21712(a)	Allowing riding on portion of vehicle not designed for passenger use prohibited	1
21806(a,b)	Failure to yield to emergency vehicle	1
21950(b)	Pedestrian right-of-way at crosswalks regulated	1
21954(b)	Failure of driver to exercise due care for safety of pedestrian on roadway	1
22102	Illegal U-turn in business district	1
22515	Leaving vehicle unattended without setting the breaks or stopping the motor	1
22517	Opening door on traffic side when unsafe	1
23123(a)	Driving while using a wireless telephone not configured for hands-free use	1

PCF Grouping Analysis Results - Bayview Police District

PCF Grouping Analysis Results - Bayview Police District

Distribution of Primary Collision Factors



Appendix D

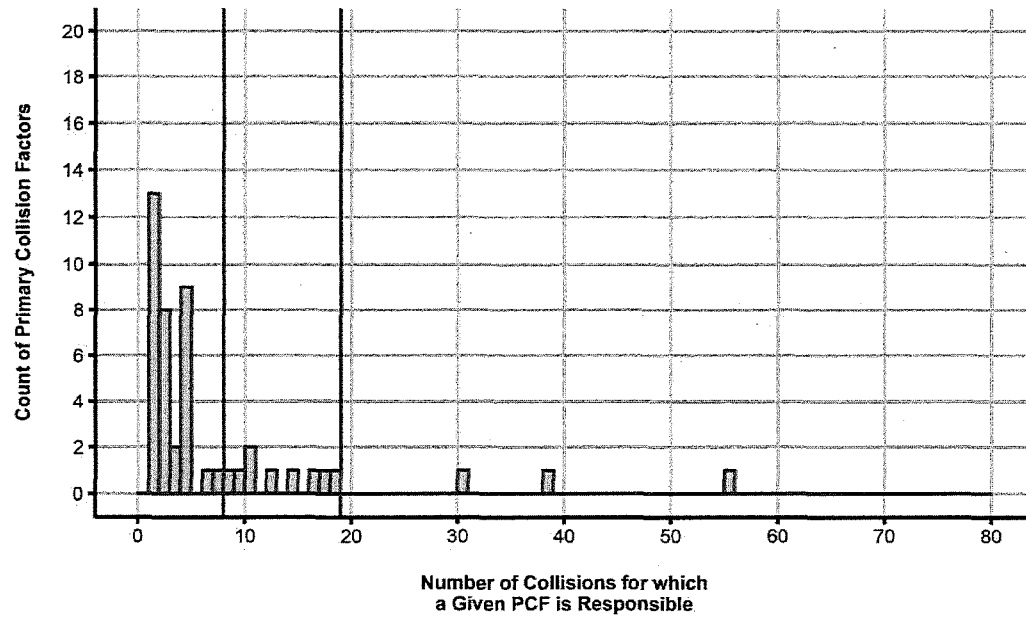
PCF Grouping Analysis Results - Central Police District

PCF	Description	Count
21950(a,c)	Driver to yield right-of-way at crosswalks	55
22350	Unsafe speed for prevailing conditions	38
21453(a,c)	"Red" signal - vehicular responsibilities	30
21955	Crossing between controlled intersections (Jaywalking)	18
22107	Unsafe turn or lane change prohibited	17
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	16
22517	Opening door on traffic side when unsafe	14
21658(a,b)	Lane straddling/failure to use specified lanes	12
21801(a,b)	Violation of right-of-way - left turn	10
23152	Driving under the influence of alcohol or drug	10
21950(b)	Pedestrian right-of-way at crosswalks regulated	9
22106	Unsafe starting or backing on highway	8
21755(a)	Unsafe passing on right shoulder	7
21703	Following too closely prohibited	6
21202(a)	Bicyclist at less than normal speed must keep to the right	4
21453(d)	"Red" signal - pedestrian responsibilities	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	4
21750	Overtaking and passing unsafely	4
21802(a,b)	Violation of right-of-way - entering through highway	4
21804(a,b)	Entering highway from alley or driveway	4
21956(a)	Pedestrian on roadway prohibited	4
22100(a,b)	Turn at intersection from wrong position	4
22450(a)	Failure to stop at STOP sign	4
21657	Driving against one-way traffic patterns	3
22400(a,b)	Minimum speed law - impeding traffic flow	3
21453(b)	"Red" signal - vehicular responsibilities with right turn	2
21650	Failure to keep to right side of road	2
21650.1	Bicycle to travel in same direction as vehicles	2
21663	Driving on sidewalk prohibited	2
21800(a-d)	Violation of right-of-way	2
22101(d)	Violating special traffic control markers	2
22102	Illegal U-turn in business district	2
22515	Leaving vehicle unattended without setting the breaks or stopping the motor	2
21200.5	Bicyclist riding under the influence	1
21201(a-d)	Equipment requirements for bicycles	1
21208(a,b)	Riding outside bicycle lane prohibited	1

21451(a,b)	"Green" signal - vehicular responsibilities	1
21451(c,d)	"Green" signal - pedestrian responsibilities	1
21712(a)	Allowing riding on portion of vehicle not designed for passenger use prohibited	1
21752(a,b,d)	Driving left of center - limited view/within 100 feet of bridge, viaduct, tunnel/within 100 feet or when traversing intersection - prohibited	1
21760(b,c,d)	Improper passing of a bicycle - Three Feet for Safety Act	1
21952	Failure to yield right-of-way on sidewalk to pedestrian	1
21954(b)	Failure of driver to exercise due care for safety of pedestrian on roadway	1
22348(a)	Driving in excess of the posted speed limit	1
22526(a,b)	Blocking intersection (gridlock) prohibited	1
23123(a)	Driving while using a wireless telephone not configured for hands-free use	1

PCF Grouping Analysis Results - Central Police District

Distribution of Primary Collision Factors



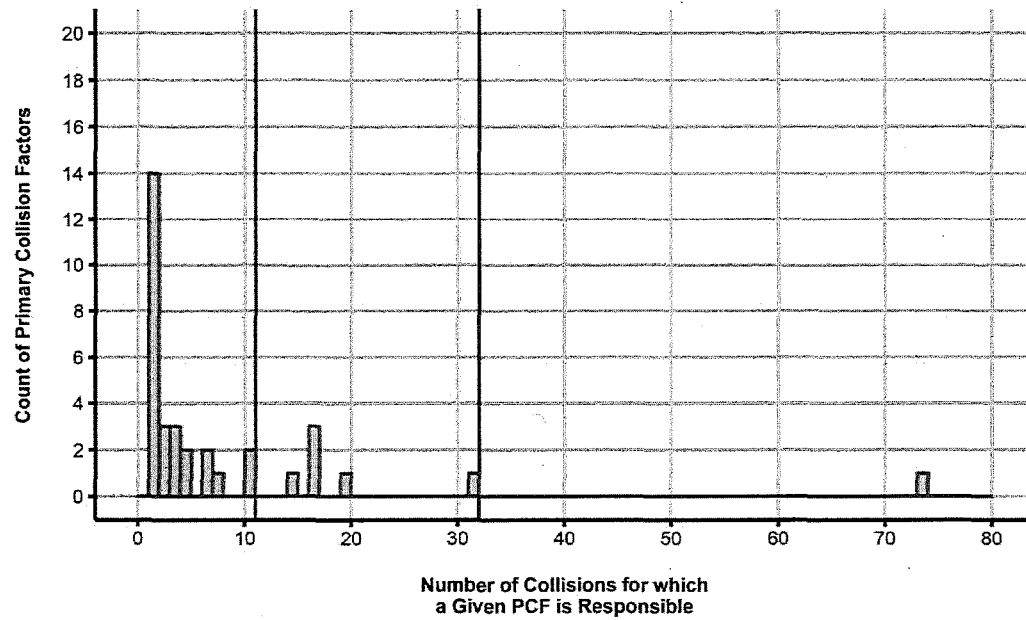
Appendix D

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	73
21950(a,c)	Driver to yield right-of-way at crosswalks	31
21453(a,c)	"Red" signal - vehicular responsibilities	19
21801(a,b)	Violation of right-of-way - left turn	16
22107	Unsafe turn or lane change prohibited	16
23152	Driving under the influence of alcohol or drug	16
22450(a)	Failure to stop at STOP sign	14
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	10
21955	Crossing between controlled intersections (Jaywalking)	10
21658(a,b)	Lane straddling/failure to use specified lanes	7
21802(a,b)	Violation of right-of-way - entering through highway	6
22106	Unsafe starting or backing on highway	6
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	4
21804(a,b)	Entering highway from alley or driveway	4
21650	Failure to keep to right side of road	3
21950(b)	Pedestrian right-of-way at crosswalks regulated	3
22517	Opening door on traffic side when unsafe	3
21201(a-d)	Equipment requirements for bicycles	2
21703	Following too closely prohibited	2
22100(a,b)	Turn at intersection from wrong position	2
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21208(a,b)	Riding outside bicycle lane prohibited	1
21750	Overtaking and passing unsafely	1
21752(a,b,d)	Driving left of center - limited view/within 100 feet of bridge, viaduct, tunnel/within 100 feet or when traversing intersection - prohibited	1
21800(a-d)	Violation of right-of-way	1
21806(a,b)	Failure to yield to emergency vehicle	1
21956(a)	Pedestrian on roadway prohibited	1
22101(d)	Violating special traffic control markers	1
22102	Illegal U-turn in business district	1
22103	Illegal U-turn in residential district	1
22352(a)(2)	Operating vehicle in excess of 15 MPH at freeway intersection with no clear field of vision	1
22500	Stopping, standing, parking in prohibited locations	1
2800.2(a)	Fleeing a peace officer - reckless driving	1
7.2.35	Parking on grades	1

PCF Grouping Analysis Results - Ingleside Police District

PCF Grouping Analysis Results - Ingleside Police District

Distribution of Primary Collision Factors



Appendix D

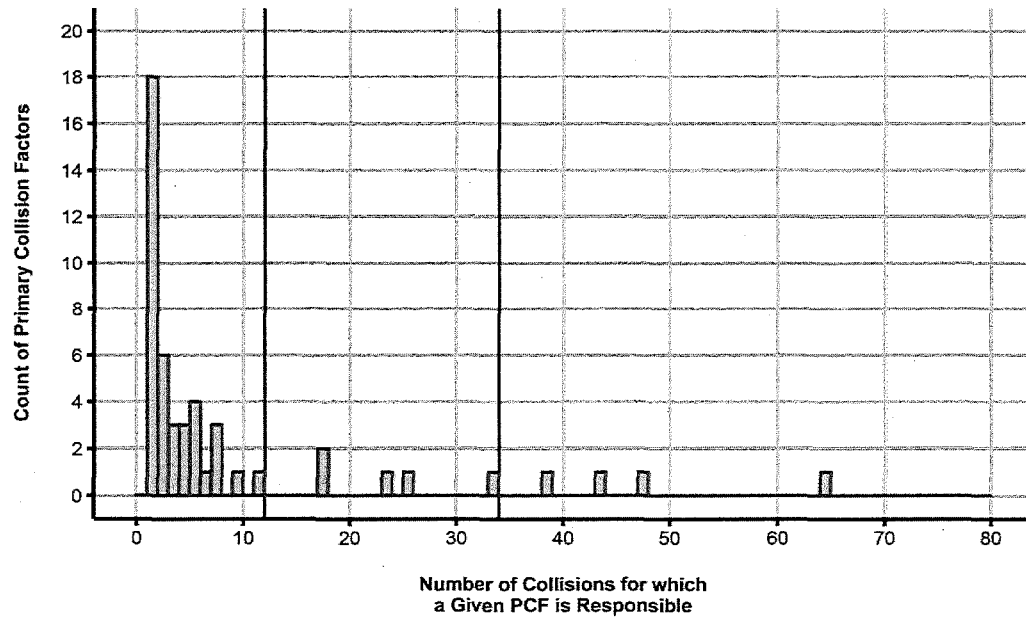
PCF	Description	Count
22350	Unsafe speed for prevailing conditions	64
21801(a,b)	Violation of right-of-way - left turn	47
22107	Unsafe turn or lane change prohibited	43
21950(a,c)	Driver to yield right-of-way at crosswalks	38
21453(a,c)	"Red" signal - vehicular responsibilities	33
22517	Opening door on traffic side when unsafe	25
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	23
21955	Crossing between controlled intersections (Jaywalking)	17
23152	Driving under the influence of alcohol or drug	17
22106	Unsafe starting or backing on highway	11
22450(a)	Failure to stop at STOP sign	9
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	7
21658(a,b)	Lane straddling/failure to use specified lanes	7
21755(a)	Unsafe passing on right shoulder	7
21453(d)	"Red" signal - pedestrian responsibilities	6
21703	Following too closely prohibited	5
21802(a,b)	Violation of right-of-way - entering through highway	5
21804(a,b)	Entering highway from alley or driveway	5
21950(b)	Pedestrian right-of-way at crosswalks regulated	5
21451(a,b)	"Green" signal - vehicular responsibilities	4
21750	Overtaking and passing unsafely	4
21956(a)	Pedestrian on roadway prohibited	4
21209(a)	Motor vehicle in bicycle lane prohibited	3
21650	Failure to keep to right side of road	3
21663	Driving on sidewalk prohibited	3
21650.1	Bicycle to travel in same direction as vehicles	2
21717	Turning across bicycle lane	2
22100(a,b)	Turn at intersection from wrong position	2
22101(d)	Violating special traffic control markers	2
22102	Illegal U-turn in business district	2
22103	Illegal U-turn in residential district	2
20002(a)	Hit and run - property damage	1
21211(a,b)	Illegally impeding bicycle lanes	1
21457(a)	Actions required at flashing red signal	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21708	Running over unprotected fire/chemical hose prohibited	1
21751	Passing without sufficient clearance	1

PCF Grouping Analysis Results - Mission Police District

21754	Improper passing on right prohibited	1
21800(a-d)	Violation of right-of-way	1
21803(a,b)	Violation of "Yield" sign	1
21954(b)	Failure of driver to exercise due care for safety of pedestrian on roadway	1
22105	Illegal U-turn on highway without unobstructed view	1
22109	Sudden stopping without signaling	1
22348(a)	Driving in excess of the posted speed limit	1
22352(a)(2)	Operating vehicle in excess of 15 MPH at freeway intersection with no clear field of vision	1
22500	Stopping, standing, parking in prohibited locations	1
24252(a-c)	Maintenance of lamps and devices required	1
7.2.12	Bicycle riding restricted	1
7.2.13	Non-motorized user-propelled vehicle - unspecified violation	1

PCF Grouping Analysis Results - Mission Police District

Distribution of Primary Collision Factors



Appendix D

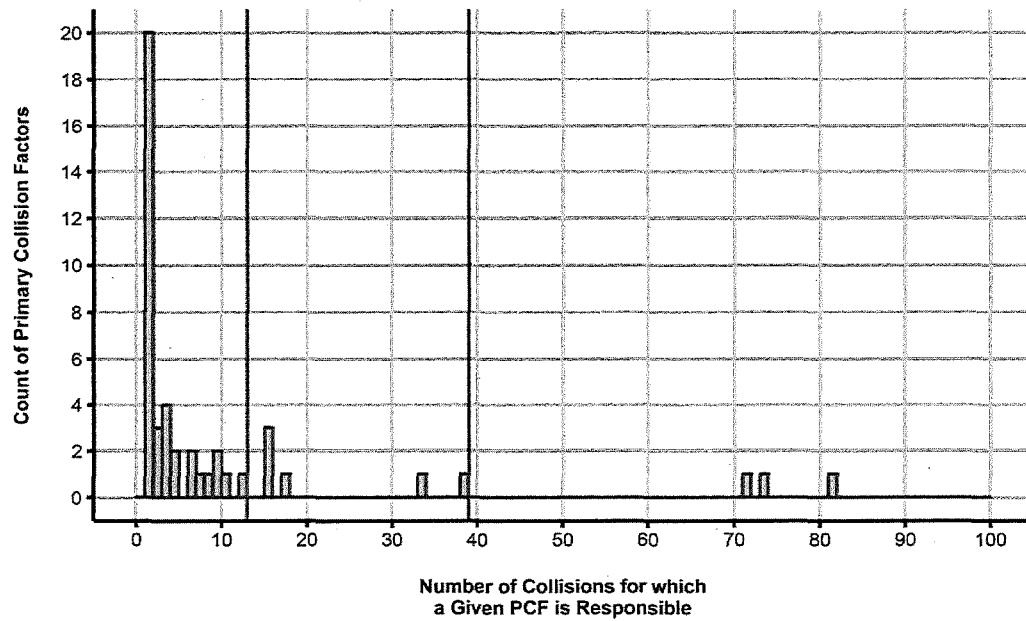
PCF Grouping Analysis Results - Northern Police District

PCF	Description	Count
21453(a,c)	"Red" signal - vehicular responsibilities	81
22350	Unsafe speed for prevailing conditions	73
21950(a,c)	Driver to yield right-of-way at crosswalks	71
22107	Unsafe turn or lane change prohibited	38
21801(a,b)	Violation of right-of-way - left turn	33
21453(d)	"Red" signal - pedestrian responsibilities	17
22450(a)	Failure to stop at STOP sign	15
22517	Opening door on traffic side when unsafe	15
23152	Driving under the influence of alcohol or drug	15
21955	Crossing between controlled intersections (Jaywalking)	12
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	10
21658(a,b)	Lane straddling/failure to use specified lanes	9
22106	Unsafe starting or backing on highway	9
21950(b)	Pedestrian right-of-way at crosswalks regulated	8
21755(a)	Unsafe passing on right shoulder	7
21703	Following too closely prohibited	6
22100(a,b)	Turn at intersection from wrong position	6
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	4
21650	Failure to keep to right side of road	4
21657	Driving against one-way traffic patterns	3
21750	Overtaking and passing unsafely	3
22101(d)	Violating special traffic control markers	3
22103	Illegal U-turn in residential district	3
21800(a-d)	Violation of right-of-way	2
21802(a,b)	Violation of right-of-way - entering through highway	2
21956(a)	Pedestrian on roadway prohibited	2
21200(a)	Bicycle riding - general rights and responsibilities	1
21201(a-d)	Equipment requirements for bicycles	1
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21451(a,b)	"Green" signal - vehicular responsibilities	1
21452(b)	Failure of pedestrian to properly respond to signal of yellow light or arrow	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21461(a)	Driver failure to obey signs/signals	1
21650.1	Bicycle to travel in same direction as vehicles	1
21651(a)	Driving across dividing section on freeway prohibited	1

21717	Turning across bicycle lane	1
21751	Passing without sufficient clearance	1
21804(a,b)	Entering highway from alley or driveway	1
21952	Failure to yield right-of-way on sidewalk to pedestrian	1
21954(b)	Failure of driver to exercise due care for safety of pedestrian on roadway	1
21968	Motorized skateboard prohibited	1
22108	Signal required before turning or changing lanes	1
22351(a,b)	Driving in excess of prima facie speed limits established in VC 22352	1
22515	Leaving vehicle unattended without setting the breaks or stopping the motor	1
23109(a-c)	Engaging in or abetting a speed contest or exhibition of speed	1
7.2.12	Bicycle riding restricted	1

**PCF Grouping Analysis Results
- Northern Police District**

Distribution of Primary Collision Factors



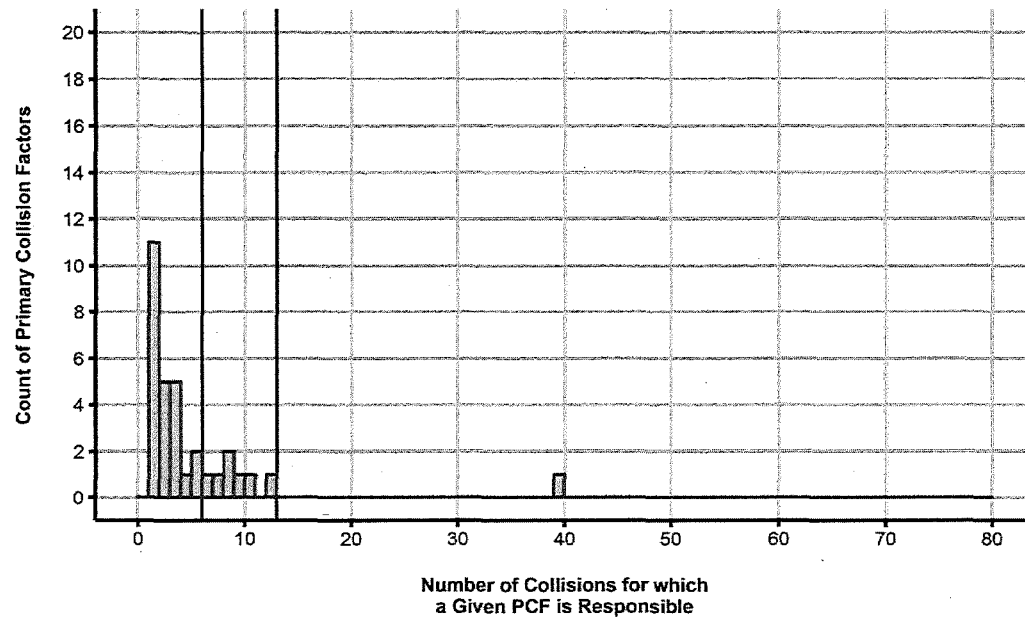
Appendix D

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	39
21950(a,c)	Driver to yield right-of-way at crosswalks	12
21453(a,c)	"Red" signal - vehicular responsibilities	10
21703	Following too closely prohibited	9
21658(a,b)	Lane straddling/failure to use specified lanes	8
22106	Unsafe starting or backing on highway	8
22107	Unsafe turn or lane change prohibited	7
21955	Crossing between controlled intersections (Jaywalking)	6
21750	Overtaking and passing unsafely	5
21801(a,b)	Violation of right-of-way - left turn	5
22517	Opening door on traffic side when unsafe	4
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	3
21802(a,b)	Violation of right-of-way - entering through highway	3
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	3
22450(a)	Failure to stop at STOP sign	3
23152	Driving under the influence of alcohol or drug	3
21453(d)	"Red" signal - pedestrian responsibilities	2
21755(a)	Unsafe passing on right shoulder	2
21800(a-d)	Violation of right-of-way	2
21950(b)	Pedestrian right-of-way at crosswalks regulated	2
21956(a)	Pedestrian on roadway prohibited	2
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21211(a,b)	Illegally impeding bicycle lanes	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21462	Failure to obey a traffic control signal	1
21650	Failure to keep to right side of road	1
21752(a,b,d)	Driving left of center - limited view/within 100 feet of bridge, viaduct, tunnel/within 100 feet or when traversing intersection - prohibited	1
22103	Illegal U-turn in residential district	1
22105	Illegal U-turn on highway without unobstructed view	1
22360	Violation of local speed limits between business and residence districts	1
22515	Leaving vehicle unattended without setting the breaks or stopping the motor	1
7.2.35	Parking on grades	1

PCF Grouping Analysis Results - Park Police District

PCF Grouping Analysis Results - Park Police District

Distribution of Primary Collision Factors



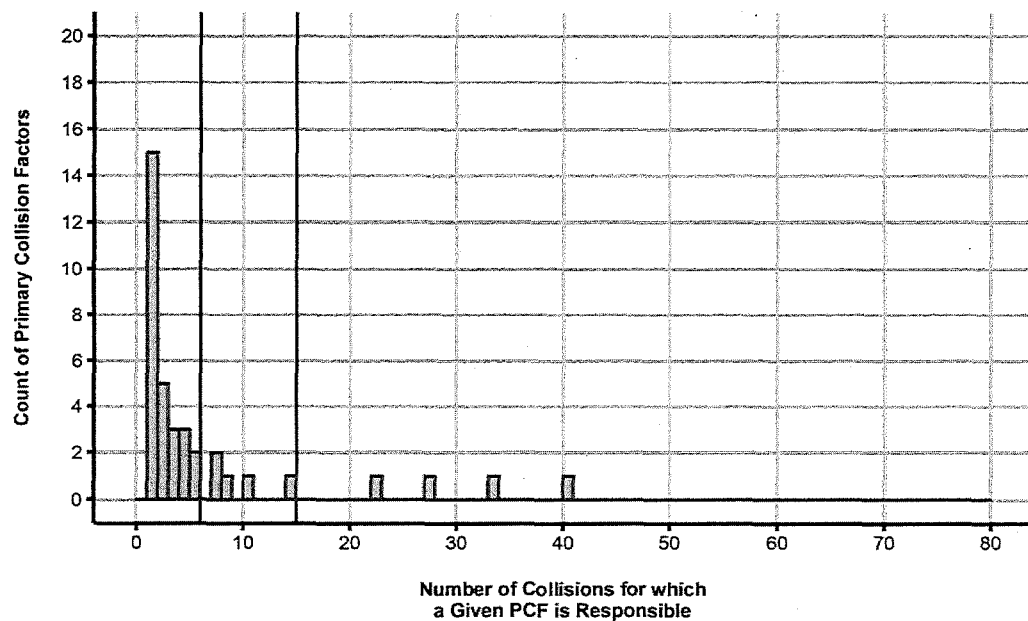
Appendix D

PCF Grouping Analysis Results - Richmond Police District

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	40
21950(a,c)	Driver to yield right-of-way at crosswalks	33
21801(a,b)	Violation of right-of-way - left turn	27
22107	Unsafe turn or lane change prohibited	22
21453(a,c)	"Red" signal - vehicular responsibilities	14
21802(a,b)	Violation of right-of-way - entering through highway	10
22517	Opening door on traffic side when unsafe	8
21658(a,b)	Lane straddling/failure to use specified lanes	7
23152	Driving under the influence of alcohol or drug	7
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	5
22450(a)	Failure to stop at STOP sign	5
21453(d)	"Red" signal - pedestrian responsibilities	4
21800(a-d)	Violation of right-of-way	4
21804(a,b)	Entering highway from alley or driveway	4
21950(b)	Pedestrian right-of-way at crosswalks regulated	3
21955	Crossing between controlled intersections (Jaywalking)	3
22106	Unsafe starting or backing on highway	3
21650	Failure to keep to right side of road	2
21717	Turning across bicycle lane	2
21750	Overtaking and passing unsafely	2
22100(a,b)	Turn at intersection from wrong position	2
22103	Illegal U-turn in residential district	2
21281	Improperly equipped assistive mobility device	1
21451(a,b)	"Green" signal - vehicular responsibilities	1
21451(c,d)	"Green" signal - pedestrian responsibilities	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21461.5	Pedestrian failure to obey signs/signals	1
21650.1	Bicycle to travel in same direction as vehicles	1
21703	Following too closely prohibited	1
21751	Passing without sufficient clearance	1
21754	Improper passing on right prohibited	1
21755(a)	Unsafe passing on right shoulder	1
21803(a,b)	Violation of "Yield" sign	1
21951	Overtaking vehicles stopped for pedestrians	1
21952	Failure to yield right-of-way on sidewalk to pedestrian	1
21956(a)	Pedestrian on roadway prohibited	1
22101(d)	Violating special traffic control markers	1

PCF Grouping Analysis Results - Richmond Police District

Distribution of Primary Collision Factors



Appendix D

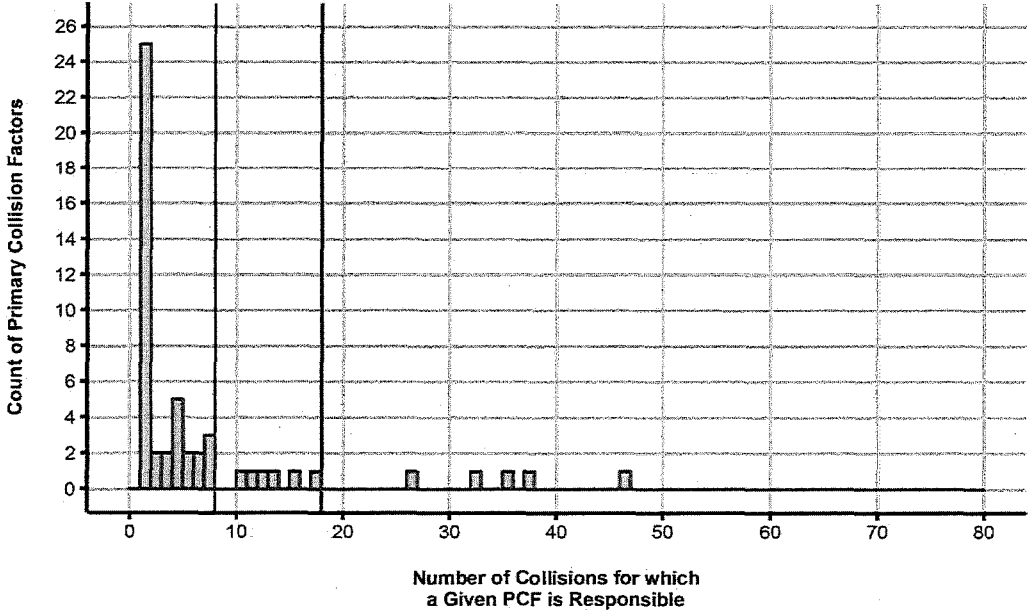
PCF	Description	Count
22350	Unsafe speed for prevailing conditions	46
21453(a,c)	"Red" signal - vehicular responsibilities	37
21950(a,c)	Driver to yield right-of-way at crosswalks	35
22107	Unsafe turn or lane change prohibited	32
21801(a,b)	Violation of right-of-way - left turn	26
22517	Opening door on traffic side when unsafe	17
21658(a,b)	Lane straddling/failure to use specified lanes	15
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	13
22101(d)	Violating special traffic control markers	12
23152	Driving under the influence of alcohol or drug	11
21955	Crossing between controlled intersections (Jaywalking)	10
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	7
21650	Failure to keep to right side of road	7
21755(a)	Unsafe passing on right shoulder	7
21703	Following too closely prohibited	6
22100(a,b)	Turn at intersection from wrong position	6
21453(d)	"Red" signal - pedestrian responsibilities	5
21650.1	Bicycle to travel in same direction as vehicles	5
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	4
21804(a,b)	Entering highway from alley or driveway	4
21950(b)	Pedestrian right-of-way at crosswalks regulated	4
22102	Illegal U-turn in business district	4
22106	Unsafe starting or backing on highway	4
21657	Driving against one-way traffic patterns	3
21956(a)	Pedestrian on roadway prohibited	3
20002(a)	Hit and run - property damage	2
21802(a,b)	Violation of right-of-way - entering through highway	2
21106(b)	Use of crosswalks where prohibited by sign	1
21201(a-d)	Equipment requirements for bicycles	1
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21204(b)	Riding bicycle on other than a permanent seat	1
21209(a)	Motor vehicle in bicycle lane prohibited	1
211210	Bicycle parked - impeding pedestrian traffic prohibited	1
21453(b)	"Red" signal - vehicular responsibilities with right turn	1
21461(a)	Driver failure to obey signs/signals	1
21461.5	Pedestrian failure to obey signs/signals	1
21660	Failure of approaching vehicles to pass to the right	1

PCF Grouping Analysis Results - Southern Police District

21663	Driving on sidewalk prohibited	1
21750	Overtaking and passing unsafely	1
21753	Failure to yield to overtaking vehicle	1
21756(a-c)	Unsafe passing of standing streetcar, trolley coach, or bus safety zones	1
21800(a-d)	Violation of right-of-way	1
21803(a,b)	Violation of "Yield" sign	1
22100.5	U-Turn at controlled intersection	1
22108	Signal required before turning or changing lanes	1
22400(a,b)	Minimum speed law - impeding traffic flow	1
22450(a)	Failure to stop at STOP sign	1
22500	Stopping, standing, parking in prohibited locations	1
23109(a-c)	Engaging in or abetting a speed contest or exhibition of speed	1
23123(a)	Driving while using a wireless telephone not configured for hands-free use	1
2800(a)	Refusal to obey a peace officer	1
7.2.12	Bicycle riding restricted	1

PCF Grouping Analysis Results
- Southern Police District

Distribution of Primary Collision Factors



Appendix D

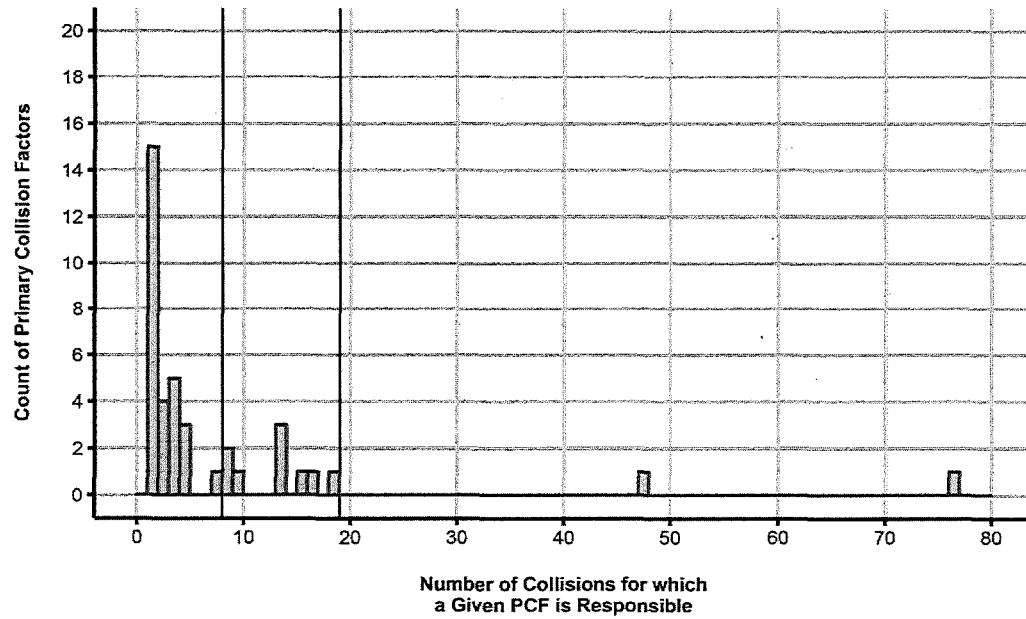
PCF	Description	Count
22350	Unsafe speed for prevailing conditions	76
21950(a,c)	Driver to yield right-of-way at crosswalks	47
21802(a,b)	Violation of right-of-way - entering through highway	18
22450(a)	Failure to stop at STOP sign	16
22107	Unsafe turn or lane change prohibited	15
21658(a,b)	Lane straddling/failure to use specified lanes	13
21801(a,b)	Violation of right-of-way - left turn	13
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	13
21703	Following too closely prohibited	9
21453(a,c)	"Red" signal - vehicular responsibilities	8
23152	Driving under the influence of alcohol or drug	8
21950(b)	Pedestrian right-of-way at crosswalks regulated	7
21955	Crossing between controlled intersections (Jaywalking)	4
21956(a)	Pedestrian on roadway prohibited	4
22106	Unsafe starting or backing on highway	4
21453(d)	"Red" signal - pedestrian responsibilities	3
21650.1	Bicycle to travel in same direction as vehicles	3
21750	Overtaking and passing unsafely	3
21800(a-d)	Violation of right-of-way	3
22103	Illegal U-turn in residential district	3
21650	Failure to keep to right side of road	2
21657	Driving against one-way traffic patterns	2
21804(a,b)	Entering highway from alley or driveway	2
22100(a,b)	Turn at intersection from wrong position	2
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21451(a,b)	"Green" signal - vehicular responsibilities	1
21453(b)	"Red" signal - vehicular responsibilities with right turn	1
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21461(a)	Driver failure to obey signs/signals	1
21651(a)	Driving across dividing section on freeway prohibited	1
21756(a-c)	Unsafe passing of standing streetcar, trolley coach, or bus safety zones	1
21806(a,b)	Failure to yield to emergency vehicle	1
21951	Overtaking vehicles stopped for pedestrians	1
22101(d)	Violating special traffic control markers	1
22105	Illegal U-turn on highway without unobstructed view	1
22109	Sudden stopping without signaling	1

PCF Grouping Analysis Results - Taraval Police District

22526(a,b)	Blocking intersection (gridlock) prohibited	1
7.2.13(b)	Riding a non-motorized user-propelled vehicle in the roadway	1

**PCF Grouping Analysis Results
- Taraval Police District**

Distribution of Primary Collision Factors



Appendix D

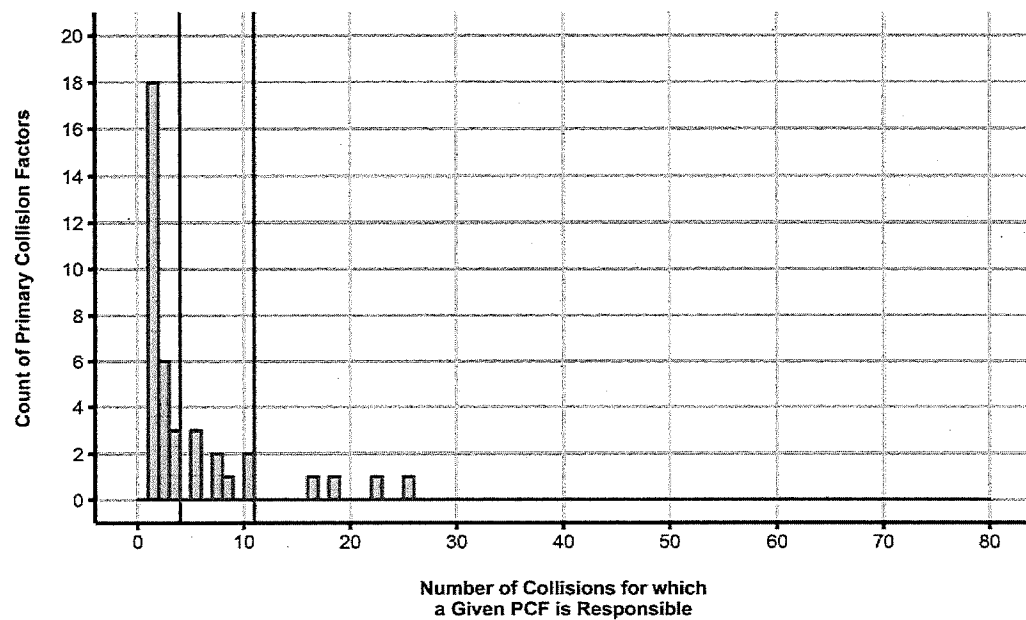
PCF Grouping Analysis Results - Tenderloin Police District

PCF	Description	Count
22350	Unsafe speed for prevailing conditions	25
21950(a,c)	Driver to yield right-of-way at crosswalks	22
21453(a,c)	"Red" signal - vehicular responsibilities	18
21955	Crossing between controlled intersections (Jaywalking)	16
21954(a)	Pedestrians must yield right-of-way outside of crosswalks	10
22107	Unsafe turn or lane change prohibited	10
22517	Opening door on traffic side when unsafe	8
21453(d)	"Red" signal - pedestrian responsibilities	7
22106	Unsafe starting or backing on highway	7
21456(a,b)	Pedestrian violation of "Walk" or "Wait" signals	5
21658(a,b)	Lane straddling/failure to use specified lanes	5
21950(b)	Pedestrian right-of-way at crosswalks regulated	5
21663	Driving on sidewalk prohibited	3
21956(a)	Pedestrian on roadway prohibited	3
23152	Driving under the influence of alcohol or drug	3
21200.5	Bicyclist riding under the influence	2
21703	Following too closely prohibited	2
21750	Overtaking and passing unsafely	2
21755(a)	Unsafe passing on right shoulder	2
21804(a,b)	Entering highway from alley or driveway	2
22101(d)	Violating special traffic control markers	2
21201(a-d)	Equipment requirements for bicycles	1
21202(a)	Bicyclist at less than normal speed must keep to the right	1
21453(b)	"Red" signal - vehicular responsibilities with right turn	1
21460(a,b)	Improper turns over double lines/solid lines to right prohibited	1
21461.5	Pedestrian failure to obey signs/signals	1
21463	No person shall illegally operate signals	1
21651(c)	Willfully driving wrong way on divided highway and causing injury or death	1
21657	Driving against one-way traffic patterns	1
21751	Passing without sufficient clearance	1
21754	Improper passing on right prohibited	1
21756(a-c)	Unsafe passing of standing streetcar, trolley coach, or bus safety zones	1
21760(b,c,d)	Improper passing of a bicycle - Three Feet for Safety Act	1
21800(a-d)	Violation of right-of-way	1
21801(a,b)	Violation of right-of-way - left turn	1
22100(a,b)	Turn at intersection from wrong position	1

22102	Illegal U-turn in business district	1
22109	Sudden stopping without signaling	1
22400(a,b)	Minimum speed law - impeding traffic flow	1

PCF Grouping Analysis Results - Tenderloin Police District

Distribution of Primary Collision Factors



From: Board of Supervisors, (BOS)
To: BOS-Supervisors; Wong, Linda (BOS)
Subject: FW: Grant Budget Revision for HCAP03-17 CDC BASIC-REFUGEE
Attachments: Memo to BOS for Budget Revision.docx; San Francisco 16-17 Revised RHAP Award 02 02 17.pdf; Attachment J - Revision Approved 02 15 17.pdf

Hello,

Attached is the memo of grant budget revision for the line item exceeding 15% and Contract Amendment Documents.

Thank you.

Victoria Vasilevitsky
Fiscal – Grant Unit
1380 Howard St., Rm. 413
San Francisco, CA 94103
Phone (415) 255-3462
Fax (415) 252-3063



City and County of San Francisco
Department of Public Health
POPULATION HEALTH AND PREVENTION

1380 Howard Street, Rm. 448
San Francisco, CA 94103-2614
415.255.3450 FAX 415.255.3675

March 14, 2017

To: Clerk of the Board of Supervisors

From: Victoria Vasilevitsky
(415) 255-3462
victoria.vasilevitsky@sfdph.org

Cc: Controller's Office AOSD

Subject: Grant Budget Revision
Grant Name: CDC BASIC-REFUGEE

In accordance with Administrative Code Section 10.170-1(F), this memo serves to notify the Board of Supervisors of a State grant line item budget revision in excess of 15% requiring funding agency approval.

A signed copy of budget revision is attached for your review.

Please feel free to contact me @ (415) 255-3462 or victoria.vasilevitsky@sfdph.org if you have any questions.

Thank you.



State of California—Health and Human Services Agency
California Department of Public Health



KAREN L. SMITH, MD, MPH
Director and State Public Health Officer

EDMUND G. BROWN JR.
Governor

February 2, 2017

Tomás J. Aragón, MD, DrPH
Health Officer
San Francisco County
101 Grove Street, Room 308
San Francisco, CA 94102

Dear Dr. Aragón:

REFUGEE HEALTH ASSESSMENT PROGRAM (RHAP) – NUMBER 16-38-90899-00
REVISED AWARD AMOUNT: \$343,994 – FISCAL YEAR 2016-2017

This letter is to inform you that the Refugee Health Assessment Program (RHAP) continuation grant for the period of October 1, 2016 through September 30, 2017, has been reduced to **\$343,994**. This award is subject to an appropriation of funds from the Federal Office of Refugee Resettlement (ORR).

Per the ORR policy request for reimbursement of expenditures under this RHAP award, expenditures must be commensurate with the number of health assessments. Thus, the level of your original RHAP award was based on an estimated number of refugees projected to arrive in your County for the federal fiscal year. However, per the Executive Order (EO): Protecting the Nation from Foreign Terrorist Entry into the United States dated January 27, 2017, the number of refugee arrivals in the United States for 2016-17 will be decreased. Based on the EO and the current refugee arrival trends in your County, it is estimated that there will be a 10% decrease in refugee arrivals for the remainder of the federal fiscal year. Therefore, it is necessary at this time to reduce your RHAP award based on the adjusted refugee arrival estimate. Should there be a significant increase in arrivals to your County during the grant period, you may contact the Office of Refugee Health to request an increase in funds.

Please submit a revised Budget Detail and Justification to reflect the reduced award no later than **February 17, 2017**, in order to receive reimbursement. Should you have any questions, please contact me at (916) 552-8264.

Sincerely,

Marisa Ramos, PhD
Chief, Office of Refugee Health



Tomás J. Aragón, MD, DrPH
Page 2
February 2, 2017

cc: Cristy Dieterich, MPH
Program Coordinator/Health Educator
Newcomers Health Program
San Francisco Department of Public Health
30 Van Ness, Suite 2300
San Francisco, CA 94102

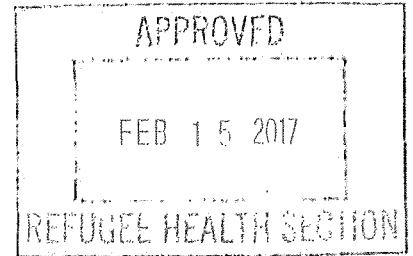
Patricia Erwin, MPH, Director
Community Health Promotion and Prevention Section
San Francisco Department of Public Health
30 Van Ness, Suite 2300
San Francisco, CA 94102

Jesse Peck, Health Program Specialist
California Department of Public Health
Office of Refugee Health
MS 5204, P.O. Box 997377
Sacramento, CA 95899-7377

Susan Osfeld
California Department of Public Health
Office of Refugee Health
MS 5204, P.O. Box 997377
Sacramento, CA 95899-7377

ATTACHMENT J

BUDGET DETAIL



Grantee: San Francisco Department of Public Health
Name of Grant: Refugee Health Assessment Program
BUDGET REVISION
Grant Number: 16-38-90899-00
Budget Period: October 01, 2016 - September 30, 2017
 Budget Revision Effective February 1, 2017
PERSONNEL SERVICES

<u>Personnel with Benefits</u>	<u>Hourly Rate</u>	<u>No. of Pay</u>		<u>Previously Approved</u>	<u>Revision Effective 2/1/17</u>	<u>New Revised Amount Eff 2/1/2017</u>
		<u>Salary or</u>	<u>Periods Percent</u>			
Health Educator (2822)	\$3,547 - 3,926	26	54%	\$ 53,717	\$ 403	\$ 54,120
Health Program Coordinator (2589)	\$2,672 - 3,248	26	80%	\$ 57,239	\$ (232)	\$ 57,007
Deputy Director, CHEP(2825)	\$4,117-4,322	26	5%	\$ 5,620	\$ (117)	\$ 5,503
Total Salaries				\$ 116,576	\$ 53	\$ 116,630
Fringe Benefits (40-48%)				\$ 48,169	\$ (6,245)	\$ 41,924
<u>Non-Benefit Staff</u>				\$ -	\$ -	\$ -
Total Non-Benefit Staff				\$ -	\$ -	\$ -
Total Personnel Services				\$ 164,746	\$ (6,192)	\$ 158,554

OPERATING EXPENSES

Travel	\$ -	\$ -	\$ -
Office Supplies	\$ -	\$ -	\$ -
Med/Pharm/Lab Supplies	\$ 22,446	\$ 6,192	\$ 28,638
Subcontract: International Institute of Bay Area (staffing)	\$ 76,808	\$ -	\$ 76,808
Subcontract: Webpragma through SFSC (database support)	\$ 111,000	\$ (38,221)	\$ 72,779
Subcontract: Strategic Planning through SFSC (strategy planning)	\$ 7,215	\$ -	\$ 7,215
Indirect Costs (Not available to counties)	\$ -	\$ -	\$ -
Total Operating Expenses	\$ 217,469	\$ (32,029)	\$ 185,440
TOTAL BUDGET	\$ 382,215	\$ (38,221)	\$ 343,994

TOTAL AWARD

\$ 343,994

California Refugee Health Program
 Policy and Procedure Manual
 November 2012

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

MEMORANDUM

Date: March 13, 2017
To: Members, Board of Supervisors
From: Angela Calvillo, Clerk of the Board
Subject: Form 700

This is to inform you that the following individual has submitted a Form 700 Statement:

Noelle Duong – Legislative Aide – Assuming
Arthur Louie – Budget and Legislative Analyst – Annual
Alisa Somera - Legislative Deputy Director – Annual

OFFICE OF THE MAYOR
SAN FRANCISCO



ORIG: Rules C: C6 B,
LEG DEP.
Dep. G. A,
CPAGE1 ac FILE
EDWIN M. LEE
MAYOR

March 8, 2017

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

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2017 MAR -8 PM 4: 17
BY *ew*

Dear Ms. Calvillo,

Pursuant to the Section 3.100 (18) of the Charter of the City and County of San Francisco, I hereby make the following appointment:

Jonathan Beauford, to the Juvenile Probation Commission, filling the seat formerly held by Annie Wong, for a term ending January 15, 2021.

I am confident that Mr. Beauford will serve our community well. He comes highly recommended by the Superior Court. Attached are his qualifications to serve, which demonstrate how this appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any questions related to this appointment, please contact my Deputy Chief of Staff, Francis Tsang, at 415-554-6467.

Sincerely,

Edwin M. Lee
Edwin M. Lee
Mayor

Jonathan Beauford

555 Bartlett St. #406
San Francisco, CA 94110

516.884.8619
jonathan.beauford@gmail.com

Experience

Google / Intern Programs Manager
JANUARY 2016 - PRESENT, SAN FRANCISCO

Lead team of 10 in recruitment and programming for all US business interns

College Track / Site Director
JULY 2014 - JANUARY 2016, SAN FRANCISCO

Directed largest office of national non-profit, managed 35 staff members serving 500 students, with \$1.5M budget: 94% program retention, 86% 4-yr college matriculation, 86% college persistence

Harlem Village Academies / Founding Director of College Programs
JUNE 2011 - AUGUST 2011, NEW YORK

Designed, staffed, and managed college counseling and alumni support programs for 1.4k-student charter network; 100% college acceptance, 96% persistence.

The Parthenon Group / Summer Principal
JUNE 2011 - AUGUST 2011, BOSTON

Managed system cost analysis of teacher effectiveness reforms; delivered estimate of market size and incremental spend required for full market penetration.

New York University / Sr. Asst. Director of Undergraduate Admissions
JULY 2007 - AUGUST 2010, NEW YORK

Administered marketing to increase applications by 8%; evaluated 2.5k applications annually; designed flexible reading schedule for 20 team members to process 38k applications in four months.

Education

Yale School of Management / MBA
AUGUST 2010 - MAY 2012, NEW HAVEN

Education Club Co-Chair, Global Social Enterprise Consultant, Black Business Alliance

New York University / MA, Psychology
AUGUST 2005 - MAY 2007, NEW YORK

Masters Scholar (4.0), Thesis: Automatic Attitude Change

Princeton University / AB, Psychology
AUGUST 2001 - MAY 2005, NEW JERSEY

Black Men's Awareness Group President 2003-2005

Interests

Health and well-being, casual astrophysics, being nice

STATEMENT OF ECONOMIC INTERESTS
COVER PAGE

Date Initial Filing Received
 Official Use Only

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
Beauford Jonathan Louis

1. Office, Agency, or Court

Agency Name (Do not use acronyms) Juvenile Probation Commission Co
 Division, Board, Department, District, if applicable Your Position
Commissioner

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge or Court Commissioner (Statewide Jurisdiction)
 Multi-County _____ County of _____
 City of San Francisco Other _____

3. Type of Statement (Check at least one box)

- Annual:** The period covered is January 1, 2016, through December 31, 2016.
 -or- The period covered is _____, through December 31, 2016.
 Assuming Office: Date assumed _____
 Candidate: Election year _____ and office sought, if different than Part 1: _____
 Leaving Office: Date Left _____ (Check one)
 The period covered is January 1, 2016, through the date of leaving office.
 -or-
 The period covered is _____, through the date of leaving office.

4. Schedule Summary (must complete) ► Total number of pages including this cover page: _____

Schedules attached

Schedule A-1 - Investments - schedule attached
 Schedule A-2 - Investments - schedule attached
 Schedule B - Real Property - schedule attached
 Schedule C - Income, Loans, & Business Positions - schedule attached
 Schedule D - Income - Gifts - schedule attached
 Schedule E - Income - Gifts - Travel Payments - schedule attached

-or-
 None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
 (Business or Agency Address Recommended - Public Document)
555 Buell St. #406 San Francisco CA 94110
 DAYTIME TELEPHONE NUMBER E-MAIL ADDRESS
(510) 884-8619 jonathan.beauford@gmail.com

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 03/08/2017 Signature _____
 (month, day, year) (File the originally signed statement with your filing official.)

**SCHEDULE A-1
Investments**

Stocks, Bonds, and Other Interests
(Ownership Interest is Less Than 10%)

Do not attach brokerage or financial statements.

CALIFORNIA FORM 700
FAIR POLITICAL PRACTICES COMMISSION

Name _____

▶ NAME OF BUSINESS ENTITY
Google

GENERAL DESCRIPTION OF THIS BUSINESS
Technology Company

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
1 / 8 / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____ / ____ / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____ / ____ / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____ / ____ / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____ / ____ / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____ / ____ / 16 _____ / ____ / 16
 ACQUIRED DISPOSED

Comments: _____

SCHEDULE A-2
Investments, Income, and Assets
of Business Entities/Trusts
 (Ownership Interest is 10% or Greater)

CALIFORNIA FORM 700
 FAIR POLITICAL PRACTICES COMMISSION

Name _____

▶ 1. BUSINESS ENTITY OR TRUST

Better Markit, LLC
 Name
555 Bartlett St Apt 406, San Francisco, CA 94110
 Address (Business Address Acceptable)
 Check one
 Trust, go to 2 Business Entity, complete the box, then go to 2

GENERAL DESCRIPTION OF THIS BUSINESS
Management Consulting Company

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$0 - \$1,999 _____ / ____ / 16 _____ / ____ / 16
 \$2,000 - \$10,000 ACQUIRED DISPOSED
 \$10,001 - \$100,000
 \$100,001 - \$1,000,000
 Over \$1,000,000

NATURE OF INVESTMENT
 Partnership Sole Proprietorship _____ Other

YOUR BUSINESS POSITION Sole Proprietor

▶ 2. IDENTIFY THE GROSS INCOME RECEIVED (INCLUDE YOUR PRO RATA SHARE OF THE GROSS INCOME TO THE ENTITY/TRUST)

\$0 - \$499 \$10,001 - \$100,000
 \$500 - \$1,000 OVER \$100,000
 \$1,001 - \$10,000

▶ 3. LIST THE NAME OF EACH REPORTABLE SINGLE SOURCE OF INCOME OF \$10,000 OR MORE (Attach a separate sheet if necessary.)

None or Names listed below

▶ 4. INVESTMENTS AND INTERESTS IN REAL PROPERTY HELD OR LEASED BY THE BUSINESS ENTITY OR TRUST

Check one box:
 INVESTMENT REAL PROPERTY

Name of Business Entity, if Investment, or Assessor's Parcel Number or Street Address of Real Property _____

Description of Business Activity or City or Other Precise Location of Real Property _____

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$2,000 - \$10,000 _____ / ____ / 16 _____ / ____ / 16
 \$10,001 - \$100,000 ACQUIRED DISPOSED
 \$100,001 - \$1,000,000
 Over \$1,000,000

NATURE OF INTEREST
 Property Ownership/Deed of Trust Stock Partnership

Leasehold _____ Yrs. remaining Other _____

Check box if additional schedules reporting investments or real property are attached

▶ 1. BUSINESS ENTITY OR TRUST

Name _____
 Address (Business Address Acceptable) _____
 Check one
 Trust, go to 2 Business Entity, complete the box, then go to 2

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$0 - \$1,999 _____ / ____ / 16 _____ / ____ / 16
 \$2,000 - \$10,000 ACQUIRED DISPOSED
 \$10,001 - \$100,000
 \$100,001 - \$1,000,000
 Over \$1,000,000

NATURE OF INVESTMENT
 Partnership Sole Proprietorship _____ Other

YOUR BUSINESS POSITION _____

▶ 2. IDENTIFY THE GROSS INCOME RECEIVED (INCLUDE YOUR PRO RATA SHARE OF THE GROSS INCOME TO THE ENTITY/TRUST)

\$0 - \$499 \$10,001 - \$100,000
 \$500 - \$1,000 OVER \$100,000
 \$1,001 - \$10,000

▶ 3. LIST THE NAME OF EACH REPORTABLE SINGLE SOURCE OF INCOME OF \$10,000 OR MORE (Attach a separate sheet if necessary.)

None or Names listed below

▶ 4. INVESTMENTS AND INTERESTS IN REAL PROPERTY HELD OR LEASED BY THE BUSINESS ENTITY OR TRUST

Check one box:
 INVESTMENT REAL PROPERTY

Name of Business Entity, if Investment, or Assessor's Parcel Number or Street Address of Real Property _____

Description of Business Activity or City or Other Precise Location of Real Property _____

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$2,000 - \$10,000 _____ / ____ / 16 _____ / ____ / 16
 \$10,001 - \$100,000 ACQUIRED DISPOSED
 \$100,001 - \$1,000,000
 Over \$1,000,000

NATURE OF INTEREST
 Property Ownership/Deed of Trust Stock Partnership

Leasehold _____ Yrs. remaining Other _____

Check box if additional schedules reporting investments or real property are attached

Comments: Inactive in 2016

SCHEDULE B
Interests in Real Property
 (Including Rental Income)

Name _____

▶ ASSESSOR'S PARCEL NUMBER OR STREET ADDRESS
555 Bartlett St. Apt #406

CITY
San Francisco

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$2,000 - \$10,000
 \$10,001 - \$100,000
 \$100,001 - \$1,000,000
 Over \$1,000,000

IF APPLICABLE, LIST DATE:
 _____/_____/16 _____/_____/16
 ACQUIRED DISPOSED

NATURE OF INTEREST
 Ownership/Deed of Trust Easement
 Leasehold _____ Residence
 Yrs. remaining Other

IF RENTAL PROPERTY, GROSS INCOME RECEIVED
 \$0 - \$499 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000

SOURCES OF RENTAL INCOME: If you own a 10% or greater interest, list the name of each tenant that is a single source of income of \$10,000 or more.
 None

▶ ASSESSOR'S PARCEL NUMBER OR STREET ADDRESS

CITY

FAIR MARKET VALUE IF APPLICABLE, LIST DATE:
 \$2,000 - \$10,000
 \$10,001 - \$100,000
 \$100,001 - \$1,000,000
 Over \$1,000,000

IF APPLICABLE, LIST DATE:
 _____/_____/16 _____/_____/16
 ACQUIRED DISPOSED

NATURE OF INTEREST
 Ownership/Deed of Trust Easement
 Leasehold _____ _____
 Yrs. remaining Other

IF RENTAL PROPERTY, GROSS INCOME RECEIVED
 \$0 - \$499 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000

SOURCES OF RENTAL INCOME: If you own a 10% or greater interest, list the name of each tenant that is a single source of income of \$10,000 or more.
 None

* You are not required to report loans from commercial lending institutions made in the lender's regular course of business on terms available to members of the public without regard to your official status. Personal loans and loans received not in a lender's regular course of business must be disclosed as follows:

NAME OF LENDER* _____

ADDRESS (Business Address Acceptable) _____

BUSINESS ACTIVITY, IF ANY, OF LENDER _____

INTEREST RATE _____% None TERM (Months/Years) _____

HIGHEST BALANCE DURING REPORTING PERIOD
 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000
 Guarantor, if applicable

NAME OF LENDER* _____

ADDRESS (Business Address Acceptable) _____

BUSINESS ACTIVITY, IF ANY, OF LENDER _____

INTEREST RATE _____% None TERM (Months/Years) _____

HIGHEST BALANCE DURING REPORTING PERIOD
 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000
 Guarantor, if applicable

Comments: _____

SCHEDULE C
Income, Loans, & Business
Positions
 (Other than Gifts and Travel Payments)

CALIFORNIA FORM 700
 FAIR POLITICAL PRACTICES COMMISSION

Name _____

▶ 1. INCOME RECEIVED

NAME OF SOURCE OF INCOME
Google

ADDRESS (Business Address Acceptable)
1 Market St. Suite 400, San Francisco CA 94105

BUSINESS ACTIVITY, IF ANY, OF SOURCE
Technology Company

YOUR BUSINESS POSITION
Intern Programs Manager

GROSS INCOME RECEIVED No Income - Business Position Only
 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000

CONSIDERATION FOR WHICH INCOME WAS RECEIVED
 Salary Spouse's or registered domestic partner's income
 (For self-employed use Schedule A-2.)

Partnership (Less than 10% ownership. For 10% or greater use
 Schedule A-2.)

Sale of _____
 (Real property, car, boat, etc.)

Loan repayment

Commission or Rental Income, list each source of \$10,000 or more

 (Describe)

Other _____
 (Describe)

▶ 1. INCOME RECEIVED

NAME OF SOURCE OF INCOME
College Track

ADDRESS (Business Address Acceptable)

BUSINESS ACTIVITY, IF ANY, OF SOURCE

YOUR BUSINESS POSITION

GROSS INCOME RECEIVED No Income - Business Position Only
 \$500 - \$1,000 \$1,001 - \$10,000
 \$10,001 - \$100,000 OVER \$100,000

CONSIDERATION FOR WHICH INCOME WAS RECEIVED
 Salary Spouse's or registered domestic partner's income
 (For self-employed use Schedule A-2.)

Partnership (Less than 10% ownership. For 10% or greater use
 Schedule A-2.)

Sale of _____
 (Real property, car, boat, etc.)

Loan repayment

Commission or Rental Income, list each source of \$10,000 or more

 (Describe)

Other _____
 (Describe)

▶ 2. LOANS RECEIVED OR OUTSTANDING DURING THE REPORTING PERIOD

* You are not required to report loans from commercial lending institutions, or any indebtedness created as part of a retail installment or credit card transaction, made in the lender's regular course of business on terms available to members of the public without regard to your official status. Personal loans and loans received not in a lender's regular course of business must be disclosed as follows:

NAME OF LENDER* _____

ADDRESS (Business Address Acceptable) _____

BUSINESS ACTIVITY, IF ANY, OF LENDER _____

HIGHEST BALANCE DURING REPORTING PERIOD
 \$500 - \$1,000
 \$1,001 - \$10,000
 \$10,001 - \$100,000
 OVER \$100,000

INTEREST RATE _____% None

TERM (Months/Years) _____

SECURITY FOR LOAN
 None Personal residence

Real Property _____
 Street address _____
 City _____

Guarantor _____

Other _____
 (Describe)

Comments: _____

BOS-11, CPAG



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Notice of Electronic Transmittal

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

Notice of Availability of the Responses to Comments Document for the 1500 Mission Street Project

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: March 10, 2017
TO: Angela Calvillo, Clerk of the Board
FROM: Michael Li, Environmental Planner *mli*
RE: Responses to Comments Document
1500 Mission Street Project
Planning Department File No. 2014-000362ENV

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2017 MAR 10 PM 2:43
W

In compliance with San Francisco Administrative Code Section 8.12.5, "Electronic Distribution of Multi-Page Documents," the Planning Department has submitted a Notice of Availability of the Responses to Comments document for the 1500 Mission Street Project in digital format. One hard copy is enclosed, and additional hard copies may be requested by contacting me at the phone number or email address listed below.

Fourteen compact discs (CDs) are also enclosed for distribution to the following parties:

- 11 CDs (one for each member of the Board of Supervisors)
- 2 CDs for the City Attorney
- 1 CD for the Clerk of the Board

There is no hearing for this project scheduled before the Board of Supervisors at this time. However, project approvals related to this project may be heard before the Board of Supervisors at some time in the future.

The RTC document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on March 23, 2017. Please note that the public review period ended on January 4, 2017.

If you or the supervisors have any questions related to this project's environmental evaluation, please contact me at (415) 575-9107 or michael.j.li@sfgov.org. Thank you.

cc: AnMarie Rodgers



RESPONSES TO COMMENTS on the Draft EIR

1500 Mission Street Project

PLANNING DEPARTMENT
CASE NO. 2014-000362ENV

STATE CLEARINGHOUSE NO. 2015052040



SAN FRANCISCO
PLANNING
DEPARTMENT

Draft EIR Publication Date:	November 9, 2016
Draft EIR Public Hearing Date:	December 15, 2016
Draft EIR Public Comment Period:	November 9, 2016–January 4, 2017
Final EIR Certification Date:	March 23, 2017

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: **March 9, 2017**
TO: Members of the Planning Commission and Interested Parties
FROM: Lisa M. Gibson, Acting Environmental Review Officer
Re: **Attached Responses to Comments on Draft Environmental Impact Report:
Case No. 2014-000362ENV for the 1500 Mission Street Project**

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on March 23, 2017.** The Planning Commission will receive public testimony on the Final EIR certification at the March 23, 2017, hearing. Please note that the public review period for the Draft EIR ended on January 4, 2017; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Responses to Comments document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Michael Li at (415) 575-9107 or michael.j.li@sfgov.org.

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

RESPONSES TO COMMENTS on the Draft Environmental Impact Report

1500 Mission Street Project

PLANNING DEPARTMENT
CASE NO. **2014-000362ENV**

STATE CLEARINGHOUSE NO. 2015052040



SAN FRANCISCO
PLANNING
DEPARTMENT

Draft EIR Publication Date:	November 9, 2016
Draft EIR Public Hearing Date:	December 15, 2016
Draft EIR Public Comment Period:	November 9, 2016–January 4, 2017
Final EIR Certification Date:	March 23, 2017

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT

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Attachments

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A. Introduction

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 1500 Mission 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) Public Resource Code Section 21091(d)(2)(A) and (B), the 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 clarifying the project description and addressing physical environmental issues associated with the proposed project. Such effects include physical impacts or changes attributable to the project rather than any social or financial implications of the project. Therefore, this document focuses primarily on responding to comments that relate to physical environmental issues in compliance with CEQA.^a In addition, this RTC document includes text changes to the Draft EIR initiated by Planning Department staff.

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 or 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 the San Francisco Administrative Code, Chapter 31. 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 Planning Commission and other City entities (such as the Board of Supervisors) where applicable prior to their decision to approve, disapprove, or modify the proposed project. If the Planning Commission and other City entities approve the proposed project, 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 Processes

Notice of Preparation and Public Scoping

The San Francisco 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

^a State CEQA Guidelines (*California Code of Regulations*, Title 14, Division 6, Chapter 3), Sections 15064(c) and (d).

Preparation (NOP) of an Environmental Impact Report and Public Scoping Meeting on May 13, 2015, 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 Effect) and 15065 (Mandatory Findings of Significance). This notice was sent to applicable agencies and organizations, tenants of the project site, and addresses within a 300-foot radius of the project site.

Pursuant to CEQA Section 21083.9 and CEQA Guidelines Section 15206, a public scoping meeting was held to receive oral comments concerning the scope of the Draft EIR on June 2, 2015, at One South Van Ness Avenue, San Francisco, CA. Attendees were given the opportunity to provide written and oral comments.

Draft EIR Public Review

The San Francisco Planning Department published a Draft EIR for the proposed project on November 9, 2016, and circulated the Draft EIR to local, State, and federal agencies and to interested organizations and individuals for a 56-day public review period. Paper copies of the Draft EIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street, and Planning Information Counter, 1660 Mission Street and (2) the San Francisco Main Library, 100 Larkin Street.^b The Planning Department also distributed notices of availability of the Draft EIR; published notification of its availability in a newspaper of general circulation in San Francisco (San Francisco Examiner); posted the notice of availability at the San Francisco County Clerk's office; and posted notices at locations within the project area.

During the Draft EIR public review period, the Planning Department received comments from three public agencies and four organizations or individuals. Attachment A of this RTC document includes copies of the comment letters submitted during the Draft EIR public review period.

During the public review period, the Planning Department conducted a public hearing to receive oral comments before the San Francisco Planning Commission on December 15, 2016, at San Francisco City Hall. A court reporter present at the public hearings transcribed the oral comments verbatim and prepared written transcripts (see Attachment B).

Responses to Comments Document and Final EIR under CEQA

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. Under CEQA Guidelines Section 15201, members of the public may comment on any aspect of the project. Further, CEQA Guidelines Section 15204(a), states that the focus of public review should be "on the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines Section 15088

^b Electronic copies of the Draft EIR can be accessed online at <http://tinyurl.com/sfceqadocs> and <http://sf-moh.org/index.aspx?page=1314>.

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 San Francisco Planning Commission, as well as to the agencies, neighborhood organizations, 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 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). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels and the project is approved, the findings must reject project alternatives and include a statement of overriding considerations for those impacts (CEQA Guidelines Section 15093(b)). The project sponsor is required to implement the MMRP as conditions of project approval.

A.3 Document Organization

This RTC document consists of the following sections, plus supplemental attachments, as described below:

- A. **Introduction** – This section discusses the purpose of the RTC document, the environmental review processes, and the organization of the RTC document.
- B. **List of Persons Commenting** – This section presents the names of persons who provided comments on the Draft EIR. The list is organized into the following groups: agencies, boards, and commissions; and organizations and individuals.
- C. **Comments and Responses** – This section presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. Similar comments are grouped together by topic area. Following each comment or group of comments on a topic are the City's responses.
- D. **Draft EIR Revisions** – This section includes all of the changes to the Draft EIR text and graphics and cites the page number where the change is made to the text or graphics.

Attachment A – Draft EIR Comment Letters

Attachment B – Draft EIR Hearing Transcript

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B. List of Persons Commenting

This RTC document responds to all comments received on the Draft EIR, including written comments submitted by letter, fax, or email, as well as written and oral comments presented at the public hearings. This section lists all agencies, organizations, and individuals who submitted comments on the Draft EIR. Commenters are grouped according to whether they commented as individuals or represented a public agency or non-governmental organization. **Table RTC-1, Persons Commenting on the Draft EIR**, lists the commenters' names, along with the corresponding commenter codes used in Section C, Comments and Responses, to denote each set of comments, the comment format, and the comment date. The complete set of written and oral comments received on the Draft EIR is provided in Attachment A, Draft EIR Comment Letters, and Attachment B, Draft EIR Hearing Transcript.

This RTC document codes the comments in the following way:

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

Each commenter is given an identifier, and each comment is numbered. Therefore, the second comment received from a representative of an organization known as "Friends of Friends" would be designated "O-FOF.2," while the third comment received from an individual named Smith would be designated "I-Smith.3." In this way, the reader can both locate a particular comment in a comment letter by referring to the comment designation.

B. List of Persons Commenting

TABLE RTC-1 PERSONS COMMENTING ON THE DRAFT EIR

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Patricia Maurice, District Branch Chief, Local Development - Intergovernmental Review	California Department of Transportation (Caltrans)	Letter	December 8, 2016
A-HPC	Andrew Wolfram, President	San Francisco Historic Preservation Commission	Letter	December 14, 2016
A-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Hearing Transcript	December 15, 2016
Organizations				
O-Heritage	Mike Buhler, President and CEO	San Francisco Architectural Heritage	Letter	January 4, 2017
Individuals				
I-Hestor	Sue C. Hestor, Attorney at Law		Letters (2)	January 4, 2017
I-Hong	Dennis Hong		E-Mail	January 3, 2017
I-Rhine	Robert Rhine		E-Mail	December 6, 2016

C. Comments and Responses

This section presents the substantive comments received on the Draft EIR 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, 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 unrelated to a specific impact category are also classified as general comments. Comments on the Summary or specific mitigation measures are included under the comments regarding the relevant topical section of the Draft EIR. 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):

Project Description [PD]	<i>Initial Study Topics</i>
Plans and Policies [PP]	Land Use [LU]
Cultural Resources [CR]	Population and Housing [PH]
Transportation and Circulation [TR]	
Wind [WI]	<i>Other CEQA Considerations [OC]</i>
Shadow [SH]	Aesthetics
Alternatives [AL]	Parking
	General Comments (GC)

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, Project Description comments [PD] are listed as PD-1, PD-2, PD-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 code described in Section B of this RTC document. The reader is referred to Attachments A and B for the full text and context of each comment letter or e-mail, 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 PD-1 is presented under Response PD-1. The responses may clarify the Draft EIR text or revise or add text to the 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 ~~striketrough~~.

Footnotes included in written comments are numbered as in the original and thus may be non-consecutive. Footnotes to responses are indicated by consecutive letters.

C.1 Project Description

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment PD-1: Housing and Occupancy in the Proposed Residential Tower
- Comment PD-2: Project Approvals—General Plan Amendments
- Comment PD-3: Project Approvals Required from Caltrans

Comment PD-1: Housing and Occupancy in the Proposed Residential Tower

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

I-Hong.6

“Table 1-page 9 and Table 1-page 4:

- a. To be family friendly, can a few more three-bedroom units be added?
- b. In Table 1-page 9 it shows 560 units and Table 1-page 4 of the NOP ---- it shows 550 Units.
- c. Can the Table also show how many are BMR and etc.” (Dennis Hong; e-mail, January 3, 2017)

Response PD-1

The comment suggests that the proposed project provide more three-bedroom units, requests clarification concerning the total number of residential units proposed, and requests information concerning below-market-rate units.

The commenter’s suggestion for an increased number of three-bedroom units addresses the merits of the project and not the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Concerning the total number of residential units, the project sponsor changed the proposed number of units from 550 proposed units at the time of the NOP publication, in May 2015, to the current proposal of 560 units that was analyzed in the Draft EIR.

Regarding proposed below-market-rate (BMR) units, as noted in Table II-1, Draft EIR p. II-21, and in the Draft EIR text on p. II-23, 20 percent of the proposed 560 residential units would be affordable, which would total 112 on-site BMR units. As stated on p. II-23 of the Draft EIR, these units would be available to residents earning a maximum of 50 percent of the average median income.

Comment PD-2: Project Approvals—General Plan Amendments

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

I-Hestor.13

“**Approvals Required DEIR II-36.** There are General Plan amendments in this project, but they are not called out as such. Please add General Plan and its elements. Area Plans are part of the General Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PD-2

The comment states that the Draft EIR does not identify amendments to the *San Francisco General Plan* that would be required as part of approval of the proposed project.

The changes in the *San Francisco General Plan* area plan height maps are included in the list of project approvals on page II-36 of the Draft EIR. For clarification, the first bullet under “Board of Supervisors” is revised as follows (new text is double-underlined):

- Zoning Map amendments to change the site’s height and bulk district designations and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan.

Additionally, the first bullet under “Planning Commission” is revised as follows (new text is double-underlined):

- Zoning Map Amendment to alter the parcels’ height and bulk and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan (recommendation to the Board of Supervisors)

Also, the following text is added to the end of the second full paragraph on Draft EIR page III-12 (new text is double-underlined):

Approval of the proposed project would entail amendment of Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed building heights.

Finally, the following text is added to the end of the second paragraph under the heading “Market & Octavia Area Plan” on Draft EIR page III-13 (new text is double-underlined):

Approval of the proposed project would entail amendment of Map 3 (height districts) of the Market & Octavia Area Plan to accommodate the proposed building heights.

Comment PD-3: Project Approvals Required from Caltrans

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

A-Caltrans.4

“**Transportation Permit.** Project work that requires movement of oversized or excessive load vehicles on State roadways requires a Transportation Permit that is issued by Caltrans. To apply, a completed Transportation Permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to:

“Caltrans Transportation Permits Office
1823 14th Street
Sacramento, CA 95811-7119

“See the following website for more information about Transportation Permits:
<http://www.dot.ca.gov/trafficops/permits/index.html>.

“**Encroachment Permit.** A Caltrans Encroachment Permit will be required for all temporary and permanent features and activities within State ROW. The proposed work within State ROW shall be designed to State standards and in accordance with the Encroachment and Utility Policy, as provided in Chapter 17 of the Project Development Procedures Manual. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed Encroachment Permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

“David Salladay, District Office Chief
Office of Permits, MS SE
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

“See the following website for more information: <http://www.dot.ca.gov/trafficops/ep/index.html>.

“**Design Exceptions.** The following project features do not meet State standards, and will not be permitted unless an exception is granted. Approval of these features should not be assumed, and appropriate alternatives should be planned in the case they are not approved:

- “• A wind canopy which encroaches five (5) feet into State ROW.
- “• Twenty-five (25) trees within the sidewalk along South Van Ness Avenue.
- “• Six (6) parklets comprised of seating areas and a wind screen (‘green wall’) within the sidewalk.
- “• Rows of tieback anchors for shoring the basement excavation which would be detensioned, but remain within State ROW after completion of construction.
- “• Use of a tower crane extending over State ROW during construction.
- “• Sidewalk used for construction staging and pedestrian walkways constructed in the curb lane.

“**Relinquishment.** The City recently requested that Caltrans relinquish sidewalks along Van Ness Avenue. Though the request has been filed, relinquishment is not complete until the related California Transportation Commission resolution is recorded. If the sidewalk that fronts the proposed development is relinquished to the City prior to the need for a permit, then those features affecting only the sidewalk will be within the City’s jurisdiction.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response PD-3

The comment notes that several approvals would be required from Caltrans, including a transportation permit for movement of oversized or excessive load vehicles on State roadways, for an encroachment permit for

temporary and permanent features and activities within the state right-of-way, and for design exceptions for project features that do not meet state standards.

These requirements noted by the commenter are Caltrans requirements that would be complied with, as applicable. The requirement for an encroachment permit is cited under project approvals on Draft EIR page II-38 because the project site fronts South Van Ness Avenue, which is a state roadway. Construction activity, such as a tower crane rotating above the state right-of-way and the installation of below-grade tiebacks into state right-of-way as part of the shoring required during excavation would be addressed under such a permit. The wind-baffling features referred to in the comment are addressed as a required entitlement on Draft EIR pages IV.D-3 and -4 as part of the encroachment permit and, which states that if these features were not approved, *Planning Code* Section 148 would require that the project be redesigned. However, as noted by the commenter, the City in 2016 requested that Caltrans relinquish sidewalks along Van Ness Avenue/South Van Ness Avenue from Lombard Street to Plum Street. The relinquishment has now been completed by both the City and the State of California, as described herein. Therefore, because the South Van Ness Avenue sidewalks are no longer under Caltrans jurisdiction, Caltrans approval would no longer be required for the wind-baffling features on and above the South Van Ness Avenue sidewalk (street trees, wind canopy, and wind screens and parklets). Caltrans approval also would not be required for use of the sidewalk for construction staging.

Regarding the South Van Ness Avenue sidewalk relinquishment, in June 2016, to facilitate implementation of the City's Better Streets Plan and various *San Francisco General Plan* objectives and policies, San Francisco Public Works formally requested the initiation of discussions with Caltrans regarding the transfer of ownership of the sidewalks along portions of Van Ness Avenue and South Van Ness Avenue from the state to the City.^c Following Caltrans' acceptance of the concept, the Board of Supervisors, in December 2016, approved and the Mayor signed, Ordinance No. 243-16, authorizing the City to accept the state's relinquishment of the sidewalks along portions of Van Ness Avenue (between Lombard Street and Market Street) and portions of South Van Ness Avenue (between Market Street and Plum Street), including the South Van Ness Avenue sidewalk adjacent to the project site. The state relinquishment required approval by the California Transportation Commission (CTC), which approved Resolution No. R-3970 on January 18, 2017, and the transfer of the sidewalks became effective January 27, 2017, with the recordation of a certified copy of the approved CTC resolution.

^c The City has been performing certain maintenance activities on state rights-of-way in San Francisco, including Van Ness Avenue (U.S. Highway 101 between Van Ness Avenue at Lombard Street and South Van Ness Avenue at 13th Street), since at least 1990 under an agreement with Caltrans.

C.2 Plans and Policies

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, Project Description, and Draft EIR Chapter III, *Plans and Policies*. These include topics related to:

- Comment PP-1: Planning Context for Proposed Project
- Comment PP-2: Consideration of *General Plan* Policies Concerning Views
- Comment PP-3: *General Plan* Amendments as Part of Project
- Comment PP-4: Height Limits
- Comment PP-5: Parking Requirements
- Comment PP-6: Housing Element Consistency
- Comment PP-7: Area Plan Consistency
- Comment PP-8: The Hub Plan
- Comment PP-9: Climate Action Plan Consistency
- Comment PP-10: Proposed Central SoMa Plan
- Comment PP-11: Zoning Map

Comment PP-1: Planning Context for Proposed Project

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

I-Hestor.2

“Two maps must be added to 1500 Mission DEIR

“Map #1

“A map showing the boundaries of the **Market/Octavia Area Plan** PLUS the boundaries of the **Eastern Neighborhoods Area Plan** with its **5 sub-area Plans** (including the **Western SoMa Area Plan**). The M/O plan should show sub-area Van Ness & Market Downtown Residential Special Use District.

“Superimpose on this Map the boundaries of the **proposed Central SoMa Area Plan, The Hub**, and all other Plans that have amended these Area Plans. This would include the **5M plan** at 5th & Market which amended part of the Eastern Neighborhood Area Plan. PLUS any **proposed** Map Amendments to either Market/Octavia or the Eastern Neighborhoods Plan, including those proposed in any pending PPA [Preliminary Project Assessment]. This is the proposed map amendment for One Oak/1500 Market. Also the requested height reclassification on the western end of One Oak/1500 Market block - at Franklin & Oak.

“This map is necessary

- “• To understand various discussions in the DEIR
- “• Show the changes/proposed changes to Market/Octavia Plan and Eastern Neighborhoods Plan
- “• Show how close the Mission Area Plan is to the boundary of the area analyzed in this EIR.

“For each Plan please provide the date of the adoption of that Plan by the City (I believe 4/17/08 for M/O and 12/19/08 for EN.) Further provide the dates of the community planning effort or its EIR. Western SoMa was the most recent of the Area Plans.

“Also for each of the areas and sub-areas please call out the amount of residential parking that it REQUIRED, if that parking is required at all.”

...

“Map of Projects – Figure IV-1 - the map goes straight up to the Mission Area Plan boundaries (13th/Duboce). It shows the relevance of projects in the Mission Plan area to this site.” (Sue C. Hestor; letter, January 4, 2017)

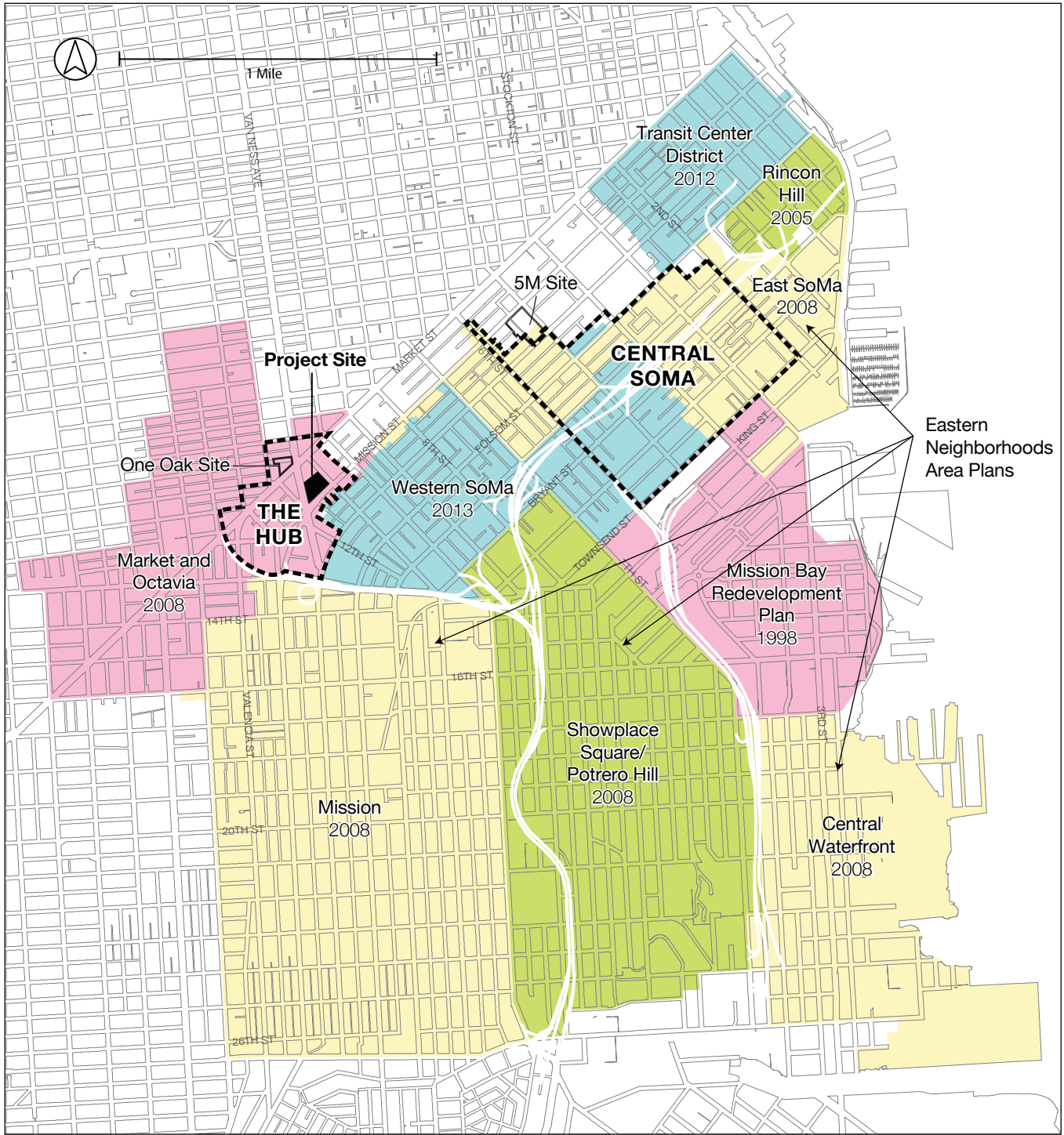
Response PP-1

The comment requests further information, including a map, concerning recent planning efforts in the project vicinity, including those for the Market & Octavia area, Eastern Neighborhoods, and Western SoMa, to provide context for the proposed project.

Figure RTC-1, Recently Adopted Area Plans in and near the 1500 Mission Street Project Site Vicinity, page RTC-14, depicts the recently adopted area plans, including the Market & Octavia Area Plan (adopted in 2008), the four Eastern Neighborhoods plans (Mission, Showplace Square/Potrero Hill, Central Waterfront, East SoMa) (adopted in 2008), the Western SoMa Plan (adopted in 2013), Rincon Hill Plan (updated plan adopted in 2005), and Transit Center District Plan (adopted in 2012). The figure also shows the area of the proposed Central SoMa Plan and the area covered by the proposed Hub planning effort. The nearby-proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) site is also shown, as is the approved 5M Project site. Each of these plans contains parking maximums, rather than parking minimums.

While the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) would require a *General Plan* amendment to modify the Height Districts map in the Market & Octavia Area Plan, as well as a corresponding change to the *Planning Code* height and bulk map, there would be no increase in the currently permitted height limit of 400 feet. Rather, the *General Plan* and zoning map changes would reduce the maximum height limit on one parcel (the east end of the One Oak site, at the corner of Oak and Market Streets; 2,750 square feet in area) from 400 feet to 120 feet and increase the maximum height limit from 120 feet to 400 feet on the western half of the parcel at the west end of the One Oak site (approximately 5,500 square feet in area).

The 5M Project (925–967 Mission Street; Case No. 2011.0409E), was approved in 2015 and included adoption of the Fifth and Mission Special Use District. The approval of the 5M project did not result in any boundary changes to the East SoMa Plan area maps, but instead resulted in the addition of a notation indicating, “The Fifth and Mission Special Use District area was not included in the Eastern Neighborhoods Area Plan, see Ordinance No. 299-08.” Six of the 20 parcels within the Special Use District are also within the East SoMa Plan area. Approval of the 5M Project also resulted in amendment of the *Planning Code* height and bulk maps to permit heights up to 450 feet, including 365 feet on the six parcels within the East SoMa Plan area.



----- Currently Proposed Plan Areas

SOURCE: San Francisco Planning Department

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-1
 Recently Adopted Area Plans In and Near the
 1500 Mission Street Project Site Vicinity

As noted above in response to Comment PD-2, approval of the proposed 1500 Mission Street project would require *General Plan* amendments in the form of amendment of Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan. The second requested map is discussed below under Transportation, Response TR-1.

Comment PP-2: Consideration of General Plan Policies Concerning Views

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

I-Hestor.12

I-Hestor.32

“Views of Project Site from south - looking up South Van Ness. **Figure II-22.** There used to be policies in the Master Plan dealing with the importance of view perspectives to give orientation to pedestrians, to vehicles, to people trying to zero in on a location. City Hall. Views of the dome of City Hall from Van Ness to the north and from streets to the south were considered important. They were to orient people - those heading to City Hall or civic center. Have those policies been removed from the General Plan? If they have not, please provide a before and after perspective of the view towards City Hall from the south. The dome is visible coming north on South Van Ness. Will it disappear from view? How far to the south.

...

“Aesthetics scoped out - page 23. See comments above about view toward City Hall dome from South Van Ness. Where the general plan has a policy of protecting certain views because they are important orientation points, I believe they are not merely ‘aesthetic.’ There is planning policy underlying them.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-2

These comments ask about *General Plan* policies concerning protection of certain views to allow orientation based on landmark locations, including City Hall and Civic Center.

Objective 1 of the Urban Design Element of the *San Francisco General Plan* (formerly the *Master Plan*) states “Emphasis of the characteristic pattern which gives to the city and its neighborhoods an image, a sense of purpose, and a means of orientation,” and the text that follows states, “San Francisco has an image and character in its city pattern which depend especially upon views, topography, streets, building form and major landscaping. This pattern gives an organization and sense of purpose to the city, denotes the extent and special nature of districts, and identifies and makes prominent the centers of human activity. The pattern also assists in orientation for travel on foot, by automobile and by public transportation. The city pattern should be recognized, protected and enhanced.”

Also, the introductory text under “City Pattern” states, “BUILDINGS AND STRUCTURES and clusters of them, which reflect the character of districts and centers for activity, provide reference points for human orientation, and may add to (but can detract from) topography and views.”

Urban Design Element Policy 1.8 states, “Increase the visibility of major destination areas and other points for orientation,” and the accompanying text states, “In travel about the city, the ability to see one’s destination and other points of orientation is an important product of the city pattern. Such an ability should be fostered in public and private development.”

However, there are no policies in the Urban Design element that specifically reference visual orientation relative to City Hall. Moreover, concerning views of the City Hall dome, the proposed project would not obscure ground-level views of the dome from anywhere in the immediate project vicinity. The dome of City Hall is not visible from South Van Ness Avenue adjacent to the project site because of intervening buildings such as the 100 Van Ness Avenue building, which is approximately 400 feet in height (see **Figure RTC-2, Views Towards City Hall**, page RTC-85). In fact, the dome is only marginally visible from South Van Ness Avenue at all: the westernmost sliver of the lower part of the dome can be seen from the western part of the South Van Ness Avenue sidewalk at Market Street (southwest corner of Market and South Van Ness), although the shape of the dome is not apparent from this viewpoint because of the small amount of the dome that is visible (see **Figure RTC-2, Views Towards City Hall**, page RTC-85). For this reason, a photosimulation showing the view of the dome from South Van Ness Avenue is not necessary.

The project block of South Van Ness Avenue is indicated in the Urban Design Element as having street views of “average” quality and is not identified as being a “street area important to urban design and views.”

Comment PP-3: General Plan Amendments as Part of Project

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

I-Hestor.14

“**Height and Bulk - DEIR III-4 Map Figure III-2.** There is no discussion that this Map includes the site of One Oak/1500 Market which also has a height increase on Market. That change should be noted. The Map shows the hypocrisy of ignoring the sibling projects.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-3

The comment states that the Draft EIR does not depict proposed height limit changes on Figure III-2.

Draft EIR Figure III-2, Existing Height and Bulk District Map (as retitled herein), page III-5, depicts existing height and bulk districts. Accordingly, proposed changes to height and bulk districts are appropriately not shown on this figure. The Draft EIR states (page III-4) that the proposed project would exceed the existing height limit and explains, on page III-6, “The proposed project would be reviewed by the Planning Commission, which would make a recommendation to the Board of Supervisors on proposed Zoning Map amendments to adjust the height and bulk limit designations” to accommodate the proposed project. On page III-6, the Draft EIR also describes the proposed new height and bulk districts (130/240-R-3 and 130/400-R-3). Amendments to the *General Plan* (height maps in the Market & Octavia Area Plan and Downtown Plan) are discussed on Draft EIR pages III-12 and III-13, respectively, as modified herein.



Looking North on Van Ness Avenue from Southwest Corner of Market Street and South Van Ness Avenue



Looking North on South Van Ness Avenue from West Side of South Van Ness Across from Project Site

With regard to the comment requesting that the figure show the proposed project at One Oak Street, this is a separate project and is not the subject of this EIR. However, that project is included in the Draft EIR's cumulative analyses. As noted in the response to Comment PP-1, above, the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E), would seek modifications of the height map in the Market & Octavia Area Plan to shift the location of the proposed tower on the site; however, the entitlements are not proposing an increase in the existing height limit of 400 feet.

Comment PP-4: Height Limits

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

I-Hestor.15

“**Figure III-2** shows the vast difference in heights between the north and south sides of Mission. Please describe the intention of the heights on south side in the Western SoMa Plan. Also please label all streets.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-4

The comment cites Draft EIR Figure III-2, Existing Height and Bulk District Map (as retitled herein), Draft EIR page III-5, and notes that height limits differ greatly on the north and south sides of Mission Street.

As stated on Draft EIR page II-7, there is an eight-story City-owned office building north of the project site and a 22-story office building to the east, across 11th Street, while to the south, across Mission Street, are three- and five-story buildings.

The parcels along the south side of Mission Street, across from the project site, are within the C-3-G (Downtown General Commercial) Use District, which is the same as the project site. The parcels on the south side of Mission Street were rezoned to C-3-G in 2008, at the time that rezoning to implement the Market & Octavia Area Plan was approved. Additionally, as part of the adoption of the Market & Octavia Area Plan, the height limits on the parcels on the south side of Mission Street were reduced, from 130 feet to between 85 feet and 120 feet.

The Western SoMa Plan, adopted in 2013, encompasses the second line of parcels south of Mission Street (fronting on Minna Street), but not the parcels fronting Mission Street. The interior of the block across Mission Street from the project site, along parts of Minna, Natoma, and Lafayette Streets, is within a Residential Enclave District (RED). The RED, an Eastern Neighborhoods Mixed-Use District, is defined in *Planning Code* Section 813 as including “many of the clusters of low-scale, medium density, predominantly residential neighborhoods located along the narrow side streets of the South of Market area,” and the zoning controls are “intended to encourage and facilitate the development of attractive, compatible and economically feasible infill housing while providing adequate residential amenities to the site and neighborhood.” Accordingly, the height limit within RED is 40 feet, while the height limit along 10th and Howard Streets, which are also within the Western SoMa Mixed Use General (WMUG) Use District, is 55 feet, except at the corner of Howard and 12th Street, within the Moderate Scale Neighborhood Commercial Transit (NCT-3) Use District, where the height limit is 50 feet.

The above height limits and use districts are to be contrasted with the project block and the south side of Mission Street, which, as noted, are within the C-3-G district. This area, including the project site, is also within the Van Ness & Market Downtown Residential Special Use District (SUD), which, as stated in *Planning Code* Section 249.33, “is intended to be a transit-oriented, high-density, mixed-use neighborhood with a significant residential presence.” This includes the northwest corner of the block across Mission Street from the project site (southeast corner of Mission Street and South Van Ness Avenue, and extending a short distance down 12th Street); here, the height limit is 120 feet and, because of parcel configurations, this height limit extends all the way to Lafayette Street at Minna Street. Therefore, while the area within the RED Use District is intended to be “low-scale,” the area immediately to the north, including the project site, is intended to provide for much greater density of development. The south side of Mission Street, within the C-3-G Use District and the SUD, with its 85- to 120-foot height limits, effectively serves as a transitional zone between high-density development, such as the proposed project, and the RED along parts of Minna, Natoma, and Lafayette Streets.

Regarding street names, these have been added to revised Figure III-1 and Figure III-2. Additionally, for clarification, the word “Existing” is added to each figure’s title, so that the two figures are entitled, “Existing Zoning Map” and “Existing Height and Bulk District Map,” respectively. (The revised figures appear in this RTC, Section D, Draft EIR Revisions on pages RTC-84 and RTC-85, respectively). The revised figures replace those in the Draft EIR on pages III-3 and III-5, respectively.

Comment PP-5: Parking Requirements

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

I-Hestor.16

“**Discussion of parking requirements III-7** seems to be saying that there is ZERO auto parking required for residences on this site but there is REQUIRED bicycle parking. Meaning that bicycle travel is highly encouraged. If this is correct, why isn’t it stated so clearly? The amount of auto parking requires a CONDITIONAL USE. Which means that the amount of parking must be measured against the impacts on nearby residents (south of Mission) AND against the policies of the entire General Plan, including those of M/O and Eastern Neighborhoods. Why is an alternative without a CU not included?” (Sue C. Hestor; letter, January 4, 2017)

Response PP-5

The comment requests clarification concerning required auto and bicycle parking requirements. The comment also questions why an alternative is not included in the Draft EIR for a project that would not require a Conditional Use authorization, as is the case for the proposed project.

The commenter’s understanding of auto and bicycle parking requirements is correct: as stated on Draft EIR page III-7, “off-street parking for residential or commercial uses in the C 3 G district is not required.” Therefore, no automobile parking is required for the proposed project, including for all proposed uses including residential, office, or retail use, and, as stated on page III-8, “the residential and retail/restaurant parking component of the proposed project requires a Conditional Use Authorization and this requirement

will be included in *Planning Code* amendments to create the Mission and South Van Ness Special Use District.” Draft EIR page III-8 also sets forth the required bicycle parking for the proposed project. The decision-makers will consider approval of the required Conditional Use Authorization with respect to parking as part of their consideration of the proposed project. When taken collectively, this subsection discussion under the header “Automobile Parking, Bicycle Parking, and Loading” (Draft EIR pages III-7 through III-9) provides the details requested in the comment.

The following discussion addresses the comment that the Draft EIR should analyze a project not requiring a Conditional Use Authorization for automobile parking. In identifying alternatives, the consideration of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)). The Draft EIR did not identify a significant effect on the environment due to a substantial parking deficit that could create hazardous conditions or cause significant delays affecting transit, bicycles or pedestrians and where particular characteristics of the project or its site demonstrably render use of other modes infeasible. Therefore, the Draft EIR was not required to identify a reduced or no parking alternative. However, Alternative C, the Full Preservation Alternative would provide 117 vehicle parking spaces for 468 dwelling units; as stated on Draft EIR page VI-29, this “would represent a ratio of 0.25 spaces per dwelling unit, which is the maximum principally permitted (without Conditional Use authorization) in the existing Van Ness & Market Downtown Residential Special Use District.” Therefore, the Draft EIR did analyze an alternative that would not require a Conditional Use for the automobile parking ratio.

The proposed project seeks approval of a new special use district, the Mission and South Van Ness Special Use District, which would replace the existing Van Ness & Market Downtown Residential Special Use District on the project site. As noted on Draft EIR page II-36, the proposed Mission and South Van Ness Special Use District would, among other things, permit residential parking at a ratio of 0.5 parking spaces per dwelling unit, meaning that the proposed project would not require Conditional Use authorization if the proposed special use district is approved.

Comment PP-6: Housing Element Consistency

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

I-Hestor.17

“Housing Element Needs III-10. What are the ABAG goals by income level? Using the current measures what % of the need v goal is being produced adding this project and One Oak/1500 Market? As San Francisco displaces lower income EMPLOYEES - including those who will work at project site or nearby - and the housing produced is more and more market rate PLUS (which we are way over-producing), the people who are EMPLOYED who cannot afford housing in San Francisco seek housing outside of San Francisco. They create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. If the people OCCUPYING the new housing are reverse commuters from counties outside SF, they also create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. Discuss the effects of NOT housing in SF workers in SF, while housing in SF people who work in other counties. Displacement of EMPLOYEES - their travel to housing - is an environmental issue.

Response PP-6

The comment requests information concerning Association of Bay Area Governments (ABAG) established regional housing need targets and how the proposed project would meet a portion of that need. The comment states that increasing housing costs in San Francisco result in lower-wage workers having to commute longer distances to jobs in San Francisco, and that San Francisco residents who work outside the City also add to the commute burden.

As stated on page 34 of the Initial Study (Draft EIR Appendix A), “In July 2013, ABAG projected regional housing needs in the Regional Housing Need Plan for the San Francisco Bay Area: 2014–2022. In 2013, ABAG projected housing needs in San Francisco for 2014–2022 as 28,869 dwelling units, consisting of 6,234 dwelling units within the very low income level (0–50 percent), 4,639 within the low income level (51–80 percent), 5,460 within the moderate income level (81–120 percent), and 12,536 within the above-moderate income level (120 percent plus).”

As stated on Draft EIR page II-23, the proposed project would provide 20 percent on-site inclusionary affordable units, available to residents earning a maximum of 50 percent of the average median income. The One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) proposes to pay an inclusionary housing in-lieu fee, as permitted by *Planning Code* Section 415.^d

The proposed 1500 Mission street project would not displace any housing, as none exists on the site, and likely would not displace any employment; as stated on page 33 of the Initial Study (Draft EIR Appendix A), “it is likely that most existing employees would retain their jobs, as Goodwill Industries is moving its office and workforce training functions to 2290 Powell Street (at Bay Street) in San Francisco and its warehouse to South San Francisco.”

As stated on page 32 of the Initial Study, of the City employees who would work at the project site, the majority “are anticipated to already work in nearby existing City office buildings in the project vicinity and would relocate to the new office component at the project site.” These employees would not substantially affect commute patterns.

As stated above, the proposed project would develop 20 percent of on-site units (about 112) as BMR units. As a result, these units would contribute toward the City’s need for such affordable housing units that would otherwise not occur if the project were not built.

Comment PP-7: Area Plan Consistency

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

I-Hestor.18

I-Hestor.34

^d San Francisco Planning Department, *One Oak Street Draft Environmental Impact Report*, November 16, 2016. Available at http://sfmea.sfplanning.org/2009.0159E_DEIR.pdf. Reviewed January 16, 2017.

“Discussion of **Downtown Plan** is coldly academic and misleading. Guiding Downtown Development evolved into the Downtown Plan with a change of Mayors and Planning Directors. Simultaneous with the years of development of the Plan in early 80s was a huge public effort at the Planning Commission to require construction of housing affordable to projected work force AND expansion of the transit system AND expansion of child care so that HOUSING, TRANSIT and CHILD CARE came on line to meet the needs of the expanded work force when offices opened. Thus, fees required of new development. There was an active community pressure. The expansion area for downtown offices was the C-3-O (SD). The C-3-S and C-3-G, and Chinatown rezoning, were aimed at protecting lower income communities that surrounded the C-3-R and C-3-O. Downtown Plan policies did NOT call for massive height increases for residential or office towers at project site.”

...

“**Land Use Planning - page 29** [of the Initial Study, EIR Appendix A]. See above comments on Area Plans. This is in Market Octavia Area Plan. Its policies are being violated, especially as to excessive parking for the TRANSIT RICH site. There is too much residential parking, which will accommodate persons who want to reverse commute/drive to work. The freeways are RIGHT THERE. I have requested a map to inform the decision-maker. This is in a relatively flat area that encourages walking and biking by residents. There should be more comprehensive discussion of policies of Market/Octavia Plan AND of the Western SoMa Plan which covers the residential neighborhood directly across Mission Street. This includes TRAFFIC being redirected into that neighborhood by driving ‘apps’ which point to a ‘short-cut.’ page 30.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-7

The comments provide a brief history of the development of the Downtown Plan in the 1980s and states that the Draft EIR discussion of the Downtown Plan is misleading in that the Draft EIR implies that the Downtown Plan substantially increased height limits at the project site. The comments also request additional discussion of the policies in the Market & Octavia Area Plan and the Western SoMa Plans, and imply that the project would provide excessive parking when compared with those policies. Finally, the comments state that drivers are currently directed by mapping applications into the Lafayette, Minna, and Natoma (LMN) residential neighborhood south of the project site.

The Draft EIR discusses the Downtown Plan, an area plan within the *San Francisco General Plan*, in Chapter III, *Plans and Policies*. This chapter provides a general description of land use plans applicable to the 1500 Mission Street project and identifies the proposed project’s potential to conflict with those plans or policies adopted for the purpose of avoiding or mitigating an environmental effect (Draft EIR page III-1). This discussion is presented in accordance with Section 15125(d) of the state CEQA Guidelines. The Draft EIR’s discussion of the Downtown Plan provides a brief overview of the Downtown Plan and states that one of the Plan’s fundamental concepts was “to expand the City’s downtown office core south from its traditional location north of Market Street, in a way that protects the smaller-scale and mixed uses in Chinatown, Jackson Square, along Kearny Street, around Union Square, and in the Mid-Market and Tenderloin/North of Market neighborhoods” (Draft EIR page III-12). As noted by the commenter, the Downtown Plan guided this expansion of office space to the newly designated C-3-O (SD) (Downtown Office Special Development) Use District. This district, bounded generally by Market, Steuart, and Folsom Streets, and a line between New

Montgomery and Third Streets, has been the focus of nearly all high-rise office development in San Francisco since the adoption of the Downtown Plan in 1985.

Rezoning to implement the Downtown Plan, while reducing height limits in many parts of the Downtown, established the City's greatest height limits—550 feet—within the C-3-O (SD) district, specifically in the area around the former Transbay Terminal, now the location of the under-construction Transbay Transit Center.^e Regarding parking, the proposed project has a residential parking ratio of 0.5 space per unit, consistent with the amount of residential parking permitted in C-3 districts with Conditional Use Authorization.

In the area containing the proposed 1500 Mission Street project site, rezoning to implement the Downtown Plan maintained the greatest height limit at 320 feet on the south side of Market Street between 10th Street and South Van Ness Avenue and on the north side of Market Street between 10th and 11th Streets while reducing height limits from 320 feet to between 120 and 200 feet in areas just to the east and west, and also on the project site. However, more-recent adoption of the Market & Octavia Area Plan (also an area plan within the *General Plan*) and its accompanying rezoning has superseded the height limits enacted along with the Downtown Plan, resulting in greater height limits in the project vicinity. As stated on Draft EIR page III-13, the Market & Octavia Area Plan “promotes a mixed-use urban neighborhood in which new and current residents enjoy a vibrant pedestrian realm and rich transit connections ... [and] allows for intensive commercial uses and residential towers clustered around the intersection of Market Street and Van Ness Avenue.” As shown on Figure III-2, Existing Height and Bulk District Map (as retitled herein), Draft EIR page III-5 (as revised herein; see revised figure on page RTC-85, rezoning to implement the Market & Octavia Area Plan resulted in height limits of up to 400 feet in the project vicinity and between 85 and 320 feet on the project site. As noted on Draft EIR page II-36 (as amended herein), the proposed project would require Zoning Map amendments to change the site's height and bulk district designations and *General Plan* amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed project.

As for the Draft EIR's conclusions with respect to consistency with the Downtown Plan, the Draft EIR states, on page III-12, that in light of the fact that the Downtown Plan proposed to shift office development away from “the smaller-scale and mixed uses in Chinatown, Jackson Square, along Kearny Street, around Union Square, and in the Mid-Market and Tenderloin/North of Market neighborhoods, ... the proposed would not obviously conflict with the objective and policies of the Downtown Plan.”

Regarding the Market & Octavia Area Plan, as stated in the Draft EIR on page III-13, the Plan “promotes a mixed-use urban neighborhood in which new and current residents enjoy a vibrant pedestrian realm and rich transit connections.” Concerning the Market & Octavia Area Plan's direction with respect to parking, the introduction to that plan states, “The Market and Octavia neighborhood can grow supported by its access to public transit. In addition to repairing its physical fabric, new development can take advantage of the area's rich transit access to provide new housing and public amenities, and reduce new traffic and parking problems associated with too many cars in the area. Because the Market and Octavia neighborhood's location supports a lifestyle that doesn't have to rely on automobiles, space devoted to moving and storing them can be

^e Subsequently, the Transit Center District Plan, adopted in 2012, increased heights on a limited number of sites in the C-3-O (SD) Use District to as much as 1,000 feet, where the Salesforce Tower is currently rising to a height of 1,070 feet, including permitted rooftop sculptural element.

dramatically reduced—allowing more housing and services to be provided more efficiently and affordably. Market and Octavia can capture the benefits of new development while minimizing the negative effects of more automobiles.”

Like most recent area planning efforts in San Francisco, the rezoning that implemented the Market & Octavia Area Plan replaced parking requirements with parking maximums, consistent with direction in Plan Policy 2.2.3. Text accompanying this policy states, “Minimum parking requirements are one of the most significant barriers to the creation of new housing, especially affordable housing, and transit-oriented development in the plan area,” and text introducing the Plan’s Section 2, Housing, notes, “Housing can be built more efficiently, affordably, and more consistent with neighborhood character if parking is not required.” The Market & Octavia Area Plan’s Section 5, Transportation, contains a discussion of “Managing Parking,” which begins with the statement, “No great city is known for its abundant parking supply.” The ensuing Objectives 5.2, 5.3, and 5.4 and their implementing policies call for, among other things, encouraging transit use rather than driving, establishing parking maximums and eliminating required parking, supporting development of housing without parking, and managing available off-street parking as efficiently as possible. Regarding parking, the proposed project has a residential parking ratio of 0.5 space per unit, consistent with the maximum amount of residential parking permitted in the Van Ness & Market Downtown Residential Special Use District that was enacted to implement the policies of the Market & Octavia Area Plan in the project vicinity.

However, the Market & Octavia Area Plan contains a number of other objectives and policies, including, among other things, creating a mixed-use neighborhood with an urban form that reinforces the importance of the neighborhood; encouraging the construction of new, higher-density housing accessible to transit; and encouraging development that contributes to the beauty of the built environment. Ultimately, the Draft EIR concludes, on page III-13:

By replacing existing structures with a high-density residential, retail/restaurant, and office space development centered around transit, the proposed project at 1500 Mission Street would implement several policies identified in the [Market & Octavia] Area Plan, including but not limited to Policies 1.1.2 (concentrating uses in areas served by transit), 1.2.2 (maximize housing opportunities and encourage high-quality commercial spaces on the ground floor), and 1.2.8 (encourage the development of slender residential towers above the base height in the area along South Van Ness Avenue between Market and Mission Streets). However, the proposed project would introduce two new towers to the area that are generally taller and larger than other buildings in the vicinity. Therefore, the proposed project may conflict with Policy 1.2.4 of the Area Plan—encourage buildings of the same height along each side of major streets.

With respect to the last conclusion, it should be noted that a project proposed across South Van Ness Avenue at 10 South Van Ness Avenue (Case No. 2015-004568ENV; CEQA evaluation under way; included in cumulative analyses for the 1500 Mission Street project) would develop buildings up to 400 feet in height, comparable to the 1500 Mission Street project’s residential tower. Were the 10 South Van Ness Avenue project to be approved and constructed, along with the proposed 1500 Mission Street project, this would result in buildings of essentially the same height along each side of South Van Ness Avenue.

Concerning the Western SoMa Plan, this Plan encompasses the second line of parcels south of Mission Street (fronting on Minna Street), but not the parcels fronting Mission Street directly across the street from the project

site. As such, while the Western SoMa Plan area is proximate to the site, its policies are not relevant to the proposed project.

In light of the foregoing, the Draft EIR does not identify any substantial conflict with plans or policies adopted for the purpose of avoiding or mitigating an environmental effect.

With regard to the comment concerning traffic allegedly being directed into the LMN residential neighborhood south of the project site, it would not appear that using Lafayette Street, a one-way southbound street from Mission Street to Howard Street, would provide an advantage for freeway-bound traffic, given that Howard Street provides no freeway access (westbound Howard Street traffic must make a right turn at South Van Ness Avenue). Like many South of Market alleys, however, it is possible that some drivers may use the LMN streets to circumvent left-turn prohibitions on Market Street. It is possible that enforcement of existing turn restrictions and/or installation of traffic calming devices in the streets within the LMN neighborhood could alleviate existing traffic concerns of neighborhood residents.

Comment PP-8: The Hub Plan

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

I-Hestor.19

“The Hub Project - III-13. Who is the public (as opposed to developers) clamoring for The Hub? The perception is that this is being driven by the Planning Department. It is another amendment to the M/O Area Plan and the adjacent areas of the Eastern Neighborhoods Area Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-8

The comment requests clarification regarding the identity of the project sponsor for The Hub rezoning project, which is currently under consideration by the Planning Department. The Draft EIR, on page III-13, describes the planning process for the Market Street Hub Project as part of the context in which the proposed 1500 Mission Street project is being proposed. As stated on page III-13 of the Draft EIR, the Hub Project “... is a community-based planning effort led by the Planning Department that seeks to reexamine and propose changes to the current zoning, land use policies and public realm/street designs for the area referred to as “SoMa West” in the Market & Octavia Area Plan.” The Hub Project has not been approved, and is currently undergoing environmental review. The plan itself is also still in development, but, as stated on Draft EIR page IV-11, it is expected to include zoning changes requiring more permanently affordable housing units and to incentivize affordable housing for artists, office space for non-profit organizations, and performance or fine arts studio space; certain height and bulk increases but also a smoothing of height transitions to adjacent areas; the potential for inclusion of additional office space beyond current Market & Octavia Area Plan allowances; a reduction in allowed parking; transportation demand management policies; and development impact fees. As

part of the community planning process, the Planning Department has held two community workshops on the Hub Project in 2016, and additional community meetings and outreach are forthcoming.^f

Comment PP-9: Climate Action Plan Consistency

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

I.Hestor.21

“Climate action plan III.B.[15]. This size is in Geologic Hazard Zone. Along with One Oak it is Artificial Fill over Bay Mud. It used to be part of the Bay and has High Liquefaction susceptibility. Rising sea levels affect the ground water. Most of South of Market is Bay Fill. Including this site. Please acknowledge.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-9

The comment states that the project site and most of the South of Market neighborhood are situated on Bay fill and subject to liquefaction. The comment states that this condition will be aggravated by rising sea levels.

The Draft EIR acknowledges that the project site “is underlain by eight to 15 feet of loose to medium dense sandy fill,” in the Geology and Soils section of the Initial Study (Draft EIR Appendix A, page 65). The fill is underlain by four to 20 feet of marsh deposit and dune sand, which was likely former marshland along the margin of Mission Bay, which historically extended north nearly to Bryant Street near Fourth Street and northwest to approximately Seventh and Townsend Streets, where Mission Creek emptied into the Bay. Historic maps depict marshy areas extending west from the edges of Mission Bay, along with two creeks, one of which, Hayes Creek, flowed easterly towards Mission Bay about two blocks north of the project site, crossing present-day Market Street at about Ninth Street. Mission Bay and its marshlands and tributary creeks were filled to create much of the South of Market neighborhood, with Mission Creek and China Basin the lone remnant of the Bay.

As stated on page 66 of the Initial Study, “the site is within a designated liquefaction hazard zone as shown on the California Geological Survey (CGS) seismic hazard zone map for the area titled State of California Seismic Hazard Zones.” The project’s geotechnical investigation found that while there is liquefiable sand underlying the project site, there is no continuous liquefiable layer across the project site. According to the geotechnical investigation, excavation for the proposed project would remove most of the liquefiable soils, while remaining liquefiable soils can be over-excavated and replaced with competent fill and/or can be improved using soil-cement columns that would provide adequate foundation support for the proposed project.^g

Concerning the effects of sea level rise on groundwater levels, the potential exists that areas of land on artificial fill atop what was once San Francisco Bay or Mission Bay may experience some rise in groundwater

^f San Francisco Planning Department, *The Market Street Hub Project* website. Available at <http://sf-planning.org/market-street-hub-project>. Reviewed January 24, 2017.

^g Langan Treadwell Rollo, *Geotechnical Investigation, 1500–1580 Mission Street, San Francisco, California*, July 20, 2015.

level, which could also increase risk of liquefaction.^h However, the project site is approximately one mile from the historic shoreline of Mission Bay and considerably farther from the historic San Francisco Bay shoreline, based on the 1859 U.S. Coast Survey Map of San Francisco (see **Figure RTC-3, Distance of Project Site from Mission Bay Shoreline**, page RTC-28).ⁱ Therefore, due to the project's location and with measures outlined under the geotechnical report relating to the project's foundation, it is unlikely that groundwater levels at and near the project site would be affected by sea level rise to the degree that the risk of liquefaction would increase.

^h City and County of San Francisco Sea Level Rise Committee, "Guidance for Incorporating Sea Level Rise into Capital Planning in San Francisco: Assessing Vulnerability and Risk to Support Adaptation," September 22, 2014; p. 6. Available at <http://onesanfrancisco.org/wp-content/uploads/Sea-Level-Rise-Guidance.pdf>. Reviewed January 28, 2017.

ⁱ Available as a Google Earth overlay and from David Rumsey Map Collection; www.davidrumsey.com.



SOURCE: Google Earth; David Rumsey Map Collection

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-3
Distance of Project Site from Mission Bay Shoreline

Comment PP-10: Proposed Central SoMa Plan

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

I-Hestor.28

“Central SoMa Plan - IV B-60. To the public it appears that the Department is determined to spend years in public meetings, adopt an EN Area Plan for SoMa; spend years in public meetings, adopt a Western SoMa Area Plan; throw it all out to plan what the Department wants as a **3rd Plan** - increasing heights and density that were intentionally omitted from both of the prior plans. I have asked above for a MAP showing various EN Area Plan boundaries, the boundaries of any plans that altered an adopted plan, and the proposals for yet another plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-10

The comment refers to the discussion of the Central SoMa Plan on Draft EIR page IV.B-10, in the Transportation section’s analysis of cumulative impacts. The comment raises questions about the planning process that has led to the Planning Department’s publication of a draft Central SoMa Plan, and notes the request for a map showing the boundaries for the various Eastern Neighborhood area plans. This map was created and is shown under Response PP-1 (see **Figure RTC-2, Recently Adopted Area Plans In and Near the 1500 Mission Street Project Site Vicinity**, page RTC-17).

The Draft EIR for the Central SoMa Plan (Case No. 2011.1356E; Draft EIR published December 14, 2016) provides the following background:

The need for the Plan became apparent during the Eastern Neighborhoods planning process, which was initiated in the early 2000s. In 2008, the City and County of San Francisco (the City) approved the Eastern Neighborhoods Rezoning and Area Plans project, which covered 2,300 acres on the city’s eastern flank and introduced new land use controls and area plans for the eastern part of SoMa (East SoMa), the Central Waterfront, the Mission, and Showplace Square/Potrero Hill neighborhoods. The Eastern Neighborhoods planning efforts had two primary objectives: to address and attempt to ensure a stable future for PDR (“production, distribution and repair,” generally light industrial) businesses in the city, mainly through zoning restrictions; and to plan for a substantial amount of new housing, particularly housing affordable to low-, moderate- and middle-income families and individuals. New housing would be developed in the context of “complete neighborhoods,” which would provide sufficient amenities for new residents of these areas.

At that time, the City determined that the pending development of the Central Subway transit project and the development potential of the surrounding area necessitated a separate, focused planning process that took into account the city’s growth needs as well as the opportunity to link transportation and land use planning. The Planning Department initiated the Central SoMa Planning Process in earnest in early 2011 with funding from the California Department of Transportation (Caltrans) and the San Francisco Municipal Transportation Agency (SFMTA).

Accordingly, by the time that the four Eastern Neighborhoods area plans (for East SoMa, the Mission, Showplace Square/Potrero Hill and the Central Waterfront) were considered for adoption in 2008, planning for the Central Subway—which is currently under construction and anticipated to begin operation in 2019—had progressed sufficiently that the City retained in place the existing Service Light Industrial (SLI) zoning in

East SoMa south of Harrison Street and proximate to the Central Subway route along Fourth Street, pending additional planning to account for the impending arrival of this new transit option. Therefore, the City did consider the potential for the Central SoMa Plan during the adoption of the Eastern Neighborhoods – East SoMa area plan.

Comment PP-11: Zoning Map

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

I-Hong⁹

“Can additional description/s of Symbols be added to Figure III-1 in what (i.e. – Zoning—color, RED-MX represent?” (Dennis Hong; e-mail, January 3, 2017)

Response PP-11

The comment requests explanation of the use district abbreviations in Draft EIR Figure III-1, Existing Zoning Map (as retitled herein), page III-3.

A key has been added to revised Figure III-1 describing the existing zoning districts shown on the figure. The revised figure appears in Section D, Draft EIR Revisions following page RTC-84.

C.3 Cultural Resources

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
- Comment CR-2: The Proposed Project Would Result in Significant Adverse Impacts on Historical Resources
- Comment CR-3: Historical Photographs of 1500 Mission Street Building
- Comment CR-4: Remnant Streetcar Tracks on 11th Street

Comment CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building

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

O-Heritage.3

“Built in 1925, 1500 Mission is a one-story reinforced concrete industrial building originally designed in the Classical Revival style; the building was enlarged and altered in 1941 in the Streamline Moderne style. In 2010, architectural historian William Kostura ranked the building among the eleven best Moderne-style buildings in San Francisco: ‘The building as it was added to and remodeled in 1941 remains essentially unchanged since that date. For that period (1941) this building retains integrity of location, design, materials, workmanship, setting, feeling, and association.’³ The 1500 Mission Street Historical Resource Evaluation, prepared by Architectural Resources Group, concurs that the old Coca-Cola Building is individually eligible for listing in the California Register of Historical Resources under Criterion 3 (architecture), a finding later confirmed by the Planning Department and in the DEIR.

“The DEIR includes a comprehensive list of character-defining features that contribute to the building’s historic eligibility, including but not limited to the full length of the facades along Mission and 11th Streets, clock tower, stucco surface, belt courses along the base, etched speed lines along the top, the steel-and-glass doors and transom, and the building’s large, open interior with skylights supported by steel trusses.⁴” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

Response CR-1

The comment presents a summary of the information on which the Draft EIR based its conclusion that the building at 1500 Mission Street is a historical resource for purposes of CEQA, a conclusion with which the commenter concurs. No further response is required.

³ Kostura, William. DPR Form for 1500 Mission Street.

⁴ DEIR, at p.IV.A-13.

Comment CR-2: The Proposed Project Would Result in Significant Adverse Impacts on Historical Resources

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

O-Heritage.4
A-HPC.1

“The proposed project would demolish one non-historic building and incorporate a small portion of the Coca-Cola Building into a mixed-use development that includes a high-rise residential tower and offices for the San Francisco Departments of Building Inspection, Planning, and Public Works. Most of the historic façade along Mission Street would be retained to a depth of forty feet, including its clock tower, and converted to retail use. A significant portion of the 11th Street elevation would also be preserved.

“Amid San Francisco’s ongoing development boom, façade retention has increasingly been approved by the city as mitigation for projects that would otherwise fully demolish eligible historic resources (e.g., 1634–1690 Pine Street Project/The Rockwell). Although such projects often present nuanced and complex preservation issues, the practice of “façadism” is largely condemned by the national and international preservation community:

“Stripped of everything but its façade, a building loses its integrity and significance, rendering it an architectural ornament with no relation to its history, function, use, construction method, or cultural heritage. With only its primary facades saved, the original structure is gone, including the roof, interior features and volume of space. [A] new structure is added on, which may be set back and sometimes cantilevered over what was the roof level of the mostly demolished older building. When its defining features are mostly removed and no longer part of an integrated whole, a building no longer demonstrates its authentic self.”⁵

“Façade retention is considered demolition of a historical resource under CEQA and is generally inconsistent with the Secretary of the Interior’s Standards. As such, Heritage agrees with the DEIR’s conclusion that the proposed project, although improved from the original design, would nonetheless result in significant and unavoidable adverse impacts to historic resources.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] concurs with the findings that the proposed project does not meet the Secretary of the Interior’s Standards and will result in a significant, unavoidable impact to the identified historic resource, 1500 Mission Street.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

⁵ Woo, Eugenia. “What Price Facadism? Authenticity and Integrity in Historic Preservation,” ARCADE 33.2, Fall 2015. Available at <http://arcadenw.org/article/what-price-facadism>.

Response CR-2

The comments express general agreement with the Draft EIR's conclusion regarding impacts to historical resources. The comments will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Comment CR-3: Historical Photographs of 1500 Mission Street Building

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

A-Moore.1

"I'd like to ask that in the historic preservation discussion of the 1500 Mission building that you include historic photos of the building that when it comes to the Final EIR will make it easier for people who are interested to comment to see what it was like. The building has slightly been altered overtime and there would be an emphasis on those elements that will be particularly integrated.

"We all have seen the first discussion on the building which does a very nice job of recognizing the importance of the building, but further elaboration on the background, historic photos would be very helpful, including where the main entrances were so we have a really better appreciation of what is included."(Planning Commissioner Kathrin Moore; Public Hearing Comments, December 15, 2016)

Response CR-3

The comment requests that the EIR present historical photographs of the former Coca Cola Building at 1500 Mission Street.

As stated in the Draft EIR on p. IV.A-11, the existing 1500 Mission Street building was constructed in 1925 and was enlarged and remodeled in 1941, in the Streamlined Moderne style, by the Coca-Cola Bottling Company. Based on the project's Historic Resources Evaluation, as concurred in by Planning Department preservation staff, the Draft EIR found that that the building is eligible for individual listing in the California Register of Historical Resources under Criterion 3 (architecture) "as a local example of an industrial building designed in the Streamline Moderne style of architecture in San Francisco" (Draft EIR, p. IV.A-13). As such, the building is considered a historical resource for the purposes of CEQA. Because the conclusion with respect to California Register eligibility is based on the building's 1941 remodeling as a Streamlined Moderne structure, the original 1925 design, for the White Motor Company, is not historically significant. **Figure RTC-4, Historical Photos of 1500 Mission Street Building (White Motor Company Building)**, page RTC-34, presents a photograph of the original White Motor Company building, a sales and service facility for trucks and buses. This photograph, taken from the southwest corner of the building, looking east along Mission Street, shows the original Classical Revival building with its Mission Street façade comprising nine bays and a peaked clock tower. The 1941 remodeling added two bays and a rounded corner and window to the western end of the Mission Street façade, removed the peaked cap from the tower, and added Streamlined Moderne detailing on the building such as rounded corners and surfaces and speed lines (bands of horizontal piping). Clock faces were also added to the tower. **Figure RTC-5, Historical Photos of 1500 Mission Street Building (Coca-Cola Bottling Plant)**, page RTC-35, shows the remodeled and enlarged building around the 1940s and in 1964.



White Motor Company Building, 1925 (photo: Architect and Engineer, June 1927)

SOURCE: Architectural Resources Group

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-4
Historical Photos of 1500 Mission Street Building
(White Motor Company Building)



Coca Cola Building, ca. 1940s (photo: Swinerton, A Builder's History)



Coca Cola Building, 1964 (photo: San Francisco Public Library)

SOURCE: Architectural Resources Group

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-5
Historical Photos of 1500 Mission Street Building
(Coca Cola Bottling Plant)

Comment CR-4: Remnant Streetcar Tracks on 11th Street

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

A-Moore.2

“The second thing I would like to ask, and I think it falls under Historic Preservation, the issue of a streetcar spur, which is basically the T Line -- no, the J, the J Line has a push-back onto 11th Street, which is a very interesting phenomenon.

“I took a picture of it one day when I was walking down the street. And as I was coming up from Mission, there was an old street car standing on 11th Street. That was such an incredible complement for celebrating the new civic office presence on 11th Street that I would like to see that the historic spurs better explained in the EIR, together that the streetscape plan for 11th Street figures out on how we can have a historic marker about this phenomenon and potentially even a place where tourists can stop and experience the street car just as you experience the turnaround on Powell, the cable car on Powell Street.

“It’s a great experience because normally you see that thing that’s moving up and down Market Street you can really never touch or feel it. And when I saw it, I was so surprised, that I thought it would be a real great innovation and invitation for also certain retail -- to have a little restaurant which focused on the thing. I don’t -- I cannot ask that there be a stop where you can jump onto it, but that would be obviously a great idea. I don’t think it’s quite set up that way. But for it to be standing there was just amazing to me.

“So that’s on there and they have basically congestion, they pulled that spur that puts a car on that spur. And I’d like you to explain that a little bit more in the EIR.”(Planning Commissioner Kathrin Moore; Public Hearing Comments, December 15, 2016)

Response CR-4

The comment refers to the two sets of streetcar stub tracks that extend on 11th Street approximately 280 feet south of Market Street and the “wye” that connects the eastbound and westbound streetcar tracks on Market Street with the tracks on 11th Street. The comment requests additional information about the tracks, including whether their presence could be commemorated by a historical marker.

The wye allows a single-ended streetcar to turn around, by turning onto the wye from one direction on Market Street and backing out of the wye onto the other direction of Market Street. Reportedly, these tracks are a remnant of Muni’s old H Potrero-Van Ness streetcar line, which ran from Army (now Cesar Chavez) Street and Potrero Avenue to Fort Mason (later shortened to terminate at Van Ness Avenue and Bay Street) via Potrero Avenue, Division Street, 11th Street, Market Street, and Van Ness Avenue. Streetcars on this line were replaced with buses in 1950, with the 11th Street-Market Street segment being replaced by Mission Street and South Van Ness Avenue. Streetcar tracks were subsequently removed from 11th Street except for the rail stub and wye that remains. Today, Muni uses the wye tracks to occasionally turn around streetcars on the F Market & Wharves historic streetcar line. The 11th Street tracks are not used for regular passenger service on the F Market & Wharves historic streetcar line, but instead are used occasionally (e.g., about one to two times a week) to repair streetcars that break down in route, for streetcar service rebalancing, and to split the streetcar line into two during special events.

The commenter's request for a plaque explaining the presence of the 11th Street streetcar tracks is noted. The project does not propose changes to the rail stub, nor do other current plans exist for such a marker; however, this matter could be considered by the City as part of the project approval process.

C.4 Transportation and Circulation

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment TR-1: Transportation Setting
- Comment TR-2: Vehicle Miles Traveled (VMT) Impacts
- Comment TR-3: Transit Impacts
- Comment TR-4: Pedestrian Impacts
- Comment TR-5: Bicycle Impacts
- Comment TR-6: Construction Impacts
- Comment TR-7: Cumulative Construction Impacts
- Comment TR-8: Vehicle Trip Reduction
- Comment TR-9: Lead Agency Responsible for Mitigation
- Comment TR-10: Parking Demand in Nearby Neighborhoods

Comment TR-1: Transportation Setting

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

I-Hestor.3
I-Hestor.26

“Two maps must be added to 1500 Mission DEIR

...

“Map #2

“A map showing the location of the FREEWAYS and the freeway ramps/access just south and west of 1500 Mission. This should include the route right in front of the Planning Department and north on South Van Ness adjacent to Project site. **DEIR II-3 states that Interstate 80 and US Highway 101 provide the primary regional access to project area.** Show it. I note the increasing amount of reverse commuting INTO San Francisco - so that the City provides HOUSING particularly for the Peninsula. There are currently 18 lanes of traffic into San Francisco from the South. The DEIR should be amended to state that those same freeways allow people to EXIT San Francisco to go to work. Reverse commute is a FACT.

“Requested map is necessary to understanding why excessive residential parking at Project, in the context of a changed reverse-commute pattern from Silicon Valley, has dumped demand for fairly high end housing into the area of 1500 Mission and One Oak/1500 Market. What is called the “Google buses” started in the very recent past, long after adoption of the M/O and EN Area Plans. Those plans were aimed at accommodating the demand for San Francisco housing based mostly on San Francisco employment and residents. Now San Francisco is producing housing for Silicon Valley, which encourages employee from Mountain View,

Cupertino, Menlo Park and other places on the peninsula to LIVE in San Francisco but WORK on the Peninsula. Since these are not low income employees, the demand is for rather high-end housing. AND THERE ARE FREEWAY CONNECTIONS RIGHT THERE.

“A MAP of the freeway access and ramps would help understand travel patterns and possible impacts. And direct attention to the excessive parking provided in this ‘TRANSIT RICH’ area. There is a freeway off ramp AT THE CORNER to the right of the Planning Department. There is an on ramp at South Van Ness and 13th. There is a Central Freeway ramp BEHIND the Planning Department.”

...

“Provide boundaries of TAZ 591 or provide map. IV B-4. Depending on the boundary there may be few residents of TAZ 591, so it is hard to understand how relevant this is to goals in M/O Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-1

The comments requests a map presenting the nearby freeways access ramps as well as clarification of the boundaries of the Traffic Analysis Zone (TAZ) 591 in which the project site is located. **Figure RTC-6, Regional Freeway Facilities in Project Vicinity**, page RTC-40, identifies the regional freeway connections. The vehicular routes between the project site and the freeway facilities are adequately described in the Draft EIR on pages IV.B-1–IV.B-2, and therefore the Draft EIR text was not amended to provide additional language that the freeway ramps are used to enter and exit San Francisco.

TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue. It includes the project block and the block to the south and southwest, with the residential area along Lafayette, Minna, and Natoma Streets, as well as the residential area along Howard Street between 12th Street and South Van Ness Avenue. The TAZ 591 data in Table IV.B-1 is provided to support analysis of whether the proposed project would increase vehicle miles traveled per capita, not whether the proposed project is consistent with the goals in the Market & Octavia Area Plan.

In response to the comment, the text of the note within Table IV.B-1 in the Final EIR on page IV.B-4 is revised as follows (new text shown in double-underline):

NOTE:

- a. The Traffic Analysis Zone (TAZ) in which the project site is located. TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue.

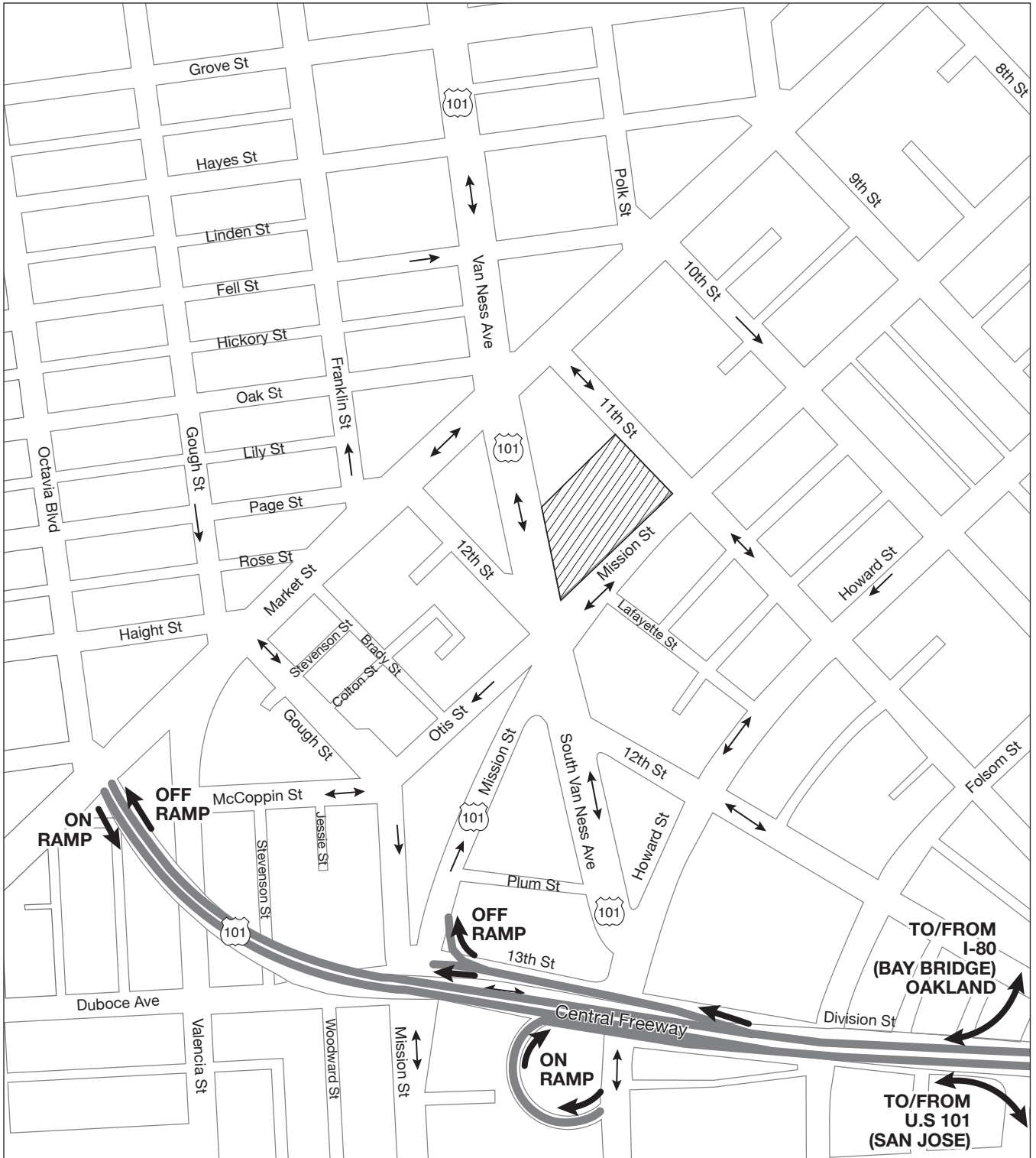
The first requested map is discussed above under Plans and Policies; see Response PP-1 on page RTC-13.

Comment TR-2: Vehicle Miles Traveled (VMT) Impacts



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

I-Hestor.7

I-Hestor.27



SOURCE: LCW Consulting

 PROJECT SITE  DIRECTION OF VEHICULAR TRAVEL



SOURCE: LCW Consulting

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-6
Regional Freeway Facilities in Project Vicinity

“On **DEIR I-4** and later in the transportation discussion an assertion is made that **VMT** - Vehicle Miles Travelled - is the appropriate measurement for transportation studies under new CEQA rules. I refer to the comments being submitted by Jason Henderson critiquing how Planning erroneously applies the VMT standard in light of the intervening work writing the Market/Octavia Plan.

...

“**Use of VMT metric - IV B-17.** I incorporate by reference comments on One Oak DEIR on how VMT was required to be applied.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-2

The comments reference Draft EIR comments on the VMT analysis methodology submitted on the One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) in a letter dated January 4, 2017, by Jason Henderson, Chair, Transportation and Planning Committee of the of the Hayes Valley Neighborhood Association. While the One Oak Street Draft EIR letter from Mr. Henderson was not attached to the letters submitted by the commenter, nor was that letter prepared in response to this project’s Draft EIR, this response addresses the comments in the letter from Mr. Henderson. The comment letter on the One Oak Project from the Hayes Valley Neighborhood Association (Henderson) included comments related to the methodology used to assess impacts of the proposed project on VMT, including project-specific detailed analysis, effects of parking on VMT, and thresholds of tolerance for additional VMT. Other transportation-related comments on the One Oak Project related to site-specific comments on bicycle and loading impact, and need for analysis of additional alternatives with less or no on-site parking.

As indicated on Draft EIR page IV.B-19, California Senate Bill 743 requires the California Office of Planning and Research to establish criteria for determining the significance of transportation impacts that shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, the California Office of Planning and Research shall recommend potential metrics including VMT. VMT is a measure of the amount and distance that a project causes potential residents, tenants, employees, and visitors of a project to drive, including the number of passengers within a vehicle. The San Francisco Planning Commission replaced automobile delay (vehicular level of service) with VMT criteria via Resolution 19579, which was adopted at the Planning Commission hearing on March 3, 2016.

Attachment F of the March 3, 2016, staff report (Methodologies, Significance Criteria, Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts, which includes an appendix from the San Francisco County Transportation Authority) provides the Planning Department’s methodology, analysis and recommendations for the VMT analysis.^j The Planning Department uses maps illustrating areas that exhibit low levels of existing and future VMT to screen out developments that may not require a detailed VMT analysis. The Planning Department relies on the San Francisco Chained Activity Model Process (SF-CHAMP) model runs prepared by the San Francisco County Transportation

^j San Francisco Planning Department, Executive Summary, Resolution Modifying Transportation Impact Analysis, Hearing date: March 3, 2016.

Authority to estimate VMT within different geographic locations (i.e., Traffic Analysis Zones, or TAZs) throughout San Francisco.

As described on Draft EIR page IV.B-23, for residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent. For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent. For retail projects, the Planning Department uses a VMT efficiency metric approach for retail projects: a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above. Thus, the use of the threshold of 15 percent below regional averages of VMT to determine low levels of VMT for development projects meets the SB 743 requirements, and is therefore appropriate.

As documented in the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA ("proposed transportation impact guidelines"), a 15 percent threshold below existing development is "both reasonably ambitious and generally achievable."^k It is also noted that the threshold is set at a level that acknowledges that a development site cannot feasibly result in zero VMT without substantial changes in variables that are largely outside the control of a developer (e.g., large-scale transportation infrastructure changes, social and economic movements, etc.).

One rationale for using the SF-CHAMP maps to screen out projects, instead of a project-by-project detailed VMT analysis, is because most developments are not of a large enough scale and/or contain unique land uses to substantially alter the VMT estimates from SF-CHAMP. SF-CHAMP is not sensitive to site-level characteristics for a development (e.g., the amount of parking provided for a development). The amount of parking provided for a development, as well as other transportation demand management (TDM) measures, could result in VMT that differs from SF-CHAMP estimation. As part of the "Shift" component of the Transportation Sustainability Program, the City adopted a citywide TDM Program (effective March 2017). For the TDM Program, staff prepared the TDM Technical Justification document^l, which provides the technical basis for the selection of and assignment of points to individual TDM measures in the TDM Program. As summarized in the TDM Technical Justification document, a sufficient amount of research indicates that more parking is linked to more driving and that people without dedicated parking are less likely to drive. However, at this time, there is not sufficient data to quantify the specific relationship between parking supply and VMT for a development in San Francisco. CEQA discourages public agencies to engage in speculation. Therefore, the quantified VMT estimates in CEQA documents for a development currently do not directly account for the effect of a development's parking supply on VMT.

Impact TR-1 on Draft EIR pages IV.B-33 – IV.B-34 and Impact C-TR-1 on Draft EIR pages IV.B-61 – IV.B-62 present the assessment of the impact of the proposed project on VMT for existing and cumulative conditions, respectively. The project site is located within an area of the city where the existing and projected future

^k Governor's Office of Planning and Research, "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA," January 20, 2016, p. 20.

^l San Francisco Planning Department, Transportation Demand Management Technical Justification, June 2015. Available online at: http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification.pdf

cumulative VMT are more than 15 percent below the regional VMT thresholds, and therefore the proposed project's land uses (residential, office, retail/restaurant, and childcare) would not generate a substantial increase in VMT. Furthermore, the project site's transportation features, including sidewalk widening, on-street commercial loading spaces and passenger loading/unloading zones, and curb cuts, fit within the general types of projects that would not substantially induce automobile travel. Therefore, the proposed project would not exceed the project-level thresholds for VMT and induced automobile travel under existing conditions, and would not result in a cumulatively considerable contribution to VMT impacts.

Comment TR-3: Transit Impacts

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

I-Hong.3

"11th street - between Market Street and Mission Street has two existing parking garage entries/exits both to 1455 Market Street. [One South Van Ness Avenue] has two Entries/Exits as well.

"Does Muni still use this street for their train street car turn arounds(?).

"Were these issues considered?

"Only because of the Projects additional traffic along 11th street between Market Street and Mission will have an impact this street.

"Minor detail. Will the Muni Stop on South Van Ness at Mission remain? This is a heavier used Muni stop. The proposed residential tower at this stop will get a lot more use. Only because in some of the recent drawings it is not shown, i.e., in Figure II-4 and Figure 3-page 5.

"Will the existing Commuter Shuttle bus stop in front of 10 South Van Ness remain? Not sure if this was one of MTA HUB stop/s." (Dennis Hong; e-mail, January 3, 2017)

Response TR-3

The comments request clarification on the use of 11th Street and project impacts on Muni operations on 11th Street, clarification of relocation of the existing Muni bus stop on South Van Ness Avenue adjacent to the project site, and clarification whether the existing Commuter Shuttle bus stop in front of 10 South Van Ness Avenue would remain with implementation of the project.

Draft EIR page IV.B-5 describes Muni operations adjacent to the project site, including the presence of the Muni historic streetcar tracks on 11th Street north of the project site. On 11th Street, there are two sets of streetcar stub tracks that extend approximately 280 feet south of Market Street and a "wye" that connects the eastbound and westbound streetcar tracks on Market Street with the tracks on 11th Street. The 11th Street tracks and wye are not used for regular passenger service on the F Market & Wharves historic streetcar line, but instead are used occasionally (e.g., about one to two times a week) to temporarily store streetcars that break down en route, for streetcar service rebalancing, and to split the streetcar line into two during special

events.^m The use of the stub tracks and wye are anticipated to remain similar to existing conditions, and may decrease in the future if a streetcar track loop proposed as part of the Better Market Street project (currently undergoing environmental review) is constructed.ⁿ The proposed streetcar track loop included in the Better Market Street project would run one-way westbound along McAllister Street between Market Street and Charles J. Brenham Place (formerly Seventh Street North), and one-way southbound on Charles J. Brenham Place between McAllister and Market Streets, and could be used to split the streetcar line into two during special events. Thus, the proposed loop would likely reduce the use of the rail stub and wye on 11th Street.

The presence of driveways into existing parking garages, driveways into the proposed project garages, the existing streetcar tracks, and existing bus operations on 11th Street were considered in the proposed project's transit impact analysis. Due to the impending implementation of a number of transportation improvements on the streets adjacent to the project site, the project transportation elements, such as driveways and sidewalk widening, were subject to SFMTA review. Impacts of the proposed project on Muni operations are presented in Impact TR-3 on Draft EIR pages IV.B-43 – IV.B-47. The analysis determined that the proposed project would not substantially affect Muni transit operations on 11th Street or South Van Ness Avenue, but that operations of the proposed off-street loading area for the residential/retail building could result in a significant transit impact due to delays to Muni buses on Mission Street. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations, described on Draft EIR pages IV.B-44 – IV.B-47 was developed with the SFMTA to mitigate impacts of the proposed project on Muni transit operations on Mission Street to less than significant.

As noted above, due to impending implementation of a number of transportation improvements on the streets adjacent to the project site, the project transportation elements were subject to SFMTA review, and the project design and impact assessment accounts for these planned and funded transportation improvements. As stated on Draft EIR page IV.B-22, with implementation of the Van Ness BRT, the existing curbside bus stop on South Van Ness Avenue directly north of Mission Street will be discontinued, and instead a northbound BRT station will be located within the median within South Van Ness Avenue at the approach to Market Street. Thus, the project plans referenced in the comment requesting clarification of the status of the existing Muni bus stop on South Van Ness Avenue adjacent to the project site assume the changes to South Van Ness Avenue as a result of implementation of the Van Ness BRT project, which is currently under construction.

In response to the comment inquiring whether the existing Commuter Shuttle Program bus stop in front of 10 South Van Ness Avenue would remain, this stop has been eliminated by the San Francisco Municipal Transportation Agency (SFMTA) and no longer exists. For information, the SFMTA Commuter Shuttle Program for 2016–2017 provides for up to 125 stops for private commuter shuttle buses, either shared with or separate from Muni bus stops. Shuttle operators must obtain a permit and pay a fee to use the shuttle stops, and must comply with guidelines and specifications established with SFMTA. Permittees must also establish a "Service Disruption Prevention Plan." The Commuter Shuttle Program is independent of any individual development project, such as the 1500 Mission Street project.

^m Telephone conversation between Ian Trout, SFMTA and Luba Wyznyckyj, LCW Consulting on January 26, 2017.

ⁿ *Better Market Street Project, Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting*, January 14, 2015, Planning Department Case No. 2014.0012E.

Comment TR-4: Pedestrian Impacts

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

I-Hong.4

“Keeping Vision 0 in mind, I was unable to reconcile the pedestrian and the vehicle traffic issue, was this issue considered at both the:

“- busy intersection - Mission Street, South Van Ness, Otis and 12th Street.

“- busy intersection - Market Street at Van Ness/South Van Ness?

‘- soon to be [busy intersections of] 11th and Mission Street and 11th and Market Street.” (Dennis Hong; e-mail, January 3, 2017)

Response TR-4

The comment raises Vision Zero concerns at the four intersections in the immediate vicinity of the project site—Van Ness/South Van Ness/Market, South Van Ness/Mission, 11th/Market, and 11th/Mission.

The City’s Vision Zero Policy, described on Draft EIR page IV.B-18, was considered in the transportation impact assessment. While Van Ness and South Van Ness Avenues, and Market and Mission Streets are included as Vision Zero High Injury Network Streets, there are no identified High Injury Intersections in the project vicinity.^o There are a number of existing, planned, and proposed projects in the project vicinity that would implement improvements to address Vision Zero goals. The Van Ness BRT project (described on Draft EIR page IV.B-22) is currently under construction and includes improvements to make Van Ness Avenue and South Van Ness Avenue safer and more comfortable for pedestrians who access the transit stations, including the planned station at the intersection of Van Ness/South Van Ness/Market. The SFMTA Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements (described on Draft EIR page IV.B-22) would be implemented as part of the Van Ness BRT changes and will improve pedestrian crossing conditions and safety at this six-legged intersection. The proposed Better Market Street Project (described on Draft EIR page IV.B-59) includes improvements to the segment of Market Street between Octavia Boulevard and The Embarcadero (and potentially to segments of Mission, Tenth, and Valencia Streets) that would include pedestrian and bicyclist improvements. In addition to these transportation projects, the proposed project includes a number of pedestrian improvements adjacent to the project site, including wider sidewalks on South Van Ness Avenue and 11th Street.

The impacts of the proposed project on pedestrians are discussed in Impact TR-4 on Draft EIR page IV.B-47. The new pedestrian trips would be accommodated on the existing pedestrian network and would not substantially affect the pedestrian conditions on sidewalks and crosswalks in the project vicinity. The proposed project would add pedestrian trips to nearby crosswalks, but would not introduce new hazardous design features to the intersections. The majority of the pedestrian trips would be added to the South Van

^o SFMTA, *Vision Zero Two-Year Action Strategy, Eliminating Traffic Deaths by 2024*, February 2015.

Ness Avenue and Mission Street sidewalks, although a portion of trips to and from the office and permit center component would also travel on 11th Street between the office building concourse/entrance and Market Street. Impact TR-4 identifies a significant pedestrian impact associated with the on-site truck loading area for the residential/retail building that would be accessed via Mission Street and a mid-block alley (see discussion on Draft EIR page IV.B-48). Unrestricted truck access to these on-site loading spaces has the potential for interfering with pedestrian circulation on Mission Street and in the mid-block alley, creating potentially hazardous conditions for pedestrians. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading (Draft EIR page IV.B-44), would manage loading access and activities for the residential/retail building, and includes monitoring to ensure that loading activities would not affect pedestrians on Mission Street. This mitigation measure would reduce proposed project impacts on pedestrians to a less-than-significant level.

Comment TR-5: Bicycle Impacts

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

I-Hestor.9

I-Hestor.22

“Proposed Site Plan Figure II-4 shows long curb cut along Mission Street. I refer to and incorporate comments on issues related to bicyclist safety ... that Henderson is submitting on One Oak DEIR. The safety ... issues are similar and only separated by one block.” (Sue C. Hestor; letter, January 4, 2017)

...

“Refer to comments submitted on One Oak regarding the hazards to bicyclists in the curb cut. III-16.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-5

The comments raise concerns regarding bicyclist safety, particularly with respect to the proposed project driveway on Mission Street, and references comments submitted on the proposed One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E).

The curb cut on Figure II-4 is for the on-site loading spaces for the proposed residential/retail building, and would be located in a similar location of the existing driveway serving the Goodwill loading area that would be eliminated. The 26-foot-wide curb cut is a standard width for two access lanes for trucks.

Impacts of the proposed project on bicyclists are discussed in Impact TR-5 on Draft EIR page IV.B-49. In the project vicinity, Market Street is the primary east-west route for bicyclists, and bicycle lanes are provided in both directions. Mission Street is a transit-preferential street and not heavily used by bicyclists, however, 11th Street between Market and Mission Streets, and Mission Street west of 11th Street serve as connector routes to bicycle facilities southwest of Market Street. As described on Draft EIR page IV.B-50, the SFMTA’s Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements and Muni Forward TTRP.14 projects include removal of all on-street parking spaces on the north side of Mission Street between 11th Street and South Van Ness Avenue and restriping the westbound right-of-way to provide for a curbside right-turn-

only lane to South Van Ness Avenue, a bicycle lane, a transit-only lane, and two westbound mixed-flow travel lanes. As discussed in the Draft EIR, unrestricted truck access into the on-site loading spaces for the residential/retail building would have the potential to block bicycle access to on-street bicycle parking and block bicycle travel on Mission Street, thereby increasing the potential for conflicts and potential safety hazards between bicyclists, buses, and other vehicles on Mission Street. Instead of accessing the on-site loading facility, some truck drivers may conduct loading activities at the curb travel lane along Mission Street, which may result in queues within the Mission Street vehicle and bicycle lanes. The Draft EIR identified these conditions as potentially hazardous conditions for bicyclists, therefore resulting in a significant impact on bicyclists. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations (Draft EIR page IV.B.-44), was developed to ensure that trucks accessing the loading area do not double-park within the planned bicycle lane while awaiting access into the mid-block alley, or otherwise create hazardous conditions for bicyclists. With implementation of Mitigation Measure M-TR-3, impacts on bicyclists would be less than significant.

The comments raised by Mr. Henderson (Hayes Valley Neighborhood Association letter dated January 4, 2017) on the One Oak Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) relate to potential impacts of the use of the existing recessed on-street truck loading bay on Market Street between Van Ness Avenue and Franklin Street on bicyclists traveling within the westbound bicycle lane on Market Street. The proposed 1500 Mission project would not substantially affect bicycle travel on Market Street, and as described above, potential safety issues related to bicycle travel on Mission Street were addressed and mitigated to less than significant.

The letter from Mr. Henderson also raised the issue of the proposed project's wind impacts on bicyclists. This issue is addressed in Response WI-1.

Comment TR-6: Construction Impacts

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

A-Caltrans.3

“A Transportation Management Plan (TMP) or construction Traffic Impact Study may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with the California Manual on Uniform Traffic Control Devices. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510.286.4579 and see the following website:

<http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev1.html>.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-6

The comment states that a Transportation Management Plan or construction Traffic Impact Study may be required where traffic restrictions and detours affect State highways (e.g., South Van Ness Avenue). As noted on Draft EIR page IV.B-55, project construction would be required to comply with the City of San Francisco's

Regulations for Working in San Francisco Streets (the Blue Book), as well as other city, state and federal codes, rules, and regulation. If required, the project sponsor would comply with Caltrans requirements for a Transportation Management Plan and/or Traffic Impact Study.

As noted on Draft EIR page IV.B-55, proposed project construction activities are not anticipated to require traffic restrictions or detours affecting South Van Ness Avenue, with the exception of some construction activities such as delivery of large construction equipment and oversized construction materials that would require one or more temporary travel lane closures on South Van Ness Avenue. Such activities would likely be conducted on weekend days when pedestrian, traffic, and transit activity is lower.

Comment TR-7: Cumulative Construction Impacts

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

I-Hestor.11

I-Hestor.25

“Construction impacts II-28. Assume that both 1500 Mission and One Oak/1500 Market will be constructed simultaneously. Please describe. They are scheduled for approval at the same time. Other already approved buildings could also start construction. But please provide traffic, sidewalk, etc. disruption is both happened at SAME or over-lapping time.

...

“Explain changes underway to Van Ness Ave - including overlap with construction times of 1500 Mission and One Oak. **DEIR IV B-3.**” (Sue C. Hestor; letter, January 4, 2017)

Response TR-7

The commenter states that construction of the proposed project would overlap with other nearby planned and proposed development and transportation projects, and requests information on impacts of overlapping construction activities.

Impact C-TR-8 on Draft EIR pages IV.B-71 - IV.B-73 presents the discussion of cumulative construction-related transportation impacts. The impact discussion acknowledges potential construction overlap with other nearby approved and proposed projects, including the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) and the Van Ness Bus Rapid Transit (BRT) project. Construction of the Van Ness BRT project is under way and will be completed in 2018. Assuming that the proposed 1500 Mission Street project and the proposed One Oak Street Project approvals are obtained in 2017, construction of these projects could overlap with the Van Ness BRT project for about one year. As described in the Draft EIR, given the magnitude of projected cumulative development and transportation/streetscape projects anticipated to occur within a few blocks of the project site, and the uncertainty concerning construction schedules, cumulative construction activities could result in multiple travel lane closures, high volumes of trucks in the project vicinity, and travel lane and sidewalk closures, which in turn could disrupt or delay transit, pedestrians, or bicyclists, or result in potentially hazardous conditions (e.g., high volumes of trucks turning at intersections). This would be a significant impact. Mitigation Measure M-C-TR-8, Construction Coordination (Draft EIR page IV.B-72), would

require the project sponsor, or its contractor(s) to consult with various City departments such as SFMTA and Public Works through the Interdepartmental Staff Committee on Traffic and Transportation, and other interdepartmental meetings, as needed, to develop coordinated plans that would address construction-related vehicle routing, detours, and transit, bicycle, and pedestrian movements adjacent to the construction area for the duration of construction overlap. Key coordination meetings would be held jointly between project sponsors and contractors of other projects for which the City departments determine impacts could overlap. Implementation of Mitigation Measure M-C-TR-8 would minimize, but would not eliminate, the significant cumulative impacts related to conflicts between construction activities and pedestrians, transit, bicyclists, and autos, and cumulative construction impacts would remain *significant and unavoidable*.

Comment TR-8: Vehicle Trip Reduction

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

A-Caltrans.2

“Caltrans commends the City for including a Transportation Demand Management (TDM) plan to reduce vehicle trips associated with the project. Given the size of the project and its potential to generate trips to and from the project area, such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. In addition to the measures recommended in the Draft EIR, with consideration of the City’s unique commuting patterns, please also consider recommending inclusion of an onsite telecommute or telework center to give residents the option of working remotely.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-8

The comment commends inclusion of a TDM plan for the proposed project, and recommends inclusion of an on-site telecommute or telework center to give residents the option of working remotely. As described on Draft EIR p. IV.B-37, the City’s TDM Program Standards identify a menu of TDM options that would encourage use of sustainable modes and reduce VMT. The TDM Ordinance was approved by the Board of Supervisors on February 7, 2017 and becomes effective March 19, 2017. The approved TDM Ordinance includes measures addressing active transportation modes, car-share, delivery, family-oriented measures, high-occupancy vehicles, information and communications, land use, and parking. Telecommute or telework centers are not included in the City’s recommended list of TDM measures given the difficulty involved in the City being able to effectively monitor compliance for such a measure. However, it should be noted that there are numerous office-share options within walking, transit, and bicycling proximity to the proposed project (e.g., Citizen Space, NextSpace, WeWork, Impact Hub, Bespoke Coworking, among others) that could readily support residents working remotely. In addition, the proposed residential building would include amenity areas that would cater to residents working from home and would feature workstations, private conference rooms, and free high-speed Internet access.

Comment TR-9: Lead Agency Responsible for Mitigation

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

A-Caltrans.1

“As the Lead Agency, San Francisco (the City) is responsible for all project mitigation, including any needed improvements to State highways, if necessary. The project’s fair share contribution, financing, scheduling, implementation responsibilities, and Lead Agency monitoring should be fully discussed for all proposed mitigation measures.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-9

The comment states that the City, as Lead Agency, would be responsible for all mitigations affecting State highways, and that the project’s fair-share contribution of those mitigation measures, as well as monitoring, need to be fully disclosed. Neither of the two transportation mitigation measures identified for the proposed project in the Draft EIR would require improvements on Caltrans right-of-way (ROW), and therefore, there is no need to identify the project’s fair share contribution, financing, scheduling, or implementation responsibilities for any projects on Caltrans ROW.

Draft EIR Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations, would manage access to the on-site loading area via Mission Street in such a way that does not result in significant conflicts with transit, bicyclists, pedestrians, or other vehicles, or result in potentially hazardous conditions. Mitigation Measure M-C-TR-8: Construction Coordination addresses transportation impacts of overlapping construction activities of cumulative projects and would require the project sponsor, or its contractor(s) to consult with various City departments such as SFMTA and Public Works through ISCOTT, and other interdepartmental meetings, as needed, to develop coordinated plans that would address construction-related vehicle routing, detours, and transit, bicycle, and pedestrian movements adjacent to the construction area for the duration of construction overlap.

As part of project approvals, a Mitigation Monitoring and Reporting Program (MMRP) will be prepared and adopted to ensure proper implementation of the mitigation measures identified in the Final EIR. Consistent with CEQA Guidelines Section 15097, the MMRP is designed to ensure implementation of the mitigation measure and would be 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 this Draft EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings must include a Statement of Overriding Considerations for those impacts (CEQA Guidelines Section 15093(b)). The project sponsor would be required to implement the MMRP as a condition of approval.

Comment TR-10: Parking Demand in Nearby Neighborhoods

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

I-Rhine.2

Note to reader: The first passage below quoted from the Draft EIR is from the Population and Housing section of the Initial Study, Draft EIR Appendix A, p. 34 (Impact C-PH-1, not Impact C-LU-1, as stated in the preceding text). Although the “comment” below discusses parking, the text concerning population is presented here, as in the original comment letter. Because the quoted text begins in the middle of a sentence, the beginning of the sentence is added by the authors of this document, in *italics*, for context.

“Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative land use impact.

LTS None required. NA

“EIR states, *‘The approved and proposed projects identified in Table 2, Cumulative Projects within 0.25 mile of the Project Site, and mapped on Figure 6, Cumulative Projects within 0.25 mile of the Project Site, within 0.25 mile of the project site would add approximately 7,510 new residents within 3,237 new dwelling units. Overall, these approved and proposed projects, when combined with the proposed project, would add 8,904 new residents in the project vicinity, which would represent a residential population increase of approximately 29 percent.’*

“EIR states, **‘Accordingly, parking impacts can no longer be considered in determining the significance of the proposed project’s physical environmental effects under CEQA.** Although not required, the EIR presents a parking demand analysis for informational purposes. The EIR also considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis.’

“Comment:

“Evidently impacts related to parking are no longer analyzed. With the exception of the LMN RED area, there is limited street parking in the project vicinity. The project as well as the future hub residential development provides limited onsite residential parking. The EIR merely assumes future tenants will not own cars because parking will not be provided. There is no assurance this will be case, and if future residents own cars without project provided parking they will be “hunting” for parking spaces in our neighborhood area, circling endlessly in that quest. The LMN RED has weekday residential parking controls, but not for weekends. Residents and businesses in the LMN RED use their cars and trucks for work seven days a week, they rely on street parking. Residential parking controls need to be extended to seven days per week and strictly enforced so residents, particularly renters, businesses and their customers, can continue to have access to street parking. Also, this area is occupied by residents who work in blue collar trades and have trucks which they use for work. These workers do not have off street parking and any increase demand for off street parking will just add to an already tenuous situation with regards to these small business trades people. With the future cumulative Hub development this represents a real impact to the residents and small businesses in the LMN RED. Finally, related to increased traffic due to people seeking parking in our neighborhood, there is no analysis of the air pollution and noise impacts within the LMN RED District boundary.” (Robert Rhine; e-mail, December 6, 2016)

Response TR-10

The comment expresses concern about potential parking impacts in the Lafayette, Minna, and Natoma (LMN) residential neighborhood to the south of the project site, as well as potential air quality and noise impacts from traffic resulting from drivers seeking parking in this neighborhood.

The boldface text quoted regarding parking is from the Initial Study transportation section. The Draft EIR provides a more extensive explanation, in the Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*, of SB 743 and CEQA Sec. 21099 as to why parking is not analyzed. As stated on Draft EIR page IV-2:

CEQA Statute Section 21099(d) states that “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.”²⁶ Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;²⁷
- b) The project is on an infill site;²⁸ and
- c) The project is residential, mixed-use residential, or an employment center.²⁹

The proposed project meets each of the above three criteria because it is (1) located within one-half mile of several rail and bus transit routes, (2) located on an infill site that is already developed with a one-story warehouse structure currently occupied by Goodwill Industries, with a below-grade parking garage, and a two-story retail and office structure also currently occupied by Goodwill Industries, and (3) would be a residential and retail/restaurant space, as well as an employment center.³⁰ Thus, this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.

However, the Draft EIR presents parking supply and demand data for informational purposes. As stated on Draft EIR page IV.B-15, while on-street parking in the project vicinity is well-utilized, evening occupancy at off-street parking facilities averages less than 50 percent, indicating that parking is available when most workers are at home.

As for the proposed project, residential parking is proposed at a ratio of one parking space per two dwelling units (0.5 spaces per unit). With considerably fewer spaces available than one space per unit, evidence

²⁶ Refer to CEQA Statute Section 21099(d)(1).

²⁷ CEQA Statute 21099(a)(7) defines a “transit priority area” as an area within 0.5 mile of an existing or planned major transit stop. A “major transit stop” is defined in CEQA Statute 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

²⁸ CEQA Statute 21099(a)(4) defines an “infill site” as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is *separated* only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

²⁹ CEQA Statute 21099(a)(1) defines an “employment center” as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

³⁰ San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 1500 Mission*, September 14, 2016. This document (and all other documents cited in this report, unless otherwise noted) is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2014.000362ENV.

suggests that driving by project residents would be lower than would be the case if more parking were provided.^P

Concerning parking controls in the LMN neighborhood and the fact that residential permit parking is not applied on weekends, this is a regulation that could be altered by the San Francisco Municipal Transportation Agency, which oversees the residential permit parking program.

Finally, the number of new vehicles from the proposed project potentially searching for parking in the LMN neighborhood would not create adverse local air quality effects, as the volume of additional project-generated traffic would be too small. (e.g., carbon monoxide, the only criteria pollutant with local effects, requires tens of thousands of daily vehicles to pass by a location in order to generate a significant impact). Likewise, traffic volumes on streets in the LMN neighborhood would be unlikely to double, which is the threshold for perceptible change in traffic noise, from people seeking parking. Therefore, air quality and noise effects would be less than significant.

^P San Francisco Planning Department, *Transportation Demand Management: Technical Justification*, June 2016, p. 31. (http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification.pdf). Reviewed January 30, 2016.

C.5 Wind

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment WI-1: Wind and Bicycle Safety
- Comment WI-2: Request for Detail Regarding Wind Screens
- Comment WI-3: Ongoing Wind Analysis in the Project Vicinity

Comment WI-1: Wind and Bicycle Safety

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

I-Hestor.9

I-Hestor.29

"I refer to and incorporate comments on issues related to bicyclist safety and winds that Henderson is submitting on One Oak DEIR. The safety and wind issues are similar and only separated by one block.

...

"**Winds - IV.D.10** ignores totally the effects on bicycles. I have talked to cyclists who were knocked off their bikes or pushed into traffic by gusting winds. This needs to be discussed seriously in EIR. There are more than pedestrians that are affected. See comments on One Oak DEIR." (Sue C. Hestor; letter, January 4, 2017)

Response WI-1

The comments refer to a comment letter submitted January 4, 2017, on the One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) by Jason Henderson, Chair, Transportation and Planning Committee of the Hayes Valley Neighborhood Association. In that letter, Mr. Henderson states that, while the One Oak Draft EIR analyzes wind effects on pedestrians, it does not analyze wind effects on bicyclists, including effects of the building and of wind canopies. These effects, the letter says, could include safety impacts such as wind pushing bicyclists off-course and potentially into traffic, and could deter bicycling, thereby undermining City policy that encourages cycling.

The commenter is correct in noting that the wind analysis focuses on pedestrian effects. However, the wind analysis includes test locations on both sides of the street surrounding the project site, meaning that the results can fairly be interpreted to encompass wind conditions in the street in between test points on either sidewalk; that is, wind speeds in the traffic lanes or, where applicable, bicycle lanes, would likely be in between the speeds on either sidewalk.

As described in Draft EIR Section IV.D, Wind, beginning on page IV.D-5, the proposed project would not result in substantial increases in ground-level winds, either along the project frontage of Mission Street or South Van Ness Avenue, or on the opposite side of the street. The proposed project would not result in any new exceedance of the wind hazard criterion along the streets surrounding the project site. In the pedestrian comfort analysis, as reported on Draft EIR page IV.D-9, "wind speeds would increase at 20 locations

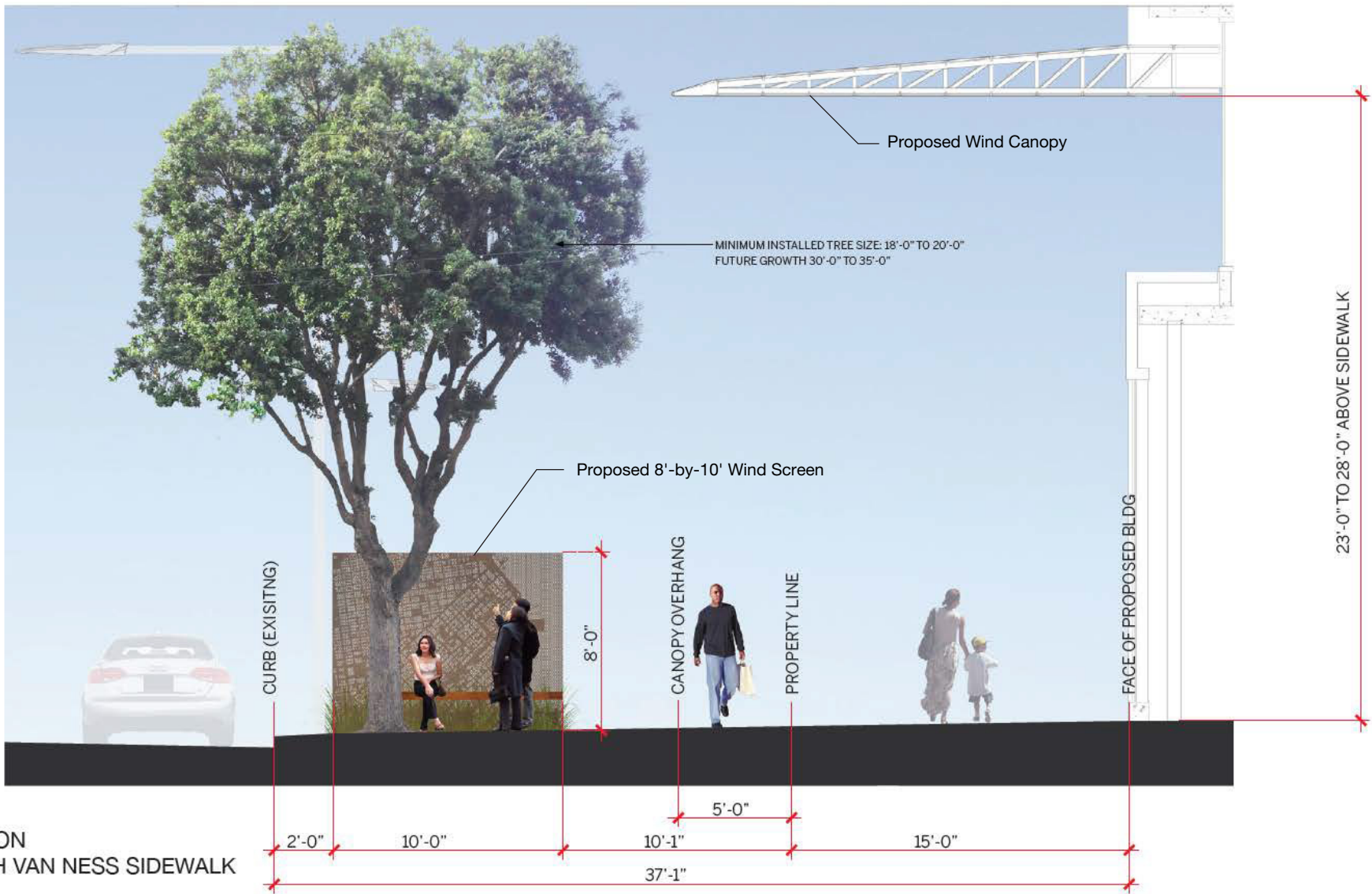
(primarily around the Mission/South Van Ness intersection and on 11th Street), decrease at 21 locations (primarily along both sides of South Van Ness Avenue, downwind of the site on Mission Street, and farther from the project site), and remain unchanged at the remaining nine locations also tested under existing conditions.” The increases in the wind speed exceeded 10 percent of the time, as measured in the pedestrian comfort analysis, would increase perceptibly along the project residential tower’s Mission Street frontage and along the northern portion of the project’s 11th Street frontage, and bicyclists could be expected to notice an increase in wind speeds, as well.

As stated on Draft EIR page II-23, as revised herein, and illustrated in Draft EIR Figure II-16, Draft EIR page 26, as well as in **Figure RTC-7, Proposed Wind Screen (Detail of Draft EIR Figure II-16)**, page RTC-56, herein, the proposed project would include a wind canopy that would surround the South Van Ness and Mission Street façades of the project’s residential tower at a height of between about 23 and 28 feet above the sidewalk. The wind canopy would be 20 feet wide on South Van Ness Avenue and 14 feet, 9 inches wide along Mission Street. It can be expected that the wind canopy, in addition to protecting pedestrians on the sidewalks surrounding the residential tower, would tend to slow winds and disperse them away from the tower. This is because wind effects of buildings result in relatively higher-speed winds at higher elevations being intercepted by the building and channeled down and around the building walls, accelerating as they descend. Anything that interrupts the flow of the wind rushing down the side of the building will result in lower ground-level wind speeds. This is why towers that are set back from building street walls tend to result in calmer wind conditions at the building base than buildings whose street walls are uninterrupted. The proposed project’s wind canopy would function much as a setback, resulting in lower wind speeds outboard from the canopy (as at the base of a building street wall with a setback tower above), including where a bicycle lane is planned on Mission Street (see below), as well as beneath the canopy, where the canopy would provide direct protection to pedestrians.

As stated above in the response to Comment TR-5, Bicycle Impacts, Market Street is the primary east-west route for bicyclists in the project area, and bicycle lanes are provided in both directions. Mission Street is a transit-preferential street and not is heavily used by bicyclists, however, 11th Street between Market and Mission Streets, and Mission Street west of 11th Street serve as connector routes to bicycle facilities southwest of Market Street. As described on Draft EIR p. IV.B-50, the SFMTA’s Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements and Muni Forward TTRP.14 projects include creation of a westbound bicycle lane on the north side of Mission Street between 11th Street and South Van Ness Avenue (the project block). Because the bicycle lane would be outboard of the right-turn lane, it would be 13 feet from the curb, or at least 5 feet farther from the project building than would a bicycle lane that is adjacent to a typical 8-foot-wide parking lane. This would offer some additional protection from any building effects on winds in the bicycle lane.

There is no bicycle lane on South Van Ness Avenue, nor is one planned or proposed, and South Van Ness Avenue has virtually no bicycle traffic.

In light of the above, no significant effects of wind on bicyclists are anticipated to result from the proposed project.



SOURCE: SOM, 2016

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-7
Proposed Wind Screen (detail of Draft EIR Figure II-16)

Comment WI-2: Request for Detail Regarding Wind Screens

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

I-Hestor.10

“Please explain and show on visual - **Figure II-16 - the proposed wind screens**. They are hard to understand/see.” (Sue C. Hestor; letter, January 4, 2017)

Response WI-2

The comment requests additional visual explication of the proposed wind screens on the South Van Ness Avenue sidewalk.

As described on Draft EIR page II-25, the proposed project would include “the installation of eight wind screens approximately eight feet tall by 10 feet wide at 40-foot intervals along the South Van Ness Avenue sidewalk adjacent to the project site and perpendicular to the street.” A typical wind screen, anticipated to be approximately 50 percent porous, is illustrated in the top image of Draft EIR Figure II-16, Draft EIR page 26. The wind screens are also visible in Figure II-22, Draft EIR page 35, which presents a view of the proposed project from South Van Ness Avenue. **Figure RTC-7, Proposed Wind Screen (Detail of Draft EIR Figure II-16)**, page RTC-56, and **Figure RTC-8, View of Proposed Wind Screens along South Van Ness Avenue (Detail of Draft EIR Figure II-22)**, page RTC-58, present enlargements of portions of Draft EIR Figure II-16 and Figure II-22 to more clearly depict the proposed wind screens.

Comment WI-3: Ongoing Wind Analysis in the Project Vicinity

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

I-Hestor.30

“There was **Chronicle article 1/1/17** about creating a wine district appellation for the ‘Windswept Petaluma Gap.’ The description of the wind tunnel through that area sounds like the wind pattern coming over the Hayes Street Hill down to Market Street and swirling around that area. Every market rate housing or office building in this area should be required to contribute funds for the CITY/Planning Department to maintain its own wind files so that the wind study is continually updated to include ALL construction.” (Sue C. Hestor; letter, January 4, 2017)



SOURCE: SOM, 2016

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-8

View of Proposed Wind Screens Along
South Van Ness Avenue (detail of Draft EIR Figure II-22)

Response WI-3

The comment states that the Planning Department should maintain its own wind-tunnel model and/or files supporting such a model.

Data on which wind-tunnel tests are based are routinely updated based on review of aerial photography and survey data, City data on building massing that is based on georeferenced aerial photography to allow for capture of accurate building massing, as well as building plans for new structures. Wind tunnel testing for CEQA analysis includes a cumulative scenario, where applicable, and Environmental Planning staff also reviewed proposed wind-tunnel test plans to ensure that current (under construction) and proposed projects are included in the testing for each project. For these reasons, the City or the Planning Department does not maintain a central repository for building data used in wind tunnel testing.

C.6 Shadow

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment SH-1: Shadow Effects on Parks

Comment SH-1: Shadow Effects on Parks

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

I-Hestor.31

“Shadows related to current usage of parks - IV E-2. Since increased housing density and construction was planned for in the M/O Plan and EN Plan, it is inappropriate to assume continuation of the current hours of operation of parks. In a presentation by planners from Rec Park staff to the ENCAC, RecPark staff stated, with regard to Gene Friend Recreation Center, that the demand for new, especially morning hours, from residents coming into the area means that hours of operation would shift to accommodate families and those who exercise outdoors in the morning. Patterns have also changed in the Mission district. Shadow impacts during early morning hours should not so easily be disregarded. This effects application of the **Proposition K Sunlight Ordinance.**” (Sue C. Hestor; letter, January 4, 2017)

Response SH-1

The comment states that hours of City park operation and park usage patterns may change, and that this could affect shadow analysis under Section 295 of the *Planning Code* (Proposition K). The comment also states that early morning shadow must be thoroughly considered.

The hours of shadow analysis under *Planning Code* Section 295, added to the *Code* by Proposition K in 1994, are based on the sunrise and sunset times, not park operating hours. Shadow analysis for compliance with Section 295, as well as for CEQA review, extends from one hour after sunrise to one hour before sunset. (Before and after those times, shadow is so extensive and moves across the ground so quickly as to preclude useful analysis in most cases.)

It would be speculative to assume a change in hours at existing parks. Additionally, *San Francisco Park Code* Section 3.21(a) sets general operating hours for parks, absent site-specific regulations, at 5:00 a.m. to 12:00 midnight daily.

As stated on Draft EIR page IV.E-20, the proposed project would cast new shadow on a portion of Patricia’s Green between 7:30 a.m. and 8:30 a.m. from January 27 through March 1 and again from October 13 through November 15, or approximately 12 weeks during the course of a year. Shadow would last no more than 23 minutes on any given day, and would never occur after 8:40 a.m. Because usage of Patricia’s Green is not as extensive at this time of day as at other times of day, and because the duration of new project shadow over the course of both the year and each day, when applicable, is limited, the project’s shadow impact was determined to be less than significant.

C.7 Alternatives

The comments and corresponding responses in this section cover topics in Draft EIR Chapter VI, *Alternatives*. These include topics related to:

- Comment AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives
- Comment AL-2: The EIR Should Analyze an Alternative With Less Parking
- Comment AL-3: The EIR Should Analyze an Alternative With More Affordable Housing
- Comment AL-4: Concurrence with EIR Analysis of Full Preservation Alternative

Comment AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives

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

A-HPC.2

“The HPC [Historic Preservation Commission] agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response AL-1

The comment expresses general concurrence with the Draft EIR’s analysis of preservation alternatives. The comment will be transmitted to City decision-makers for consideration in their deliberations on the proposed project. The preservation alternatives would not avoid the significant and unavoidable cumulative construction transportation impacts identified in the Draft EIR.

Comment AL-2: The EIR Should Analyze an Alternative with Less Parking

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

I-Hestor.4

“Project Alternatives must be increased

“The summary of alternatives(S-35) omits an **Alternative with drastically reduced residential parking. It must be added.** Another alternative with ZERO parking, but very expanded car share parking.

“Van Ness - highway 101 - has a high volume of traffic, including trucks. With BRT lanes being added, vehicle traffic becomes more constrained. As new residential projects are approved, developers of market rate housing request more and more parking because the units sell for more money. As the City accommodates each request, the cost of land goes up. It is priced ASSUMING the maximum amount of parking. Housing prices go up. **Has the City done a study of what effect eliminating parking on this transit corridor would**

have on housing prices? How much are prices increased when the maximum amount of parking, versus ZERO residential parking, is provided? (Sue C. Hestor; letter, January 4, 2017)

Response AL-2

The comment requests analysis in the EIR of alternatives that would provide less residential parking and no parking (other than car-share parking). The comment also asks about the cost of providing parking in development of residential units. The comment, however, does not suggest that a reduced parking or no parking alternative would avoid or mitigate any potentially significant environmental impacts of the proposed project while meeting most of the project sponsor's objectives, or be more feasible than the alternatives analyzed in the Draft EIR (CEQA Guidelines, Section 15204 (a)).

As stated on page VI-1 of the Draft EIR, Section 15126.6(a) of the CEQA Guidelines provides that "[a]n EIR need not consider every conceivable alternative" to a project. Under the "rule of reason" governing the selection of the range of alternatives, the EIR is required "to set forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines, Section 15126.6 (f)). This section also requires the presentation of a reasonable range of alternatives. Although an EIR must consider a reasonable range of potentially feasible alternatives, it does not have to identify and analyze alternatives that would not meet most of the project sponsor's basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, or alternatives that do not further reduce or eliminate significant impacts of the project. In identifying alternatives, the consideration of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)). The alternatives identified and evaluated in the Draft EIR were developed on this basis.

The comment also states that the Draft EIR should analyze a project not requiring a Conditional Use Authorization for automobile parking (i.e., reduced parking alternative) or a no parking alternative. The Draft EIR did not identify a significant effect on the environment due to a substantial parking deficit that could create hazardous conditions or cause significant delays affecting transit, bicycles, or pedestrians and where particular characteristics of the project or its site demonstrably render use of other modes infeasible. Therefore, the Draft EIR was not required to identify a reduced or no parking alternative.

In addition, the Draft EIR does analyze an alternative with substantially reduced parking—the Full Preservation Alternative. The Full Preservation Alternative would provide a total of 142 parking spaces compared with up to 414 spaces for the proposed project. As stated on Draft EIR page VI-29 (and summarized in Table VI-1, Draft EIR page VI-6), the Full Preservation Alternative "would have only one level of below-grade parking beneath both the office and permit center component and the residential retail/restaurant component. As a result, this alternative would provide approximately 25 vehicle parking spaces for offices and 117 vehicle parking spaces for residential use; the latter would represent a ratio of 0.25 spaces per dwelling unit, which is the maximum principally permitted (without Conditional Use authorization) in the existing Van Ness & Market Downtown Residential Special Use District." The Full Preservation Alternative would provide residential parking at one-half the rate of the proposed project (one space per four dwelling units, as opposed to one space per two units with the project), and in total would provide less than half the

residential parking of the proposed project, as well as less office parking (25 spaces versus up to 120 spaces with the proposed project).

An alternative that considers no parking for the project's City office building component was not analyzed in the Draft EIR because most of the proposed office parking would accommodate City vehicles that are used daily by inspectors and other City personnel who make off-site field trips (for building inspection and other official business), and these vehicles are already accommodated in the project vicinity at present, including some that are parked on the project site in spaces leased by San Francisco Public Works.

Additionally, accommodating City vehicles on the project site is a City objective identified in the Draft EIR and would not result in more vehicle use by City employees. A No Parking Alternative would also fail to satisfy Objective 3 of the City's office and permit center component of the project: "Provide approximately 120 off-street parking spaces to accommodate vehicles used by inspectors and other City personnel who make off-site field trips, as well as parking for members of the public visiting the permit center and other City offices."

An alternative that considers no residential parking was not considered because such an alternative would fail to meet the project objective of developing a financially feasible project, and would fail to reduce the significant and unavoidable impacts of the proposed project. Moreover, while the proposed project includes a proposed Mission and South Van Ness Special Use District that would replace the existing Van Ness & Market Downtown Residential Special Use District on the project site and would allow for a residential parking ratio of one parking space per two dwelling units (0.5 spaces per unit), even the existing special use district allows for one parking space per four units (0.25 spaces per unit) as a principal use without conditional use authorization, which is the parking ratio included in the Full Preservation Alternative, as described above.

Additionally, the project site is underlain by liquefiable soil and in order to develop the structures as part of the project objectives this soil must be excavated, as is currently proposed under the project's proposed two-basement development concept, or another foundation system employed, such as soil improvement with deep soil mixing (in which the poor-quality soil is strengthened by mixing with a cementitious slurry) or the installation of drilled displacement columns that gain support from the dense sand layer below the liquefiable soil. Given the subsurface conditions, according to the project sponsor, excavation of the unsuitable soil is the most efficient means of achieving an appropriate bearing surface to support the proposed buildings; because the greatest amount of excavation is required at the south end of the project site, primarily beneath the proposed residential building, one or more basement levels would most appropriately be constructed where the excavation would occur. Soil improvement or a deeper foundation system that would be required were the liquefiable soil not to be excavated could potentially increase project construction costs.

Effects on housing prices due to elimination of parking are not physical environmental impacts. For informational purposes, it is noted that the Planning Department estimates each residential parking space adds \$20,000 to \$30,000 to the cost of developing a unit of housing, and even more in certain parts of the City.⁹ If this cost is passed on directly to a resident, the cost of that dwelling unit would increase accordingly, beyond what the cost would be without parking. Section 167 of the *San Francisco Planning Code* requires that for new residential buildings of 10 units or more, parking spaces be leased or sold separately from the rental

⁹ "What is the Problem with Parking." Available online at <http://sf-planning.org/what-problem-parking>. Reviewed February 17, 2017.

or purchase cost of the unit. This requirement, known as unbundled parking, exists, according to Section 167, so that “potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space.”

The Draft EIR evaluated a reasonable range of alternatives, as required by CEQA, that allows City decision-makers and the public to evaluate and compare the potential impacts of the proposed project with other similar development scenarios designed to lessen the project’s environmental effects. It is noted that reducing the number of on-site parking spaces would be unlikely to result in any increased environmental impacts; therefore, the Planning Commission could approve the proposed project or an alternative with no changes other than a reduction in on-site residential parking, if desired. Additionally, as described above, the Draft EIR did consider an alternative with reduced parking—the Full Preservation Alternative.

Comment AL-3: The EIR Should Analyze an Alternative with More Affordable Housing

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

I-Hestor.5

“The summary of alternatives also omits an alternative with 25% inclusionary housing. This should also be included. The project is an SUD. A search of the *Planning Code* for SUDs will show that historically an SUD, which changes *Planning Code* requirements for a small area, has been used for 100% affordable housing projects. 20% is headed in the right direction, but there should also be a 25% on-site inclusionary alternative.” (Sue C. Hestor; letter, January 4, 2017)

Response AL-3

The comment requests analysis in the EIR of an alternative with a greater percentage of on-site affordable housing (25 percent) than the project’s proposed 20 percent.

As stated on page VI-1 of the Draft EIR, Section 15126.6(a) of the CEQA Guidelines provides that “[a]n EIR need not consider every conceivable alternative” to a project. Under the “rule of reason” governing the selection of the range of alternatives, the EIR is required “to set forth only those alternatives necessary to permit a reasoned choice” (CEQA Guidelines, Section 15126.6 (f)). This section also requires the presentation of a reasonable range of alternatives. Although an EIR must consider a reasonable range of potentially feasible alternatives, it does not have to identify and analyze alternatives that would not meet most of the project sponsor’s basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, or alternatives that do not further reduce or eliminate significant impacts of the project.

An alternative with 5 percent more affordable housing on site would not have substantially different environmental impacts, if any. The Planning Department’s analysis methodologies do not consider the income of project residents when calculating travel demand, air pollutant emissions, or other quantifiable impact measures. Other qualitative analyses of effects such as those on historic architectural resources, wind, and shadow are a function of the site location and the proposed building massing and would likewise not be altered by a change in assumed residential income levels.

Comment AL-4: Concurrence with EIR Analysis of Full Preservation Alternative

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

O-Heritage.7

A-HPC.3

“Heritage’s comments on the NOP, dated March 17, 2015, requested consideration of ‘at least one bona fide preservation alternative in the EIR that attempts to meet most of the project objectives while retaining the Old Coca-Cola Bottling Plant’s eligibility as a historical resource... including an increased setback behind the historic clock tower, retention of the full length of the 11th Street façade, and/or adaptive reuse of a portion of the current warehouse space.’¹⁰

“The Full Preservation Alternative largely meets these criteria, as it would preserve exterior features of the Coca-Cola Building and a substantial portion of the industrial warehouse section of the building, including wire-glass skylights, exposed steel truss work/structural framing, and the full-height interior space that would remain intact as part of the first floor permit center. It would also retain the Mission and 11th Street facades in their entirety, and a new office tower would be constructed at the rear northwest corner of the existing building.

(Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] concurs that the Full Preservation Alternative meets the Secretary of Interior’s Standards.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response AL-4

The comments express general agreement with the Draft EIR’s conclusion with respect to the Full Preservation Alternative. With regard to the note provided by the comment’s footnote, the term “preferable” is used in the context of historic resources, and does not represent the environmentally superior alternative as discussed under Draft EIR Chapter VI, *Alternatives*. The comments will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

¹⁰ The DEIR includes a Partial Preservation Alternative and a Full Preservation Alternative. The Partial Preservation Alternative is preferable to the proposed project in that it reduces adverse impacts on historic resources, but not to a less than significant level.

C.8 Initial Study Topics

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment LU-1: Effects on Neighborhood Character
- Comment PH-1: Housing Displacement
- Comment PH-2: Housing for Project Employees

Land Use

Comment LU-1: Effects on Neighborhood Character

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

I-Rhine.1
I-Hestor.6

“Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity.

“LTS None required. NA

“The EIR states:

The proposed 39-story, 396-foot-tall tower (416 feet to top of parapet) residential and retail/restaurant building would be taller than the buildings located to the south and west on Mission and Minna Streets, but would be similar in height to other buildings along Market, 11th, and 10th Streets to the north and east. **Although the 39-story tower would be substantially taller than the low-rise residential buildings in the area to the south around Lafayette, Minna, and Natoma Streets;** given the layout of the street grid, the tower would only be visible in views north from Lafayette Street. The existing buildings located along the 35-foot-wide Minna and Natoma Streets would obscure views of the tower, except where a few single-story buildings are located on the north sides of those streets. Furthermore, this low-rise residential area would continue to be surrounded by low-scale buildings to the east, west, and south; therefore, **the 39-story tower would not substantially alter the character of this area. The proposed 16- story office building would be taller than buildings to the south and west,** but similar in height to buildings directly north and east of the proposed project. Therefore, the proposed project would be generally consistent with the overall existing height and massing of buildings in the area. The proposed project would also establish a mixed-use building and office building in proximity to other similar mixed-use and office buildings, and would not introduce an incompatible land use to the area. The proposed project would contain land uses that are consistent and compatible with surrounding land uses, **and would be in keeping with the existing character of the urban fabric of the neighborhood.** Therefore, the proposed project would have a less than-significant impact upon the existing character of the vicinity and no mitigation measures are necessary.

“Comment:

“Our neighborhood is located directed south of the project site (less than 75 feet) and is part of the Western SOMA plan area, zoned Residential Enclave District (RED) with a height district 40-X. During hearings before the Planning Commission for the Market Octavia Plan, our neighborhood association, Lafayette, Minna and Natoma neighborhood association (LMN) expressed concern that the proposed plan height district at Mission and South Van Ness (then 320’) would be out of scale with the height district of the Western SOMA plan (RED). Nowhere else in the city does such a sharp transition of height districts occur, and at the time of the passage of the Market Octavia Plan the San Francisco Planning Commission assured the LMN neighborhood association that consideration would be given to that issue as future projects came forward.

“Now the proposed height will increase to over 400 feet. We understand the reasons for the proposed increase, however the EIR did not address the impact to the character of the area (Impact LU-3 above), merely stating, ‘The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood.’ The figure below shows how close the proposed project is to our residential area. Mission Street does not provide enough separation between a 400+ foot tower and 40 foot residential apartments. At a project information meeting I was told that the tower would not be located further north on the project site because of the wind impact, however no alternative location of the tower was considered. Could it have been further north and then set back on the parcel to the east?” (Robert Rhine; e-mail, December 6, 2016)



...

“Comments by residents of residential area south of Mission were ignored. DEIR I-3 states that comments at the public scoping meeting are incorporated into this DEIR. Residents of the LMN neighborhood - Lafayette, Minna, Natoma directly across from the project - raised serious questions on the abrupt height changes proposed. They live in the area covered by the Western SoMa Area Plan and had participated in the recent hearings on that Plan which aimed to guarantee protection of housing for existing lower income residents.

They raised the issue of driving “apps” that direct Uber, Lyft, and private drivers that to a short-cut through their narrow streets to avoid South Van Ness or 11th Street traffic. These issues do not come through in the DEIR.” (Sue C. Hestor; letter, January 4, 2017)

Response LU-1

The comments state that the character of the Lafayette, Minna, and Natoma (LMN) residential neighborhood south of the project site could be adversely affected by the proposed project’s 400-foot residential tower.

As stated in the text by the first commenter, from page 40 of the Initial Study (Draft EIR Appendix A), the 400-foot residential tower would not generally be visible from Minna or Natoma Streets, although it would be clearly visible from Lafayette Street. As stated by the commenter, height limits to the east, south, and west of the LMN neighborhood are considerably lower—generally 55 feet or less. Therefore, most new development would remain low-rise within the LMN residential neighborhood. Additionally, there is a 120-foot zone on the west side of Lafayette at Minna. These lower height limits would serve to limit the overall change in the character of the LMN neighborhood. While the proposed project would introduce a 400-foot tall tower to the north of the neighborhood, neither the proposed project nor other cumulative development would substantially affect the neighborhood, inasmuch as only the 400-foot tower would be nearby and only to the north. It is noted that the areas of 40- and 55-foot height limits in the LMN neighborhood are not immediately across Mission Street from the proposed project, but rather is separated by a row of buildings on the south side of Mission Street that are in an 85-X height and bulk district, which allows buildings up to 85 feet in height. This means that the distance from the proposed residential tower to the interior of the LMN neighborhood and its 40-foot height limit is about 170 feet, or approximately twice the width of Mission Street. Together with the greater height limit and several existing multi-story buildings on the south side of Mission Street, this separation would provide some buffer from the proposed project’s residential tower. Moreover, shadow effects of the proposed residential tower on the LMN neighborhood would be limited because of the tower’s location being generally to the north and the relatively narrow streets in the neighborhood, which allow existing buildings to cast substantial morning and afternoon shadow across the streets.

It is further noted that areas west and northwest of the Market and Van Ness intersection—where the Market & Octavia Area Plan’s greatest height limits exist—are situated similarly to the proposed condition of the LMN neighborhood, with height limits of 400 feet separated from residential neighborhoods with 40- and 50-foot height limits and with an intermediate zones of 85- to 120-foot height limits to provide a buffer between the greatest heights and the lesser heights of residential areas.

Regarding the potential for relocation of the residential tower on the project site, while some relocation may be possible, the distance that the residential tower could be moved to the north and east is limited by (1) the hazardous wind standard in *Planning Code* Section 148 (in wind tunnel tests it was determined that the two building facades along South Van Ness must maintain a certain minimum separation in order to avoid a continuous vertical “wall,” which negatively impacts wind conditions), and (2) the tower separation requirements of *Planning Code* Section 270(f)(3) (existing Van Ness & Market Downtown Residential Special Use District) and proposed Section 270(g)(1)(C) (proposed Mission and South Van Ness Special Use District).

Concerning the Western SoMa height limits and the LMN neighborhood, see Response PP-4, page RTC-18.

Concerning the potential for traffic “short-cuts” through the LMN neighborhood, see Response PP-7, page RTC-22.

Population and Housing

Comment PH-1: Housing Displacement

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

I-Hestor.35

“**Population and Housing - page 31.** See discussion above. As the price of housing goes up and reverse commuters find the location attractive because San Francisco is providing more housing than the peninsula, SF EMPLOYEES are forced out of SF to locations to a great extent in the East Bay which has cheaper housing. Escalating land values in SF displace residents both directly (removal) and indirectly (inadequate housing added).” (Sue C. Hestor; letter, January 4, 2017)

Response PH-1

The comment states that increased housing costs in San Francisco have resulted in displacement of San Francisco employees to areas with lower-cost housing.

As stated on page 33 of the Initial Study (Draft EIR Appendix A), “The proposed project would not displace any residents or housing units, since no residential uses or housing units currently exist on the project site.” Additionally, implementation of the City’s Inclusionary Affordable Housing Program requirements (*Planning Code* Sections 415 et seq.) results in new market-rate housing also funding or developing below-market-rate (BMR) residential units, as well—units that would not be added to the housing supply but for the production of market-rate units that are subject to the Inclusionary Affordable Housing Program.”

As stated on Draft EIR page II-23, the proposed project would include 20 percent on-site inclusionary affordable units, available to residents earning a maximum of 50 percent of the average median income. These 112 affordable units would not be built but for the proposed project. Accordingly, the Initial Study finds that the proposed project would not displace jobs and effects related to displacement would be less than significant.

Comment PH-2: Housing for Project Employees

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

I-Hestor.36

“Where are the people who WORK on site going to be housed? Page 32 ignores them.” (Sue C. Hestor; letter, January 4, 2017)

Response PH-2

The comment states that the Draft EIR does not analyze effects related to housing for employees of the proposed project.

The Initial Study evaluates the employment associated with the proposed project. The project is anticipated to generate approximately 109 new retail/restaurant jobs and would generate approximately 1,643 City employee jobs (including the 13 childcare facility employees), the majority of whom are anticipated to already work in nearby existing City office buildings in the project vicinity and would relocate to the new office component at the project site. As also stated in the Initial Study, if existing space occupied by City offices were to be backfilled with the same number of employees, those new employees would constitute less than 10 percent of the employment growth forecast for San Francisco between 2010 and 2040. Thus, this growth is already planned for. The proposed project's 560 dwelling units—including 116 affordable units that would be built on-site—would themselves offset some portion of the housing demand from this growth.

C.9 Other CEQA Considerations

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment OC-1: Request for an Aerial View of the Proposed Project
- Comment OC-2: Coordination of Responses to Comments for two Draft EIRs.

Comment OC-1: Request for an Aerial View of the Proposed Project

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

I-Hong.2

“Even though current CEQA does not require images renderings and etc. of the project. I disagree with this CEQA issue only because all too often words, black and white elevations describing the design does not present what it will look like. I believe all too often projects fail because of this missing link. However, this DEIR does an excellent job with this process and is a positive Plus for its justification and uniqueness to this blighted area. Granted, design, color and materials are personal. But I studied and practiced both architecture and urban design and now retired. To add just one link to this presentation it would be to insert the project in to an aerial photo showing how these projects would look with the existing environment. The birds eye figure does some of this - but the photo and the proposed project to me - would be a spot on.” (Dennis Hong; e-mail, January 3, 2017)

Response OC-1

The comment commends the Draft EIR’s presentation of figures describing the proposed project but asks if it is possible to present an aerial rendering of how the proposed project, along with other nearby proposed projects, would appear.

In general, for CEQA purposes, the Planning Department presents ground-level views (plans and renderings) of a proposed project because those represent pedestrian-level views that would be available to most observers. An aerial image would not add to the relevant descriptive information presented in the Draft EIR.

Comment OC-2: Coordination of Responses to Comments for two Draft EIRs

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

I-Hestor.1

“There are 2 DEIRs out for development on blocks diagonally across Market and Van Ness/South Van Ness at virtually the same time:

“Comments and Responses on TWO DEIRs should be coordinated

"1500 Mission St - southern half of AB 3506 2014-000362 - City office building, dense market rate housing, on-site inclusionary housing, Planning Code and height increase, parking. DEIR hearing 12/15/16, Comment DL [deadline] 1/4/17.

"One Oak Street/1500 Market St - eastern portion of AB 836 2009.015E - Dense market rate housing, Planning Code and height increase, parking. DEIR hearing 1/15/17, Comment DL 1/10/17.

"The issues of wind, traffic, transit, impacts on pedestrians, changes in the General Plan and Planning Code TO THE SAME Van Ness & Market Downtown Residential Special Use District - part of the Market/Octavia Area Plan - have EXTREMELY similar impacts, including cumulative impacts. Market and Van Ness. Mission and South Van Ness. DIAGONAL BLOCKS. Sites about 400' apart.

"The deadline for DEIR comments are less than a week apart. There is no rational reason why public comments on the 2 DEIRs that have applications to BOTH projects should not be considered by both.

"This specifically includes issues related to transportation and parking, winds, comments on cumulative displacement and housing, including excessive parking in this transit-rich area with heavy traffic GOING STRAIGHT ONTO FREEWAYS. The high parking allowance for residences encouraging occupancy by middle and upper income people who drive instead of using public transit.

"Environmental Review is ignoring these issues unless comments on issues relevant to both sites are considered in BOTH Comments and Responses/FEIRs.

"Since sending [the above] comments, I received an Advance Calendar which shows they are slated for approval within 2 weeks of each other. 1500 Mission is slated for approval March 23. One Oak/1500 Market on April 6. It is therefore more compelling that DEIR comments on issues common to both be considered whether they are submitted on 1500 Mission or One Oak/1500 Market." (Sue C. Hestor; letter, January 4, 2017)

Response OC-2

The comment appears to request that public comments on this Draft EIR and on the Draft EIR for the One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) be responded to jointly.

The proposed 1500 Mission Street project—the subject of this Draft EIR—and the nearby proposed project at One Oak Street are separate projects with separate sponsors and separate objectives. CEQA requires analysis of a proposed project; it is not permissible to conflate the effects of two projects, as it would be impossible to differentiate the effects of each project. Because the Planning Commission and other approving bodies must separately consider each project for approval, each project's individual impacts must be separately described in its own EIR in order to have a valid project description under CEQA. Also, each project's impacts must be separately described and analyzed to provide the decision-makers with adequate information upon which to base a decision to approve or disapprove each project.

At the same time, CEQA requires a cumulative analysis, which evaluates impacts "created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (CEQA Guidelines Section 15130(a)(1)). Both this Draft EIR and the Draft EIR for the One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) contain a robust cumulative impact analysis that includes not only the other of these two projects, but also considers many other cumulative projects in the vicinity. The cumulative

impact analysis also considers forecast growth citywide and region-wide, where applicable, depending on the environmental topic evaluated, such as wind, shadow, and transportation and circulation.

It is also noted that the Market & Octavia Neighborhood Plan EIR (Case No. 2003.0347E; Final EIR certified April 5, 2007) evaluated the programmatic impacts of implementing high-density, high-rise development at and near the intersection of Market Street with Van Ness Avenue and South Van Ness Avenue. The 1500 Mission Street project, which is the subject of this EIR, proposes to implement a portion of the development analyzed in the Market & Octavia EIR, although with a different arrangement and height of buildings than analyzed in the Market & Octavia EIR. This is also true for the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E; Draft EIR published November 16, 2016), as well as for approved projects including 1601 Mission Street (Case No. 2014.1121ENV) and 1546–64 Market Street (Case No. 2012.0877E) and several other relatively larger projects currently undergoing environmental review (10 South Van Ness Avenue; Case No. 2015-004568ENV, 30 Otis Street; Case No. 2015-010013ENV, and 1629 Market Street; Case No. 2015-005848ENV). A complete list of cumulative projects within 0.25 mile of the project site can be found in Table IV-1 (page IV-9 of Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*).

See also responses to specific cumulative comments regarding transportation (Comment TR-7).

C.10 General

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*, and Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment GC-1: Project Merits
- Comment GC-2: Support for Approval of the Full Preservation Alternative
- Comment GC-3: Timing of Release of Draft EIR, and other Draft EIRs
- Comment GC-4: Cumulative Projects List and Map
- Comment GC-5: Limiting Construction Impacts
- Comment GC-6: Triangle at 12th Street and South Van Ness Avenue

Comment GC-1: Project Merits

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

I-Hong.1

I-Hestor.20

A-HPC.5

I-Hong.7

O-Heritage.1

I-Hong.10

O-Heritage.5

"I fully support this project. This Draft EIR is very comprehensive and covers just about all the issues and has done an excellent job because it shows.

...

"I like the step down and separation of the towers. The renderings does an excellent job with communicating what this will look like, vs black and white elevations. (Just a simple CEQA issue. I believe this issue is being currently reviewed with CEQA and may be a requirement down the road). Figures 11-17 thru 11-22 says it all. The proposed public open space is another positive to this project.

...

"As I mentioned earlier, I fully support this project. This semi blighted area needs this project and others so it can continue to develop others in this area." (Dennis Hong; e-mail, January 3, 2017)

"**Accountable Planning Initiative - Prop M 1986. DEIR III-14.** Allowing increased parking - much more than REQUIRED for housing in an area that defines TRANSIT RICH, and which has really close access to the freeway system, is opposite of discouraging commuter automobiles. Particularly when there is an existing lower income neighborhood *directly across the street.*"

...

"**Adequacy of parking - page 23.** The issue in this project is not whether there is ENOUGH parking but whether there is TOO MUCH in the residential building." (Sue C. Hestor; letter, January 4, 2017)

“Despite notable design improvements [since an earlier iteration of the proposed project], including greater retention of the Mission and 11th Street façades, the project as currently proposed would still demolish approximately 90% of the historic Coca-Cola Building.¹ As the future home of the Planning Department and related city agencies, Heritage believes that the project has heightened symbolic importance: We are concerned that the current design would encourage “façadism” as a preferred preservation treatment for historic resources citywide, when this practice undermines preservation values and can result in a false sense of place.”

...

“Heritage believes that the preservation treatment of the Coca-Cola Building should be held to a high standard because of the example it will set for the broader development community in San Francisco. Indeed, if façade retention is adopted as the preferred solution for the Departments of Planning, Building Inspection, and Public Works, the city’s credibility to curb this practice in projects seeking their approval will be significantly compromised. It will be difficult for the Planning Department to require retention of historic resources if the city itself does not adhere to sound preservation practice.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] generally agreed with San Francisco Heritage’s statement about the symbolic importance of this project and its potential to compromise the credibility of the City’s preservation program with a façade retention project as the future headquarters of several City Departments, including Planning. The HPC President noted, further, that he hopes that the Planning Commission will be very thoughtful in their deliberations about the project and consider what the project says about the City’s interest in preserving historic resources.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response GC-1

The comments express both support for and opposition to approval of the proposed project. Some comments express concern that approval of the proposed project could potentially provide implicit endorsement of façade retention as a City-supported approach to historic preservation.

Comments in support of and in opposition to the proposed project are noted and will be transmitted to City decision-makers for consideration in their deliberations on the project.

Regarding the Partial Preservation Alternative analyzed in the Draft EIR beginning on page VI-10 and its consistency with the HPC’s direction, as noted on that page, the Partial Preservation Alternative “would retain the entirety of both the Mission Street and 11th Street facades of the 1500 Mission Street building as part of the office and permit center component of the development.” As a result, this alternative “would maintain most of the exterior character-defining features of the existing 1500 Mission Street building.” The Partial Preservation alternative would add a second story to the existing 1500 Mission Street building, set back about 38 feet from Mission Street and approximately 29 feet from 11th Street. The City office building would step up to seven

¹ The project as currently proposed would demolish the western end of the Mission Street façade as well as a portion of the 11th Street façade.

stories behind the two-story addition at a distance of approximately 111 feet from the Mission Street façade, and the building would rise up to 16 stories beginning about 180 feet back from the Mission Street façade. The tower would be set back approximately one structural bay from the east (11th Street) elevation of the existing building. Thus, the retention of the street-facing facades and the setbacks from these facades attempt to respond to the HPC’s direction.

Comment GC-2: Support for Approval of the Full Preservation Alternative

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

O-Heritage.2
O-Heritage.6

O-Heritage.8
A-HPC.4

“Heritage joins the Historic Preservation Commission in urging the Planning Department to adopt the Full Preservation Alternative as the environmentally superior (and ostensibly feasible) project alternative.²

...

“The Full Preservation Alternative substantially lessens impacts on historic resources while achieving most project objectives.

“A key policy under the CEQA is the lead agency’s duty to ‘take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.’⁶ CEQA ‘requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.’⁷ The fact that an environmentally superior alternative fails to meet all project objectives does not necessarily render it infeasible under CEQA; reasonable alternatives must be considered ‘even if they substantially impede the project or are more costly.’⁸ CEQA requires that a project determined to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.⁹ To this end, CEQA mandates that the lead agency deny the proposed project if less harmful alternatives would feasibly obtain most of the basic objectives.

...

“Significantly, the DEIR identifies the Full Preservation Alternative as the ‘environmentally superior alternative;’ because ‘it would meet most of the project sponsor and City’s basic objectives, while avoiding the cultural resource impact to the 1500 Mission Street building that would occur under the proposed project.’¹¹ The Full Preservation Alternative would not only achieve a majority of the programmatic goals, but would also enable the city to ‘lead by example’ by demonstrating how high-density new construction can sensitively

² At its regular meeting on December 7, 2016, the Historic Preservation Commission unanimously voted to endorse the Full Preservation Alternative.

⁶ Public Resource Code, Sec. 21001 (b), (c).

⁷ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁸ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline §15126(d)(1).

⁹ Cal. Public Resources Code § 21002, 21081.

¹¹ DEIR, at p.S-37 (emphasis added).

retain and adapt historic structures.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] agreed that they recommend adoption of the Full Preservation Alternative as it avoids significant impacts to the historic resource by retaining the majority of character-defining features and allows the building to continue to convey its significance while also allowing for adaptive use and new construction to accommodate many of the project objectives.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response GC-2

The comments express support for adoption of the Full Preservation Alternative, rather than the proposed project. The commenters’ support for adoption of the Full Preservation Alternative is noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Comment GC-3: Timing of Release of Draft EIR, and other Draft EIRs

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

I-Hestor.8

“I note that the **55-day public review and comment period on this DEIR (DEIR I-5)** began with DEIR release 11/9, the day after the Presidential election, Planning hearing was at **10am 12/15**, the last Planning Commission meeting before Christmas with comments due 1/4/17, one day after people return from the holidays. This is a brutal approach to holidays, especially when the One Oak/1500 Market DEIR was released hot on its heels. Not to mention release of the Central SoMa Area Plan (3rd version of the Eastern Neighborhoods Area Plan) came out in December.”

“Environmental Review appears to enjoy dumping massive DEIRs on the public over Thanksgiving and Christmas holidays.” (Sue C. Hestor; letter, January 4, 2017)

Response GC-3

The comment states that the schedule for public review of the Draft EIR coincided with the holiday season and overlapped with review periods for other EIRs.

As noted by the commenter, the public review period for the Draft EIR was 55 days, which is 10 days longer than the required 45-day Draft EIR review period (Public Resources Code Section 21091). The review period was extended because a normal 45-day period would have resulted in the review period ending on December 24; therefore, the comment period was extended until after the holiday season to allow the public additional time to review and comment on the Draft EIR.

Regarding the time of the start of the Draft EIR public hearing at the Planning Commission at 10:00 a.m., Planning Commission meetings typically are scheduled to begin at 12:00 noon. However, occasionally, a very full Planning Commission calendar or joint hearings on a particular item on the calendar item compels a 10:00 a.m. meeting start. In the case of the December 15, 2016, public hearing on the Draft EIR, this was held at

a 10:00 a.m. meeting because the Planning Commission was scheduled to hold a joint meeting with the Recreation and Park Commission at 1:00 p.m. for consideration of the Recreation and Park Department's Significant Natural Areas Management Plan and Final EIR.

It is also noted that the public review period for the Central SoMa Plan EIR was also extended, from 45 to 61 days.

Comment GC-4: Cumulative Projects List and Map

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

I-Hestor.23

I-Hong.5

"Cumulative Land Use Project List - IV-9 - specify which of the projects are already approved or open." (Sue C. Hestor; letter, January 4, 2017)

"The Cumulative Land Use:

"The Table IV-1 page IV-9 shows there are 22 Projects/work to be done in this 0.25 mile area-Nov 2016. [- 24 Months (2 years) for this massive 1500 Mission project - page II-28. (I recall there was a much longer time shown for this project but was unable to find it).]

"a. Can project time lines be shown for each of these projects on this Table IV-1?

"b. Can the following project also be shown on this chart:

"- San Francisco MTA/MUNI - BRT project." (Dennis Hong; e-mail, January 3, 2017)

Response GC-4

With regard to the comment's request for clarification regarding the cumulative land use list (Table IV-1 in Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*), it would be infeasible to provide specific construction schedules for every project, as the information is not readily available. Information regarding the Cumulative Land Use List project approval and construction status is available and described as follows. Of the projects listed in Table IV-1, those completed include 101 Polk Street (Case No. 2011.0702E), 1 Franklin Street (Case No. 2008.1328E), and 104 Ninth Street (also known as 1321 Mission Street) (Case No. 2011.0312E). These projects were under construction at the time the Notice of Preparation was issued.

Approved projects under construction include 22 Franklin Street (Case No. 2013.1005E) and 1563 Mission Street (2014.0095E).

Approved projects not yet under construction include 1601 Mission Street (2014.1121ENV), 1740 Market Street (Case No. 2014.0409E), 915 Minna Street (Case No. 2015-002600ENX), and 1532 Howard Street (Case No. 2013.1305E).

Regarding the Van Ness Avenue Bus Rapid Transit (BRT) project, this project is not included in Table IV-1 because this table lists only "land use projects"; that is, projects proposed to develop residential, office, retail,

hotel, and similar uses. However, the Van Ness BRT project is discussed, along with other planning and transportation projects, on pages II-11 and IV-12. It is noted that, since publication of the Notice of Preparation, construction has begun on the Van Ness BRT project.

Comment GC-5: Limiting Construction Impacts

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

I-Hong.⁹

“One of my major concerns with these projects has been the use of “Best Practices” with the construction work. All too often this fails, for example all the work being done with the Transit Center; Dust control, hours of construction operation, noise, control of traffic, pedestrian safety, staging of material, the list goes on. These construction issues needs to be better controlled. One of the most recent projects that had sort of a magic touch to was DPR’s - Construction of the Chinese Hospital up in Chinatown had some unique control measures in place for these kind of issues and in my opinion was very successful here. It even made the SF Business Times. A point of contact phone number to call on these issues would be very beneficial, including communicating (a current www site to visit with updates, etc.) for the local business and residents to access and as to what is happening with info such as street closures, after hour work, pile driving and etc. I think this would go a long way.” (Dennis Hong; e-mail, January 3, 2017)

Response GC-5

The comment expresses concern as to whether construction-period “best practices” with respect to dust control, hours of operation, noise, traffic control, pedestrian safety, materials staging, and other factors are sufficient to avoid adverse impacts to nearby residents and workers. The comment makes favorable reference to construction practices with respect to Chinese Hospital.

The City of San Francisco ensures that construction practices result in the minimum feasible disruption through enforcement of numerous regulations, including the Construction Dust Control Ordinance, the Noise Ordinance, and the Municipal Transportation Agency’s *Regulations for Working in San Francisco Streets* (the “Blue Book”). In addition, the Draft EIR contains construction-related mitigation measures, such as Mitigation Measure M-C-TR-8, Construction Coordination, Mitigation Measure M-AQ-3a, Construction Air Quality, Mitigation Measure M-NO-2, Construction-Related Noise Reduction, and Mitigation Measure M-HZ-2, Hazardous Building Materials Abatement. Nevertheless, in light of the fact that several large projects in the vicinity of the project site may be under construction simultaneously, the Draft EIR finds:

Implementation of Mitigation Measure M-C-TR-8 would minimize, but would not eliminate, the significant cumulative impacts related to conflicts between construction activities and pedestrians, transit, bicyclists, and autos. Other measures, such as imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity, were considered but deemed infeasible due to potentially lengthy delays in project implementation. Therefore, construction of the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, could contribute considerably to cumulative construction-related transportation impacts, which would remain significant and unavoidable with mitigation.

With respect to the Chinese Hospital project, that project entailed demolition of a closed hospital building and construction of a replacement hospital building adjacent to a working hospital building and within a densely populated neighborhood with many old masonry buildings and surrounded by narrow streets.

Comment GC-6: Triangle at 12th Street and South Van Ness Avenue

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

I-Hong.11

“Are there any thoughts with the small triangle shaped lot at 12th and South Van Ness that butts up against #10 South Van Ness? Every time I pass by it, it seems to gather Homeless, pigeons and debris. Maybe the 10 South Van Ness project can do something with it.” (Dennis Hong; e-mail, January 3, 2017)

Response GC-6

The comment apparent refers to a currently unbuilt-upon lot adjacent to the south façade of the San Francisco Honda building, on the west side of South Van Ness Avenue at 12th Street (Assessor’s Parcel 003A on Block 3506). Under current conditions, a “hook” ramp from southbound South Van Ness Avenue to northbound 12th Street curves around this lot. To the south of this ramp is a landscaped triangular pedestrian island within the street right-of-way that separates 12th Street from South Van Ness Avenue. The lot in question is across South Van Ness Avenue from the proposed 1500 Mission Street project site; as a result, the proposed 1500 Mission Street project would have no effect on this lot.

For information, it is noted that Parcel 003A is a separate lot only for Assessor’s property classification and property tax assessment; however, it is not a separate legal parcel, but is part of the same legal parcel on which the 10 South Van Ness Avenue property is located. The proposed 10 South Van Ness Avenue project would be built almost to the property line on its south end, meaning that all but approximately the southernmost 6 feet of Lot 003A would be developed. The remaining, unbuilt portion of the parcel would become part of a widened sidewalk.^r The information provided herein regarding the 10 South Van Ness Avenue project is subject to pending approvals.

Additionally, as part of the planning process for The Hub project for the area surrounding the intersection of Market Street and Van Ness/South Van Ness Avenues, the Planning Department and Municipal Transportation Agency are considering closing the portion of 12th Street south of the current hook ramp and bending 12th Street to meet South Van Ness Avenue at a T intersection just south of Parcel 003A. This would allow the existing pedestrian island to be connected to a widened sidewalk on the west side of 12th Street, creating additional landscaped open space.^s As with the 10 South Van Ness Avenue project, this information is subject to pending approvals.

^r Crescent Heights (developer of proposed 10 South Van Ness Avenue project), response to the Notice of Planning Department Requirements; October 14, 2016.

^s San Francisco Planning Department, Public Realm Presentation Boards Regarding Streets and Intersections—12th Street, The Hub Workshop No. 2, June 22, 2016. Available at http://default.sfplanning.org/plans-and-programs/in-your-neighborhood/hub/Hub_Workshop2_Boards_Public_Realm_Proposal_Street+Intersection.pdf.

D. Draft EIR Revisions

The following changes to the text of the Draft EIR are made in response to comments on the Draft EIR or are included to clarify the Draft EIR text. The revisions reflect changes identified in Section C, *Comments and Responses*, or staff-initiated text changes; all of which clarify, expand or update information and/or graphics presented in the Draft EIR. Staff-initiated changes to clarify information presented in the Draft EIR are highlighted with an asterisk (*) in the margin to distinguish them from text changes in response to comments. For each change, new language is double underlined, while deleted text is shown in ~~striketrough~~. The changes are organized in the order of the Draft EIR table of contents.

These revisions do not result in any changes in the analysis or conclusions prepared pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines Section 15162(a)(3). Therefore, recirculation of the Draft EIR is not required.

D.1 Revisions in Response to Comments

Chapter II, Project Description

* On page II-23, the third full sentence in the first partial paragraph of the Draft EIR is revised as follows to clarify the description of the proposed project’s wind canopy (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

In addition, an approximately 20-foot-wide wind reduction canopy would be located along the South Van Ness façade, and an approximately 14-foot-nine-inch-wide canopy would be located on a portion of the Mission Street façade, both of which would be between approximately 23 and 28 feet above the sidewalk level of the residential tower ~~and retail/restaurant component~~.

On page II-36, the first bullet under “Board of Supervisors” is revised as follows to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

- Zoning Map amendments to change the site’s height and bulk district designations and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan.

On page II-36, the first bullet under “Planning Commission” is revised as follows to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

- Zoning Map Amendment to alter the parcels’ height and bulk and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend to Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan (recommendation to the Board of Supervisors)

Chapter III, Plans and Policies

On page III-12, the following text is added to the end of the second full paragraph to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

Approval of the proposed project would entail amendment of Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed building heights.

On page III-13, the following text is added to the end of the second paragraph under the heading “Market & Octavia Area Plan” to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

Approval of the proposed project would entail amendment of Map 3 (height districts) of the Market & Octavia Area Plan to accommodate the proposed building heights.

Chapter IV, Environmental Setting, Impacts, and Mitigation Measures

The note within Table IV.B-1 on Draft EIR page IV.B-4 is revised as follows to clarify the location of Traffic Analysis Zone 591 (new text shown in double-underline):

NOTE:

- a. The Traffic Analysis Zone (TAZ) in which the project site is located. TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue.

* On page IV.B-74, the first sentence under the heading “Parking Supply vs. Demand” is revised as follows to clarify that the parking total of 414 given in the parking demand analysis excludes 6 proposed car-share spaces (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

Midday Conditions. For weekday midday conditions, the overall parking demand of 1,112 spaces would not be accommodated within the total parking supply of 414 vehicle parking spaces (i.e., 294 parking spaces within the residential and retail/restaurant component, excluding 6 car-share spaces, and up to 120 parking spaces parking spaces, within the office and permit center component, including ADA-accessible parking spaces), which would result in a shortfall of 698 spaces.

* On page IV.B-75, the following text is added after the last paragraph to supplement the discussion of parking supply and demand in the project vicinity (new text is shown in double underline):

If the proposed project did not provide any on-site parking spaces, the proposed project would have an unmet parking demand of 1,112 parking spaces during the midday period, and 646 parking spaces overnight. As indicated on Table IV.B-6, Off-Street Public Parking Supply and Utilization, there is a number of off-street public parking facilities in the project vicinity, with some availability during the weekday midday period; however, the unmet parking demand of 1,112 parking spaces during the midday period would not be accommodated within the available supply. During the overnight period, the unmet parking demand of 646 parking spaces could be accommodated within existing on- and off-street parking spaces. As a result, off-street and on-street parking occupancy in the study area would increase. It is not anticipated that this would result in a substantial parking deficit, as some drivers may park outside of the study area or switch to transit, carpool, bicycle or other forms of travel. Therefore, any unmet parking demand associated with the proposed project would not

materially affect the overall parking conditions in the project vicinity such that hazardous conditions or significant delays would be created for traffic, transit, bicycles or pedestrians.

* On page IV.E-41, the following text is added after the reference to Figure IV.E-14 through Figure IV.E-29 to provide additional information that became available after the publication of the Draft EIR (new text is shown in double underline):

After its creation, the future park at 11th Street between Minna and Natoma streets would have an area of about 19,570 sf. The park would receive about 72,829,287 square-foot-hours of Theoretical Annual Available Sunlight. On an annual basis, the proposed project would cast about 1,745,651 square-foot-hours (2.4 percent of the Theoretical Annual Available Sunlight) of net new shadow on the park. The net new project shadow would occur from early March until mid-October during the late afternoon/early evening (after 4:30 p.m.).^{209a}

On an annual basis, the proposed project would combine with other cumulative development projects to cast about 3,986,443 square-foot-hours (5.47 percent of the Theoretical Annual Available Sunlight) of net new shadow on the park. The net new cumulative shadow would occur throughout the year beginning at one hour after sunrise. Depending on the time of year, the morning shadow would move off the park by 12:00 p.m. during the summer, by 11:00 a.m. during the fall/spring, and by 8:30 a.m. during the winter.^{209b} The proposed project would contribute to the cumulative shadow on the park. As discussed above, the proposed project would cast net new shadow on the park from early March until mid-October during the late afternoon/early evening (after 4:30 p.m.).

D.2 Appendix A, Initial Study

* In Appendix A, Initial Study, the header on pages ii, iii, and iv is revised to correct an editorial error by deletion of the phrase, "Preliminary Initial Study 2 – Subject to Change."

D.3 Figures

Revised EIR figures follow this page.

^{209a} PreVision Design, Shadow Analysis Report for the Proposed 1500 Mission Street Project per San Francisco Planning Code Section 295 Standards, Final R1, February 17, 2017.

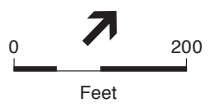
^{209b} Ibid.



 Project Site

USE DISTRICTS

- C-3-G** Downtown General Commercial
- NCT-3** Moderate-Scale Neighborhood Commercial Transit
- P** Public Use District
- RCD** Regional Commercial District
- RED** Residential Enclave District
- RED-MX** Residential Enclave District – Mixed
- WMUG** Western SoMa Mixed Use – General



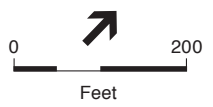
SOURCE: San Francisco Planning Department

1500 Mission Street; Case No. 2014-000362ENV

● **Figure III-1 (Revised)**
Existing Zoning Map



 Project Site



Number indicates permitted height; letter or alphanumeric indicator (e.g., R-2) indicates bulk district. Where two heights are given (e.g., 85/250-R-2), the first number indicates the permitted base height and the second number indicates the maximum height. Bulk limitations apply above the base height to limit the massing of towers.

SOURCE: San Francisco Planning Department

1500 Mission Street; Case No. 2014-000362ENV
● Figure III-2 (Revised)
 Existing Height and Bulk District Map

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ATTACHMENTS

Attachments	Draft EIR Comments Introduction
Attachment A	Draft EIR Comment Letters
Attachment B	Draft EIR Hearing Transcript

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ATTACHMENTS DRAFT EIR COMMENTS

INTRODUCTION

Attachments A and B present all comments received on the Draft EIR. Attachment A contains copies of all written comments received on the Draft EIR, including comments submitted either by letter, fax, or email. Attachment B presents the public hearing transcript. Written and public hearing comments are grouped under one of three categories: governmental agencies, non-governmental organization, and individuals.

This RTC document codes the comments in the following way:

- Comments from agencies are designated by “A-” and the agency’s name or acronym thereof.
- Comments from organizations are designated by “O-” and the organization’s name or acronym thereof. In cases where several commenters from the same organization provided comments, the acronym is followed by the commenter’s last name.
- Comments from individuals are designated by “I-” and the commenter’s last name.

Each commenter is given an identifier, and each comment is numbered. Therefore, the second comment received from a representative of an organization known as “Friends of Friends” would be given designated “O-FOF.2,” while the third comment received from an individual named Smith would be designated “I-Smith.3.” In this way, the reader can both locate a particular comment in a comment letter by referring to the comment designation.

The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR, 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 unrelated to a specific impact category are also classified as general comments. Comments on the Summary or specific mitigation measures are included under the comments regarding the relevant topical section of the Draft EIR. 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):

Project Description [PD]	<i>Initial Study Topics</i>
Plans and Policies [PP]	Land Use [LU]
Cultural Resources [CR]	Population and Housing [PH]
Transportation and Circulation [TR]	
Wind [WI]	<i>Other CEQA Considerations [OC]</i>
Shadow [SH]	Aesthetics
Alternatives [AL]	Parking
	General Comments (GC)

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, Project Description comments [PD] are listed as PD-1, PD-2, PD-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 code described in Section B of this RTC document. The reader is referred to Attachments A and B for the full text and context of each comment letter or e-mail, 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.

ATTACHMENT A DRAFT EIR COMMENT LETTERS

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Patricia Maurice, Dist. Branch Chief, Local Development-Intergovernmental Rev., California Dep't. of Transportation (Caltrans)	Letter, December 8, 2016	1	TR-9: Lead Agency Responsible for Mitigation
			2	TR-8: Vehicle Trip Reduction
			3	TR-6: Construction Impacts
			4	PD-3: Project Approvals Required from Caltrans
A-HPC	Andrew Wolfram, President, San Francisco Historic Preservation Commission	Letter, December 14, 2016	1	CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
			2	AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives
			3	AL-4: Concurrence with EIR Analysis of Full Preservation Alternative
			4	GC-2: Support for Approval of the Full Preservation Alternative
			5	GC-1: Project Merits
Organizations				
O-Heritage	Mike Buhler, President and CEO, San Francisco Architectural Heritage	Letter, January 4, 2017	1	GC-1: Project Merits
			2	GC-2: Support for Approval of the Full Preservation Alternative
			3	CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
			4	CR-2: Proposed Project Would Result in Significant Adverse Impacts on Historical Resources
			5	GC-1: Project Merits
			6	GC-2: Support for Approval of the Full Preservation Alternative
			7	AL-4: Concurrence with EIR Analysis of Full Preservation Alternative
			8	GC-2: Support for Approval of the Full Preservation Alternative

TABLE A-1 COMMENT LETTERS AND E-MAILS

Committer Code	Name and Title of Commenter	Format	Com. No.	Topic Code	
Individuals					
I-Hestor	Sue C. Hestor, Attorney at Law	Letter (1 of 2), January 4, 2017 (Part 1)	1	OC-2: Coordination of Responses to Comments for two Draft EIRs	
			1	OC-2: Coordination of Responses to Comments for two Draft EIRs	
			Letter (2 of 2), January 4, 2017 (Part 2)	2	PP-1: Planning Context for Proposed Project
				3	TR-1: Transportation Setting
				4	AL-2: The EIR Should Analyze an Alternative With Less Parking
				5	AL-3: The EIR Should Analyze an Alternative With More Affordable Housing
				6	LU-1: Effects on Neighborhood Character
				7	TR-2: Vehicle Miles Traveled (VMT) Impacts
				8	GC-3: Timing of Release of Draft EIR, and other Draft EIRs
				9	TR-5: Bicycle Impacts
				9	WI-1: Wind and Bicycle Safety
				10	WI-2: Request for Detail Regarding Wind Screens
				11	TR-7: Cumulative Construction Impacts
				12	PP-2: Consideration of General Plan Policies Concerning Views
				13	PD-2: Project Approvals-General Plan Amendments
				14	PP-3: <i>General Plan</i> Amendments as Part of Project
				15	PP-4: Height Limits
				16	PP-5: Parking Requirements
				17	PP-6: Housing Element Consistency
				18	PP-7: Area Plan Consistency
				19	PP-8: The Hub Plan
				20	GC-1: Project Merits
21	PP-9: Climate Action Plan Consistency				
22	TR-5: Bicycle Impacts				

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			23	GC-4: Cumulative Projects List and Map
			24	PP-1: Planning Context for Proposed Project
			25	TR-7: Cumulative Construction Impacts
			26	TR-1: Transportation Setting
			27	TR-2: Vehicle Miles Traveled (VMT) Impacts
			28	PP-10: Proposed Central SoMa Plan
			29	WI-1: Wind and Bicycle Safety
			30	WI-3: Ongoing Wind Analysis in the Project Vicinity
			31	SH-1: Shadow Effects on Parks
			32	PP-2: Consideration of <i>General Plan</i> Policies Concerning Views
			33	GC-1: Project Merits
			34	PP-7: Area Plan Consistency
			35	PH-1: Housing Displacement
			36	PH-2: Housing for Project Employees
I-Hong	Dennis Hong	E-Mail, January 3, 2017	1	GC-1: Project Merits
			2	OC-1: Request for an Aerial View of the Proposed Project
			3	TR-3: Transit Impacts
			4	TR-4: Pedestrian Impacts
			5	GC-4: Cumulative Projects List and Map
			6	PD-1: Housing and Occupancy in the Proposed Residential Tower
			7	GC-1: Project Merits
			8	PP-11: Zoning Map
			9	GC-5: Limiting Construction Impacts
			10	GC-1: Project Merits
			11	GC-6: Triangle at 12th Street and South Van Ness Avenue

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
I-Rhine	Robert Rhine	E-Mail, December 6, 2016	1	LU-1: Effects on Neighborhood Character
			2	TR-10: Parking Demand in Nearby Neighborhoods

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



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December 8, 2016

SCH # 2015052040
GTS # 04-SF-2016-00055
SF101201
SF-101-PM T4.71

Ms. Chelsea Fordham
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

1500 Mission Street – Draft Environmental Impact Report

Dear Ms. Fordham:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 1500 Mission Street project. Thank you also for coordinating a meeting with Caltrans in anticipation of necessary permits and relinquishment agreements. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), the Caltrans Strategic Management Plan includes targets to reduce Vehicle Miles Travelled (VMT), in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Draft Environmental Impact Report (EIR).

Project Understanding

The proposed project would demolish an existing 29,000 square foot building at 1580 Mission Street and retain and rehabilitate a portion of an existing 57,000 square foot building at 1500 Mission Street and demolish the remaining portions on the project site, and construct a mixed-use development with two components: an approximately 767,200 square foot residential and retail/restaurant building at the corner of South Van Ness Avenue and Mission Street; and an approximately 567,300 square foot office building for the City and County of San Francisco on 11th Street between Market Street and Mission Street.

The project site is located in the proposed Mission and South Van Ness Special Use District in the South of Market neighborhood of San Francisco. The project site is adjacent to South Van Ness Avenue, otherwise known as US 101, part of the State Transportation Network. Several proposed project features, temporary and permanent, are in the State right of way (ROW).

The project area includes a full range of horizontally- and vertically-mixed land uses and is well-served by high-capacity transit. The existing average daily VMT per capita for the project's Transportation Analysis Zone is substantially below the existing regional average daily VMT for all proposed uses: residential, office, and retail.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Chelsea Fordham, City and County of San Francisco
December 8, 2016
Page 2

Lead Agency

As the Lead Agency, San Francisco (the City) is responsible for all project mitigation, including any needed improvements to State highways, if necessary. The project's fair share contribution, financing, scheduling, implementation responsibilities, and Lead Agency monitoring should be fully discussed for all proposed mitigation measures.

TR-9
A-Caltrans.1

Vehicle Trip Reduction

Caltrans commends the City for including a Transportation Demand Management (TDM) plan to reduce vehicle trips associated with the project. Given the size of the project and its potential to generate trips to and from the project area, such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. In addition to the measures recommended in the Draft EIR, with consideration of the City's unique commuting patterns, please also consider recommending inclusion of an on-site telecommute or telework center to give residents the option of working remotely.

TR-8
A-Caltrans.2

Transportation Management Plan

A Transportation Management Plan (TMP) or construction Traffic Impact Study may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with the *California Manual on Uniform Traffic Control Devices*. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510-286-4579 and see the following website: <http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev1.html>

TR-6
A-Caltrans.3

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a Transportation Permit that is issued by Caltrans. To apply, a completed Transportation Permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to:

Caltrans Transportation Permits Office
1823 14th Street
Sacramento, CA 95811-7119

See the following website for more information about Transportation Permits:
<http://www.dot.ca.gov/trafficops/permits/index.html>

PD-3
A-Caltrans.4

Encroachment Permit

A Caltrans Encroachment Permit will be required for all temporary and permanent features and activities within State ROW. The proposed work within State ROW shall be designed to State standards and in accordance with the Encroachment and Utility Policy, as provided in Chapter 17 of the *Project Development Procedures Manual*. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed Encroachment Permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

Ms. Chelsea Fordham, City and County of San Francisco
December 8, 2016
Page 3

David Salladay, District Office Chief
Office of Permits, MS 5E
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

See the following website for more information: <http://www.dot.ca.gov/trafficops/ep/index.html>

Design Exceptions. The following project features do not meet State standards, and will not be permitted unless an exception is granted. Approval of these features should not be assumed, and appropriate alternatives should be planned in the case they are not approved:

- A wind canopy which encroaches five (5) feet into State ROW.
- Twenty-five (25) trees within the sidewalk along South Van Ness Avenue.
- Six (6) parklets comprised of seating areas and a windscreen ("green wall") within the sidewalk.
- Rows of tieback anchors for shoring the basement excavation which would be detensioned, but remain within State ROW after completion of construction.
- Use of a tower crane extending over State ROW during construction.
- Sidewalk used for construction staging and pedestrian walkways constructed in the curb lane.

Relinquishment. The City recently requested that Caltrans relinquish sidewalks along Van Ness Avenue. Though the request has been filed, relinquishment is not complete until the related California Transportation Commission resolution is recorded. If the sidewalk that fronts the proposed development is relinquished to the City prior to the need for a permit, then those features affecting only the sidewalk will be within the City's jurisdiction.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jesse Schofield at 510-286-5562 or jesse.schofield@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

↑
PD-3
cont.
A-Caltrans.4
(cont'd.)



SAN FRANCISCO PLANNING DEPARTMENT

Letter
A-HPC

December 14, 2016

Ms. Lisa Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th 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 December 7, 2016, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed 1500-1580 Mission Street Project (2014-00362ENV). After discussion, the HPC arrived at the comments below:

- The HPC concurs with the findings that the proposed project does not meet the Secretary of the Interior’s Standards and will result in a significant, unavoidable impact to the identified historic resource, 1500 Mission Street.
- The HPC agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives.
- The HPC concurs that the Full Preservation Alternative meets the Secretary of Interior’s Standards.
- The HPC agreed that they recommend adoption of the Full Preservation Alternative as it avoids significant impacts to the historic resource by retaining the majority of character-defining features and allows the building to continue to convey its significance while also allowing for adaptive use and new construction to accommodate many of the project objectives.
- The HPC generally agreed with San Francisco Heritage’s statement about the symbolic importance of this project and its potential to compromise the credibility of the City’s preservation program with a façade retention project as the future headquarters of several City Departments, including Planning,. The HPC President noted, further, that he hopes that the Planning Commission will be very thoughtful in their deliberations about the project and consider what the project says about the City’s interest in preserving historic resources.

CR-1
A-HPC.1

AL-1
A-HPC.2

AL-4
A-HPC.3

GC-2
A-HPC.4

GC-1
A-HPC.5

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

Sincerely,

Andrew Wolfram, President
Historic Preservation Commission

January 4, 2017

Submitted by email

Lisa M. Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA
lisa.gibson@sfgov.org

RE: 1500-1580 Mission Street

Dear Ms. Gibson,

On behalf of San Francisco Heritage (Heritage), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed project at 1500-1580 Mission Street, the site of the old Coca-Cola Bottling Works (now Goodwill). On December 1, 2016, representatives of the City and County of San Francisco, SOM, and Related California met with Heritage’s Projects & Policy Committee to present changes to the project since the Notice of Preparation (NOP) was issued in 2015; this meeting followed an initial presentation by the project team to Heritage in early 2015.

We appreciate the project team’s good faith efforts to address Heritage’s comments on the NOP and to develop feasible preservation alternatives for the DEIR. Despite notable design improvements, including greater retention of the Mission and 11th Street façades, the project as currently proposed would still demolish approximately 90% of the historic Coca-Cola Building.¹ As the future home of the Planning Department and related city agencies, Heritage believes that the project has heightened symbolic importance: We are concerned that the current design would encourage “façadism” as a preferred preservation treatment for historic resources citywide, when this practice undermines preservation values and can result in a false sense of place. Accordingly, **Heritage joins the Historic Preservation Commission in urging the Planning Department to adopt the Full Preservation Alternative as the environmentally superior (and ostensibly feasible) project alternative.**²

GC-1
O-Heritage.1

GC-2
O-Heritage.2

¹ The project as currently proposed would demolish the western end of the Mission Street façade as well as a portion of the 11th Street façade.

² At its regular meeting on December 7, 2016, the Historic Preservation Commission unanimously voted to endorse the Full Preservation Alternative.

I. Historical Significance of the Old Coca-Cola Bottling Plant

Built in 1925, 1500 Mission is a one-story reinforced concrete industrial building originally designed in the Classical Revival style; the building was enlarged and altered in 1941 in the Streamline Moderne style. In 2010, architectural historian William Kostura ranked the building among the eleven best Moderne-style buildings in San Francisco: “The building as it was added to and remodeled in 1941 remains essentially unchanged since that date. For that period (1941) this building retains integrity of location, design, materials, workmanship, setting, feeling, and association.”³ The 1500 Mission Street Historical Resource Evaluation, prepared by Architectural Resources Group, concurs that the old Coca-Cola Building is individually eligible for listing in the California Register of Historical Resources under Criterion 3 (architecture), a finding later confirmed by the Planning Department and in the DEIR.

The DEIR includes a comprehensive list of character-defining features that contribute to the building’s historic eligibility, including but not limited to the full length of the facades along Mission and 11th Streets, clock tower, stucco surface, belt courses along the base, etched speed lines along the top, the steel-and-glass doors and transom, and the building’s large, open interior with skylights supported by steel trusses.⁴

CR-1
O-Heritage.3

II. The Proposed Project would result in significant adverse impacts on historic resources

The proposed project would demolish one non-historic building and incorporate a small portion of the Coca-Cola Building into a mixed-use development that includes a high-rise residential tower and offices for the San Francisco Departments of Building Inspection, Planning, and Public Works. Most of the historic façade along Mission Street would be retained to a depth of forty feet, including its clock tower, and converted to retail use. A significant portion of the 11th Street elevation would also be preserved.

Amid San Francisco’s ongoing development boom, façade retention has increasingly been approved by the city as mitigation for projects that would otherwise fully demolish eligible historic resources (e.g., 1634-1690 Pine Street Project/The Rockwell). Although such projects often present nuanced and complex preservation issues, the practice of “facadism” is largely condemned by the national and international preservation community:

Stripped of everything but its façade, a building loses its integrity and significance, rendering it an architectural ornament with no relation to its history, function, use, construction method, or cultural heritage. With only its primary facades saved, the original structure is gone, including the roof, interior features and volume of space. [A] new structure is added on, which may be set back and

CR-2
O-Heritage.4

³ Kostura, William. DPR Form for 1500 Mission Street.

⁴ DEIR, at p.IV.A-13.

sometimes cantilevered over what was the roof level of the mostly demolished older building. When its defining features are mostly removed and no longer part of an integrated whole, a building no longer demonstrates its authentic self.⁵

Façade retention is considered demolition of a historical resource under CEQA and is generally inconsistent with the *Secretary of the Interior's Standards*. As such, Heritage agrees with the DEIR's conclusion that the proposed project, although improved from the original design, would nonetheless result in significant and unavoidable adverse impacts to historic resources.

Heritage believes that the preservation treatment of the Coca-Cola Building should be held to a high standard because of the example it will set for the broader development community in San Francisco. Indeed, if façade retention is adopted as the preferred solution for the Departments of Planning, Building Inspection, and Public Works, the city's credibility to curb this practice in projects seeking their approval will be significantly compromised. It will be difficult for the Planning Department to require retention of historic resources if the city itself does not adhere to sound preservation practice.

III. The Full Preservation Alternative substantially lessens impacts on historic resources while achieving most project objectives

A key policy under the CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."⁶ CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."⁷ The fact that an environmentally superior alternative fails to meet all project objectives does not necessarily render it infeasible under CEQA; reasonable alternatives must be considered "even if they substantially impede the project or are more costly."⁸ CEQA requires that a project determined to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.⁹ To this end, CEQA mandates that the lead agency deny the proposed project if less harmful alternatives would feasibly obtain *most* of the basic objectives.

Heritage's comments on the NOP, dated March 17, 2015, requested consideration of "at least one bona fide preservation alternative in the EIR that attempts to meet most of

CR-2
cont.
O-Heritage.4
(cont.d')

GC-1
O-Heritage.5

GC-2
O-Heritage.6

AL-4
O-Heritage.7

⁵ Woo, Eugenia. "What Price Facadism? Authenticity and Integrity in Historic Preservation," ARCADE 33.2, Fall 2015. See <http://arcadenw.org/article/what-price-facadism>.

⁶ Public Resource Code, Sec. 21001 (b), (c).

⁷ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁸ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁹ Cal. Public Resources Code § 21002, 21081.

the project objectives while retaining the Old Coca-Cola Bottling Plant’s eligibility as a historical resource... including an increased setback behind the historic clock tower, retention of the full length of the 11th Street façade, and/or adaptive reuse of a portion of the current warehouse space.”¹⁰

The Full Preservation Alternative largely meets these criteria, as it would preserve exterior features of the Coca-Cola Building and a substantial portion of the industrial warehouse section of the building, including wire-glass skylights, exposed steel truss work/structural framing, and the full-height interior space that would remain intact as part of the first floor permit center. It would also retain the Mission and 11th Street facades in their entirety, and a new office tower would be constructed at the rear northwest corner of the existing building.

Significantly, the DEIR identifies the Full Preservation Alternative as the “environmentally superior alternative” because **“it would meet most of the project sponsor and City’s basic objectives, while avoiding the cultural resource impact to the 1500 Mission Street building that would occur under the proposed project.”**¹¹ The Full Preservation Alternative would not only achieve a majority of the programmatic goals, but would also enable the city to “lead by example” by demonstrating how high-density new construction can sensitively retain and adapt historic structures.

Thank you again for the opportunity to comment on the Draft EIR for the 1500 Mission Street project. Should you have questions or concerns, please do not hesitate to contact me directly at mbuhler@sfheritage.org or 415/441-3000 x25.

Sincerely,

Mike Buhler
President & CEO

cc: Steve Vettel, Esq., Farella Braun + Martel LLP
Chelsea Fordham, San Francisco Planning Department
Tim Frye, Historic Preservation Officer, San Francisco Planning Department

↑
AL-4
cont.
O-Heritage.7
(cont'd.)

GC-2
O-Heritage.8

¹⁰ The DEIR includes a Partial Preservation Alternative and a Full Preservation Alternative. The Partial Preservation Alternative is preferable to the proposed project in that it reduces adverse impacts on historic resources, but not to a less than significant level.

¹¹ DEIR, at p.S-37 (emphasis added).

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

Letter
I-Hestor

January 4, 2017

Chelsea Fordham
Environmental Review
1650 Mission St #400
San Francisco CA 94103

Comment on 1500 Mission St Project DEIR 2014-000362 - part One

I submit the following comment on the 1500 Mission Street DEIR.

There are 2 DEIRs out for development on blocks diagonally across Market and Van Ness/South Van Ness at virtually the same time:

Comments and Responses on TWO DEIRs should be coordinated

1500 Mission St - southern half of AB 3506 2014-000362 - City office building, dense market rate housing, on-site inclusionary housing, Planning Code and height increase, parking. **DEIR hearing 12/15/16, Comment DL 1/4/17.**

One Oak Street/1500 Market St - eastern portion of AB 836 2009.015E - Dense market rate housing, Planning Code and height increase, parking. **DEIR hearing 1/15/17, Comment DL 1/10/17.**

The issues of wind, traffic, transit, impacts on pedestrians, changes in the General Plan and Planning Code TO THE SAME Van Ness & Market Downtown Residential Special Use District - part of the Market/Octavia Area Plan - have EXTREMELY similar impacts, including cumulative impacts. Market and Van Ness. Mission and South Van Ness. DIAGONAL BLOCKS. Sites about 400' apart.

The deadline for DEIR comments are less than a week apart. There is no rational reason why public comments on the 2 DEIRs that have applications to BOTH projects should not be considered by both. This specifically includes issues related to transportation and parking, winds, comments on cumulative displacement and housing, including excessive parking in this transit-rich area with heavy traffic GOING STRAIGHT ONTO FREEWAYS. The high parking allowance for residences encouraging occupancy by middle and upper income people who drive instead of using public transit.

Environmental Review is ignoring these issues unless comments on issues relevant to both sites are considered in BOTH Comments and Responses/FEIRs.

Sue C. Hestor

cc: Michael Jacinto
Lisa Gibson
Market-Octavia Area Plan CAC
Eastern Neighbors Area Plan CAC

OC-2
I-Hestor.1

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

January 4, 2017

Chelsea Fordham
Environmental Review
1650 Mission St #400
San Francisco CA 94103

Comment on 1500 Mission St Project DEIR 2014-000362 - part TWO

I submit the following comments on the 1500 Mission Street DEIR to supplement previously submitted part one. That comment recognized that there are 2 DEIRs in the same area of the Market/Octavia Area Plan proposing increased heights and revisions to the General Plan. Both with excessive parking on the Market/Van Ness/Mission/South Van Ness corridor. Located on blocks diagonally across Market/Van Ness from each other. On streets with heavy traffic and congestion. Plus very well served by transit. BUT extremely near to Highway 101. And they have extreme winds.

The projects and DEIRs are 1500 Mission Street and One Oak Street/1500 Market Street.

Since sending part one of DEIR comments, I received an Advance Calendar which shows they are slated for approval within 2 weeks of each other. 1500 Mission is slated for approval March 23. One Oak/1500 Market on April 6. It is therefore more compelling that DEIR comments on issues common to both be considered whether they are submitted on 1500 Mission or One Oak/1500 Market.

OC-2
I-Hestor.1
cont'd.

Two maps must be added to 1500 Mission DEIR

Map #1

A map showing the boundaries of the **Market/Octavia Area Plan** PLUS the boundaries of the **Eastern Neighborhoods Area Plan** with its **5 sub-area Plans** (including the **Western SoMa Area Plan**). The M/O plan should show sub-area Van Ness & Market Downtown Residential Special Use District.

Superimpose on this Map the boundaries of the **proposed Central SoMa Area Plan, The Hub**, and all other Plans that have amended these Area Plans. This would include the **5M plan** at 5th & Market which amended part of the Eastern Neighborhood Area Plan. PLUS any **proposed** Map Amendments to either Market/Octavia or the Eastern Neighborhoods Plan, including those proposed in any pending PPA. This is the proposed map amendment for One Oak/1500 Market. Also there requested height reclassification on the western end of One Oak/1500 Market block - at Franklin & Oak.

PP-1
I-Hestor.2

This map is necessary

- To understand various discussions in the DEIR
- Show the changes/proposed changes to Market/Octavia Plan and Eastern Neighborhoods Plan
- Show how close the Mission Area Plan is to the boundary of the area analyzed in this EIR.

For each Plan please provide the date of the adoption of that Plan by the City (I believe 4/17/08 for M/O and 12/19/08 for EN.) Further provide the dates of the community planning effort or its EIR. Western SoMa was the most recent of the Area Plans.

↑
PP-1
cont.
I-Hestor.2
(cont)

Also for each of the areas and sub-areas please call out the amount of residential parking that it REQUIRED, if that parking is required at all.

Map #2

A map showing the location of the FREEWAYS and the freeway ramps/access just south and west of 1500 Mission. This should include the route right in front of the Planning Department and north on South Van Ness adjacent to Project site. **DEIR II-3 states that Interstate 80 and US Highway 101 provide the primary regional access to project area.** Show it. I note the increasing amount of reverse commuting INTO San Francisco - so that the City provides HOUSING particularly for the Peninsula. There are currently 18 lanes of traffic into San Francisco from the South. The DEIR should be amended to state that those same freeways allow people to EXIT San Francisco to go to work. Reverse commute is a FACT.

TR-1
I-Hestor.3

Requested map is necessary to understanding why excessive residential parking at Project, in the context of a changed reverse-commute pattern from Silicon Valley, has dumped demand for fairly high end housing into the area of 1500 Mission and One Oak/1500 Market. What is called the "Google buses" started in the very recent past, long after adoption of the M/O and EN Area Plans. Those plans were aimed at accommodating the demand for San Francisco housing based mostly on San Francisco employment and residents. Now San Francisco is producing housing for Silicon Valley, which encourages employee from Mountain View, Cupertino, Menlo Park and other places on the peninsula to LIVE in San Francisco but WORK on the Peninsula. Since these are not low income employees, the demand is for rather high-end housing. AND THERE ARE FREEWAY CONNECTIONS RIGHT THERE.

A MAP of the freeway access and ramps would help understand travel patterns and possible impacts. And direct attention to the excessive parking provided in this "TRANSIT RICH" area. There is a freeway off ramp AT THE CORNER to the right of the Planning Department. There is an on ramp at South Van Ness and 13th. There is a Central Freeway ramp BEHIND the Planning Department.

Project Alternatives must be increased

The summary of alternatives(S-35) omits an **Alternative with drastically reduced residential parking. It must be added.** Another alternative with ZERO parking, but very expanded car share parking.

AL-2
I-Hestor.4

Van Ness - highway 101 - has a high volume of traffic, including trucks. With BRT lanes being added, vehicle traffic becomes more constrained. As new residential projects are approved, developers of market rate housing request more and more parking because the units sell for more money. As the City accommodates each request, the cost of land goes up. It is priced ASSUMING the maximum amount of parking. Housing prices go up. **Has the City done a study of what effect eliminating parking on this transit corridor would have on housing prices? How much are prices increased when the maximum amount of parking, versus ZERO residential parking, is provided?**

The summary of alternatives also omits an alternative with 25% inclusionary housing. This should also be included. The project is an SUD. A search of the Planning Code for SUDs will show that historically an SUD, which changes Planning Code requirements for a small area, has been used for 100% affordable

↓
AL-3
I-Hestor.5

housing projects. 20% is headed in the right direction, but there should also be a 25% on-site inclusionary alternative.

↑ **AL-3**
cont.
I-Hestor.5
(cont.)

Comments by residents of residential area south of Mission were ignored. **DEIR I-3** states that **comments at the public scoping meeting** are incorporated into this DEIR. Residents of the LMN neighborhood - Lafayette, Minna, Natoma directly across from the project - raised serious questions on the abrupt height changes proposed. They live in the area covered by the Western SoMa Area Plan and had participated in the recent hearings on that Plan which aimed to guarantee protection of housing for existing lower income residents. They raised the issue of driving "apps" that direct Uber, Lyft, and private drivers that to a short-cut through their narrow streets to avoid South Van Ness or 11th Street traffic. These issues do not come through in the DEIR.

LU-1
I-Hestor.6

On **DEIR I-4** and later in the transportation discussion an assertion is made that **VMT** - Vehicle Miles Travelled - is the appropriate measurement for transportation studies under new CEQA rules. I refer to the comments being submitted by Jason Henderson critiquing how Planning erroneously applies the VMT standard in light of the intervening work writing the Market/Octavia Plan.

TR-2
I-Hestor.7

I note that the **55-day public review and comment period on this DEIR (DEIR I-5)** began with DEIR release 11/9, the day after the Presidential election, Planning hearing was at **10am** 12/15, the last Planning Commission meeting before Christmas with comments due 1/4/17, one day after people return from the holidays. This is a brutal approach to holidays, especially when the One Oak/1500 Market DEIR was released hot on its heels. Not to mention release of the Central SoMa Area Plan (3rd version of the Eastern Neighborhoods Area Plan) came out in December.

GC-3
I-Hestor.8

Environmental Review appears to enjoy dumping massive DEIRs on the public over Thanksgiving and Christmas holidays.

Proposed Site Plan Figure II-4 shows **long curb cut along Mission Street**. I refer to and incorporate comments on issues related to bicyclist safety and winds that Henderson is submitting on One Oak DEIR. The safety and wind issues are similar and only separated by one block.

TR-5
WI-1
I-Hestor.9

Please explain and show on visual - **Figure II-16 the proposed wind screens**. They are hard to understand/see.

WI-2
I-Hestor.10

Construction impacts II-28. Assume that both 1500 Mission and One Oak/1500 Market will be constructed simultaneously. Please describe. They are scheduled for approval at the same time. Other already approved buildings could also start construction. But please provide traffic, sidewalk, etc disruption is both happened at SAME or over-lapping time.

TR-7
I-Hestor.11

Views of Project Site from south - looking up South Van Ness. **Figure II-22**. There used to be policies in the Master Plan dealing with the importance of view perspectives to give orientation to pedestrians, to vehicles, to people trying to zero in on a location. City Hall. Views of the dome of City Hall from Van Ness to the north and from streets to the south were considered important. They were to orient people - those heading to City Hall or civic center. Have those policies been removed from the General Plan? If they have not, please provide a before and after perspective of the view towards City Hall from the south. The dome is visible coming north on South Van Ness. Will it disappear from view? How far to the south.

PP-2
I-Hestor.12

Approvals Required DEIR II-36. There are General Plan amendments in this project, but they are not called out as such. Please add General Plan and its elements. Area Plans are part of the General Plan.

PD-2
I-Hestor.13

Height and Bulk - DEIR III-4 Map Figure III-2. There is no discussion that this Map includes the site of One Oak/1500 Market which also has a height increase on Market. That change should be noted. The Map shows the hypocrisy of ignoring the sibling projects.

PP-3
I-Hestor.14

Figure III-2 shows the vast difference in heights between the north and south sides of Mission. Please describe the intention of the heights on south side in the Western SoMa Plan. Also please label all streets.

PP-4
I-Hestor.15

Discussion of parking requirements III-7 seems to be saying that there is ZERO auto parking required for residences on this site but there is REQUIRED bicycle parking. Meaning that bicycle travel is highly encouraged. If this is correct, why isn't it stated so clearly? The amount of auto parking requires a CONDITIONAL USE. Which means that the amount of parking must be measured against the impacts on nearby residents (south of Mission) AND against the policies of the entire General Plan, including those of M/O and Eastern Neighborhoods. Why is an alternative without a CU not included?

PP-5
I-Hestor.16

Housing Element Needs III-10. What are the ABAG goals by income level ? Using the current measures what % of the need v goal is being produced adding this project and One Oak/1500 Market? As San Francisco displaces lower income EMPLOYEES - including those who will work at project site or nearby - and the housing produced is more and more market rate PLUS (which we are way over-producing), the people who are EMPLOYED who cannot afford housing in San Francisco seek housing outside of San Francisco. They create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. If the people OCCUPYING the new housing are reverse commuters from counties outside SF, they also create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. Discuss the effects of NOT housing in SF workers in SF, while housing in SF people who work in other counties. Displacement of EMPLOYEES - their travel to housing - is an environmental issue.

PP-6
I-Hestor.17

Discussion of **Downtown Plan** is coldly academic and misleading. Guiding Downtown Development evolved into the Downtown Plan with a change of Mayors and Planning Directors. Simultaneous with the years of development of the Plan in early 80s was a huge public effort at the Planning Commission to require construction of housing affordable to projected work force AND expansion of the transit system AND expansion of child care so that HOUSING, TRANSIT and CHILD CARE came on line to meet the needs of the expanded work force when offices opened. Thus fees required of new development. There was an active community pressure. The expansion area for downtown offices was the C-3-O (SD). The C-3-S and C-3-G, and Chinatown rezoning, were aimed at protecting lower income communities that surrounded the C-3-R and C-3-O. Downtown Plan policies did NOT call for massive height increases for residential or office towers at project site.

PP-7
I-Hestor.18

The Hub Project - III-13. Who is the public (as opposed to developers) clamoring for The Hub? The perception is that this is being driven by the Planning Department. It is another amendment to the M/O Area Plan and the adjacent areas of the Eastern Neighborhoods Area Plan.

PP-8
I-Hestor.19

Accountable Planning Initiative - Prop M 1986. DEIR III-14. Allowing increased parking - much more than REQUIRED for housing in an area that defines TRANSIT RICH, and which has really close access to

GC-1
I-Hestor.20

the freeway system, is opposite of discouraging commuter automobiles. Particularly when there is an existing lower income neighborhood *directly across the street*.

↑ GC-1
cont.
I-Hestor.20

Climate action plan III.B.5. This site is in Geologic Hazard Zone. Along with One Oak it is Artificial Fill over Bay Mud. It used to be part of the Bay and has High Liquefaction susceptibility. Rising sea levels affect the ground water. Most of South of Market is Bay Fill. Including this site. Please acknowledge.

(cont.)
PP-9
I-Hestor.21

Refer to comments submitted on One Oak regarding the **hazards to bicyclists in the curb cut.** III-16.

TR-5
I-Hestor.22

Cumulative Land Use Project List - IV-9 - specify which of the projects are already approved or open. Map of Projects - Figure IV-1 - the map goes straight up to the Mission Area Plan boundaries (13th/Duboce). It shows the relevance of projects in the Mission Plan area to this site.

GC-4
I-Hestor.23
PP-1
I-Hestor.24

Explain changes underway to Van Ness Ave - including overlap with construction times of 1500 Mission and One Oak. **DEIR IV B-3**

TR-7
I-Hestor.25

Provide boundaries of **TAZ 591** or provide map. **IV B-4.** Depending on the boundary there may be few residents of TAZ 591, so it is hard to understand how relevant this is to goals in M/O Plan.

TR-1
I-Hestor.26

Use of VMT metric - IV B-17. I incorporate by reference comments on One Oak DEIR on how VMT was required to be applied.

TR-2
I-Hestor.27

Central SoMa Plan - IV B-60. To the public it appears that the Department is determined to spend years in public meetings, adopt an EN Area Plan for SoMa; spend years in public meetings, adopt a Western SoMa Area Plan; throw it all out to plan what the Department wants as a **3rd Plan** - increasing heights and density that were intentionally omitted from both of the prior plans. I have asked above for a MAP showing various EN Area Plan boundaries, the boundaries of any plans that altered an adopted plan, and the proposals for yet another plan.

PP-10
I-Hestor.28

Winds - IV.D.1 0 ignores totally the effects on bicycles. I have talked to cyclists who were knocked off their bikes or pushed into traffic by gusting winds. This needs to be discussed seriously in EIR. There are more than pedestrians that are affected. See comments on One Oak DEIR.

WI-1
I-Hestor.29

There was **Chronicle article 1/1/17** about creating a wine district appellation for the "Windswept Petaluma Gap." The description of the wind tunnel through that area sounds like the wind pattern coming over the Hayes Street Hill down to Market Street and swirling around that area. Every market rate housing or office building in this area should be required to contribute funds for the CITY/Planning Department to maintain its own wind files so that the wind study is continually updated to include ALL construction.

WI-3
I-Hestor.30

Shadows related to current usage of parks - IV E-2. Since increased housing density and construction was planned for in the M/O Plan and EN Plan, it is inappropriate to assume continuation of the current hours of operation of parks. In a presentation by planners from Rec Park staff to the ENCAC, RecPark staff stated, with regard to Gene Friend Recreation Center, that the demand for new, especially morning hours, from residents coming into the area means that hours of operation would shift to accommodate families and those who exercise outdoors in the morning. Patterns have also changed in the Mission district. Shadow impacts during early morning hours should not so easily be disregarded. This effects application of the **Proposition K Sunlight Ordinance.**

SH-1
I-Hestor.31

Issues scoped out in Initial Study. Appendix A.

The Initial Study was issued at the same time and in the DEIR. Therefore comments on it must be made in these comments.

Aesthetics scoped out - page 23. See comments above about view toward City Hall dome from South Van Ness. Where the general plan has a policy of protecting certain views because they are important orientation points, I believe they are not merely "aesthetic." There is planning policy underlying them.

PP-2
I-Hestor.32

Adequacy of parking - page 23. The issue in this project is not whether there is ENOUGH parking but whether there is TOO MUCH in the residential building.

GC-1
I-Hestor.33

Land Use Planning - page 29. See above comments on Area Plans. This is in Market Octavia Area Plan. Its policies are being violated, especially as to excessive parking for the TRANSIT RICH site. There is too much residential parking, which will accommodate persons who want to reverse commute/drive to work. The freeways are RIGHT THERE. I have requested a map to inform the decision-maker. This is in a relatively flat area that encourages walking and biking by residents. There should be more comprehensive discussion of policies of Market/Octavia Plan AND of the Western SoMa Plan which covers the residential neighborhood directly across Mission Street. This includes TRAFFIC being redirected into that neighborhood by driving "apps" which point to a "short-cut." **page 30**

PP-7
I-Hestor.34

Population and Housing - page 31. See discussion above. As the price of housing goes up and reverse commuters find the location attractive because San Francisco is providing more housing than the peninsula, SF EMPLOYEES are forced out of SF to locations to a great extent in the East Bay which has cheaper housing. Escalating land values in SF displace residents both directly (removal) and indirectly (inadequate housing added).

PH-1
I-Hestor.35

Where are the people who WORK on site going to be housed? Page 32 ignores them.

PH-2
I-Hestor.36

Respectfully Submitted,

Sue C. Hestor

From: [Fordham, Chelsea](#)
To: [Witte, Matthew](#); [Eryn Brennan](#); [Karl Heisler](#)
Subject: Fwd: 1500 Mission DEIR Comments Case# 2014-000362ENV
Date: Wednesday, January 04, 2017 4:08:30 PM

See below an additional DEIR comment.

Get [Outlook for iOS](#)

----- Forwarded message -----

From: "**Dennis Hong**" <dennisj.gov88@yahoo.com>
Date: Tue, Jan 3, 2017 at 3:33 PM -0800
Subject: 1500 Mission DEIR Comments Case# 2014-000362ENV
To: "Secretary, Commissions (CPC)" <commissions.secretary@sfgov.org>, "Gibson, Lisa (CPC)" <lisa.gibson@sfgov.org>, "Fordham, Chelsea" <chelsea.fordham@sfgov.org>
Cc: "Board of Supervisors, (BOS)" <board.of.supervisors@sfgov.org>, "Lee, Mayor (MYR)" <mayoredwinlee@sfgov.org>, "Kim, Jane (BOS)" <jane.kim@sfgov.org>, "Rose, Paul (MTA)" <paul.rose@sfmta.com>

Good afternoon Honorable Mayor Edwin Lee, Honorable members of the San Francisco Planning Commission, Honorable members of the Board of Supervisors and Miss Lisa Gibson and Miss Chelsea Fordham,

I have been a resident of San Francisco for more than 70 Plus years and as requested I'm submitting my comments to this 1500 Mission Street Project. I have worked in this windy area; specifically at OSVN (One South Van Ness) and 1455 Market Street for more than 20 years and still visit this area. I was one of the Project Mangers for the 1455 Market Street building - formerly the B o A Data Center.

Some of my comments may be redundant on this DEIR, only because this Document overlaps with the Initial Study, the NOP, Public Scoping, the DEIR itself and other documents. So pardon any variances to the

specific subjects I refer to. First of all I fully support this project. This DEIR is very comprehensive and covers just about all the issues and has done an excellent job because it shows. Secondly excuse me for rambling on.

GC-1
I-Hong.1

Even though current CEQA does not require images renderings and etc of the project. I disagree with this CEQA issue only because all to often words, black and white elevations describing the design does not present what it will look like. I believe all to often projects fail because of this missing link. However, this DEIR does an excellent job with this process and is a positive Plus for its justification and uniqueness to this blighted area. Granted, design, color and materials are personal. But I studied and practiced both architecture and urban design and now retired. To add just one link to this presentation it would be to insert the project in to an aerial photo showing how these projects would look with the existing environment. The birds eye figure does some of this - but the photo and the proposed project to me - would be a spot on. So lets get started:

OC-1
I-Hong.2

1. TRAFFIC and Vision 0:

- A. 11th street - between Market Street and Mission Street has two existing parking garage entries/exits both to 1455 Market Street.
- B. OSVN has two Entries/Exits as well.
- C. Does Muni still use this street for their train street car turn

TR-3
I-Hong.3

around(?).

D. Were these issues considered? Only because of the Projects

additional traffic along 11th street between Market Street and

Mission will have an impact this street.

E. Minor detail. Will the Muni Stop on South Van Ness at Mission

remain? This is a heavier used Muni stop. The proposed residential

tower at this stop will get a lot more use. Only because in some of

the recent drawings it is not shown, i.e., in Figure II-4 and

Figure 3-page 5. But again as I mentioned there are over laps of these documents.

F. Will the existing Commuter Shuttle bus stop in front of 10 South

Van Ness remain? Not sure if this was one of MTA HUB stop/s.

G. Keeping Vision 0 in mind, I was unable to reconcile the pedestrian

and the vehicle traffic issue, was this issue considered at both the:

- busy intersection - Mission Street, South Van Ness, Otis and 12th Street.

- busy intersection - Market Street at Van Ness/South Van Ness?

- soon to be 11th and Mission Street and 11th and Market Street.

TR-3
cont.
I-Hong.3
(cont.)

TR-4
I-Hong.4

2. The Cumulative Land Use:

The Table IV-1 page IV-9 shows there are 22 Projects/work to be done in this 0.25 mile area-Nov 2016. [- 24 Months (2 years) for this massive 1500 Mission project - page II-28. (I recall there was a much longer time time shown for this project but was unable to find it).]

- a. Can project time lines be shown for each of these projects on this Table IV-1?
- b. Can the following project also be shown on this chart:
 - San Francisco MTA/MUNI - BRT project.

GC-4
I-Hong.5

3. Housing and occupancy in the proposed Residential Tower

Table 1-page 9 and Table 1-page 4:

- a. To be family friendly, can a few more three bedroom units be added?
- b. In Table 1-page 9 it shows 560 units and Table 1-page 4 of the NOP ---- it shows 550 Units.
- c. Can the Table also show how may are BMR and etc. I realize the this matrix varies.

PD-1
I-Hong.6

4. Project Architectural Design and Aesthetics:

- a. I like the step down and separation of the towers.
- b. The renderings does an excellent job with communicating what this will look like, vs black and white elevations. (Just a simple CEQA issue. I believe this issue is being currently reviewed with CEQA and may be a requirement down the road). Figures 11-17 thru 11-22 says it all.
- c. The proposed public open space is another positive to this project.

GC-1
I-Hong.7

5. Drawings/Graphics:

- a. Can additional description/s of Symbols be added to Figure 111-1 in what (i.e. - Zoning-color, RED-MX represent)?

PP-11
I-Hong.8

6. Construction work:

One of my major concerns with these projects has been the use of "Best Practices" with the construction work. All to often this fails, for example all the work being done with the Transit Center; Dust control, hours of construction operation, noise, control of traffic, pedestrian safety, staging of material, the list list goes on. These construction issues needs to be better controled. One of the most recent projects that had sort

GC-5
I-Hong.9

of a magic touch to was DPR's - Construction of the Chinese Hospital up in Chinatown had some unique control measures in place for these kind of issues and in my opinion was very successful here. It even made the SF Business Times. A point of contact phone number to call on these issues would be very beneficial, including communicating (a current www site to visit with updates, etc.) for the local business and residents to access and as to what is happening with info such as street closures, after hour work, pile driving and etc.. I think this would go a long way.

↑
GC-5
cont.
I-Hong.9
(cont.)

7. In conclusion:

As I mentioned earlier, I fully support this project. This semi blighted area needs this project and others so it can continue to develop others in this area. Are there any thoughts with the small triangle shaped lot at 12th and South Van Ness that butts up against #10 South Van Ness? Every time I pass by it, it seems to gather Homeless, pigeons and debris. Maybe the 10 South Van Ness project can do something with it.

GC-1
I-Hong.10
GC-6
I-Hong.11

Once again, it was a pleasure and thanks again for the opportunity to review and comment on this most exciting project. I trust I have met your deadline of January 4, 2017 to submit my comments for consideration. Sorry for my disorganized presentation of comments.

Please add my comments to the RTC document and send me a hard copy of the RTC when finished. Please

contact me if you need any additional information to my comments.

Best regards, Dennis

December 6, 2016

Lisa M. Gibson, Acting Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Submission of Comments
1500 Mission Street Project Draft EIR
PLANNING DEPARTMENT
CASE NO. 2014-000362ENV

Dear Ms. Gibson,

Thank you for this opportunity to respond to the 1500 Mission Street Project Draft EIR (the Planning Commission Public Hearing on December 15, 2016). These comments are aligned to the EIR Impact findings and relate to two topics: character of the adjacent existing western SOMA residential enclave, and the cumulative impact of the Hub development to the same area.

Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity.
LTS None required. NA

The EIR states,

"The proposed 39-story, 396-foot-tall tower (416 feet to top of parapet) residential and retail/restaurant building would be taller than the buildings located to the south and west on Mission and Minna Streets, but would be similar in height to other buildings along Market, 11th, and 10th Streets to the north and east. Although the 39-story tower would be substantially taller than the low-rise residential buildings in the area to the south around Lafayette, Minna, and Natoma Streets; given the layout of the street grid, the tower would only be visible in views north from Lafayette Street. The existing buildings located along the 35-foot-wide Minna and Natoma Streets would obscure views of the tower, except where a few single-story buildings are located on the north sides of those streets. Furthermore, this low-rise residential area would continue to be surrounded by low-scale buildings to the east, west, and south; therefore, the 39-story tower would not substantially alter the character of this area. The proposed 16-story office building would be taller than buildings to the south and west, but similar in height to buildings directly north and east of the proposed project. Therefore, the proposed project would be generally consistent with the overall existing height and massing of buildings in the area. The proposed project would also establish a mixed-use building and office building in proximity to other similar mixed-use and office buildings, and would not introduce an incompatible land use to the area. The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood. Therefore, the proposed project would have a less than-significant impact upon the existing character of the vicinity and no mitigation measures are necessary."



LU-1
I-Rhine.1

Comment:

Our neighborhood is located directed south of the project site (less than 75 feet) and is part of the Western SOMA plan area, zoned Residential Enclave District (RED) with a height district 40-X. During hearings before the Planning Commission for the Market Octavia Plan, our neighborhood association, Lafayette, Minna and Natoma neighborhood association (LMN) expressed concern that the proposed plan height district at Mission and South Van Ness (then 320') would be out of scale with the height district of the Western SOMA plan (RED). Nowhere else in the city does such a sharp transition of height districts occur, and at the time of the passage of the Market Octavia Plan the San Francisco Planning Commission assured the LMN neighborhood association that consideration would be given to that issue as future projects came forward.

Now the proposed height will increase to over 400 feet. We understand the reasons for the proposed increase, however the EIR did not address the impact to the character of the area (Impact LU-3 above), merely stating, "The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood." The figure below shows how close the proposed project is to our residential area. Mission Street does not provide enough separation between a 400+ foot tower and 40 foot residential apartments. At a project information meeting I was told that the tower would not be located further north on the project site because of the wind impact, however no alternative location of the tower was considered. Could it have been further north and then set back on the parcel to the east?

LU-1
cont.
I-Rhine.1
(cont.)



Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative land use impact.
LTS None required. NA

EIR states, "...project site would add approximately 7,510 new residents within 3,237 new dwelling units. Overall, these approved and proposed projects, when combined with the proposed project, would add 8,904 new residents in the project vicinity, which would represent a residential population increase of approximately 29 percent."

EIR states, "Accordingly, parking impacts can no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. Although not required, the EIR presents a parking demand analysis for informational purposes. The EIR also considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis."

Comment:

Evidently impacts related to parking are no longer analyzed. With the exception of the LMN RED area, there is limited street parking in the project vicinity. The project as well as the future hub residential development provides limited onsite residential parking. The EIR merely assumes future tenants will not own cars because parking will not be provided. There is no assurance this will be case, and if future residents own cars without project provided parking they will be "hunting" for parking spaces in our neighborhood area, circling endlessly in that quest. The LMN RED has weekday residential parking controls, but not for weekends. Residents and businesses in the LMN RED use their cars and trucks for work seven days a week, they rely on street parking. Residential parking controls need to be extended to seven days per week and strictly enforced so residents, particularly renters, businesses and their customers, can continue to have access to street parking. Also, this area is occupied by residents who work in blue collar trades and have trucks which they use for work. These workers do not have off street parking and any increase demand for off street parking will just add to an already tenuous situation with regards to these small business trades people. With the future cumulative Hub development this represents a real impact to the residents and small businesses in the LMN RED. Finally, related to increased traffic due to people seeking parking in our neighborhood, there is no analysis of the air pollution and noise impacts within the LMN RED District boundary.

TR-10
I-Rhine.2

Thank you for your review and consideration.

Sincerely,

Robert Rhine

1025 Minna Street, Apt 5
San Francisco, Ca. 94103

cc:

San Francisco Planning Commission

Commission President Fong
Commission Vice-President Richards
Commissioner Hillis
Commissioner Johnson
Commissioner Koppel
Commissioner Melgar
Commissioner Moore
Jonas P. Ionin, Commission Secretary

Chelsea E. Fordham, Environmental Planner, San Francisco Planning Department

ATTACHMENT B DRAFT EIR HEARING TRANSCRIPT

TABLE B-1 PUBLIC HEARING COMMENTS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Moore	Kathrin Moore, San Francisco Planning Commission	Hearing Transcript, December 15, 2016	1	CR-3: Historical Photographs of 1500 Mission Street Building
			2	CR-4: Remnant Streetcar Tracks on 11th Street

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BEFORE THE
SAN FRANCISCO PLANNING COMMISSION

1500 MISSION STREET PROJECT

HEARING ON

DRAFT ENVIRONMENTAL IMPACT REPORT
AND INTENT TO INITIATE GENERAL PLAN AMENDMENTS
AND INTENT TO INITIATE
PLANNING CODE TEXT AND ZONING MAP AMENDMENTS

Thursday, December 15, 2016
San Francisco City Hall
One Dr. Carlton B. Goodlett Place
Commission Chambers, Room 400
San Francisco, California

Item No: 6
Case No.: 2014-00362ENV

Reported By: Deborah Fuqua, CSR #12948

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APPEARANCES:

San Francisco Planning Commission:

- President Rodney Fong
- Commissioner Kathrin Moore
- Commissioner Joel Koppel
- Commissioner Christine Johnson
- Commissioner Myrna Melgar
- Commissioner Dennis Richards

- Commission Secretary Jonas Ionin
- Planning Staff Director John Rahaim

Planning Staff:

- Chelsea Fordham
- Tina Chang
- Dan Sider

PUBLIC COMMENT

(No comments offered from the public)

---o0o---

1 Thursday, December 15, 2016 10:25 a.m.

2 --o0o--

3 P R O C E E D I N G S

4 SECRETARY IONIN: Very good, Commissioners.
5 That will place us on our regular Calendar Item 6.

6 For Case No. 2014-000362ENV, at 1500 Mission
7 Street, this is the Draft Environmental Impact Report.

8 CHELSEA FORDHAM: Good morning, President Fong
9 and Members of the Commission. I am Chelsea Fordham,
10 Planning Department Staff.

11 The item before you is review and comment on
12 the 1500 Mission Street Draft Environmental Impact
13 Report, or EIR, pursuant to the California
14 Environmental Quality Act, or CEQA, and San Francisco's
15 local procedure for implementing CEQA. The item before
16 you is the public hearing to receive comments on the
17 Draft Environmental Impact Report or Draft EIR for the
18 1500 Mission Street project.

19 I am joined here today by my colleagues, Wade
20 Wietgreffe, Senior Environmental Planner, Tina Tam with
21 Preservation staff and members of the consult team and
22 project sponsor team are also present today.

23 The project site is located at 1500 Mission
24 Street, which is located on the north side of Mission
25 with South Van Ness Avenue to the West, 11th Street to

1 the east and within the South of Market neighborhood of
2 San Francisco.

3 This site is currently developed in two
4 buildings, including the existing retail building at
5 1580 Mission and a warehouse building at 1500 Mission.
6 The proposed project includes demolition of an existing
7 retail building at 1580 and partial demolition and
8 partial retention of the existing warehouse at 1500
9 Mission Street and construction of a mixed-use
10 development with two project components: one, an
11 approximately 400-foot-tall tower of residential and
12 retail uses at the corner of South Van Ness and Mission
13 and an approximately 250-foot tall office and permit
14 center building for the City and County of
15 San Francisco between 11th Street on -- between -- on
16 11th between Market and Mission.

17 In sum, the two components would result in a
18 total of 560 dwelling units, about 38,000 gross square
19 feet of commercial space, and 567,000 square feet of
20 office and childcare space. Also included would be
21 off-street parking for 420 vehicles, 530 bicycles, and
22 58,000 gross square feet of public and common open
23 space.

24 The Draft EIR concluded that the proposed
25 project would result in two significant and unavoidable

1 impacts including a project-specific impact to historic
2 architectural resources and a cumulative impact related
3 to transportation and circulation.

4 The Draft EIR found that other impacts to
5 archeological and tribal cultural resources, air
6 quality, transportation and circulation, noise,
7 inadvertent discovery of paleontological resources and
8 hazardous materials could be mitigated to a less than
9 significant level.

10 A hearing to receive the Historic Preservation
11 Commission's comments on the Draft EIR was held last
12 week on December 7th. I have provided you with a copy
13 of the HPC's comment letter. At the hearing the HPC
14 agreed that the DEIR analyzed an appropriate range of
15 preservation alternatives to address the historic
16 resource impact. Further, the HPC commented that they
17 appreciated that the preservation alternatives not only
18 avoided some or all of the identified significant
19 impacts but also met or partially met the project
20 objectives.

21 Further comments in regards to the project and
22 the project approvals. Today, comments should be
23 directed towards the adequacy and accuracy of the
24 information gained in the Draft EIR. Comments on the
25 merits of the project will be heard following this

1 hearing during the public comment period on the next
2 agenda item.

3 For members over the public who wish to speak
4 on the Draft EIR, please state your name for the
5 record.

6 Staff is not here to answer comments today.
7 Comments will be transcribed and responded to in
8 writing in the comments and responses document. We
9 will respond to all verbal and written comments
10 received and make revisions to the Draft EIR as
11 appropriate.

12 Those who are interested in commenting on the
13 Draft EIR in writing by mail or e-mail may submit their
14 comments to the environmental review officer at 1650
15 Mission, Suite 400, San Francisco by 5:00 p.m. on
16 January 4th, 2017.

17 After the comment period ends on January 4th,
18 the Planning Department will prepare a comments and
19 responses document which will contain our responses to
20 all relevant comments on the Draft EIR heard today and
21 sent in writing to the Planning Department.

22 We anticipate publication of the comments and
23 responses document early spring of next year followed
24 by an EIR certification hearing, also early spring of
25 2017.

1 And unless the Commissioners have questions, I
2 would respectfully suggest that the public hearing on
3 this item be opened.

4 SECRETARY IONIN: I have no speaker cards.

5 PRESIDENT FONG: Okay. Opening up to public
6 comments.

7 (No response)

8 PRESIDENT FONG: Not seeing any, public
9 comment's closed.

10 Commissioner Moore?

11 COMMISSIONER MOORE: Yes. I'd like to ask
12 that in the historic preservation discussion of the
13 1500 Mission building that you include historic photos
14 of the building that when it comes to the Final EIR
15 will make it easier for people who are interested to
16 comment to see what it was like. The building has
17 slightly been altered overtime and there would be an
18 emphasis on those elements that will be particularly
19 integrated.

20 We all have seen the first discussion on the
21 building which does a very nice job of recognizing the
22 importance of the building, but further elaboration on
23 the background, historic photos would be very helpful,
24 including where the main entrances were so we have a
25 really better appreciation of what is included.

A-CPC-
Moore-1

CR-3

1 The second thing I would like to ask, and I
2 think it falls under Historic Preservation, the issue
3 of a street car spur, which is basically the T Line --
4 no, the J, the J Line has a push-back onto 11th Street,
5 which is a very interesting phenomenon.

6 I took a picture of it one day when I was
7 walking down the street. And as I was coming up from
8 Mission, there was an old street car standing on 11th
9 Street. That was such an incredible complement for
10 celebrating the new civic office presence on
11 11th Street that I would like to see that the historic
12 spurs better explained in the EIR, together that the
13 streetcape plan for 11th Street figures out on how we
14 can have a historic marker about this phenomenon and
15 potentially even a place where tourists can stop and
16 experience the street car just as you experience the
17 turnaround on Powell, the cable car on Powell Street.

18 It's a great experience because normally you
19 see that thing that's moving up and down Market Street
20 you can really never touch or feel it. And when I saw
21 it, I was so surprised, that I thought it would be a
22 real great innovation and invitation for also certain
23 retail -- to have a little restaurant which focused on
24 the thing. I don't -- I cannot ask that there be a
25 stop where you can jump onto it, but that would be

A-CPC-
Moore-2

CR-4



1 obviously a great idea. I don't think it's quite set
2 up that way. But for it to be standing there was just
3 amazing to me.

4 So that's on there and they have basically
5 congestion, they pulled that spur that puts a car on
6 that spur. And I'd like you to explain that a little
7 bit more in the EIR.

8 Otherwise, I am comfortable with where you are
9 going. I think it's thorough and covers all those
10 things that I, from my perspective, need to know about.
11 Thank you.

12 SECRETARY IONIN: If there's nothing further
13 Commissioners, we can move on.

14 (Whereupon, the proceedings concluded
15 at 10:33 a.m.)

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A-CPC-
Moore-1
cont'd.

CR-4
cont'd.

1 STATE OF CALIFORNIA)
2 COUNTY OF MARIN) ss.

3 I, DEBORAH FUQUA, a Certified Shorthand
4 Reporter of the State of California, do hereby certify
5 that the foregoing proceedings were reported by me, a
6 disinterested person, and thereafter transcribed under
7 my direction into typewriting and is a true and correct
8 transcription of said proceedings.

9 I further certify that I am not of counsel or
10 attorney for either or any of the parties in the
11 foregoing proceeding and caption named, nor in any way
12 interested in the outcome of the cause named in said
13 caption.

14 Dated the 5th day of January, 2017.

15 

16 DEBORAH FUQUA

17 CSR NO. 12948

18
19
20
21
22
23
24
25

BOS-11, OPAGE

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov



March 6, 2017

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

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2017 MAR -9 PM 4:29
BY [Signature]

RE: National Register of Historic Places Nomination for Henry Geilfuss House

Dear Board of Supervisors:

Pursuant to Federal Regulations 36 CFR Part 60.6(c) I am notifying you that the State Historical Resources Commission (SHRC) at its next meeting intends to consider and take action on the nomination of the above-named property to the National Register of Historic Places (National Register). Details on that meeting are on the enclosed notice. The National Register is the federal government's official list of historic buildings and other cultural resources worthy of preservation. Listing in the National Register provides recognition and assists in preserving California's cultural heritage. If the item is removed from the scheduled agenda, you will be notified by mail.

Local government comments regarding the National Register eligibility of this property are welcomed. Letters should be sent to California State Parks, Attn: Office of Historic Preservation, Julianne Polanco, State Historic Preservation Officer, 1725 23rd Street, Suite 100, Sacramento, California 95816. So that the SHRC will have adequate time to consider them, it is requested, but not required, that written comments be received by the Office of Historic Preservation fifteen (15) days before the SHRC meeting. Interested parties are encouraged to attend the SHRC meeting and present oral testimony.

As of January 1, 1993, all National Register properties are automatically included in the California Register of Historical Resources (California Register) and afforded consideration in accordance with state and local environmental review procedures.

The federal requirements covering the National Register program are to be found in the National Preservation Act of 1966, as amended, and in Federal Regulations 36 CFR Part 60. State law regarding the California Register is in the Public Resources Code, Section 5024. Should you have questions regarding this nomination, or would like a copy of the nomination, please contact the Registration Unit at (916) 445-7009.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Enclosures: Meeting Notice

(6)

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



MEETING NOTICE

FOR: State Historical Resources Commission Quarterly Meeting

DATE: Friday, May 10, 2017

TIME: 9:00 A.M.

PLACE: Council Chamber
Pasadena City Hall
100 North Garfield Avenue, Room S249
Pasadena, California 91109

This room is accessible to people with disabilities. Questions regarding the meeting should be directed to the Registration Unit (916) 445-7008.

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



PLEASE SEE THE CORRECTED DATE

MEETING NOTICE

FOR: State Historical Resources Commission Quarterly Meeting

DATE: **Wednesday, May 10, 2017**

TIME: 9:00 A.M.

PLACE: Council Chamber
Pasadena City Hall
100 North Garfield Avenue, Room S249
Pasadena, California 91109

This room is accessible to people with disabilities. Questions regarding the meeting should be directed to the Registration Unit (916) 445-7008.

File 161289
BOS-11, BIF
RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

MAR -9 PM 4:57
CU

February 22, 2017

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

Re: Fully Fund the Public Defender's Deportation Defense Unit

Dear Supervisors Cohen, Tang and Yee,

I write to urge you to fully fund the deportation defense unit of the San Francisco Public Defender's Office.

President Trump has stated his intentions to deport up to 3 million immigrants, and as his executive orders have shown, he will be acting on his plan regarding immigration. If even a fraction of his plan is realized, the legal defense response must be efficient and organized. The Public Defender's Office's infrastructure of lawyers, law clerks, social workers, mental health specialists, investigators, and workspace will be critical in quickly providing detained San Franciscans with the high quality legal representation they will need. The office represents more than 20,000 people each year and has unrivaled expertise in working with individuals in detention, including those in civil immigration detention. In addition to criminal defense, the office has also worked in civil law, including its current representation of clients in mental health conservatorship hearings.

Like New York City, the only other place in the nation with a public defender type system for the detained in immigration courts, San Francisco should also take steps to assure that immigrant detainees have access to counsel and due process. The public defender's involvement institutionalizes detention representation for immigrants most in need and will be a great benefit for all San Franciscans in the long-term. Its attorneys specialize in the intersection of criminal and immigration law, one of the most complicated areas of law where access to criminal specialization is paramount. The office's very existence is based on the concept of accepting all cases, no matter how complex.

Finally, the public defender can minimize expenses by handling multiple cases at once, handling more cases per attorney, and attracting seasoned hires with the experience and capacity to handle complex cases immediately.

I fully support the proposal to fund the San Francisco Public Defender's Office to provide detained removal defense to non-citizens facing deportation.

Sincerely,

Michael Koch

Name: MICHAEL KOCH

Position: retired mental health worker

Affiliation, if any: SEIU 1021

Contact information: rojoroto49@gmail.com

3219 23rd st #5
S.F. 94110

(7)

From: Board of Supervisors, (BOS)
To: BOS-Supervisors; Major, Erica (BOS)
Subject: File 170115 FW: Los Angeles' per capita water imports will be less than ours

From: Dave Warner [mailto:dwar11@gmail.com]
Sent: Thursday, March 09, 2017 4:13 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Jue, Tyrone (MYR) <tyrone.jue@sfgov.org>
Subject: Los Angeles' per capita water imports will be less than ours

Dear Board of Supervisors and Mr. Jue

Thank you for the discussion of the Bay Delta Water Quality Control Plan at yesterday's Public Safety and Neighborhood Services Committee meeting, including Supervisors Ronen's and Fewer's thoughtful questions. As mentioned, The Los Angeles Department of Water and Power is projecting a substantial decrease in its water imports (from 85% to 50% of its supply) while our water imports are not (staying in the range of 85%). This means that when Los Angeles achieves its decrease, our per capita water use from imports will be higher than Los Angeles. How can we let this happen? Los Angeles Mayor Eric Garcetti was the leader behind LA DWP's reduction and as you know, he was re-elected by a landslide.

It seems unforgivable that we will have higher per capita water imports than Los Angeles. We should set a water imports reduction goal, which then makes it an easy decision to support the State Water Board's plan for the Tuolumne. As another speaker mentioned, our voters have demonstrated time and again their interest in protecting the Bay Delta.

By the way, to complement the mention of Orange County's hugely successful water recycling program, there's a great article in the Los Angeles Time regarding storm water capture: <http://www.latimes.com/local/lanow/la-me-ln-stormwater-20170308-story.html>

Sincerely,

Dave Warner

(presenter at yesterday's PSNS meeting)

From: Board of Supervisors, (BOS)
To: BOS-Supervisors; Somera, Alisa (BOS)
Subject: File 170160 FW: SPUR Comments on Stationless Bicycle Share Program
Attachments: SPUR - Comments on Stationsless Bikeshare Legislation.pdf

From: Arielle Fleisher [mailto:afleisher@spur.org]
Sent: Tuesday, March 14, 2017 10:30 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: SPUR Comments on Stationless Bicycle Share Program

Good morning,

On behalf of SPUR, please see attached for comments on the Stationless Bikeshare Program legislation.

Thank you,

Arielle

--
Arielle Fleisher
Transportation Policy Associate
SPUR • Ideas + Action for a Better City
415-644-4280
afleisher@spur.org

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SPUR

San Francisco | San Jose | Oakland

March 14, 2017

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, Ca. 94102-4689

Re: Stationless Bicycle Share Program

Dear Board President Breed, and Supervisors Fewer, Farrell, Peskin, Tang, Kim, Yee, Sheehy, Ronen, Cohen and Safai:

SPUR is a member-supported nonprofit organization that promotes good planning and good government in the San Francisco Bay Area through research, education and advocacy. We are writing to express our strong support for the legislation sponsored by Supervisor Peskin to regulate San Francisco's bike-share operators.

SPUR believes that bike-share is an important and necessary part of our city's transportation ecosystem. But we need bike-share that is planned, regulated, and accountable to the city and stakeholders.

Several bike-share startups offering a stationless bikeshare system are seeking to enter San Francisco's bikeshare market. Users of these services would not be required to leave their bike at a docking station. Consequently, the bikes could collect anywhere in the public realm that prior users choose to leave them—including sidewalks, streets, parks, Muni stops, BART stations, or public entryways. There is a real concern of bikes littering public spaces and becoming an eyesore on our streets.

A robust, integrated and technologically advanced bike-share system is fundamental to San Francisco's transportation future. Achieving this goal will require regulation and working in partnership with the city so that we don't end up with unintended negative consequences that ultimately could undermine the very important goal of expanding bike-share.

The City needs to take proactive measures to ensure that all bikeshare operators abide by a standard set of rules and principles consistent with the larger mobility goals of the Bay Area. We are encouraged by the collaborative process undertaken by Motivate. They have worked



SPUR

San Francisco | San Jose | Oakland

with stakeholders to ensure an equitable bike share infrastructure that protects the safety of riders and promotes ridership.

We believe the legislation is consistent with these aims and we are ready to support additional measures to protect the future of urban mobility.

Sincerely,

Ratna Amin

SPUR Transportation Policy Director

From: Board of Supervisors, (BOS)
To: BOS-Supervisors; BOS-Legislative Aides; Wong, Linda (BOS); Evans, Derek
Subject: FW: my loose ends for March 10, 2017

From: Dennis Hong [mailto:dennisj.gov88@yahoo.com]
Sent: Friday, March 10, 2017 3:45 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: Lee, Mayor (MYR) <mayoredwinlee@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>
Subject: my loose ends for March 10, 2017

Dear Honorable Members of the Board of Supervisors,

Here are a few of my loose ends and ramblings for this week.

1. I'm in full support of the reappointment of Mr. Miguel Bustos as Commissioner to the Community Investment and Infrastructure Commission - item #18-170163 on 3/14/2017 Agenda. Since his last appointment he has proved his value and has earned his pay to both the City and this Commission. I worked with Miguel in the early 1990's when together we did a national project for the White House, called "Netday96". Bridging the Digital Divide - Nationally, wiring up the schools to the Internet. Thanks to the White House, Miguel and his leadership it was a very successful and rewarding (volunteer) project. I too would like your support for his reappointment come March 14, 2017.

2. After reviewing all the comments in support of the Pier 29 Project, I agree they are all spot on, so I too support this wonderful project. The Sponsor has done an excellent job in developing and working with the community and the city to this point. This new project would enhance The Embarcadero and make a wonderful pathway/connection between Fisherman's Wharf and the Ferry Building for both visitors and residence alike. It's not blocking anyone's views. Only wished we could add an exterior part of the



pier for fishing. Growing up in North Beach/Chinatown some of us kids used to fish of the end of Pier 25. Honest there was a pier 25, for some reason it no longer shows up any of the the maps. Visitors used to come out and watch us kids using a simple drop line catch fish of the pier.

3. Thanks to all who voted for the recent Housing issue on 3/7/2017 item number 170145. As I recall think there was another item that tagged along with this one and the Planning Department Document 2015-013229CWP a great job here. I believe this too is up for another round of approvals, but again, I would like your approvals here too. Some how, I still think all the correspondence and etc. regarding our Housing needs to be consolidated in to one package. There are still some good points out there, but they seem to be scattered; such as rental, senior, family, BMR units and etc. Maybe sort of a MATRIX of all. But its a starting point. Mr. Aaron Goodman (3/02/2017) had submitted an interesting letter and package to you all on this same issue - GAP.

4. Can some one get back to me regarding the issue with construction issues; noise, dust, working hours, pedestrian and vehicle traffic safety. Not only with the Rincon Hill project? It these issues just needs to be enforced a bit more.

In closing, as usual if there is anything I can do to support these above issues or clarify what my ramblings meant, I would be happy to hear what any one has to say or comment on and would be happy if you would contact me, even if its to tell me to go fly a kite, that would be ok too.

Best Regards, Dennis

Retired and a Resident of District 7 for 45 plus years.



Office of the Clerk of the Board
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
(415) 554-5184

REC
BOARD OF SUPERVISORS
SAN FRANCISCO
March 7, 2017
2017 MAR -9 PM 4:28
CU

Dear Board of Supervisors,

You recently passed a law to prevent pet stores from selling animals in San Francisco. This is a great first step to protecting consumers and stopping support of puppy and kitty mills.

Each year in the U.S. around 6 million animals in shelters are euthanized because there is simply no place to put them. This doesn't even mean that these are bad or unruly animals, there are just too many of them. This is a national disgrace--I'm hoping that San Francisco will do better.

The City and County of Santa Cruz have a **mandatory spay and neuter law** that is enforced. You may not have or own an unneutered cat or dog.

The City of Santa Cruz Municipal Code reads:

8.16.030 MANDATORY SPAYING/NEUTERING

No person shall own, harbor or keep within the City of Santa Cruz a dog or cat over the age of six months which has not been spayed or neutered unless such person holds an unaltered animal certification for the animal.

The wording is such that breeders (who originally were concerned over the ordinance) agreed because they could still run their businesses. This ordinance has been mostly successful and has cut down on the number of puppies and kittens filling the shelters. However, there are still around 20 animals a day that are left at the shelters. That is a lot of animals being dropped off, yet this law is slowing down the problems and heartbreak of pet overpopulation.

Further, an option to "low cost spaying and neutering" would be to pay people \$20 to have their animals spayed or neutered. There would be a line around the block. The upfront \$20 would be cheaper than housing, feeding, euthanizing, and disposing of that animals off-spring. I will sponsor the first five takers of the program.

There are lots of pets here in Santa Cruz, but you don't see people outside of stores trying to give them away or sell them. The law is enforced. I haven't seen a box of puppies or kittens in years!

We try not to think about what a pile of euthanized animals look like, but it is heart wrenching. If you became a Supervisor because you want to make a real difference in your community, in our world, then this ordinance could slow down the constant deaths occurring in the shelters. These animals need people to speak and act for them.

I have a rescue dog. Cody was physically damaged and slated for euthanasia. She's the best little gal. There are dogs and cats just like her that weren't lucky. Maybe you could change their luck.

Most Sincerely,

Christine Moran
10310 California Drive
Ben Lomond, CA 95005
831-246-4895



BOS-11
CPA SR

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

AGUSTIN HUNEEUS
1010 LOMBARD STREET
SAN FRANCISCO, CA 94109

2017 MAR 14 AM 11:13

37 AB

March 13th, 2017

San Francisco Board of Supervisors
City Hall - 1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, Ca 94102-4689

Ref: Opposes Reservation and Toll on the 1000 Block of Lombard Street

Dear Board of Supervisors,

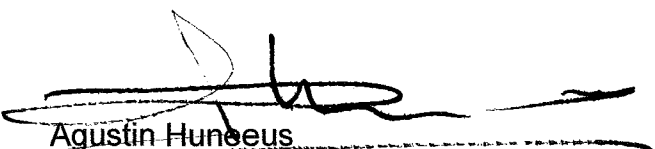
As a long term (33 years) resident of the Lombard 1000 block (crooked), I very much appreciate your positive intervention which has brought us relief in traffic management and help in running the gardens.

Thank you!

With respect to the present discussion of the SFTCA report, we support all recommendations except the imposing a reservation and toll system on the street. I share concern with some of my neighbors that such a system may cause severe inconvenience to access our homes by family, friends, deliveries, use of taxi or other services.

In our desperation to improve this situation, we may relegate those concerns as "details" to be worked out later. We don't consider this a "detail" ...but essential, and don't support this study going any further without having assurance that the project would not go forth until a solution for that is found.

Sincerely,


Agustin Huneeus

(12)

From: Christina Zimbaro <czimbaro@gmail.com>
Sent: Monday, March 13, 2017 12:17 PM
To: BreedStaff, (BOS); Board of Supervisors, (BOS)
Cc: Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Karunaratne, Kanishka (BOS); andrew.heidel@sfcta.org
Subject: Neighborhood response to SFCTA Report, "Lombard Study"
Attachments: SFCTA letter.BOS.2017.docx

Dear San Francisco Board of Supervisors,

Attached is a letter from our neighborhood group, the Lombard Hill Improvement Association, in which we report the results of a poll of our residents with respect to the SFCTA Report: "Lombard Study: Managing Access to the 'Crooked' Street."

Eighty percent of the respondents are in favor of moving forward with the next phase of SFCTA research, to work out the details of various implementation options. We thank the SFCTA for the excellent work they have done so far.

Sincerely,
Greg Brundage (President)
Jim Hickman (Vice-President)
Christina Zimbaro (Secretary)
Ryan Miller (Treasurer)

LOMBARD HILL IMPROVEMENT ASSOCIATION

March 12, 2017

Recipient Name
San Francisco City Hall
1 Dr. Carlton B. Goodlett Pl
San Francisco, CA 94102

Dear Recipient Name,

The Lombard Hill Improvement Association (whose members live on and maintain the gardens of the "Crookedest Street in the World") had a recent meeting to discuss the Final Draft Report by the San Francisco County Transportation Authority (SFCTA) dated February 2017. If members were unable to attend the meeting, they were asked to express their opinions in either email or voicemail messages.

In the *Lombard Study: Managing Access to the "Crooked Street,"* the SFCTA fairly summarizes the challenges and the escalating problems we have seen over recent years. Its recommendations address many of the issues noted in the Report. We commend SFCTA and Andrew Heidel, in particular, for carrying out this important research, and working with the neighborhood to develop viable solutions that would address disparate needs and concerns. At the same time, we all have questions about the details of any final recommended actions.

However, eighty percent (80%) of the LHIA members who responded were in favor of moving forward with the next phase of research, in order to answer those questions. Thus, we strongly encourage the Board of Supervisors to direct the SFCTA to continue its work with the neighborhood to develop details on how the recommendations could be implemented effectively.

Sincerely,

Greg Brundage, President

Jim Hickman, Vice President

Christina Zimbardo, Secretary

Ryan Miller, Treasurer

From: Daniel Kassabian <daniel.kassabian@mail.mcgill.ca>
Sent: Sunday, March 12, 2017 10:08 PM
To: BreedStaff, (BOS); Board of Supervisors, (BOS)
Cc: Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Karunaratne, Kanishka (BOS); andrew.heidel@sfcta.org
Subject: Support For SFCTA's Recommendations the Crooked Street
Attachments: 2017.03.12 [MontTerrAssoc] Ltr re Crooked Street Study Recommendations.pdf

Dear President Breed and Supervisors:

Please see the attached letter in PDF from the Montclair Terrace Association in support of the SFCTA's recommendations for the Crooked Street.

Regards,
Daniel N. Kassabian

MONTCLAIR TERRACE ASSOCIATION

March 12, 2017

London Breed, President
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett, Jr. Place, Room 244
San Francisco, CA 94102
breedstaff@sfgov.org

Angela Calvillo
Office of the Clerk of the Board
1 Dr. Carlton B. Goodlett, Jr. Place, Room 244
San Francisco, CA 94102
board.of.supervisors@sfgov.org

**Re: Support For Recommendations in Lombard Study: Managing Access to the
“Crooked Street” Draft Final Report (February 2017)**

Dear President Breed and Supervisors:

The Montclair Terrace Association, Inc. (#C0734477) is a nonprofit neighborhood association formed in 1975 by the residents of Montclair Terrace to address issues affecting that cul-de-sac, which is off the Crooked Street. We are a mix of working families and empty nesters, including 8 children that now live and play together on Montclair Terrace, as can be seen in this photo of them trick-or-treating on Montclair Terrace and the Crooked Street last year. They love living in the City, and we want to continue to make it our home. We request that the Board of Supervisors support measures that make the City sustainable for families like ours.



We write to support the key recommendations of Lombard Study: Managing Access to the “Crooked Street” Draft Final Report (February 2017) (the “Report”) by the San Francisco County Transportation Authority (SFCTA), specifically: (1) “Reservations and Pricing System for Vehicles” (i.e., a Toll System); and (2) “Improved Enforcement of Existing Regulations” (i.e., Increased Parking Control and Police Officer Presence). While the Report sets forth traffic studies and local polling that show strong support for these recommendations, we write to give further support by everyday examples of the nightmare that the Crooked Street has become due to current ineffective methods of traffic control in the face of ever-growing pedestrian and vehicular traffic, and the crime that has accompanied it.

The toll system has the potential to be a game-changer solution to regulate what has become unbearable traffic every weekend, and to dissuade the miscreant drunk drivers that come to joyride and terrorize the neighborhood after the bars close. The toll system also could potentially fund increased law enforcement throughout Russian Hill and down to North Beach to address the crime, illegal parking, pollution, and littering caused by the popularity of the Crooked Street as a tourist destination. That tourism is driven by San Francisco’s tourist industry and the ever-growing prevalence of social media being populated with photos and videos from smartphone cameras. Make no mistake, one downside of that tourism is that the Crooked Street is now a known hot spot and target area for smartphone and camera robberies—including at gunpoint—and vehicular smash-and-grab burglaries, both of which are felonies. We need resources allocated to protect not only us, but also the tourists that are targeted by criminals.

The vehicular traffic problem is multi-faceted. The Report correctly notes that the volume of vehicles is a large part of the problem. The other problem is aberrant, illegal behavior of unregulated tour operators, and some misbehaving tourists that, unfortunately, now are significant in number given the number of tourists in general that flood the Crooked Street.

As one example, Russian Hill has signs posted throughout that disallow commercial vans and larger vehicles from travelling up the Hill per San Francisco Code section 503(a)(8). As can be seen in this photo, however, commercial vans not only come up the Hill, but also go down the Crooked Street—often stopping midway to allow passengers to get off and walk partway down!



Shockingly, a Montclair resident observed the van in this photo while Parking Control Officers (PCOs) were on duty, and immediately brought the illegality of this van going down the Crooked Street to the attention of the PCO at the top of the Crooked Street, who let that particular van down. The PCO responded that it was not his place to write tickets for that type of moving violation, and refused to radio for police help. Rather than PCO inaction, a toll system with a license-plate camera could curb this illegal conduct by levying a hefty fine for vans captured going down the Crooked Street.

A related issue is the aberrant pedestrian tourist behavior. The most problematic are the tourists that block traffic and endanger themselves by standing in or near the crosswalks at the top and bottom of the Crooked Street to take pictures, instead of actually walking across the roadway.



The above photo shows the crosswalk on the opposite side of Leavenworth, at the base of the Crooked Street. Highlighted in red are people taking pictures while standing in the roadway, and thus blocking traffic in both directions per the yellow arrows. Worse, two of them are facing away from the direction of traffic coming off the Crooked Street!

Another example of poor behavior are tourists constantly stepping into the bricked roadway so that they are photographed right on the Crooked Street, and thus ignoring the posted “No pedestrian” graphical signs. Those tourists on foot now show up by the busload, literally, as



demonstrated by this photo of multiple buses parked at Lombard and Columbus Streets, only three blocks away. The tour buses park illegally at Muni bus stop zones, red zones, or across multiple parking meter spots. Worse, most do not drop-off on Columbus where they park. Instead, they go up Russian Hill—in violation of the San Francisco Code like the commercial vans—and stop in the middle of Hyde Street or another road near the top of the Crooked Street, to drop-off their passengers, causing a traffic jam while they do so. The buses then go downhill, park at Columbus, and wait for their patrons to

trickle down the Hill back to the bus. This abuse of public roadways and public transportation stops is akin to the commuter bus abuse that SFMTA is now addressing. We need PCOs and police that can write parking and moving violation tickets for tour bus violations, thus discouraging the abuse by this burgeoning and unregulated industry.

The combination of the tourists breaking the law and abusing our neighborhood in car and on foot further builds on one another. Tourists driving in cars down the Crooked Street stop and wait for tourists that stand in the roadway or crosswalk for a picture. The drivers do so not as a courtesy, but really as an excuse to extend the time they take to drive down the Crooked Street. The people in those cars often also make videos of their journey in precarious ways. They hold smart phones while halfway out their windows or standing through sunroofs. Many of these cars’ drivers focus on the phones in their own hands instead of the road—dangerous violations of the hands-free cell phone law, California Vehicle Code section 23123.5. Obviously, these tourists in cars want to maximize their time going down and documenting this one block. After all, they usually have spent 1-2 hours in a line going uphill on Lombard Street—fighting other cars trying to cut in that line at intersections between Van Ness and Hyde—while causing pollution as they crawl up that steep roadway. The tango between these pedestrian and driving tourists is not pretty—and more importantly, it comprises hundreds of law violations a day.

The Crooked Street needs a toll system to regulate vehicular traffic flow. The Crooked Street needs more law enforcement to regulate cell phone use in cars and to keep pedestrians off the road and going through crosswalks, thus increasing safety for everyone. The added presence of police officers will have positive secondary effects of reducing the theft of cell phones from tourist’s hands, and reducing smash-and-grabs from cars of tourists who park nearby.

We understand that the SFCTA has recommended the toll system as a mid-term solution, and posits questions on page 9 of the Report as to the system’s operation. As residents, we believe it is worth noting that all these questions can be answered, as follows:

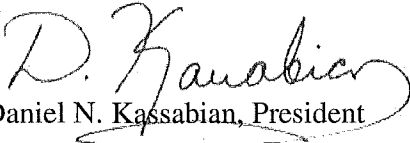
- “What entity, either existing or new, should lead project planning, design, environmental review, and construction of the reservation/toll system?”
 - ANSWER: SFCTA, which not only lead the Study phase, but also heads significant projects like the bus lanes on Van Ness Avenue.
- “What entity, either existing or new, would lead management, operation and maintenance of the system, including monitoring and adjusting pricing policy, once built?”
 - ANSWER: The City can create a transportation district authority, under the SFCTA or SFMTA, to oversee the Crooked Street just like the Golden Gate Bridge Highway and Transportation District handles that bridge’s toll system and transportation projects.
- “What should the reservation and pricing policy be, including who is required to pay, at what times, and at what rate?”
 - ANSWER: Economics should dictate pricing. Just like Uber has surge pricing and the Giants have game pricing based on popularity, demand will dictate the price of this good in a short and fixed supply, and the reservation system can offer a low rate to encourage better planning by those who wish to drive on it. San Francisco residents per their license plate registration could also pay a low, fixed fee. Middle of the night driving—like 10 pm to 6 am—should be priced prohibitively to ensure quiet enjoyment by residents. Residents, their guests, and their vendors should be exempt.
- “How would pedestrian congestion be impacted?”
 - ANSWER: The tolling system will transition visitation from vehicles to pedestrians, but that is a good thing because it reduces pollution and traffic. It also heightens the need for better enforcement and management of tour buses, which could be accomplished with revenues from the tolls. We should not disfavor a good solution to the vehicular traffic problem just because it might marginally contribute to the existing pedestrian problem that requires better enforcement in any event. In sum, pedestrian behavior needs adjustment through enforcement, regardless of its volume.
- “Would people crowd the sidewalks if they are discouraged from using their cars, or would they just shift their automobile visit to a different time?”
 - ANSWER: See answer immediately above.
- “How much would the system cost, including both initial capital investment and ongoing operation and maintenance costs?”
 - ANSWER: The Golden Gate Bridge Highway and Transportation District can share information to answer this question and further enable proper fiscal analysis. That this solution will require some further viable research and effort should not be an impetus.
- “What would the policy be for visitors who don’t have access to credit/debit card or electronic funds transfer accounts?”
 - ANSWER: the Golden Gate Bridge’s toll system, used by millions of people per year including tourists, provides a cashless system model that this toll system can emulate.
- “How would revenue in excess of operational and management costs be used?”
 - ANSWER: To fund police officers under the 10B program and other improvements worth pursuing. Excess revenues beyond that (if any) could be used to pay for the Gardens that everyone comes to visit, and cleaning the street, steps and sidewalks that tourists trash.

March 12, 2017
Page 5

We strongly encourage the Board of Supervisors to adopt the recommendations of a toll system and better enforcement in the Report, and ask that it direct the SFCTA to continue to work with community leaders as to the implementation details of those recommendations.

We also take this opportunity to thank Kanishka Karunaratne and Andrew Heidel for their work on this project. It is through their outreach to the community that the voices of San Franciscans affected by the problems of the Crooked Street—families like us—are being heard.

Best regards,


Daniel N. Kassabian, President

cc: District 1 Supervisor Sandra Lee Fewer (sandra.fewer@sfgov.org)
District 2 Supervisor Mark Farrell (mark.farrell@sfgov.org)
District 3 Supervisor Aaron Peskin (aaron.peskin@sfgov.org)
District 4 Supervisor Katy Tang (katy.tang@sfgov.org)
District 6 Supervisor Jane Kim (jane.kim@sfgov.org)
District 7 Supervisor Norman Yee (norman.yee@sfgov.org)
District 8 Supervisor Jeff Sheehy (jeff.sheehy@sfgov.org)
District 9 Supervisor Hillary Ronen (hillary.ronen@sfgov.org)
District 10 Supervisor Malia Cohen (malia.cohen@sfgov.org)
District 11 Supervisor Ahsha Safai (ahsha.safai@sfgov.org)
District 2 Legislative Aid Kanishka Karunaratne (kanishka.karunaratne@sfgov.org)
SFCTA Project Manager Andrew Heidel (andrew.heidel@sfcta.org)

From: Board of Supervisors, (BOS).
To: BOS-Supervisors
Subject: FW: Day Without a Woman

From: Izzy Hendry [mailto:izzyh10@gmail.com]
Sent: Wednesday, March 08, 2017 8:01 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Day Without a Woman

Dear SF Board,

I'm striking today for the Day Without a Woman, and I wanted to express my thanks to you for passing the Paid Parental Leave act. This is a huge step forward for gender justice and economic justice, and I am so grateful to you for standing up and doing the right thing. Happy International Womens Day!

Best,
Isabella Hendry
(94117)

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Airbnb One Host One Home Policy Update
Attachments: One Host One Home – San Francisco Feb 2017 (1).pdf

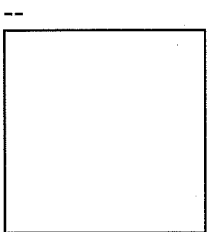
From: Matt Middlebrook [mailto:matt.middlebrook@airbnb.com]
Sent: Saturday, March 11, 2017 3:41 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Airbnb One Host One Home Policy Update

This week we released updated information about the Airbnb community in San Francisco which covers the time period between February 1, 2016 and February 1, 2017, following the implementation of our One Host, One Home policy. As part of our ongoing commitment to work with the City of San Francisco to craft responsible home sharing rules, we will continue to release updated data, as outlined below.

Some key facts include:

- 93.5 percent of Airbnb hosts who share an entire home have only one entire home listing; meanwhile, the balance (~ 6.5 percent of listings) represent accepted exemptions to our One Host, One Home policy (i.e. co-hosts, long-term rentals, traditional bed and breakfasts, licensed hotels, etc.)
- Most hosts share their space occasionally. The median nights booked per listing since February 2016 is 57; the median annual earnings citywide is \$10,900, an economic life preserver for many hosts who are struggling to live in an increasingly expensive city.
- As part of our One Host, One Home policy in San Francisco, we have removed 923 listings that appeared to be shared by hosts with multiple entire unit listings that could impact long term housing availability or did not provide the best possible experience on our platform. The breakdown of removed listings by listing type is as follows:
 - Entire home: 317
 - Private room: 26
 - Shared room: 580
- From February 1, 2016 to February 1, 2017, 88 percent of host earnings in SF have come from guest stays in private and shared spaces, long-term stays lasting at least 30 days, and short-term stays with hosts who have only one entire home listing. The remaining 12 percent of host earnings were driven by listings exempted under the One Host, One Home policy.

Please let me know if you have any questions or would like additional information.



Matt Middlebrook

Public Policy
888 Brannan Street
San Francisco, CA 94103



One Host, One Home: San Francisco (February 2017 Update)

Key Figures About Airbnb's San Francisco Community

On [April 2, 2016](#) we announced our One Host, One Home policy in San Francisco, as part of our broader commitment to promote responsible home sharing, which limits hosts to sharing listings at just one address on our platform in San Francisco. In [November 2016](#), we incorporated this policy into our product, redoubling our efforts to promote responsible home sharing in San Francisco.

Today, we're releasing updated information about the Airbnb community in San Francisco which covers the time period between February 1, 2016 and February 1, 2017, following the implementation of our One Host, One Home policy. As part of our ongoing commitment to work with the City of San Francisco to craft responsible home sharing rules, we will continue to release updated data, as outlined below.

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While we continue to identify and remove listings that do not reflect our vision for our community, we remain committed to working with leaders across the City to further progressive policies that protect public safety and affordable housing, while fostering the economic opportunity of home sharing for SF families, businesses, and communities.

Active Listings as of February 1, 2017

This chart shows the number of listings throughout San Francisco.

Listing Type	Active listings as of Feb 1, 2017
Entire Homes	6,200
Private Rooms/Shared Spaces	4,000
All listings	10,200

Median Nights Booked Per Typical Listing¹ Feb. 1, 2016–Feb. 1, 2017

This chart shows the median number of nights a listing is booked in San Francisco.

Listing Type	Median Nights Booked
Entire Home	47
Private Rooms/Shared Spaces	73
All listings	57

¹ The median nights booked metric presents the median value for all listings that were active on the site as of the beginning of the study period, and had at least one booking during the study period. Presenting the median value for listings which were active as of the start of the study period provides the most representative values for a year's worth of booking activity.



Number of Hosts By Count of Active Entire Home Listings as of February 1, 2017

The vast majority of hosts in San Francisco are sharing just one listing. Under our One Host, One Home policy, hosts are allowed to share more than one entire unit listing on our platform only under the following exemptions:

- Co-hosting, whereas a host manages the listing of a friend or family member while they're traveling;
- Licensed hotels and Bed and Breakfasts;
- Units with a 30+ night minimum requirement;
- And, ADUs, in-law units and basement units that are part of someone's home and are advertised as an "entire home" because they have a separate entrance.

Number of Active Listings Per Host	Number of Entire Home Hosts
1	4,990
2	240
3	40
4	20
5	10
6+	40

Additional Details: Hosts With More Than One Listing

Some hosts offer long-term housing, setting limits that only allow for guest reservation requests of 30 days or more. We continue to monitor listings from hosts with more than one entire home listing and at this point have determined, to the best of our knowledge, that many are appropriate for our community. For example if the listing is part of a primary residence (in-law suites), or if the host is managing someone else's primary residence on their behalf.



Listings as of February 1, 2017	# of active listings	Listings as % of all active entire home listings in SF	Listings as % of total all active listings in SF
Long-term entire home listings (30+ days)	940	15%	9%
All other entire home listings from hosts with more than 1 entire home listing exempted under the One Host, One Home policy	303	5%	3%
Total number of entire home listings managed by hosts with more than 1 entire home listing	1,243	20%	12%

Sources of Airbnb Host Revenue

From February 1, 2016 to February 1, 2017, 88 percent of host earnings in SF have come from guest stays in private and shared spaces, long-term stays lasting at least 30 days, and short-term stays with hosts who have only one entire home listing. Additional income from those hosts with more than one listing comes from listings that appear to be appropriate for our community. For example if the listing is part of a primary residence (such as an inlaw suite), or if the host is managing someone else's primary residence on their behalf.

Source of Host Earnings ²	Percent of Total Revenue, February 1, 2016 - February 1, 2017
Stays in Private Rooms & Shared Spaces	26%
Stays in entire home listings (see below)*	74%
Total	100%

² This table reflects the percentage of revenue from shared space and private rooms. Prior releases only showed the percentage of revenue from entire home listings. In addition, our methodology has shifted to more accurately distinguish hosts with two or more active concurrent listings from hosts who have had more than one listing, but never concurrently.



*Stays in entire home listings	Percent of Total Revenue, February 1, 2016 - February 1, 2017
Short-term, where hosts had only one such listing	52%
Long-term stays of 30 or more days (only at listings that accept long term stays)	7%
Long-term stays of 30 or more days (including stays at listings that accept both short and long term stays)	3%
Other short-term, entire home listing stays with hosts managing more than one such listing at time (see below)**	13%
Total	74%

**Other short-term, entire home listing stays with hosts managing more than one such listing at time	Percent of Total Revenue, February 1, 2016 - February 1, 2017
Hosts with 2 entire homes offered on a short term basis	9%
Hosts with 3 entire homes offered on a short term basis	2%
Hosts with 4 entire homes offered on a short term basis	1%
Hosts with 5 entire homes offered on a short term basis	<1%
Hosts with 6 or more entire homes offered on a short term basis	1%
Total	13%

Additional Background on Airbnb Hosts

According to an annual survey of Airbnb hosts conducted in February 2016:

- 47 percent of Airbnb hosts in San Francisco have incomes of less than \$100,000.
- 81 percent of Airbnb hosts in San Francisco use the money they earn sharing their space to stay in their home.
- 34 percent of Airbnb hosts in San Francisco have unsteady incomes. Many are freelancers, part-time workers, or students.
- Airbnb supports small business entrepreneurs. 13 percent of hosts said they used Airbnb to support themselves while launching a new business.



- 94 percent of our hosts share a property that is their permanent home, according to a surveys of our host community.

Frequently Asked Questions

What does the room type of a listing mean?

When a host creates a listing, a host selects one of three room types for their listing:

- Shared room
- Private room
- Entire home/apartment

When you book a shared room, you share a room and the entire space with other people. When you book a private room, you have a bedroom to yourself, but share some spaces with others. With an entire home/apartment, you have an entire space to yourself.

Is Airbnb taking housing off the market and making housing in San Francisco harder to find and more expensive?

We have heard from thousands of San Franciscans who have told us that Airbnb is the only way they can afford to stay in an expensive city. The approach we have outlined is intended to remove from our platform any entire home listings that are offered by hosts with multiple short-term entire home listings in San Francisco and that may be impacting the availability of housing. This will help prevent the conversion of multiple entire homes into illegal hotels. We want to work to remove entire home listings from our community in San Francisco that might otherwise be on the long-term rental market.

Who are these hosts who are sharing their entire homes?

Some critics wrongly assume entire home listings have been converted into full-time rentals for tourists and are mostly offered by commercial operators and wrongly classify these as “unhosted” listings. In fact, many San Franciscans regularly travel for work or pleasure, and countless hosts share their home on Airbnb when they are away. While they may be out of town, these hosts work before, during and after their guests’ stay to personally connect with their guests and ensure they experience the best of what San Francisco has to offer.

Here are some examples of how some hosts might use Airbnb:

- A contractor who lives in San Francisco, with clients and jobs around the State of California. When she travels for jobs out-of-town, she shares her apartment on Airbnb.



- A family of teachers who often travel in the summer. While they are on vacation, they list their home on Airbnb. The money they earn makes San Francisco more affordable and helps them discover new destinations.
- A young professional who lives and works in San Francisco. He lists his home on Airbnb and takes weekend trips when he gets a booking.
- A family with young children who have an extra bedroom in their home with a separate entrance, often occupied by their visiting grandparents. When the children's grandparents aren't in town, the family shares that extra room on Airbnb and list it as an "entire space" given the separate entrance.

While home sharing isn't new, sharing your home through a platform like Airbnb is. In a dynamic city like San Francisco, more and more people have obligations and plans that require them to travel on regular basis. Airbnb has succeeded in part because we help these families make the most efficient use of their home.

What is an "unwelcome commercial operator" and how do you identify them?

We regularly examine our community and we are alerted to unwelcome commercial activity by examining a series of factors including, but not limited to:

- The number of listings controlled by a host.
- The quality of the listing, as measured by the features and amenities provided by the host.
- Guest reviews and the type of experience the host provides.

We are committed to ensuring Airbnb guests have unique, local experiences and we remove listings offered by commercial operators who fail to provide the kinds of experiences our hosts and guests deserve.

Do your hosts and guests pay hotel taxes in San Francisco?

Yes. Since 2014, we have been collecting and remitting transient occupancy taxes on behalf of our hosts. This approach will not change that at all. In 2016 alone, we collected and remitted 19 million dollars to The City of San Francisco.

3)

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Against setting Comfort Women with the proposed inscription

From: Natsuko Ikeda [mailto:peacefulcommunityforchildren@gmail.com]
Sent: Sunday, March 12, 2017 1:03 AM
To: Lee, Mayor (MYR) <mayoredwinlee@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Against setting Comfort Women with the proposed inscription

Dear Mayor and Supervisors,

I am against setting up "Comfort Women" statue with the proposed inscription in San Francisco.

The inscription doesn't reflect the truth. The following statement is not true and there is no proof of it. Rather there is plenty of evidence that it was totally not true.

I here refer another opinion on Fox News.

President Park should publicly apologize for South Korea's sexual violence in Vietnam

By Norm Coleman

About Mr. Norm Coleman: Republican Norm Coleman represented Minnesota in the U.S. Senate from 2003-2009. During his six years in the Senate, he served on the Foreign Relations Committee as Chair of the Western Hemisphere and ranking member of the Near East subcommittees. Senator Coleman currently serves as a board member of the National Endowment for Democracy, and on the Advisory Council for the U.S. Global Leadership Coalition.

This week's state visit by South Korean President Park Geun-hye presents an opportunity to assess the strength of the alliance between our two countries. At the same time, it presents an obligation to challenge our ally when its behavior does not fully align with American values.

The United States as a country has a strong legacy of embracing mistakes and atoning for them. President Park should embrace this uniquely American value and publicly apologize to the thousands of Vietnamese women who were forcibly raped by troops under her father's command during the Vietnam War.

Forty years ago, Park Chung-hee – the current president's father and a former general, led over 320,000 of his U.S.-allied troops into the War in Vietnam. Throughout the war, South Korean soldiers

violently raped and sexually assaulted thousands of young women, some as young as 13 and 14 years of age. Many of these women bore children as a result of these assaults. Today, between 5,000 and 30,000 children of mixed Korean-Vietnamese ancestry, called the “Lai Dai Han,” live at the margins of Vietnamese society.

When my good friend Senator John McCain recounts the horrors he survived during his captivity in Vietnam, he often talks about the deep emotional and physical scars war leaves on the lives of those impacted by it. What happened to these women, so many of whom lost their innocence at the hands of South Korean soldiers, is one of the great untold tragedies of the Vietnam War.

It’s time to lift the veil of silence and allow those violated women – only 800 of whom are estimated to be alive today – to share their stories.

Since my time as a member of the Senate Foreign Relations Committee, I have always fought and stood up for those who have been victims of systemic violence around the world. These women, the mothers of the Lai Dai Han, deserve to have the world bear witness to their testimonies. After decades of raising their children and grandchildren in the face of tremendous adversity, they deserve to be heard.

As a father, I can only imagine the heartache and pain these poor young women and their families had to endure. We cannot erase the memory of what happened -- but an acknowledgement by the South Korean government of their suffering and an apology for the sexual violence perpetrated by their troops, would be a welcome step in easing the pain.

President Park is one of the most powerful women in the world. Certainly, it is within her power to extend a full and public apology for the crimes committed by her father’s soldiers against so many innocent women. Failing to make such an unequivocal apology would only undermine President Park’s moral authority as she presses Japan to apologize for the sexual violence perpetrated against South Korean “comfort women” during World War II.

Earlier this week, I added my name to a petition started by Nguyen Thi Bach Tuyet on Change.org calling on President Park to apologize to the victims of South Korea’s systemic sexual violence in Vietnam.

Ms. Nguyen has led a tragic life. Both she and her mother were raped and impregnated by South Korean soldiers. After her mother passed away, Ms. Nguyen raised her mother’s son alongside her own family, fled an abusive husband, and started a new life in rural Vietnam. Her life has not been easy, but the decision to apologize to her should be.

On Thursday, I am honored to speak on behalf of Ms. Nguyen and the thousands of women like her during an event hosted by Voices of Vietnam at the National Press Club. This event is the best chance yet to bring the world’s attention to what happened to these women and their families.

It’s time to lift the veil of silence and allow those violated women – only 800 of whom are estimated to be alive today – to share their stories.

The United States has a great history of looking back in history, bearing witness to our mistakes, and atoning for what happened. It is precisely this that has made our country a beacon of hope and freedom around the world.

President Park should take advantage of the opportunity she has been presented to acknowledge the suffering of these innocent women, make a full apology for what happened, and to begin to work to make it right.

This is proposed inscription for Comfort Women.

"This monument bears witness to the suffering of hundreds of thousands of women and girls euphemistically called 'Comfort Women,' who were sexually enslaved by the Japanese Imperial Armed Forces in 13 Asian-Pacific countries from 1931 to 1945. Most of these women died during their wartime captivity," it continues. "This dark history was largely hidden for decades until the 1990s, when the survivors courageously broke their silence."

Best regards,

Peaceful Community for Children

From: 彦山 進 <s-hikoyama@rx.tnc.ne.jp>
Sent: Thursday, March 09, 2017 10:41 PM
To: Board of Supervisors, (BOS)
Cc: Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); BreedStaff, (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS)
Subject: ▽Korea Pusan city Higashi-ku (comfort woman image of Japan territory advance): Conservatist "A comfort woman image and trash are illegal similarly!"-> The police "The street, so you can't meddle."-> Citizen group "It isn't to be permitted!"
Attachments: The trash an opponent left is in the leaving state in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave.①.jpg; The trash an opponent left is in the leaving state in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave.②.jpg; The trash an opponent left is in the leaving state in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave.③.jpg; The trash an opponent left is in the leaving state in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave.④.jpg; The man who leaves trash around the image of a girl (comfort woman image).jpg; On a wall in the subway entrance back in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave, bill①.jpg; On a wall in the subway entrance back in front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave, bill②.jpg; In front of the Japanese Consulate in Pusan city Higashi-ku grass beam cave The man who opposes image of a girl (comfort woman image) establishment.png; The Japanese Consulate in the Korea Pusan city.jpg; Comfort woman image in front of the Japanese Consulate in the Korea Pusan city.jpg; Japanese consulate general back entrance and immediate comfort woman image in Pusan city.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate①The dance against which Pusan comfort woman image is defended.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate②The dance against which Pusan comfort woman image is defended.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate③The dance against which Pusan comfort woman image is defended.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate④.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate⑤.jpg; Performance at a place by the (Korea Pusan city) comfort woman image in front of the Japanese Consulate⑥.jpg; Comfort woman installation site in Korea (present 56 points)①.jpg; Comfort woman installation site in Korea (present 56 points)②.jpg; Comfort woman installation site in Korea (present 56 points)③.jpg; in Mika representation of a Korean volunteer corps problem council①.jpg; in Mika representation of a Korean volunteer corps problem council②.jpg; in Mika representation of a Korean volunteer corps problem council④.jpg; in Mika representation of a Korean volunteer corps problem council⑤.jpg; in Mika representation of a Korean volunteer corps problem council⑥.jpg; in Mika representation of a Korean volunteer corps problem council⑦.jpg; in Mika representation of a Korean volunteer corps problem council⑧Protest activity in France.jpg; Tank M88 in a 2nd infantryman division post in the US.jpg; Athletic shoes of Mr. MISON who was flying to a bush in a site.jpg; The cenotaph made around the dead late site.JPG; 1205-1.jpg; The right side Late shim and Mr. MISON (14 years old) / The left side

Attachments:

Late Shinn and Mr. HYOSUN (14 years old)④The White House.jpg; Demonstration march to discussion government-controlled rice army tank female junior high school student run-over death event (It occurs on June 13, 2002.).jpg; The right side Late shim and Mr. MISON (14 years old) / The left side Late Shinn and Mr. HYOSUN (14 years old)①.jpg; Late shim and Mr. MISON (14 years old).png; Late shim and Mr. MISON (14 years old) / Comfort woman ? ①.jpg; Korea peaceful image of a girl (comfort woman image of Japan ambassador manmaeVienna Convention treaty violation).jpg; Comfort woman image in front of this zai embassy of the Republic of Korea and Japan(Soul music)④.jpg; Comfort woman image in this zai consulate general of the Republic of Korea and Japan (Pusan)②.jpg; San Francisco city comfort woman commemoration image and tombstone (candidate site St. Mary square park) ①.jpg; San Francisco city comfort woman commemoration image and tombstone (candidate site St. Mary square park)②.jpg; The Pusan citizen behavior against which an image of a girl (comfort woman image) is defended is suggesting An image of a girl (comfort woman image), stop a damage act..jpg; Demonstration march of a citizen group the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended①.jpg; Demonstration march of a citizen group the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended②.jpg; Of Sen who protects an image of a girl, chair event of a citizen group the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended (barefoot performance)1.jpg; Of Sen who protects an image of a girl, chair event of a citizen group the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended (barefoot performance)2.jpg; Of Sen who protects an image of a girl, chair event of a citizen group the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended (barefoot performance)3.jpg; bokusanseki (PAKU Sam foot) Pusan city Higashi-ku agency chief..jpg; boku Genjun (PAKU WONSUN), soul music mayor The next presidential candidate.②.jpg; boku Genjun (PAKU WONSUN), soul music mayor The next presidential candidate.①.jpg

Dear Ms. Sharon Page Ritchie, Commission Secretary

I strongly protest against the "Comfort Women" monument in San Francisco.

["Is the surrounding trash leaving of an image of a girl (comfort woman image) neutral?" Korea: Autonomous body and the police "You can't participate."】

●The illegal advertising thing and the dirt from which an image of a girl (comfort woman image) is asking removal around the Japanese Consulate front in Korea Pusan city Higashi-ku "peaceful image of a girl (comfort woman image)" are falling.

The paper on which the sentence to which I say "Love Japan." was written around the image of a girl (comfort woman image) from January, 2017 begins

to be stuck according to Pusan KYOREHANA newspaper (Korea) on March 5, and trash of an extinct family tool collects from first February.

Pusan city Higashi-ku agency of the Korean police force and control is because we assume "You can't participate."

These administrative agencies are giving a reason with the purpose which keeps neutrality and equity.

An image of a girl (comfort woman image) promotion committee builds an image of a girl (comfort woman image) on December 28, 2016 and puts up the banner which notifies the circumference of the effect a lot.

Though this is also illegal, the Korea police and Pusan city Higashi-ku agency are the viewpoint it isn't possible to restrain only the side where I oppose an image of a girl (comfort woman image) where.

The circumference of the image of a girl (comfort woman image) is the landscape which bears a close resemblance to a trash dump by such circumstances.

The members of a citizen group who built an image of a girl (comfort woman image) remove trash, and the "pursuit race" the people who insist on image of a girl removal put trash again follows.

Discord is rising with the side behavior opposite to the image of a girl (comfort woman image) tries to defend an image of a girl (comfort woman image) against which beyond the degree.

Even the fear which develops is raised to a violent situation between both.

●Discord between the citizen concerning installation approval and disapproval of an image of a girl (comfort woman image) exceeds the degree.

Korea Pusan city Higashi-ku and neighborhood of the image of a girl in front of the Japanese Consulate (comfort woman image) are full of the trash the man who insists on move of an image of a girl brought on March 4.

The Kim certain which carries on the activity that an image of a girl (comfort woman image) is defended (68), he visited an image of a girl (comfort woman image).

There wasn't a person who protects an image of a girl (comfort woman image) in night, so I had come to confirm the safety of an image of a girl (comfort woman image).

After that well, a wax fact or 2 males "move an image of a girl (comfort woman image)" around the image of a girl (comfort woman image), after the contents of etc. put a written advertising thing, the extinct family tool loaded onto a car was thrown away and trash of a bunch of the plastic bottle wrapped in vinyl was put on the roadside tree and the street light stickily.

When the man who made "trash dump" again around the image of a girl a citizen cleaned beautifully (comfort woman image) tried to drive a car and get away before a long time, Kim took the vehicle number with a camera of a cellular phone.

Then this man got out of a car and requested elimination of a picture of Kim.

When Kim refused, both men lay ahead before and behind Kim.

The man who insists on removal of an image of a girl (comfort woman image) runs after the citizen who protects for 20 minutes, and an... citizen group says that complaint is considered.

【A citizen group can't reach a consensus with a comfort woman image and an autonomous body in the Korea Taegu city, and is to installation enforcement.】

* A discrepancy of an opinion has occurred to Nanbu of Korea and Taegu (Taegu) wide area city between the citizen group and the local government which promote installation concerning the comfort woman image by which installation is scheduled on February 20, 2017.

Taegu city "a peaceful image of a girl (comfort woman image), construction citizen promotion committee (promotion committee)" and the Taegu city ward held a conference the 3rd time concerning image establishment on the 20th, but the ditch which has formed both wasn't buried, and negotiations broke down

The promotion committee side was conference until last time, and the flow population was insisting on establishment to Tojo (TONSON) street and a square in front of the Taegu department store as the place which symbolizes the history which resisted colonial rule by Japan (48 countries conformed to international law in Merger of Korea:, and approved USA, United Kingdom, France, Russia, Germany and Italy.) much, but one step was conceded on this conference and a place by the relaxation around here was proposed as an installation site of substitution.

But the Taegu city ward side made on the modal road and the footing where an alternative isn't also admitted clear.

When you can't reach a consensus just as it is, non-governmental organization's promotion committee says the policy which enforces image establishment in 31 joins (the holiday and March 1 when Korean independence movement is commemorated).

The store centers of Tojo street as well as Naka-ku, in opposition to installation, when, there is also fear of occurrence of collision.

We assume clearly "It isn't possible to break the law and build an image of a girl (comfort woman image) in Tojo way, when a promotion committee enforced installation, I have no choice but to take over in a procedure and remove." for the Naka-ku person concerned.

* (A comfort woman image in front of Pusan city Japanese Consulate, sometime, Pusan city Higashi-ku side, (for establishment on the sidewalk, as illegality), it was removed, but I met with the strong opposition of a citizen group and was established.

I requested Pusan city Higashi-ku to remove, but Higashi-ku chief said "You remove then!", and after all, a Korean diplomatic department (Ministry of Foreign Affairs) wasn't removed.)

【It's large in scale around the Korean comfort woman image on March 1, demonstration.】

●A group is the policy which asks not to move an image of a girl (comfort woman image) as well as suggests removal and management of an image of the bill stuck on Pusan city Higashi-ku around the image.

About 1000 people are planning to participate in an assembly and the peaceful march which tours around the Japan consulate general is also performed.

Fear of the business interference by which the Korean police force is a foreign country diplomatic mission at first for an assembly, I have that, as it was made prohibited, but a group represented the provisional injunction application which asks cancellation of assembly prohibited notice disposal from Pusan district court to a courthouse.

Pusan district court points out recently "The thing which becomes the assembly which is cross with the assembly which prohibits the holding by which an

assembly, on the law about demonstration and in front of the foreign country diplomatic mission are within 100 meters but peaceful from the assembly performed up to now is expected."

I judged "An assembly day won't be interference of business of the consulate in a holiday, the anxiety which invades the function of the diplomatic engine and peace by violence and large-scale demonstration is low." and permitted holding.

●The Korean citizen group which supports a comfort woman victim of the old Japanese military "Korean volunteer corps problem council" (teitsuikyou) will hold the regular "Wednesday meeting" from which a solution of a comfort woman problem is asked in front of the Japanese Embassy in Seoul on March 1, tomorrow.

Because this assembly falls on the Korean 3 "and" 1 section which resist Japanese colonial rule (Merger of Korea) and commemorate the independence movement which has occurred in 1919, teitsuikyou is expected that about 1000 citizens participate.

Mr. beam, "I tried to march to the diplomatic part (Ministry of Foreign Affairs) in 3 and 1 section, I didn't have leave.", it was regretted.

【3 and the peace march by which a "of Sen who protects an image of a girl (comfort woman image), chair" event goes around the Japanese Consulate after that in Pusan on 1 memorial day!】

* "An image of a girl (comfort woman image), stop a damage act." I'm prompting the Pusan citizen behavior against which an image of a girl (comfort woman image) is defended to stop the illegal sticking act performed around 13 days and the image of a girl (comfort woman image) immediately.

' The Pusan citizen behavior against which an image of a girl (comfort woman image) is defended' holds a meeting by a subject as' chair of Sen who protects an image of a girl (comfort woman image)' before a teihatsu general image in Pusan Japanese Consulate neighborhood in 3 and 1 memorial day.

While a diplomatic department (Ministry of Foreign Affairs) was sending the closed official document of which an image of a girl (comfort woman image) requests move to Pusan city and Higashi-ku agency recently, we assumed clearly for 28 days that Pusan citizen behavior planned this assembly to defend an image of a girl (comfort woman image) again by the power of the citizen.

Pusan citizen behavior distorts and pulls construction spirit around the image of a girl (comfort woman image) from last month, and I'm planning to request next a damage act also removes this in Higashi-ku agency, and to want you to manage an image of a girl (comfort woman image) such as a lowered advertising thing is put up.

A performance and a remark are the event which continues, and the situation which catches eye most is the performance performed by participant all the members.

sanshimono which sat down on 1000 chairs put in the meeting space closely does keeping quiet demonstration for 1 minute while taking off footwear like an image of a girl (comfort woman image) and raising the heel barefoot.

* (Why is the comfort woman image in Korea (Comfort woman image in front of the consulate general of in front of the Japanese Embassy in the soul music city and Pusan city) barefoot? Is the comfort woman image in Glenn Dale city also barefoot? Why aren't shoes worn?)

* (The image of a girl which is planning to be installed in St. Mary park in San Francisco city (comfort woman image) is also a bare foot.

June 13, 2002 : Can this take off girl's shoes by discussion government-controlled rice army tank female junior high school student run-over death event, and may derive from becoming barefooted?)

* Are you explaining that sculptor Kim and UNSON of a comfort woman image manufacturer show that Kim and Mr. and Mrs. SOGYON (Korea) have been abandoned being cool toward "bare foot", and without being understood in an age...?

When Pusan citizen behavior showed the will against which a citizen defends the image of a girl on the verge of removal and a move crisis by keeping quiet demonstration, I spoke.

When an assembly is finished, about 1000 people, the Japanese Consulate, slightly, the peace march which spreads is performed.

We assumed that business interference of a foreign country diplomatic mission and sticking out behavior of sansekimono were anxious, and the Korea police notified of prohibited at first, but a courthouse permitted it, and 3 of Pusan citizen behavior and 1 anniversary assembly were opened.

★A boku headman of a ward visited the "peaceful image of a girl" established in front of the Japanese Consulate in the morning on the same day (comfort woman image) officially for the first time and lowered his head.

"There is nothing the problem of an image of a girl (comfort woman image) of also having my mother and grandmother a possibility can calculate by law" with a boku headman of a ward at this seat, "CCTV to protect an image of a girl gets all disposal.", I spoke.

As far as there is an image of a girl in Higashi-ku, he "can't leave", "The thing which should be done from the angle of the ward office about safety of an image of a girl (comfort woman image) and the environment after today is argued internally.", I spoke.

When the citizen who has that recently needed, a boku headman of a ward "made the will to which he'd like to contribute CCTV" clear, "CCTV which cooperated with an integration control system in Higashi-ku will be installed around the image of a girl (comfort woman image).", I spoke.

"Whether I can cooperate and manage considers the city revival business and the image of a girl performed at the ward at present (comfort woman image)" for a boku headman of a ward, "It's expected that girl's bronze statue becomes the cultural heritage which goes down in history for long like a teihatsu general bronze statue.", I spoke.

★A soul music city council approves a regulation: "construction of a soul music city bronze statue, a monument and a modeling thing and regulation about control criterion" (another name: "A peaceful image of a girl (comfort woman image), defence regulation") to comfort woman image move prevention (2016/9/9).

☆A comfort woman image in front of the soul music city Japanese Embassy and a comfort woman image in front of Pusan city Japanese Consulate violate the Vienna Convention which prohibited "invasion of dignity of a diplomatic mission" (the 22nd 2 item article).

*The peaceful city of San Francisco should not be involved in such issue by erecting memorial of one-sided allegations.

I protest against the "Comfort Women" memorial in San Francisco.

Thank you very much.

Susumu Hikoyama

3-5 Kuniyoshida 6-choume,suruga-ku,shizuoka-city,shizuoka- Prefecture 422-
8004,JAPAN

From: 彦山 進 <s-hikoyama@rx.tnc.ne.jp>
Sent: Thursday, March 09, 2017 10:43 PM
To: Board of Supervisors, (BOS)
Cc: Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); BreedStaff, (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS)
Subject: * It'll be a reference data, so please check it. * ▽Are you a sexual slave in comfort woman's fact-truth? / Diary of the Korean engaged in a consolation place (the diary found in Korea in 2013)
Attachments: Diary of the Korean engaged in a found consolation place in Korea①.jpg; Diary of the Korean engaged in a found consolation place in Korea②.jpg; Diary of the Korean engaged in a found consolation place in Korea③.jpg; Diary of the Korean engaged in a found consolation place in Korea④.jpg; Recruitment advertisement of the comfort woman who appeared on a newspaper of 1944①.jpg; Recruitment advertisement of the comfort woman who appeared on a newspaper of 1944②.jpg; Recruitment advertisement of the comfort woman who appeared on a newspaper of 1944③.gif; The matter about army consolation place funado in the service the trouble unnecessary to private traders, I don't have that, notify.jpg; The notification to private traders by which private traders gather comfort women by a way of a kidnapping imitation and do comfort woman recruitment using a name of an army recklessly.jpg; attachment12.jpg; attachment34.jpg; Comfort woman's payroll sheet.jpg; Consolation place①.jpg; Consolation place②.jpg; Comfort_women_crossing_a_river_following_soldiers.png; Oyaji-lanfu.jpg; comfort%20women%202.jpg; comfort%20women%205.jpg; comfort%20women%206.jpg

Dear Ms. Sharon Page Ritchie, Commission Secretary

I strongly protest against the "Comfort Women" monument in San Francisco. [Diary of the Korean engaged in a consolation place (the diary found in Korea in 2013)]

* the diary of a Korean man who worked in the brothels in Burma/Singapore discovered in 2013 in Korea.

The pictures here are; the diary in the news conference and the news paper article.

The man left Pusan in 1942 with the 4th comfort mission group and returned home (he was not well so he quite his job) in 1944.

This is the first discovery of the diary of a brothel worker in Korea and Japan.

It was discovered by Professor Ann Byonjiku from the Seoul University.

A museum near Seoul purchased at the antique store about ten years ago and Mr. Ann found this diary through his research work.

This is a picture of the Japanese Prisoner of War Interrogation Report No49 which has the interviews/reports from the Korean comfort ladies in Burma.

It was reported in 1942 and the date and place where comfort ladies worked was matching to his diary.

We believe that this diary holds authenticity.

The diary found in Korea:

1 yen is now 3000 yen. 10,000 yen now is 300,000 yen. If you need to know how much in US dollar, 1 yen is \$30 and 10,000 yen is 300,000 dollars.

Jan. 25, 1943

We deposited \$969,000 to the Yokohama Bank, Rangoon branch.

Aug. 10

We attended the brothel inns labor union meeting.

(They had a labor union)

For the member fee, the owner of the brothel paid \$300 and the comfort lady paid \$60 each the total of \$1860.

Aug. 11

Not so many people come to the brothel and our income has dropped significantly.

Aug. 13

The ladies went to see a movie at the railroad army unit.

Aug. 24

Mr. Murayama informed me that he will operate the brothel until September

and will sell it on October.

Sept. 9

Mr. Kinkawa in Pegu signed in to the agreement and sold his Inn today.

Oct. 27

I went to the central bank for the comfort lady and sent \$180,000 to her family in (no country mentioned).

Feb. 1, 1944

We saw off five comfort ladies.

Mar. 3

Two Japanese ladies quit working today.

Apr. 5

Two Japanese ladies bought the boarding tickets for the boat going back to Japan. Kyoigoraku-bu (Korean comfort lady group), Korean lady depart tomorrow too. (to Korea)

Apr. 14

Mr. Nishihara and I went to the branch of the Yokohama Seikin Bank and wired money to two Korean ladies who went back to Korea.

Apr. 15

I am back to Korea to seek (with the advertisement flyers) more comfort ladies.

Apr. 30

Today also had a lot of soldiers that we made more money than yesterday. It was \$77,700 and the best ever.

June 9

No ladies can get cigaret starting this month but for the Kagyoufu (operating

lady or woman in business) can receive 10 cigarets.

June 13

I wired to the lady who went back to Korea but she sent two telegrams telling me that she has not received.

June 13

A lady just got back to Korea already asking money and sent the telegram.

Aug. 31

The Korean lady of the Kyouei Goraku-bu sent me a post card telling me that she safely arrived in Korea.

Oct. 14

I am not feeling well so decided to go back to Korea.

Oct. 25

Mr. Miyamoto and the lady who used be the comfort lady, now waitress here married at Daiichi Shiro Botan. I was invited to the wedding reception tonight.

Oct. 26

I submitted the form for the wiring money for Korean lady who is going home soon.

Oct. 27

I withdrew \$180,000 from her account and wired to her home in Korea.

Nov. 9

I deposited for the comfort ladies at the Yokohama Seikin Bank at the Singapore branch.

Nov. 15

The woman in business (comfort lady) boarded a ship going back to Korea.

Dec. 4

I wired \$300,000 for a lady from Korea.

The diary shows that the comfort ladies had some freedom to see the movie, wired a lots of money to Korea (or Japan), be able to quite working and go home.

The brothel had union and made sure that the ladies got paid in full even after they got home.

This diary was found in Korea and made the news in Korea. As we suspected that the brothel business made a lots of money.

Millions.

- A diary of the Korean man who was doing one clerical employee's salty taste at Burma (present Myanmar) and the Singaporean consolation during the world war the 2nd was found in Korea.

The valuable material from which I learn about the living reality of the comfort woman.

It was born in 1905 and a man has died in 1979.

A Korean museum got a diary in 1922 which chipped one for several years-1957 from an old bookstore.

anchoku (An Byeong-jik) Seoul University honorary professors and others studied for 1943 in the comfort woman age-1944.

There are etc. which goes to logistics headquarters and has turned in a daily report of 5 days "" and description by which "Haruko who has done a conjugal life (marriage) and has gone out of the consolation place (the name of Japan) and Hiroko (the name of Japan) came" to return to Kaneizumi Tate as a comfort woman again by an order of the logistics for a diary.

Participation of an army to the consolation place where Japanese Government is also admitted lines that such shape (the management by which sexually transmitted disease measures are physical check-ups) came.

"A person of Korean Tadashi state which has come with me (Mr. Seiji Arai) is managing a Bunraku puppet show consolation place." and, the case that a Korean was managing a consolation place and, a case that the income (The comfort woman recruitment advertisement indicated on a newspaper of 1944: Comfort woman's salary was 300 yen every month according to material, and sergeant's salary of the Japanese military was 30 yen for 1 month.) fitted a comfort woman is also describing "600 yen a gold zero destination sends to the comfort woman were taken down from a saving, and it was sent at Central Post Office."

"There is a showing of a movie by a railroad unit, and comfort women have checked." I also touch etc. and comfort woman's life.

* The reliability is very high and maybe can it be said that a comfort woman cut off a private prostitute? Saying that it was perfect enslavedness conversely is denied.

【American war intelligence bureau material "psychological warfare team report" (October 1, 1994)】

* The contents I interrogated from the Korean comfort woman 20 people who could catch U.S. forces at Burma (present Myanmar) and MITOKINA (present MICHINA) are being gathered.

The comfort woman's living reality in the consolation place is expected as follows according to that.

"A meal and living articles weren't cut down so much, and she had money in TA much, so it was possible to buy something I want. It was possible to buy clothes, shoes, a cigarette and cosmetics as well as a present from a soldier."

"While I was in Burma (present Myanmar), the thing by which they have a record player in them who enjoyed a sport and participated in a picnic, an entertainment and a dinner party as well as an officer and man and go out to shopping in a town was permitted."

Later, "a comfort woman granted the special rights which decline a visitor" for a report, I'm writing "There were a lot of cases to which a soldier proposes marriage, and there was also a case to marriage actually."

Share Ratio of a consolation place proprietor and a comfort woman was each 50 % about a employment agreement, but average monthly income was 1500 yen. (For the noncommissioned officer's monthly salary of the those days, about 15 yen)

- The US force caught a comfort woman at Burma (present Myanmar) in 1944, and a form from National Archives was a written apparent and real report. (This report, it's read, and, opinion of the American who has that)

They met an advancement of U.S. forces and were running away with the Japanese military.

These comfort women spoiled immediately behind the Japanese military.

The place where it wasn't away but is unable to rest in peace, it was caught by U.S. forces.

After that "hearing of circumstances" was done by U.S. forces i.

The midst of a war in 1944. Since it was concerned with the Japanese military's and U.S.

forces's operating on a self-army profitably during a war, the reason was made propaganda.

Because U.S. forces is the reason which caught the "comfort woman" who was working at a consolation place by these Japanese military, U.S. forces should be able to say "They were demanding prostitution!" "The Japanese military would know how long it's cruel they!"

But U.S. forces didn't do that. Because that will be because I'll lie. U.S. forces should also be because I knew to say that that isn't fact indeed, and be the justice of the U.S. forces.

This report d U.S. forces will report fact and is the translations these women applied, and by which "were employed", and the Japanese military show that compulsion wasn't taken from Korean Peninsula forcibly and are here. They're "You were providing expensiveness." as a consideration of employment.

* More this reports are continued so.

They live comfortably with the large sum of money and come, and it's also possible to buy something for oneself for clothes, cosmetics and other ones, and women have been out to a town. "Sexual slave" but is it cut with such thing?

"Sexual slave" but can such large sum of money be earned? If I cleared off the debts, I was even going home. "Sexual slave" but is it cut with such thing?

Time with the Japanese soldier wasn't enough in the comfort woman, and it wasn't possible to welcome any soldiers, and the person saying "You couldn't serve the soldiers who come and everyone, and it was regrettable." spoiled, too. "Sexual slave" but such, do you think and do?

* More reports continue so.

Comfort women play sports with soldiers of the Japanese military, and I go to a picnic, and they're an entertainment and the one which gives a dinner. "Sexual slave" but whether such thing is done?

【Mr. Kenichi Takagi of a Japanese second Tokyo bar association visited Indonesia, and a notice of the contents which say to local paper "They came from Japan for compensation. A former comfort woman wanted you to appear." was given.】

*It was the fact that I say "When appearing, you can get compensation at 2,000,000 yen from a comfort woman." by this thing and was transmitted.

When saying 2,000,000 yen in Indonesia then, it's equivalent to 200,000,000 yen by Japanese yen and is the frame by which several households can play and live for life.

An applicant rushed of course, and it was a panic.

Very, if people as much as 22,234 people "were a comfort woman victim", introduction was given.

The Japanese soldiers stationed at Indonesia during wartime were 20,000.

This, a Japanese Chukyo television (Nagoya-shi), "Asian women have begun to utter a cry.", it was broadcast.

*On the other hand Jamal on English paper "Indonesian times" and Chairperson Ali saw a program of Chukyo television (Nagoya-shi) and told as follows in Indonesia.

"It's absurd. It's exaggeration. Do you say to 1 soldier that there was 1 comfort woman? Why isn't an Indonesian good place moved? Nothing is useful for friendship of both countries for such program (Chukyo television). We're different from Korea and China of our Japanese Bato make-up, and have history

and pride. "You give money to me." I don't even request the Netherlands where our country was ruled for 360 years etc.."

A Japanese Murayama ministry (June 30, 1994-August 8, 1995)? Distribution of the subscription of "Asian female fund" was being sounded out in Indonesia.

Sueno social minister held a press conference on November 14, 1996, and an answer of an Indonesian government to this announced it as follows.

(1) . An Indonesian government has not requested compensation because of this problem.

(2) . But Japanese Government (Prime Minister Murayama) makes the apology a former comfort woman, and I say that I'd like to pay money, so I receive, but it isn't handed to a former comfort woman individual and it's used for female wellbeing and preservation of health business.

(3) . An indemnification problem with Japan has concluded by an agreement in 1958.

【Common name Japan-ROK Basic Relations Treaty】

*The treaty tied to (in 1965) June 22, 1965 between Japan and South Korea.

Establishment of diplomatic relations of Japan and the Republic of Korea, Japanese economic assistance at about 1,100,000,000 dollars to Korea, perfection of a right of claim between the both countries and last solution.

Related normalization based on those was decided.

The validity of the merger of Japan and the Republic of Korea was postponed actually with an expression of "already, invalidity".

Takeshima of Japan (Korea great Tok-do) shelved a problem as a dispute settlement matter.

* *The peaceful city of San Francisco should not be involved in such issue by erecting memorial of one-sided allegations.

I believe the monument will divide your multi-cultural good communities. And also it will drive a wedge among US, South Korea, and Japan alliance, and that will only make Communist China and North Korea happy.

Thank you very much.

Susumu Hikoyama

3-5 Kuniyoshida 6-choume,suruga-ku,shizuoka-city,shizuoka- Prefecture 422-8004,JAPAN

James J. Ludwig
66 Montclair Terrace
San Francisco, CA 94109

BOS-11 1 CPAGL

March 7, 2017

Mr. Jeffrey M. Johnson
Publisher & CEO
San Francisco Chronicle
901 Mission Street
San Francisco, CA 94103

Re: The *San Francisco Chronicle's* article, "Traffic Pulls Ahead"

Dear Mr. Johnson,

As a former 25 year President of the San Francisco Municipal Railway Corporation which saved the Cable Car, a former 25 year President of the Uptown Parking Corporation, (Sutter Stockton and Union Square Garages-which saved the Union Square shopping area, former Vice-President of SPUR, and a daily car driver in San Francisco and the Peninsula, let me respond to your article with a few suggestions:

1. Make 6th Street one-way south from Market Street onto 280.
2. Make 5th Street one-way north from Brannan Street to Market Street.
3. Make Brannan Street one-way East so traffic leaving 280, can turn right on Brannan Street and then left on 5th Street to Market Street and downtown.
4. Make Bryant Street one-way west to balance Brannan Street.
5. Reduce the number of bicycle lanes as they are lightly used and they eliminate car lanes and slow automobile traffic.
6. Build a "Southern Crossing" between San Francisco and the East Bay. This was planned years ago but not acted upon. This would speed traffic between San Francisco and the East Bay.

Regards,

James J. Ludwig

cc: Mayor, Ed Lee
Board of Supervisors ✓
Edward Reiskin, Director of the SFMTA
SPUR-San Francisco Planning and Urban Renewal Board

2017 MAR 13 PM 3:51
BOARD OF SUPERVISORS
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