



# Community Plan Evaluation Appeal

## 344 14th Street

**DATE:** September 30, 2018  
**TO:** Angela Calvillo, Clerk of the Board of Supervisors  
**FROM:** Lisa Gibson, Environmental Review Officer – (415) 575-9032  
Sherie George, Senior Planner – (415) 575-9039  
**RE:** Board File Number 190890, Planning Department Case No. 2014.0948ENV  
Appeal of Community Plan Evaluation for the 344 14th Street Project  
**HEARING DATE:** October 8, 2019  
**ATTACHMENT(S):** A – San Francisco Planning Department, Summary of Geotechnical Analyses prepared for the 344 14th Street Project, September 30, 2019  
B – Fehr & Peers, *Eastern Neighborhoods / Mission District Transportation and Demographic Trends*, January 12, 2017 and *Updated Eastern Neighborhood Traffic Counts*, April 17, 2017  
C – Fehr & Peers, *2918 Mission Analysis Memorandum*, June 4, 2018

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**PROJECT SPONSOR:** John Kevlin, Reuben, Junius & Rose, on behalf of MM Stevenson, LLC, (415) 567-9000  
**APPELLANT(S):** Larisa Pedroncelli and Kelly Hill, on behalf of Our Mission No Eviction, (415) 317-0832

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### INTRODUCTION

This memorandum and the attached documents are a response to the letter of appeal to the board of supervisors (the board) regarding the Planning Department's (the department) issuance of a community plan evaluation (CPE) under the Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report in compliance with the California Environmental Quality Act (CEQA determination) for the proposed 344 14th Street project.

As described below, the CPE conforms to the requirements of CEQA for a community plan evaluation pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183; the appellant has not demonstrated otherwise. Accordingly, based upon its review of the information presented by the appellant, the planning department recommends that the board of supervisors uphold the department's determination for the CPE and reject the appeal.

The department, pursuant to CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, determined that the project is consistent with the development density established by zoning, community plan, and general plan policies in the Eastern Neighborhoods Rezoning and Area Plans for the project site, for which a programmatic EIR (PEIR) was certified, and issued the CPE for the

project on May 30, 2019. Under the circumstances, CEQA limits the city's review to consideration of environmental effects that:

1. Are peculiar to the project or its parcel;
2. Were not analyzed as significant effects in the PEIR, with which the project is consistent;
3. Are potentially significant off-site or cumulative impacts that were not discussed in the PEIR; or
4. Are previously identified significant effects which, as the result of substantial new information that was not known at the time the Eastern Neighborhoods PEIR was certified, are determined to have a more severe adverse impact than was discussed in the PEIR.

If an impact is not peculiar to the project, has been addressed as a significant impact in the PEIR, or can be substantially mitigated by imposition of uniformly applied development policies or standards, then CEQA provides that an additional EIR need not be prepared for the project.

Accordingly, the department conducted project-specific analysis to evaluate whether the project would result in new significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the PEIR. Based on this analysis, the department determined that the project is exempt from further environmental review beyond what was conducted in the CPE initial study and the Eastern Neighborhoods PEIR in accordance with CEQA section 21083.3 and CEQA Guidelines section 15183. This analysis is presented in the project-specific CPE initial study and is supported by substantial evidence in the record. In summary, the CPE initial study found that the proposed project would result in significant impacts to archeological resources and construction noise and air quality. These significant impacts were found to be less than significant with application of mitigation measures identified in the Eastern Neighborhoods PEIR. All other environmental impacts from the project were found to be less than significant.

The decision before the board is whether to uphold the planning department's determination that the project is not subject to further environmental review beyond that conducted in the CPE initial study and the PEIR pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183 and deny the appeal, or to overturn the department's CPE determination for the project and return the CPE to the department for additional environmental review. The board's decision must be based on substantial evidence in the record. (See CEQA Guidelines section 15183(b) and (c).)

## **SITE DESCRIPTION AND EXISTING USE**

The project site consists of a surface parking lot located on the block bounded by 14th Street to the south, Stevenson Street to the west, Duboce Avenue to the north and Woodward Street to the east in San Francisco's Mission neighborhood. The lot is a 15,664-square foot (sf) lot that occupies the entire 14th Street frontage of the subject block and also has frontages on Stevenson and Woodward streets. Immediately adjacent to the east of the project site are five three- and four-story residential buildings fronting Woodward Street (constructed between 1907 and 1912 and ranging in height from 35 feet to 40 feet tall), and immediately north of the project is a surface parking lot fronting Stevenson Street. At the northwest intersection of Stevenson and 14th streets, which is across the street to the west of the project site, is a 55-foot tall, five-story mixed-use residential building that contains 36 units with commercial uses at the

ground floor (constructed in 2012). The Annunciation Greek Orthodox Cathedral backs onto Stevenson Street across from the project site, and the San Francisco Armory is located across 14th Street from the project site.

The project site is served by transit lines (Muni lines 14, 14R, 22, 33, 49, 55 and streetcar and light rail lines F, J, KT, L, M and N) and bicycle facilities (there is a bike lane on 14th Street). Zoning districts in the vicinity of the project site include UMU (Urban Mixed-Use), PDR-1-G (Production, Distribution and Repair, General), RM-1 (Residential-Mixed, Low Density), NCT-3 (Moderate Scale Neighborhood Commercial Transit District), Valencia Street NCT (Valencia Street Neighborhood Commercial Transit), and Mission Street NCT (Mission Street Neighborhood Commercial Transit). Height and bulk districts in the project vicinity include 40-X, 50-X, 55-X and 68-X.

## **PROJECT DESCRIPTION**

The proposed project includes the construction of a 7-story, 78-foot tall (83 feet tall with elevator penthouse) mixed-use residential building. The building would include 62 residential units, approximately 5,775 sf of ground floor retail space, and 63 class 1 bicycle parking spaces<sup>1</sup>. The proposed project includes no vehicle parking. The mixed-use residential building would include 1,800 sf of residential common open space on the ground floor, 3,210 sf of residential common open space on the seventh floor, and private residential open space on floors five and seven. The project would require waivers, concessions, and/or incentives from the planning code's physical development limitations pursuant to California Government Code section 65915, commonly known as the state density bonus law, including for a building height that is 20 feet above the 58-foot height limit for the project site.

The proposed project would remove both an existing 22-foot curb cut on 14th Street and an existing 18-foot curb cut on Stevenson Street. Construction is estimated to last 18 months and would include 2,320 cubic yards of excavation to a depth of up to 4 feet below grade. There would be no excavation, shoring or construction work for a below-grade foundation within ten feet of the project's interior property lines which abut properties to the north of the project site on Woodward Street (82/84 Woodward Street). The proposed project would include the removal of four trees on the project site and the planting of 21 street trees on Stevenson, Woodward and 14th streets.

## **BACKGROUND**

On December 11, 2015, MM Stevenson, LLC (project sponsor) filed an environmental application with the planning department for a CEQA determination. On May 30, 2019, the department issued a CPE certificate and initial study, based on the following determinations:

1. The proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Rezoning and Area Plans;
2. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Eastern Neighborhoods PEIR;

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<sup>1</sup> Class 1 bicycle parking spaces are secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees.

3. The proposed project would not result in potentially significant off-site or cumulative impacts that were not identified in the Eastern Neighborhoods PEIR;
4. The proposed project would not result in significant effects, which, as a result of substantial new information that was not known at the time the Eastern Neighborhoods PEIR was certified, would be more severe than were already analyzed and disclosed in the PEIR; and
5. The project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant impacts.

The planning commission considered the project on July 25, 2019. On that date, the planning commission adopted the CPE and approved the large project authorization for the project (planning commission resolution No. 20492), which constituted the approval action under Chapter 31 of the San Francisco Administrative Code.

On August 26, 2019, Lisa Pedroncelli and Kelly Hill on behalf of Our Mission No Eviction filed an appeal of the CPE determination.

## **CEQA GUIDELINES**

### **Community Plan Evaluations**

On August 7, 2008, the Planning Commission certified the Eastern Neighborhoods PEIR by Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors. CEQA Guidelines section 15162(c) establishes that, once a project is approved:

“[T]he lead agency’s role in that approval is completed unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any.” [Emphasis added.]

There are currently no discretionary approvals before the board concerning the Eastern Neighborhoods Rezoning and Area Plans.

As discussed in the Introduction above, CEQA section 21083.3 and CEQA Guidelines section 15183 **mandate** that subsequent projects being evaluated under a CPE that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, **shall not** require additional environmental review unless there are project-specific effects that are peculiar to the project or its site and that were not disclosed as significant effects in the prior EIR.

### **Significant Environmental Effects**

CEQA Guidelines section 15064(f) provides that the determination of whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA

Guidelines 15604(f)(5) offers the following guidance: “Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts.”

## **SAN FRANCISCO ADMINISTRATIVE CODE**

Section 31.16(e)(3) of the San Francisco Administrative Code states: “The grounds for appeal of an exemption determination shall be limited to whether the project conforms to the requirements of CEQA for an exemption.”

Administrative code section 31.16(b)(6) provides that, in reviewing an appeal of a CEQA decision, the board of supervisors “shall conduct its own independent review of whether the CEQA decision adequately complies with the requirements of CEQA. The Board shall consider anew all facts, evidence and issues related to the adequacy, accuracy and objectiveness of the CEQA decision, including, but not limited to, the sufficiency of the CEQA decision and the correctness of its conclusions.”

## **PLANNING DEPARTMENT RESPONSES**

The three-page appeal letter of August 26, 2019 contains five bulleted points expressing the general bases for the appeal. The topics of concern raised in the appeal letter are addressed in the responses below. A supplemental department response may be forthcoming to address more detailed concerns raised in the appellant’s Appeal Brief Letter, dated September 27, 2019.

**Response 1: The geotechnical investigation for the project provides accurate information regarding groundwater depth, accounting for drought. Adherence to the geotechnical report recommendations, as required by the state and local building code, together with other city requirements, would avoid significant impacts related to soils (including groundwater) or other geological hazards (including effects on adjacent buildings).**

The appellant contends that the geotechnical report is inadequate because it conducted soil samples during a period of drought. A geotechnical investigation was conducted for the proposed project, consisting of a geotechnical report and a supplemental analyses.<sup>2</sup> The soil investigation measured groundwater at depths ranging from 12 to 21 feet below ground surface.<sup>3</sup> The geotechnical report acknowledges that groundwater levels at the site are expected to fluctuate several feet seasonally with potentially larger fluctuations annually, depending on the amount of rainfall, and noted that the investigation’s measurements were

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<sup>2</sup> Attachment A provides a summary of the geotechnical report and supplemental analyses prepared for the original project and various iterations of the proposed project. The discussion in this response is based on those analyses. Documents cited in this report, unless otherwise noted, are available for review online through the San Francisco Property Information Map, <https://sfplanninggis.org/pim>. Individual files can be viewed by clicking on the Planning Applications link, clicking the “More Details” link under the project’s environmental record number 2014.0948ENV and then clicking on the “Related Documents” link. Case File No. 2014.0948ENV documents are also available for electronic review at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

<sup>3</sup> Two borings were drilled to depths of 61 feet and 51.5 feet below ground surface (bgs), respectively, on December 5, 2015. Laboratory testing results of the soil investigation are available in Appendix B of the Rockridge Geotechnical Investigation.

conducted after several years of severe drought. The geotechnical report carefully considered how the soil conditions would function under different rainfall patterns. Therefore, the geotechnical report considered existing groundwater data in combination with historic groundwater data and, on that basis, recommended the building design not extend more than 8 feet below ground surface to avoid groundwater.

The proposed project includes excavation only to a depth of 4 feet below grade, which is 4 feet above the recommended maximum design depth based on a high groundwater level depth of 8 feet below grade. Thus, it is unlikely that following construction the proposed project would have any effect on groundwater. The report recommends a mat foundation on improved soil or a deep foundation system to address liquefaction hazards.<sup>4</sup> Foundation support on improved soil means installation of either drilled displacement sand cement columns or compaction grouting during construction. Selected ground improvement elements are recommended to extend about five feet into or reach the top of the dense to very dense sand beneath the potentially liquefiable material ranging from about 23 to 28 feet below existing site grades. These ground improvement elements do not require excavations. Whether the project includes a deep foundation system that extends into groundwater or foundation support on improved soil, the building department would review the permit application and project construction documents for compliance with the building code and conformance with the recommendations in the project-specific geotechnical report. This would ensure that adjacent buildings would not be affected. As stated on page 54 of the CPE initial study:

Building code Chapter 18, Soils and Foundations, provides the parameters for geotechnical investigations and structural considerations in the selection, design, and installation of foundation systems to support the loads from the structure above. Section 1803 (Geotechnical Investigations) sets forth the basis and scope of geotechnical investigations conducted. Section 1804 (Excavation, Grading and Fill) specifies considerations for excavation, grading, and fill to protect adjacent structures and to prevent destabilization of slopes due to erosion and/or drainage. In particular, Section 1804.1 (Excavation near foundations) requires that adjacent foundations be protected against a reduction in lateral support as a result of project excavation. This is typically accomplished by underpinning or protecting said adjacent foundations from detrimental lateral or vertical movement, or both. Section 1807 (Foundation Walls, Retaining Walls, and Embedded Posts and Poles) specifies requirements for foundation walls, retaining walls, and embedded posts and poles to ensure stability against overturning, sliding, and excessive pressure, and water lift, including seismic considerations. Sections 1808 through 1810 (Foundations) specify requirements for foundation systems based on the most unfavorable loads specified in Chapter 16, Structural, for the structure's seismic design category in combination with the soil classification at the project site. The building department would review the project plans for conformance with the recommendations in the project-specific geotechnical report during its review of the building permit for the project and may require additional site-specific soils report(s) through the building permit application process, as needed.

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<sup>4</sup> Five cone penetration tests (CPT) were advanced to refusal at a depth ranging from 26 feet to 31.5 feet bgs on December 18, 2015. Laboratory testing results to understand liquefaction potential of the soil encountered are available in Appendix B of the Rockridge Geotechnical Investigation.

In addition, the project is in a seismic hazard zone for liquefaction hazard and is subject to the state Seismic Hazards Mapping Act (the act). Projects located within a seismic hazard zone are required to implement measures identified in project specific geotechnical reports. As stated on CPE initial study p. 54, the Department of Building Inspection would review the project for conformance with the act's requirements during the permit review process. Any measures identified in the geotechnical report and required by the building department would become requirements of the project and are therefore, not mitigation measures, but rather measures required pursuant to the requirements of the act. These measures are part of the project itself.

Furthermore, as described on pp. 57-58 of the CPE initial study, any groundwater encountered during construction would be subject to the requirements of the City's Sewer Use Ordinance and require a permit from the San Francisco Public Utilities Commission (SFPUC). Additionally, any dewatering wells that might be required during construction would be subject to the Soil Boring and Well Regulation Ordinance, requiring a permit from the department of public health. These permit requirements would ensure that groundwater meets specified water quality standards.

The project is required to comply with the state and local building code, which ensures the safety of all new construction in the city. In summary, the review of the building permit application and plans pursuant to requirements of the Seismic Hazards Mapping Act, the building department's implementation of the building code, the building department's administrative bulletins and information sheets, local implementing procedures, and state laws, regulations, and guidelines would ensure that the project would have no significant impacts related to soils (including groundwater) or other geological hazards.

For the above reasons, the CPE's conclusion that the project would not result in individual or cumulative significant effects related to soil, groundwater, or other geological hazards that were not identified in the Eastern Neighborhoods PEIR is based on substantial evidence; the appellant has not proven otherwise.

**Response 2: The geotechnical investigation evaluates ground improvement recommendations and the potential impacts related to flooding. That analysis finds that the proposed project would not affect existing drainage patterns in a way that could increase flooding. The department's analysis is based on substantial evidence; the appellant has not demonstrated otherwise.**

The appellant contends that a diversion or a change in current groundwater drainage patterns as a result of the project's foundation, in combination with drainage diversions taking place as a result of foundations of the 380 Valencia Street and 245 Valencia Street projects, could result in flooding of perimeter areas. The appellant does not substantiate this claim with facts or other evidence. As discussed in detail in Response 1, the proposed project is not likely to have any effect on groundwater. Therefore, the project would not have the potential to affect groundwater drainage patterns to the extent that increased flooding would occur.

The CPE initial study fully addressed concerns related to increased flooding potential. The CPE initial study contains a review of historic flooding issues near the site and evaluates the impact of the proposed project. As stated on CPE initial study p. 58 under Hydrology and Water Quality, the northern area of the

Mission District includes sites that previously contained an historic lake, tidal marsh and slough that were filled to make way for development. The neighborhood topography, together with these historic watersheds, creates recurring flooding issues.<sup>5</sup>

A supplemental analysis for the proposed project was conducted to specifically address potential impacts on the water table and potential flooding in the immediate area.<sup>6</sup> That analysis concluded that the rise in groundwater elevation in the site vicinity as a result of the project would be negligible.<sup>7</sup> Therefore, the project would not negatively impact the adjacent buildings, including increasing the existing flood risk in the perimeter areas.

**Response 3: The proposed project would not result in significant impacts to existing utilities and service systems. The department's determination is based on substantial evidence; the appellant has not demonstrated otherwise.**

The CPE initial study concludes that the project would not result in a peculiar significant individual or cumulative impact with respect to utilities and service systems. The appellant claims that the CEQA findings did not study the capacity of the existing sewer system and that existing pipes have been overloaded during large events at the armory. The CEQA findings are a part of the project approval action, which is not before the Board of Supervisors in this appeal of the CPE determination.<sup>8</sup>

The appellant is incorrect in asserting that the CPE initial study did not evaluate effects of the proposed project on the sewer system. In addition, based on comments received during the Notice of Project Receiving Environmental Review, a separate, project-specific study was prepared specifically to address flooding concerns. This study, Project Impacts on Groundwater (Mission Creek), analyzes the project's potential to effect groundwater drainage patterns and possible effects related to flooding. In accordance with CEQA guidelines section 15125, the environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. Therefore, any concerns regarding the existing sewer system capacity or performance are part of the baseline, existing environmental conditions. As discussed in the CPE initial study Utilities and Service Systems section (pp. 47 to 49), the project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. The Southeast Water Pollution Control Plant provides wastewater and stormwater treatment and management for the east side of the city, including the project site in accordance with the

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<sup>5</sup> San Francisco Planning Department, Mission District Streetscape Plan, October 2010, p. 20.  
[http://www.sf-planning.org/ftp/CDG/docs/missionstreets/MDSP\\_FINAL\\_DRAFT\\_OCT2010.pdf](http://www.sf-planning.org/ftp/CDG/docs/missionstreets/MDSP_FINAL_DRAFT_OCT2010.pdf)

<sup>6</sup> Rockridge Geotechnical, Project Impacts on Groundwater (Mission Creek), December 10, 2018.

<sup>7</sup> The analysis was conducted for a prior version of the project that included a below grade basement level (See Attachment A). The project no longer includes a basement level. Therefore, any possible effects of the project related to groundwater elevations would continue to be negligible.

<sup>8</sup> As a point of clarification, the CEQA findings are not appealable to the Board of Supervisors. Per San Francisco Administrative Code Section 31.16(e)(3), the grounds for appeal of a CEQA exemption determination are limited to whether the project conforms to the requirements of CEQA for an exemption. The CEQA findings are a part of the project approval action, which is not before the Board of Supervisors in this appeal of the CPE determination. The appellant has filed an appeal of the Large Project Authorization approval to the Board of Permit Appeals. The appellants may contest the CEQA findings as part of their appeal to the Board of Permit Appeals. For purposes of this CPE determination appeal, the department is interpreting the appellant's concern as a concern related to the analysis contained in the CPE initial study and not a concern regarding the CEQA findings.



city's National Pollutant Discharge Elimination System Permit.<sup>9</sup> The project site is occupied by an existing surface parking lot and is entirely covered with impervious surfaces.

As described on p. 48 of the CPE initial study under Utilities and Service Systems, the proposed project would not substantially increase the amount of stormwater entering the combined sewer system because the project would not increase impervious surfaces at the project site. In fact, stormwater entering the sewer system is likely to be reduced from existing conditions upon project completion because the project is required to comply with the Stormwater Management Ordinance.<sup>10</sup> This ordinance requires that stormwater generated by the proposed project meet a performance standard that reduces the existing runoff flow rate and volume by 25 percent for a two-year 24-hour design storm. Therefore, the proposed project would not contribute additional stormwater runoff to the city's stormwater infrastructure. Further analysis regarding drainage at the site and the project's tie-in to the City's combined sewer system would be performed when technical construction drawings are developed and certain details such as the location and depth of the sewer are identified. This review would occur as part of the building permit application process.

As described in the CPE initial study p. 48, the project would add 62 residential units and 5,775 sf of retail to the project site. The Southeast Water Pollution Control Plant treats an average of 60 million gallons per day of dry-weather flow, has a current dry-weather design capacity of 85.4 million gallons per day, and has a peak wet-weather capacity of 250 million gallons per day.<sup>11,12</sup> The small increase in demand for dry weather wastewater collection, conveyance, and treatment resulting from the project would not require expansion of existing wastewater facilities or construction of new facilities and would be more than offset by the reduction in wet weather demand through compliance with the stormwater management ordinance.

As noted in the appeal letter and addressed on p. 58 in the CPE initial study, public comments received during the project's notification of project receiving environmental review expressed concern with existing sewer backflows on Woodward Street. The property owner is not responsible for the existing conditions at adjacent properties, including at the SF Armory. However, the property owner is responsible for compliance with and maintenance of all stormwater management controls constructed in accordance with the Stormwater Management Ordinance. The property owner must sign a maintenance agreement to acknowledge and accept this maintenance responsibility. If the property owner fails to adequately implement the approved Stormwater Control Plan, they may be subject to enforcement action.<sup>13</sup> Further, as discussed above and on p. 47 in the CPE initial study, the project would require connections to the existing combined sewer system, which handles both sewage and stormwater runoff.

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<sup>9</sup> San Francisco Public Utilities Commission, Waste Discharge Permits, <https://sfwater.org/index.aspx?page=498>, accessed September 12, 2019.

<sup>10</sup> San Francisco Public Utilities Commission, Stormwater Management Requirements, <https://sfwater.org/index.aspx?page=1000>, accessed September 12, 2019.

<sup>11</sup> San Francisco Bay Regional Water Quality Control Board, Order No. R2-2013-0029 and NPDES No. CA0037664, 2013, [https://www.waterboards.ca.gov/sanfranciscobay/board\\_decisions/adopted\\_orders/2013/R2-2013-0029.pdf](https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2013/R2-2013-0029.pdf), accessed January 23, 2019.

<sup>12</sup> San Francisco Public Utilities Commission, Southeast Treatment Plant, 2018, <http://sfwater.org/index.aspx?page=616>, accessed January 23, 2019.

<sup>13</sup> San Francisco Public Utilities Commission, Stormwater Management Requirements and Design Guidelines (SMR) – Frequently Asked Questions, <https://sfwater.org/Modules/ShowDocument.aspx?documentID=9920>, accessed September 12, 2019.

For the reasons discussed above and in the CPE, the project's compliance with the stormwater management requirements and design guidelines would ensure that any existing sewer backflows are not exacerbated by the project.

In summary, the department's conclusion that the project would not result in a significant individual or cumulative impact with respect to utilities and service systems is based on substantial evidence. The appellant has not demonstrated otherwise.

**Response 4: The CPE sufficiently evaluates potential impacts to historic resources and concludes that the proposed project would not affect adjacent resources. The department's determination is based on substantial evidence; the appellant has not demonstrated otherwise.**

The appellant contends that because the geotechnical evaluation was inadequate, there is potential for the proposed project to undermine the foundations of adjacent historic resources and to cause flooding that could affect adjacent historic resources. This is incorrect.

The project site is adjacent to the Woodward Street Romeo Flats Reconstruction State Historic District, which includes the existing residential buildings on both sides of Woodward Street from 14th Street to Duboce Avenue. The San Francisco Armory, San Francisco landmark 108, is located across 14th Street from the project site. Construction of the proposed project would occur adjacent to buildings located within the Woodward Street Romeo Flats Reconstruction Historic District.<sup>14</sup> As discussed in the project description above, no excavation or shoring would occur within ten feet of the project site's northern property line on Woodward Street (82/84 Woodward Street).<sup>15</sup>

As discussed in Response 1, project construction would not result in a significant geotechnical impact on adjacent buildings. Response 2 addresses project effects related to groundwater and flooding, concluding that the project would not result in a significant impact on adjacent buildings.<sup>16</sup> Response 3 addresses project effects related to utilities and service systems, finding that the project would not result in a significant effect on adjacent buildings.

In addition, as described on pp. 33-35 of the CPE initial study, the department provides an analysis of the potential for adverse impacts to adjacent historical structures due to construction-related vibration.<sup>17</sup> The vibration analysis assesses the type of construction equipment that would be used to excavate and construct the proposed project and the equipment's proximity to neighboring structures. The analysis finds that construction of the proposed project would not result in vibration at levels that could result in damage to adjacent buildings, including historic structures.

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<sup>14</sup> Woodward Street was added to the Landmark Designation Work Program on March 16, 2016.

<sup>15</sup> BAR Architects, Application for Large Project Authorization State Density Bonus Planning Commission Packet, 344 14th Street, San Francisco, CA, May 23, 2019

<sup>16</sup> Concerns regarding impacts the proposed project would have on the groundwater conditions within the site vicinity and, specifically, the effects on the Armory building were addressed by the analysis referenced in Response 2.

<sup>17</sup> Charles M Salter and Associates, 34414th St Construction Vibration Analysis, January 8, 2019.

Furthermore, as stated on page 24 of the CPE initial study, department preservation staff reviewed the proposed project for compatibility with the Woodward Street Romeo Flats Reconstruction Historic District and determined that the proposed project would not result in significant impacts to nearby existing or potential historic resources or historic districts.<sup>18</sup> For these reasons, the department's determination that the project would not result in significant impacts on historic architectural resources is supported by substantial evidence. The appellant has not demonstrated otherwise.

**Response 5: CEQA Guidelines section 15183 mandates that projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review unless there are significant effects peculiar to the project or its site that were not disclosed as significant effects in the prior EIR. The department has conducted a thorough project-specific and cumulative environmental analysis of the proposed project and determined that the project would not result in new or more severe adverse impacts than disclosed in the PEIR. The department's determination is based on substantial evidence; the appellant has not demonstrated otherwise.**

The appellant states that the proposed project does not qualify for a CPE under CEQA Guidelines section 15183 because the approval is based on the 2008 EIR prepared for the Eastern Neighborhoods Area Plan. More specifically, the appellant contends that the EIR can no longer be relied upon to support a CPE in the areas of direct, indirect, and cumulative impacts to: traffic and circulation patterns, land use, and consistency with area plans and policies. The appellant contends that substantial new information affecting environmental analysis has become available regarding these topics.

As discussed in the CEQA Guidelines section above, the Eastern Neighborhoods PEIR need not reexamine the environmental effects disclosed in the PEIR unless a subsequent discretionary approval is required for the plan itself. However, for subsequent projects being evaluated in a CPE, CEQA Guidelines section 15183 requires additional analysis if there is new information presented which was not known at the time of the certification of the PEIR which indicates that the **subsequently proposed project** would result in a new or more severe adverse impact than was discussed in the Eastern Neighborhoods PEIR. The CPE initial study contains a comprehensive project-specific and cumulative analysis for each environmental topic addressed under CEQA. As noted above, the CPE initial study found that the proposed project would result in significant impacts to archeological resources and construction noise and air quality. These significant impacts were found to be less than significant with application of mitigation measures identified in the Eastern Neighborhoods PEIR. All other environmental impacts from the project were found to be less than significant.

The discussion below addresses each of the appellant's concerns regarding perceived new information and provides substantial evidence that the proposed project would not result in a new or more severe impact than previously identified in the Eastern Neighborhoods PEIR or that the project would result in a considerable contribution to any such impact.

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<sup>18</sup> SF Planning Preservation, Memorandum, RE: 344 14th Street/1463 Stevenson Street, July 26, 2017.

*Increase in Automobile Ownership and TNC Use*

The appellant asserts that the influx of high earners in the Mission has resulted in a “substantial increase” in the use of transportation network companies (TNCs), a higher rate of automobile ownership, and “unanticipated increases” in congestion and traffic patterns. The appellant claims that the PEIR did not take these factors into account. However, the appellant does not demonstrate what is significantly different from the circumstances disclosed in the PEIR.

At the time that the Eastern Neighborhoods PEIR was certified in 2008, the department considered increased traffic congestion as measured by the level of service metric to be a physical environmental impact under CEQA. However, as discussed on page 6 in the CPE initial study, automobile delay, as described solely by level of service or similar measures of traffic congestion, is no longer considered a significant impact on the environment under CEQA in accordance with CEQA section 21099 and Planning Commission Resolution 19579. Accordingly, the CPE evaluates whether the proposed project would result in significant impacts on vehicle miles traveled (VMT).

Even though the CPE establishes that the proposed project would not have significant impacts either individually or cumulatively related to increased VMT, the department has conducted additional transportation analysis based on updated local and regional transportation modeling, census data, and traffic counts at intersections in the Mission. This analysis was undertaken as part of the department’s response to CEQA appeals filed for two projects in the Mission District: 2675 Folsom Street (board of supervisors file no. 190890) and 2918-2924 Mission Street (board of supervisors file no. 180019). The additional analysis conducted by the department provides evidence that TNC use, automobile ownership rates, and purported increased reverse commute distances by families that no longer live in the Mission are not causing significant cumulative transportation impacts beyond those anticipated under the Eastern Neighborhoods PEIR. The additional analysis includes a 2016 transportation study and April 2017 traffic counts conducted for 2675 Folsom Street (Attachment B), and 2018 traffic counts conducted for 2918-2914 Mission Street (Attachment C). Based on these studies, observed traffic volumes were generally lower than what would be expected (using the Eastern Neighborhoods PEIR trip generation methodology) compared to the amount of estimated development completed as of the date of the studies (2017 and 2018). This indicates that current traffic volumes are similar to or slightly below PEIR projections. In other words, recent traffic data collected by the department indicates that the Eastern Neighborhoods PEIR overestimated the volume of vehicle trips that would be generated by development that could occur as a result of the Eastern Neighborhoods rezoning. This includes traffic at certain intersections in the Mission District.

The department has recently undergone a revision of its transportation analysis guidelines to, among other things, update project trip generation and mode split assumptions for proposed projects. This revision relies on observational and intercept survey data collected from recently completed projects in the Mission and elsewhere in San Francisco. The data collected to support updated trip generation rates were collected in 2016 and 2017, when TNCs were widely in use, and therefore take into account estimates of the number of for-hire vehicles (taxis/TNCs) from new development. The updated trip generation rate is applied to the proposed project and is discussed on p. 29 of the CPE initial study. As stated there, the proposed project would result in 27 p.m. peak hour vehicle trips, inclusive of TNCs. By comparison, if using the prior trip generation methodology, the project would have been estimated to result in 54 p.m. peak hour vehicle trips.

Given the above, the department's conclusion that the proposed project would not result in new or more severe transportation impacts than already disclosed in the PEIR is supported by substantial evidence; the appellant has not demonstrated otherwise.

Additionally, the appellant incorrectly asserts that the transportation analysis conducted for the proposed project does not address cumulative impacts. As stated on pp. 30-31 of the CPE initial study, the department conducted project-level and cumulative transportation analysis and determined that the project would not result in an individual or cumulative significant transportation impact. As discussed in the CPE initial study, the projected transportation conditions and cumulative effects of project buildout analyzed in the Eastern Neighborhoods PEIR were based on a 2025 horizon year. In 2015, the department updated its cumulative transportation impact analysis for all projects to use a 2040 horizon year. Therefore, the project-specific cumulative transportation impact analysis presented in the CPE to determine whether the proposed project would result in new or substantially more severe significant impacts than previously disclosed is based on updated growth projections through year 2040. The CPE initial study correctly evaluates cumulative transportation impacts from the proposed project; the appellant has not demonstrated otherwise.

#### *Cumulative Impacts on Pedestrian and Bicycle Safety*

The appellant asserts that cumulative development in the vicinity of the project has altered traffic circulation patterns, risking pedestrian and bicycle safety. The Eastern Neighborhoods PEIR found that growth resulting from the zoning changes would not result in significant impacts related to pedestrians and bicyclists. The PEIR states that in general, the analyses of pedestrian and bicycle, loading, emergency access, and construction transportation impacts are specific to individual development projects, and that project-specific analyses would need to be conducted for future development projects under the Eastern Neighborhoods Rezoning and Area Plans.

Accordingly, the department conducted project-level analysis of the pedestrian and bicycle transportation impacts of the proposed project. This project-level analysis is based on existing conditions and considers the cumulative transportation volumes and circulation patterns within the vicinity. Based on this project-specific review, the department determines that the proposed project would not have significant impacts that are peculiar to the project or the project site; the appellant has not demonstrated otherwise.

In addition, the project would make improvements that increase safety for people walking and bicycling. Specifically, the proposed project would remove both an existing 22-foot curb cut on 14th Street and an existing 18-foot curb cut on Stevenson Street. The project would also install a raised crosswalk across Woodward Street where it intersects with 14th Street and re-layout on-street parking to include daylighting (removal of parking at intersections) at the 14th Street/Woodward Street intersection. The project's proposed streetscape plan has been reviewed and approved by the Streetscape Design Advisory Team (SDAT). SDAT is an advisory body composed of members from the planning department, the San Francisco Municipal Transportation Agency, and other city agencies. SDAT's primary charge is ensuring that street and sidewalk changes initiated by projects that trigger Planning Code Section 138.1 are built to the highest possible standards in terms of safety, accessibility, functionality, conviviality, aesthetics, materiality, and maintainability.<sup>19</sup> The project is also subject to the Transportation Sustainability Fee, pursuant to Planning

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<sup>19</sup> San Francisco Planning Department, Street Design Advisory Team (SDAT), <https://sfplanning.org/project/street-design-advisory-team>, accessed September 12, 2019.

Code Section 411A. This fee generates revenue to pay for City transportation improvements, including projects that create safer streets for pedestrians and bicyclists.

*Eastern Neighborhoods PEIR Housing Projections*

The appellant alleges that the department's determination to issue a CPE for the project is invalid because the residential development assumptions upon which the analyses of the PEIR are based are set to exceed the amount that has been constructed, entitled, or in the development pipeline. This is a claim that has been made in previous appeals of the department's CEQA determination for residential projects in the Mission District, including the following projects: 2750 19<sup>th</sup> Street, 901 16th Street/1200 17th Street, 1296 Shotwell Street and 2918 Mission Street. Moreover, that claim was made and expressly rejected by the Superior Court and the First District Court of Appeal in litigation challenging the department's determination regarding 901 16th Street/1200 17th Street. In each case, the board found that the PEIR was, in fact, adequate and that the use of a CPE relying on the Eastern Neighborhoods PEIR was appropriate.

As in the other cases, the appellant portrays the PEIR as outdated because housing production appears to be on track to exceed the housing projections used in the Eastern Neighborhoods PEIR to analyze physical environmental effects of the plan. The appellant provides no evidence of any significant environmental impacts and, as discussed above, significant impacts must be based on substantial evidence in the record. Furthermore, the question to be addressed is whether the proposed project would result in significant environmental effects not disclosed in the PEIR, not whether the PEIR's analysis of environmental effects remain valid.

The growth projections included in the Eastern Neighborhoods PEIR are based upon the best estimates of foreseeable development that could occur under the Plan available at the time the Eastern Neighborhoods PEIR was prepared. The growth projections informed the analysis of some, but not all, of the environmental analyses in the PEIR. For the reasons described below, the proposed project would not result in new significant environmental effects not disclosed in the PEIR.

**1) The CPE prepared for the proposed project does not rely solely on the growth projections considered in the Eastern Neighborhoods PEIR in examining whether the project would have significant impacts that are peculiar to the project or site.**

The project- and site-specific analysis contained in the CPE is based on updated growth projections and related modelling, and updated analysis methodology, to evaluate project-level and cumulative impacts. Each environmental topic contains a project-level and cumulative impact analysis. Specifically, the population and housing topic contains a cumulative analysis that considers all cumulative projects within the department's residential pipeline. In another example, the CPE initial study cumulative transportation analysis is based on a 2040 horizon year; in other words, it uses an updated cumulative growth projection. San Francisco 2040 cumulative conditions were projected using the San Francisco County Transportation Authority's ("Transportation Authority") San Francisco Activity Model Process ("SF-CHAMP") and includes residential and job growth estimates and reasonably foreseeable transportation investments through 2040.

**2) The appellant has not provided evidence that significant physical environmental impacts not already disclosed in the Eastern Neighborhoods PEIR would occur, much less that the project would have a considerable contribution to an undisclosed significant environmental impact.**

The appellant provides no information about how the claim of residential growth exceeding the PEIR projections has or would result in direct, indirect, and/or cumulative environmental impacts

not already disclosed in the PEIR. Further, the appellant has provided no evidence that the 344 14th Street project, with its 62 dwelling units and 5,755 sf of retail, would have a considerable contribution to a significant cumulative environmental impact not disclosed in the PEIR. The appellant must demonstrate the absence of substantial evidence supporting the Planning department's analysis and has not done so.

*Disproportionate Construction of Market Rate Units*

The appellant states that the City has exceeded its 2015-2022 Regional Housing Needs Allocation (RHNA) for above-moderate income housing and that the production of low-income housing continues to be below RHNA targets. The appellant fails to explain how this point constitutes an argument that the CPE is not based on substantial evidence. The PEIR's analysis of physical environmental effects relied on population projections that did not differentiate between an affordable housing unit or a market rate development. Therefore, the affordability of residential development does not affect the environmental analysis in the PEIR or CPE.

The issues raised by the appellant are not new. The Population, Housing, Business Activity, and Employment section of the Eastern Neighborhoods PEIR includes a thorough analysis of these issues, examining, among other things, whether development under the rezoning and area plans would cause or contribute to gentrification or displacement. The impacts of growth afforded under the rezoning and area plans on the physical environment are evaluated and disclosed in both the plan-level and project-level CEQA documents under the relevant resource topics such as population and housing, transportation, air quality, noise, parks and open space, and public services. The conclusions of the CPE are based upon substantial evidence; the appellant has not demonstrated otherwise.

**CONCLUSION**

The planning department's determination that the proposed project qualifies for a community plan evaluation pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183 is supported by substantial evidence in the record. The appellant has not provided evidence to demonstrate otherwise. The planning department conducted necessary studies and analyses and provided the planning commission with the information and documents necessary to make an informed decision at a noticed public hearing in accordance with the planning department's CPE initial study and standard procedures, and pursuant to CEQA and the CEQA Guidelines. Therefore, the planning department respectfully recommends that the board of supervisors uphold the department's determination that the CPE conforms with the requirements of CEQA and reject the appeal.

# Attachment A

Summary of Geotechnical Analyses  
prepared for the 344 14th Street Project  
Planning Department Case No.  
2014.0948ENV

September 30, 2019



## Attachment A: Summary of Geotechnical Analyses

The following table provides a summary of the geotechnical report and supplemental analyses prepared for the original project and various iterations of the proposed project at 344 14th Street (Planning Department Case No. 2014.0948ENV). The geotechnical report and all supplemental analyses were conducted by Rockridge Geotechnical, a licensed civil engineer authorized to practice geotechnical engineering. Projects located within a seismic hazard zone for liquefaction are subject to the seismic hazards act requirements, which include the preparation of a geotechnical investigation by qualified engineer to delineate the area of hazard and to propose measures to address any identified hazards.<sup>1</sup> The analysis was conducted by a qualified geotechnical consultant with consistent recommendations for foundation support on improved soil to address liquefaction hazard. The building department has reviewed the project's geotechnical report.

Date	Geotechnical Report	Project Description Analyzed	Recommended Foundation Type
May 6, 2016	Rockridge Geotechnical, Geotechnical Investigation Proposed Mixed Use Development 14th and Stevenson San Francisco, California.	Mixed-use building that would occupy most of the site and include one level of below-grade parking.	Mat foundation on improved ground elements or deep foundations.
November 13, 2017	Rockridge Geotechnical, Memorandum Regarding Project Impacts on Groundwater (Mission Creek).	Mixed-use building that would occupy most of the site and include one level of below-grade parking.	Mat foundation on improved ground elements.
December 10, 2018	Rockridge Geotechnical, Memorandum Regarding Project Impacts on Groundwater (Mission Creek).	Two buildings would be constructed on the site and include one level of below-grade parking.	Mat foundation on improved ground elements.
January 8, 2019	Rockridge Geotechnical, Letter Regarding Project Modifications 344 14th Street, 1463-1499 Stevenson Street, 86-89 Woodward Street San Francisco, California.	Two buildings would be constructed on the site and include one level of below-grade parking.	Mat foundation on improved ground elements or deep foundations.
September 10, 2019	Rockridge Geotechnical, Letter Regarding Response to Appeal Comments Proposed Mixed-Use Development 14th and Stevenson Streets San Francisco, California.	One at-grade building. No parking proposed.	Mat foundation on improved ground elements or deep foundations.

<sup>1</sup> Department of Building Inspection Information Sheet No. S-05, May 7, 2019. Available at <https://sfdbi.org/sites/default/files/IS%20S-05.pdf>

## Attachment B

1. Fehr & Peers, Eastern Neighborhoods /  
Mission District Transportation and  
Demographic Trends, January 12, 2017

2. Fehr & Peers, Updated Eastern  
Neighborhoods Traffic Counts,  
April 17, 2017



January 12, 2017

Chris Kern  
Senior Environmental Planner  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Subject: Eastern Neighborhoods / Mission District Transportation and Demographic Trends**

Dear Chris:

Fehr & Peers has prepared this letter summarizing key transportation trends that have occurred since the adoption of the Eastern Neighborhoods Plan in August 2008, focusing on the Mission District. Specifically, San Francisco Planning staff identified three key questions regarding the transportation analysis prepared for the Eastern Neighborhoods Plan environmental review process and subsequent effects on the transportation network due to new development:

- If new construction based on the Eastern Neighborhoods Plan results in displacement of lower income workers, do these workers then move to distant suburbs and increase the number of automobile commute trips and regional VMT compared to the Eastern Neighborhoods Plan EIR?
- Does new housing in the Eastern Neighborhoods plan area attract higher income residents, who own more cars and are therefore adding additional automobile trips than were accounted for in the Eastern Neighborhoods Plan EIR?
- Do commuter shuttles have transportation impacts not considered in the Eastern Neighborhoods Plan EIR?

Overall, Fehr & Peers has found that the Eastern Neighborhoods Plan EIR took a fairly conservative approach to transportation analysis and findings. The EIR generally estimated that a slightly higher percentage of new trips would be made by private vehicles than recent traffic counts as well as census travel survey data would suggest are occurring. On a more detailed level, Fehr & Peers found that while the Mission has undergone significant demographic and economic



change, residents on average still appear to own around the same number of vehicles, and use non-auto modes at similar rates as in the period from 2000 – 2009.<sup>1</sup>

With regards to the effects of potential displacement of lower-income households, data tracking individuals or households who move out of the neighborhood is not available, limiting our ability to state with certainty whether displacement of lower income workers is leading those same workers to increase their vehicle travel. Collecting this data would require a long-term focused survey effort on a different horizon that which is available for the preparation of this letter report .

In absence of this data, Fehr & Peers has conducted an analysis and review of the regional models used to develop the travel demand estimates for the Eastern Neighborhoods Plan EIR and, more generally, the role that they play in planning/CEQA efforts. This review of the travel model focuses on available data, and how that data can be used to answer the questions posed above. The regional model uses available data, such as existing mode share, trends in travel time to work, and current research on travel behavior to assess how changes in population or employment affect vehicle travel on our transportation facilities. The growth in households and jobs included in the model is based on regional and local planning efforts such as Plan Bay Area, City general plans, and specific plans such as the Eastern Neighborhoods Plan.

The growth in the share of households and jobs located in dense, urban areas (as planned for in Plan Bay Area and the Eastern Neighborhoods Plan) is expected to generally decrease regional vehicle miles traveled per capita between now and 2040. In the short term, the distance between Bay Area residents and their places of employment has increased slightly from 2004 to 2014; this has not, however, been accompanied by a similar increase in the share of regional commuting by single-occupant vehicle.

In addition to these demographic and economic variables, several new technologies and programs have affected transportation in the Eastern Neighborhoods area. Commuter shuttles to campuses in the Peninsula and South Bay have grown in amount and ridership, and some members of the community are concerned they may be negatively affecting traffic or public transit operations. Fehr & Peers has not found any evidence that their effects have not been contained in the envelope of traffic effects analyzed in the Eastern Neighborhoods Plan EIR.

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<sup>1</sup> Fehr & Peers has attempted to maintain consistency across data sources. Census data is used from the 2000 decennial census, and from the 2004 – 2009 and 2009 – 2014 five-year average reports of the American Community Survey. Non-Census data may use other base years.



With regards to non-automotive travel, Planning and SFMTA have both undertaken substantial citywide efforts to encourage non-auto modes of travel, including MuniForward and Planning's Transportation Sustainability Program (TSP); these provide mechanisms for encouraging shifts to sustainable modes of travel, although it is still too early in their implementation to provide detailed analysis on their efficacy. These programs would be expected to have the effect of decreasing overall vehicular travel, and perhaps increasing transit ridership.

### **Background and Literature on Factors Surrounding Travel Behavior**

While this letter focuses on the interplay between jobs and housing and the effect that relationship has on local and regional travel patterns, these elements are only one potential factor in individual travel behavior. Regional traffic and travel patterns are the combination of many different factors that influence individual decisions; these factors include items related to the built environment, local land use, regional distributions of housing and jobs, household socioeconomic factors, roadway network design and capacity, and availability of alternative transportation services such as transit.

When used in travel demand models, these variables can be sorted into four groups: socioeconomic characteristics, travel options, local land use characteristics, and regional land use characteristics, all of which influence total regional travel<sup>2</sup>. The below narrative discusses how these complicated factors are reflected in the variables selected for use in the regional model; these variables rely on data that is readily available, and broad enough for regional use. Many other individual circumstances are not reflected in the model, even though they may influence decisions with respect to residential location, employment, and household formation. Instead, the model focuses on the outcomes of these decisions, and uses past trends to predict future changes in variables that can more easily be included in the model. The following is a summary of some of the factors used in modeling travel behavior, and definitions or explanations of each for reference.

#### **Socioeconomic Characteristics**

For modeling purposes, several variables are used as proxies for socioeconomic characteristics that influence travel. These variables include the number of workers and non-workers in each

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<sup>2</sup> Hu, H., Choi, S., Wen, F., Walters, G., & Gray, C. J. (2012, February). Exploring the Methods of Estimating Vehicle Miles of Travel. In *51th Annual Meeting of the Western Regional Science Association*.



household, the age of household members, and median household income. Generally, larger households make more trips by all modes; people between ages 16 – 64 are more likely to drive, and higher income individuals are more likely to own a car; as such, analysis areas with populations meeting these characteristics tend to generate a larger number of vehicle trips in the model. Other individual traits, including English proficiency, ability to obtain a driver's license, and ability or disability may also influence travel decisions at this level, but are too generalized to be included in a regional travel demand model, despite their importance to individual decisions.

### **Travel Options**

Travel options variables include considerations of transit access, transit quality, and access to a vehicle. Each of these factors can determine the mode an individual chooses to make a given trip. Generally, individuals will choose the most efficient mode among those that they have access to. Efficiency can include considerations such as cost, estimated travel time, comfort, wait times, or convenience, among other concerns. In travel models, these factors are considered through proxy variables such as car ownership, distance from transit, and the frequency at which nearby transit operates.

### **Local Land Use and Built Environment**

Local land use variables include variables often referred to as "the D's": density of jobs and housing, diversity of land uses, design of roadway facilities and the urban environment, and similar elements. These factors help to create urban environments that are more walkable, and tend to have a lower automobile modeshare<sup>3</sup>. The academic literature surrounding the effects of land use on transportation choices has shown fairly consistently that dense, mixed-use neighborhoods with strong regional access have the lowest levels of vehicle trip-making.<sup>4</sup> When used in travel models, these are usually translated into measures of density for a given area, such as the number of dwelling units or jobs per acre.

### **Regional Land Use and Built Environment**

Regional land use patterns determine travel patterns mostly as a function of where people live versus places they typically travel to; the most common example of this is the relationship

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<sup>3</sup> Cervero, R., & Kockelman, K. (1997). Travel demand and the 3Ds: density, diversity, and design. *Transportation Research Part D: Transport and Environment*, 2(3), 199-219.

<sup>4</sup> Ewing, R., & Cervero, R. (2010). Travel and the built environment: a meta-analysis. *Journal of the American planning association*, 76(3), 265-294.



between a person's home and workplace. Regional accessibility, such as the availability of longer distance transportation options (including regional transit such as BART and Caltrain, as well as freeways and major arterials) also plays a key role in transportation decisions. Ongoing jobs-housing imbalances have been shown to have a substantial effect on the distance households travel to work, while regional accessibility (as measured by the mix of destinations easily accessible by a household) also tends to encourage non-auto trips<sup>5,6,7</sup>.

### Number of Long-Distance Commute Trips

In addressing the question of whether the new residential construction in the Eastern Neighborhoods plan displaces lower income workers and therefore leads to longer commute trips from distant suburbs, Fehr & Peers focused on available data which includes regional data on inter-county commutes, and data showing the regional distance between a worker's home and workplace. While speculation exists that individuals that move out of the Mission commute longer distances to existing jobs, the literature on job change following residential relocation is very limited. As such, it cannot be ascertained whether individuals moving from the Mission to outlying areas keep or change their job location.

In addition to the potential for longer commute trips, households moving from the Mission to areas with fewer non-auto transportation options may increase their use of private vehicles for non-work trips. This increase in trips may be offset by individuals who move into denser neighborhoods and then use private vehicles less often, particularly if new housing growth is concentrated in these denser neighborhoods.

As an example of how residential location affects commute patterns, **Table 1** summarizes the number of commuters who both live and work in the same Bay Area County, the number who live and work in different counties and drive alone to work, and the median rent by county to serve as a proxy for cost of living. Counties that have a lower than average share of residents who drive alone to work in another county are Santa Clara County, Sonoma County, and San Francisco County, while counties with the largest share of residents who drive alone to work in another county are San Mateo, Contra Costa, and Solano Counties.

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<sup>5</sup> Ewing, R. (1995). Beyond density, mode choice, and single-purpose trips. *Transportation Quarterly*, 49(4), 15-24.

<sup>6</sup> Levinson, D. M. (1998). Accessibility and the journey to work. *Journal of Transport Geography*, 6(1), 11-21.

<sup>7</sup> Cervero, R. (1996). Jobs-housing balance revisited: trends and impacts in the San Francisco Bay Area. *Journal of the American Planning Association*, 62(4), 492-511.



Based on these figures, we would assume that a net movement of households from San Francisco to counties such as Contra Costa County and Solano County without a corresponding movement in jobs would result in a higher share of individuals driving longer distances to work. However, job and housing growth projections prepared by ABAG indicate that population growth will be concentrated in areas that, in general, have fewer individuals driving alone to work across county lines.<sup>8</sup>

<b>TABLE 1: COMMUTERS LIVING AND WORKING IN DIFFERENT COUNTIES, 2010<sup>1</sup></b>						
<b>County</b>	<b>Employed Residents</b>	<b>Residents Working in Same County</b>	<b>Percentage Working in Same County</b>	<b>Drove Alone to Another County for Work</b>	<b>Percentage Drive Alone to Another County</b>	<b>2010 Median Rent<sup>2</sup></b>
<b>Santa Clara</b>	817,000	712,000	87%	85,000	10%	\$1,471
<b>Sonoma</b>	226,000	188,000	83%	29,000	13%	\$1,227
<b>San Francisco</b>	432,000	331,000	77%	68,000	16%	\$1,446
<b>Napa</b>	62,000	48,000	77%	12,000	19%	\$1,218
<b>Alameda</b>	693,000	468,000	68%	142,000	20%	\$1,233
<b>Marin</b>	121,000	79,000	65%	29,000	24%	\$1,563
<b>Contra Costa</b>	466,000	281,000	60%	121,000	26%	\$1,311
<b>San Mateo</b>	349,000	205,000	59%	101,000	29%	\$1,525
<b>Solano</b>	184,000	109,000	59%	55,000	30%	\$1,199
<b>Grand Total</b>	<b>3,350,000</b>	<b>2,421,000</b>	<b>72%</b>	<b>642,000</b>	<b>19%</b>	<b>\$1,353</b>

1. VitalSigns does not provide data prior to 2010.

2. Median rents are based on self-reported rents paid by current residents across a variety of unit types, and do not reflect the rent accepted by new residents. Amounts shown are adjusted for inflation to 2014 dollars.

Source: Metropolitan Transportation Commission VitalSigns, 2016; Fehr & Peers, 2016

To study the total *future* change in vehicle trips and vehicle miles traveled due to demographic shifts and changing development patterns, a travel model is typically employed studying conditions both with and without a demographic change.

<sup>8</sup> ABAG projections are taken from Plan Bay Area 2013.





Fehr & Peers performed a brief review of the model data used in developing the future year VMT and travel forecasts used for CEQA purposes, and found that they do account for changes in the number of households by income level, as well as changes in the number of jobs throughout the region. Travel models are used to forecast future year conditions, as well as changes in traffic due to major land use changes (such as the adoption of the Eastern Neighborhoods Plan). These models are designed to use research on current travel patterns to estimate how changes in roadway configurations, population locations, and jobs can affect vehicle travel as well as travel by other modes. The San Francisco specific model, SF-CHAMP, uses the same data as the regional model, but reassigns growth within San Francisco to reflect local planning efforts. Individual model runs can provide estimates of traffic levels on individual roadways, and as noted above are often used for portions of the traffic and VMT analyses prepared for CEQA purposes.

In order to provide these estimates, SF-CHAMP estimates travel behavior at the level of transportation analysis zones (TAZs). There are 981 TAZs within San Francisco that vary in size from single city blocks in the downtown core, to multiple blocks in outer neighborhoods, to even larger geographic areas in historically industrial areas like the Hunters Point Shipyard. It also includes zones outside of San Francisco, for which it uses the same geography as the current MTC Model: "Travel Model One". For each TAZ, the model estimates the travel demand based on TAZ population and employment assumptions developed by the Association of Bay Area Governments (ABAG). Essentially, the model does its best to represent average travel choices and patterns of "people" (the daytime service population) that represent all travelers making trips to and from each TAZ the entire day<sup>9</sup>.

Neither SF-CHAMP nor the regional travel model explicitly link low-income workers living in one area with lower paying jobs in another area, or high-income workers with high-paying jobs for that matter; this level of analysis is generally considered to be more fine-grained than is appropriate for regional travel forecasts. Instead, household-job links are established using existing research on typical commute patterns and distances, including the distribution of workers living in a given area who travel longer distances to work, and so forth. Future concentrations of jobs and housing are based on the most recent regional planning documents prepared by ABAG.

Regardless of the model assumptions, some households will move from San Francisco and have increased commute distances, while others may change jobs and have decreased commute

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<sup>9</sup> Kosinski, Andy. (2016, April). VMT Analysis for 2675 Folsom Street, Case No 2014-000601. 2675 Folsom Street Transportation Impact Analysis Project Record



distances. However, the model does indicate that overall aggregate regional growth is expected to help reduce the average distance that a typical worker travels between home and work. The SFCTA has estimated that existing average VMT per household is 17.2 for the region and 8.4 in San Francisco. The regional VMT per household is expected to decrease to approximately 16.75 by the year 2040<sup>10</sup>. Employment data shows that the share of Bay Area residents living more than ten miles from their employer increased from 2004 to 2014 (See **Table 2**); over the same period, the absolute number of individuals living more than ten miles from their employer also increased. As such, a larger number of individuals are likely driving alone to work across longer distances. This does not, however, translate into a higher share of individuals driving alone to work; the regional drive alone commute modes share is at its lowest point since 1960, based on census data.

**TABLE 2: DISTANCE FROM HOME CENSUS BLOCK TO WORK CENSUS BLOCK<sup>1</sup>, BAY AREA RESIDENTS, 2004 - 2014**

Distance	2004 <sup>2</sup>		2014	
	Number of Workers	Share of Workers	Number of Workers	Share of Workers
Less than 10 miles	1,507,000	52%	1,600,000	47%
10 to 24 miles	800,000	27%	944,000	28%
25 to 50 miles	351,000	12%	445,000	13%
Greater than 50 miles	255,000	9%	390,000	12%
Drive-Alone Commute Modeshare	79%		76%	

1. LEHD data uses payroll and other labor information; distances may not represent an employee's typical workplace, but rather the location of their employer's office for labor reporting purposes.

2. 2004 base year is used due to data from 2000 not being available

Source: Longitudinal Employer-Household Dynamics, 2016; MTC VitalSigns, 2016; Fehr & Peers, 2016

## Vehicle Trip Rates and Demographics of New Residents

While data are unavailable for households moving away from the Mission, a look at ACS data shows some insight on households that have recently moved to the Mission from elsewhere.

<sup>10</sup> Schwartz, Michael, Coper, Drew. (2016, February). Quantification of Impacts under CEQA following new guidelines from the Governor's Office of Planning and Research. And Kosinski, Andy. (2016, April). VMT Analysis for 2675 Folsom Street, Case No 2014-000601. 2675 Folsom Street Transportation Impact Analysis Project Record



Around 15 percent of Mission residents had moved within the past year; of these, around half moved to the Mission from outside of San Francisco (**Table 3**). New residents, particularly those moving from outside of California, tend to have higher incomes than existing residents.

**TABLE 3: MIGRATION STATUS OF MISSION RESIDENTS<sup>1</sup> IN PAST YEAR AND MEDIAN INDIVIDUAL INCOME**

Year		Did not move in past year	Moved; within San Francisco	Moved; from different county in CA	Moved; from different state	Moved; from abroad
2004-2009	% of Residents	86%	9%	2%	2%	1%
	Median Income (2014 Dollars)	\$37,000	\$40,000	\$32,000	\$40,000	\$15,000
2009 -2014	% of Residents	86%	8%	3%	2%	1%
	Median Income (2014 Dollars)	\$35,000	\$43,000	\$32,000	\$76,000	\$46,000

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.

Source: ACS Table S0701, 5-year averages, 2004-2009, 2009-2014; Fehr & Peers, 2016

Generally, higher income households tend to have more vehicles per household, and also tend to drive more (See **Table 4**). However, a preliminary look at trends studied in the Census and American Community Survey (ACS) indicate that this effect has had a minimal effect on overall vehicular use in the Mission district from 2000 to 2014.

**TABLE 4: DRIVE ALONE MODESHARE BY INCOME GROUP, MISSION RESIDENTS<sup>1</sup> (2009- 2014)**

Worker Earnings	% Driving Alone to Work
<\$15,000	16%
\$15,000 – \$25,000	21%
\$25,000 - \$50,000	24%
\$50,000 – \$75,000	28%
>\$75,000	29%
<b>Average, All Incomes</b>	<b>27%</b>

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.

Source: ACS Table S1901, 5-year averages, 2009-2014; Fehr & Peers, 2016



Partially due to the in-migration of higher income earners shown in **Table 3**, the median household living in the Mission in 2014 has a significantly higher income than the median household living there in 2000 (see **Table 5**). Median annual income increased from around \$67,000 to around \$74,000 during that time period (in 2014 inflation-adjusted dollars). This reflects the migration patterns partially discussed above, as well as some level of general increases in incomes over that time. The same pattern can be seen by examining the share of all households with incomes above \$100,000, which has more than doubled from 2000 to 2014.

However, although the typical household has a higher income, vehicles per households has not increased over the same time period. The same percentage of households have zero cars (39 – 40 percent of households), and the average number of vehicles per household has remained nearly constant over that same period. Similarly, the share of Mission residents commuting to work by driving alone has also remained steady, at 25 – 29 percent. Due to population growth, this does result in more vehicles and more people driving alone compared to in 2000; however, this growth is in line with past trends, and does not exceed the level of vehicle travel projected in the Eastern Neighborhoods EIR, as discussed below.

In addition to census data, Planning has conducted three case studies at residential developments built in the past ten years in the Mission Neighborhood. These sites are located at 2558 Mission Street, 555 Bartlett Street, and 1600 15<sup>th</sup> Street. Each building consists of newer, largely market-rate housing, although 555 Bartlett Street and 1600 15<sup>th</sup> Street each have between 15 and 20 percent of units set aside as below market rate housing. Surveys at these sites were conducted during the extended AM and PM peak hours, and consisted of intercepting individuals at all project entrances and exits to inquire about their mode choice. In addition, person counts and vehicle counts were conducted at all entrances. Results from these surveys are shown by site in

**Table**

**6.**



**TABLE 5: COMPARISON OF SHIFTS IN INCOME AND AUTOMOBILE TRAVEL INDICATORS, MISSION RESIDENTS<sup>1</sup>**

<b>Year</b>	<b>Median Household Income (2014 Dollars)</b>	<b>Average Household Income (2014 Dollars)</b>	<b>Share of Households with Income Above \$100,000 (nominal)</b>	<b>Share of Commuters Driving Alone to Work</b>	<b>Share of Households with Zero Cars Available</b>	<b>Vehicles Available per Household</b>
2000	\$67,000	\$81,000	15%	29 %	39%	.85
2004 - 2009	\$70,000	\$98,000	31%	25 %	40%	.82
(% Change from 2000)	+ 4%	+21%	+ 106%	- 14%	<1%	-3%
2009 – 2014	\$74,000	\$109,000	40%	27 %	40%	.82
(% Change from 2000)	+ 10%	+35%	+ 166%	- 7%	<1%	-3%

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.

Source: American Community Survey, Tables B25044, B08130, S1901, 5-year averages, 2004 – 2009 and 2009 - 2014 ; Decennial Census, Tables H044, P030, DP3, 2000; Fehr & Peers, 2016



**TABLE 6: OBSERVED MODE SPLITS AT RESIDENTIAL DEVELOPMENTS IN THE MISSION**

Address	Drive Alone	Carpool	Walk	Taxi / TNC	Bike	SF Muni	BART	Private Shuttle
<b>1600 15th St</b> (162 market rate units, 40 BMR units, 596 total person trips)	19%	15%	33%	4%	5%	7%	16%	2%
<b>555 Bartlett Street</b> (49 market rate units, 9 BMR units, 183 total person trips)	25%	28%	19%	3%	6%	4%	14%	1%
<b>2558 Mission Street</b> (114 market rate units, 288 total person trips)	13%	13%	38%	8%	1%	7%	17%	4%

Based on trips made between 7AM – 10AM and 3PM – 7PM on a typical weekday in the summer. Total number of trips represented all counted person trips; response rates to survey varied between sites. Final percentages are imputed from survey responses and vehicle counts.

Source: SF Planning, 2015; Fehr & Peers, 2016

The three sites showed a drive alone modeshare that ranged from 13 percent to 25 percent, all of which are below the average drive alone commute mode for the area (of around 27 percent; see **Table 5**). The total auto modeshare (drive alone + carpool + taxi/TNC) ranges from 34 percent to 56 percent of all trips, which is similar to the total auto modeshare for all trips as modeled by SF-CHAMP (ranging from 31 percent to 53 percent for key transportation analysis zones in the Mission).<sup>11</sup>

### Transit Modeshare Over Time

The share of Mission residents commuting via transit has remained fairly steady from 2000 to 2014, based on ACS journey to work data (see **Table 7**). Transit modeshare has decreased slightly in recent years, from a high of 46 percent in 2004 – 2009; most of this shift has been to bicycling and “other means” (which may include trips made by TNC). This fluctuation is well within a typical margin of error, and includes a period of decreased Muni transit service during the Great Recession; service was restored in 2015.

<sup>11</sup> SF-CHAMP auto modeshare is based on the Central SoMa 2012 Baseline model run; the presented modeshares are for the analysis zones where each of the case study developments are located.



**TABLE 7: MISSION RESIDENT TRANSIT MODESHARE TRENDS, 2000 – 2014 (COMMUTE TRIPS ONLY)**

Year	Total Transit Modeshare	Muni Bus or Rail <sup>1</sup>	BART <sup>2</sup>	Caltrain <sup>3</sup>
2000	42%	24%	16%	1%
2004 – 2009	46%	29%	16%	1%
2009 – 2014	44%	24%	18%	3%

1. “Bus or trolley bus” and “Streetcar or trolley car” categories

2. “Subway or elevated” category

3. “Railroad” category

Source: ACS 2014; Fehr & Peers, 2016

### Expected and Observed Peak Hour Vehicle Traffic Growth

The Eastern Neighborhoods Transportation Impact Study (TIS) and EIR analyzed several intersections within the Mission District. Fehr & Peers worked with Planning to select four of these intersections and conduct one-day PM peak hour turning movement counts in December 2016<sup>12</sup>; these intersection counts do not include Mission Street due to the installation of bus-only lanes (which act to divert some private vehicle traffic from Mission Street) in 2015. These counts were then compared to the expected level of traffic growth based on the total change in housing units constructed in the Mission from 2011 – 2015. Full turning movement volumes and estimated calculations are included in **Attachment A**.

Overall, the current level of reported development from the Eastern Neighborhoods Monitoring Report was estimated to represent around 65 percent of background, no project growth (based on progress from 2000 baseline year to 2016 relative to the 2025 projections), and around 10 percent complete<sup>13</sup> for the growth projected under EIR Option C. While the preferred alternative does not precisely match any of the three options set forth in the EIR, Fehr & Peers selected Option C for comparison purposes as it showed the highest level of residential growth in the Mission. **Table 8** shows a summary of observed and estimated traffic volumes for the intersections analyzed.

<sup>12</sup> While vehicle counts are typically not taken in December due to changes in travel patterns during that time, schedule constraints necessitated immediate counts. Counts were collected on a weekday with average weather, while area schools were still in session.

<sup>13</sup> Estimate of 10 percent complete includes 25 percent of estimated increase in housing units and 4 percent of estimated increase in non-residential square footage from the 2000 baseline. This does not include the reduction in total PDR square footage.



On average, observed traffic volumes in 2016 were around 5 - 10 percent lower than expected based on the Eastern Neighborhoods EIR and the percentage of estimated development complete<sup>14</sup>. At three of the four intersections counted, total traffic volume had in fact decreased from the 2000 baseline count data. The exception is at 16<sup>th</sup> Street and South Van Ness, where there was an increase in traffic volume traveling northbound and southbound. This likely reflects shifts from other north/south streets such as Mission Street that have seen changes in their roadway configurations that were not anticipated by the analysis in the Eastern Neighborhoods Plan. The observed traffic counts also include only one day of count data, which introduces a chance that the observations are not representative; however, traffic volumes at urban intersections tend to be fairly stable with respect to the amount of peak hour traffic. Overall, this reflects that the Eastern Neighborhoods TIS and EIR took a fairly conservative approach to modeling the levels of local traffic generated by the changes in land use allowed by the Plan.

**TABLE 8: COMPARISON OF OBSERVED AND ESTIMATED TRAFFIC VOLUMES AT MISSION INTERSECTIONS**

Intersection	2000 Baseline Total Volume	2025 Option C Projected Volume	2016 To Date Projected Volume <sup>1</sup>	2016 Observed Volume	Net Difference (2016 Observed – 2016 Projected)	% Difference
Guerrero / 16 <sup>th</sup>	2,704	2,895	2,729	2,628	-101	-4%
S. Van Ness / 16 <sup>th</sup>	2,513	2,682	2,534	2,692	158	6%
Valencia / 16 <sup>th</sup>	1,848	2,168	1,885	1,572	-313	-17%
Valencia / 15 <sup>th</sup>	2,287	2,438	2,311	1,913	-398	-17%
<b>Average</b>					-164	-7%

1. 2016 to date projected volume is derived from the 2000 baseline volume plus 10 percent of Option C added project trips. Actual completed development analyzed in Option C amounts to 25% of studied residential units, and 4% of non-residential new development.

Source: Fehr & Peers, 2016; Eastern Neighborhoods TIS, 2008

<sup>14</sup> While not shown in Table 8, projected traffic volumes for EIR Option A (at 30% complete) and the No Project scenario were similar to those for Option C, and were on average higher than the observed 2016 traffic volumes.





## **Policy and Program Changes since Adoption of Eastern Neighborhoods Plan**

The above analysis represents a look at how 2016 compares to conditions considered in the Eastern Neighborhoods Plan TIS and EIR. However, since the adoption of the Eastern Neighborhoods Plan, the City has embarked on several projects and programs designed to better accommodate sustainable growth. Future transportation investments are anticipated to align with these goals, and include a focus on transit capital and operational investments, bicycle infrastructure, and pedestrian safety. Many of these improvements may be financed by fees collected from new developments.

### **San Francisco Bicycle Plan**

The 2009 San Francisco Bicycle Plan was adopted shortly after the adoption of the Eastern Neighborhoods Plan. It identifies specific bicycle route improvement projects, and is intended to foster a safe and interconnected bicycle network that supports bicycling as an attractive alternative to driving. This plan identified sixty total bicycle projects and bicycle route improvements, several of which are located within the Eastern Neighborhoods Plan area. In the Mission, this includes facilities on 17<sup>th</sup> Street and 23<sup>rd</sup> Street, as well as potential long-term improvements on Shotwell Street and Capp Street.

### **Better Streets Plan**

The Better Streets Plan, adopted in 2010, includes streetscape policies and guidelines that outline streetscape requirements for new development, as well as generally guide the design of new street improvement projects. It seeks to enhance the pedestrian environment, and includes guidelines for width and design of sidewalks, crosswalks, and general enhancements to the pedestrian environment, including street trees, lighting, and other elements. New developments are expected to bring relevant streetscape elements near their project into compliance with the Better Streets Plan as part of the development review process.

### **Muni Forward**

Muni Forward is an adopted plan following the findings of the Transit Effectiveness Project (TEP). The TEP was an in-depth planning process that sought to evaluate and enhance the Muni system; in 2014, the SFMTA Board of Directors adopted many of these recommendations, which included an overall 12 percent increase in Muni service citywide. Major projects affecting the Mission include the installation of red bus-only lanes on Mission Street, as well as service improvements



on the 14 and 14R buses, which provide a key connection for Mission residents to sites along the Mission Street corridor.

### **Vision Zero**

Vision Zero, adopted in 2014, represents an action plan for building better and safer streets, with the goal of having zero traffic fatalities by the year 2024. This goal utilizes a “safe systems” approach to protect people from serious injury or death when a crash occurs by creating safe roads, slowing speeds, improving vehicle design, educating people, and enforcing existing laws. Part of this process includes identifying high injury corridors, where people are more likely to experience serious injury or death as a result of automobile collisions. Guerrero Street, Valencia Street, Mission Street, South Van Ness Avenue, Harrison Street, 15<sup>th</sup> Street, 16<sup>th</sup> Street, 17<sup>th</sup> Street, 24<sup>th</sup> Street, Cesar Chavez Street, and segments of 18<sup>th</sup> Street and Dolores Street are all included in the Vision Zero High Injury Network. High priority projects to address these issues in the Mission include the installation of bus-only lanes on Mission Street, as well as installation of pedestrian countdown signals at key intersections on Guerrero Street and S. Van Ness Avenue.

### **Propositions A and B (2014)**

In 2014, San Francisco voters passed Propositions A and B, both of which provided additional funding for transportation projects, almost all of which was designated for transit, pedestrian, and bicycle improvements. Proposition A authorized \$500 million in general obligation bonds for transportation infrastructure needs citywide. Funds were earmarked for specific project types that focused on transit, bicycle, and pedestrian improvements, including construction of transit-only lanes and separated bikeways, transit boarding islands, escalator upgrades, new pedestrian signals, sidewalk improvements, and Muni maintenance facilities. Proposition B required that the City’s contributions to SFMTA increase based on population growth, including both the daytime and night-time populations. Additionally, Proposition B required the 75 percent of any population-based increase be used to improve Muni service, and 25 percent be used for improving street safety.

### **Transportation Sustainability Program**

The Transportation Sustainability Program (TSP) reflects plans to adopt smart planning and investment practices to improve and expand on the existing transportation system. They include requiring new developments to adopt comprehensive transportation demand management (TDM) programs (anticipated to be in effect early 2017) in order to reduce the number of trips



made by automobile, as well as adoption of the new Transportation Sustainability Fee for new developments, and environmental review guidance that prioritizes smart growth in the form of infill development near quality transit service.

### Commuter Shuttle Program

The SFMTA implemented a formal Commuter Shuttle Program in 2014 to regulate how long-distance commuter shuttles utilize public roadways and public curb space, including bus stops. An October 2015 review found that the program was eligible for a categorical exemption (Case No. 2015-007975ENV). The analysis used for this determination also examined the total number of shuttles and shuttle stop incidents. This study found that shuttle vehicles would remain less than 10 percent of vehicles traveling on arterials with shuttle stop locations, and that this increase was not expected to substantially affect traffic operations on arterial roadways. As shown in **Table 8**, current levels of traffic within the Mission remain below expected volumes based on the amount of development completed under the Eastern Neighborhoods Plan.

### On-Demand Smartphone Ride Companies

At the time of the Eastern Neighborhoods EIR, transportation network companies (TNCs) such as Lyft, Uber, and Chariot did not exist. In recent years, this method of transportation has grown significantly. However, many details regarding how these companies fit into the larger transportation picture in San Francisco is unclear. To date, no holistic study has examined whether TNC users are making trips they would not otherwise make, or substituting a Lyft or Uber ride for either a public transit trip or private vehicle trip. Based on the surveys conducted at newer residential developments, the combination of Taxi and on-demand / smartphone-based transportation represents between three and eight percent of all trips. These trips have not led to growth in traffic at Eastern Neighborhoods study intersections that exceed what was predicted, based on actual intersection-level counts, and can reasonably be considered to fall within the envelope of transportation effects identified in the Eastern Neighborhoods EIR.



Sincerely,

FEHR & PEERS

A handwritten signature in black ink, appearing to read 'ew'.

Eric Womeldorff, P.E.  
Principal

A handwritten signature in black ink, appearing to read 'Teresa Whinery'.

Teresa Whinery  
Transportation Planner

Attached:

Attachment A

Attachment A - Percent Complete

**Option A Percent Complete**

	<b>CIE</b>	<b>Medical</b>	<b>Office</b>	<b>PDR</b>	<b>Retail</b>	<b>Visitor</b>	<b>Residential</b>
<b>Net Change, 2011 - 2015</b>	-25,211	15,200	108,400	-206,311	40,119	0	506
<b>EN Option A Plan Total (Delta from Baseline)</b>	104,400	37,200	422,021	-448,753	114,000	0	782
<b>Progress</b>	-24%	41%	26%	46%	35%	100%	65%
Progress: Non-Residential & Non-PDR	20%						
Progress: Residential	65%						
<b>Percent Complete, Option A</b>	<b>40%</b>						

**Option C Percent Complete**

	<b>CIE</b>	<b>Medical</b>	<b>Office</b>	<b>PDR</b>	<b>Retail</b>	<b>Visitor</b>	<b>Residential</b>
<b>Net Change, 2011 - 2015</b>	-25,211	15,200	108,400	-206,311	40,119	0	506
<b>EN Option C Plan Total (Delta from Baseline)</b>	609,480	49,448	2,214,011	-3,370,350	598,323	10,274	2,054
<b>Progress</b>	-4%	31%	5%	6%	7%	0%	25%
Progress: Non-Residential & Non-PDR	4%						
Progress: Residential	25%						
<b>Percent Complete, Option C</b>	<b>10%</b>						

**No Project Percent Complete**

	<b>CIE</b>	<b>Medical</b>	<b>Office</b>	<b>PDR</b>	<b>Retail</b>	<b>Visitor</b>	<b>Residential</b>
<b>Net Change, 2011 - 2015</b>	-25,211	15,200	108,400	-206,311	40,119	0	506
<b>EN CNP Total (Delta from Baseline)</b>	134,700	36,900	551,400	-513,185	144,000	1	420
<b>Progress</b>	-19%	41%	20%	40%	28%	100%	120%
Progress: Non-Residential & Non-PDR	16%						
Progress: Residential	120%						
<b>Rounded Estimate Complete, No Project</b>	<b>70%</b>						
<b>Time Estimate Complete, No Project (2016 - 2000) / (2025 - 2000)</b>	<b>64%</b>						

Attachment A - Turning Movement (Option A)

		2000 Baseline	2025 NP	2025 Option A	2016 NP Estimate	2016 Option A To Date Estimate	Intersection Level Total Estimate	2016 Count	Intersection Level Observed	Change from To-Date Estimate	% of Estimated Traffic	
16th & Guerrero	NBL	73	81	86	78	78	2,789	16	2,628	-161		
	NBT	649	721	761	695	694		599				
	NBR	60	67	72	64	65		52				80%
	SBL	50	52	53	51	51		10				106%
	SBT	748	784	760	771	753		815				
	SBR	43	45	44	44	43		76				95%
	EBL	16	17	18	17	17		8				
	EBT	301	314	305	309	303		291				97%
	EBR	61	64	68	63	64		64				
	WBL	81	87	87	85	83		55				
WBT	537	572	571	559	551	521						
WBR	85	91	91	89	87	121						
S. Van Ness & 16th	NBL	0	0	0	0	0	2,591	70	2,692	101		
	NBT	530	578	567	561	545		656				
	NBR	96	104	104	101	99		67				123%
	SBL	0	0	0	0	0		65				126%
	SBT	575	587	616	583	591		689				
	SBR	39	40	42	40	40		44				72%
	EBL	0	0	0	0	0		9				
	EBT	448	476	474	466	458		295				91%
	EBR	52	64	74	60	61		71				
	WBL	0	0	0	0	0		7				
WBT	674	727	728	708	696	653						
WBR	99	106	105	103	101	66						

Attachment A - Turning Movement (Option A)

Valencia & 16th	NBL	59	63	71	62	64	2,018	39	1,572	-446	84%
	NBT	442	480	535	466	479		417			
	NBR	0	0	0	0	0		0			
	SBL	0	0	0	0	0		2			
	SBT	549	553	557	552	552		407			
	SBR	199	218	224	211	209		162			
	EBL	0	0	0	0	0		0			
	EBT	0	0	0	0	0		0			
	EBR	0	0	0	0	0		0			
	WBL	73	104	108	93	87		54			
WBT	443	632	655	564	528	396	76%				
WBR	83	118	123	105	99	95					
Valencia & 15th	NBL	49	50	51	50	50	2,376	40	1,913	-463	77%
	NBT	398	433	497	420	438		323			
	NBR	73	74	78	74	75		71			
	SBL	70	74	77	73	73		43			
	SBT	499	530	535	519	513		364			
	SBR	50	53	54	52	52		48			
	EBL	28	30	29	29	28		36			
	EBT	318	336	334	330	324		272			
	EBR	65	69	67	68	66		44			
	WBL	58	62	63	61	60		52			
WBT	604	647	645	632	620	549	89%				
WBR	75	80	81	78	77	71					

**Sources:**

2000 Baseline: Eastern Neighborhoods Plan TIS  
 2025 NP: Eastern Neighborhoods Plan TIS  
 2025 + Opt. A: Eastern Neighborhoods Plan TIS  
 2025 + Opt. B: Eastern Neighborhoods Plan TIS  
 2016 NP Estimate: = (2000 Baseline) + [(2025 NP) - (2000 Baseline)] \* [(2016 - 2000) / (2025 - 2000)]

2016 Opt. A Estimate: = (2000 Baseline) + [(2025 Opt. A) - (2000 Baseline)] \* (Opt. A % Complete)

2016 Opt. C Estimate: = (2000 Baseline) + [(2025 Opt. C) - (2000 Baseline)] \* (Opt. C % Complete)

Attachment A - Turning Movement (Option C)

		2000 Baseline	2025 NP	2025 Option C	2016 NP Estimate	2016 Option C To Date Estimate	Intersection Level Total Estimate	2016 Count	Intersection Level Total Count	Change from To-Date Estimate	% of Estimated Traffic
16th & Guerrero	NBL	73	81	87	78	74	2,729	16	2,628	-101	84%
	NBT	649	721	776	695	662		599			
	NBR	60	67	72	64	61		52			
	SBL	50	52	52	51	50		10			
	SBT	748	784	772	771	750		815			107%
	SBR	43	45	44	44	43		76			
	EBL	16	17	18	17	16		8			96%
	EBT	301	314	301	309	301		291			
	EBR	61	64	70	63	62		64			
	WBL	81	87	88	85	82		55			98%
WBT	537	572	585	559	542	521					
WBR	85	91	92	89	86	121					
S. Van Ness & 16th	NBL	0	0	0	0	0	2,534	70	2,692	158	125%
	NBT	530	578	589	561	536		656			
	NBR	96	104	107	101	97		67			
	SBL	0	0	0	0	0		65			130%
	SBT	575	587	598	583	577		689			
	SBR	39	40	41	40	39		44			
	EBL	0	0	0	0	0		9			
	EBT	448	476	457	466	449		295			74%
	EBR	52	64	78	60	55		71			
	WBL	0	0	0	0	0		7			
WBT	674	727	741	708	681	653	93%				
WBR	99	106	108	103	100	66					



Attachment A - Turning Movement (Option C)

Valencia & 16th	NBL	59	63	69	62	60	1,885	39	1,572	-313	89%
	NBT	442	480	518	466	450		417			
	NBR	0	0	0	0	0		0			
	SBL	0	0	0	0	0		2			
	SBT	549	553	583	552	552		407			
	SBR	199	218	230	211	202		162			
	EBL	0	0	0	0	0		0			
	EBT	0	0	0	0	0		0			
	EBR	0	0	0	0	0		0			
	WBL	73	104	99	93	76		54			
WBT	443	632	603	564	459	396	88%				
WBR	83	118	113	105	86	95					
Valencia & 15th	NBL	49	50	53	50	49	2,311	40	1,913	-398	82%
	NBT	398	433	477	420	406		323			
	NBR	73	74	79	74	74		71			
	SBL	70	74	77	73	71		43			
	SBT	499	530	550	519	504		364			
	SBR	50	53	55	52	51		48			
	EBL	28	30	29	29	28		36			
	EBT	318	336	326	330	319		272			
	EBR	65	69	67	68	65		44			
	WBL	58	62	63	61	59		52			
WBT	604	647	657	632	609	549	85%				
WBR	75	80	82	78	76	71					

**Sources:**

2000 Baseline: Eastern Neighborhoods Plan TIS

2025 NP: Eastern Neighborhoods Plan TIS

2025 + Opt. A: Eastern Neighborhoods Plan TIS

2025 + Opt. B: Eastern Neighborhoods Plan TIS

2016 NP

Estimate: = (2000 Baseline) + [(2025 NP) - (2000 Baseline)] \* [(2016 - 2000) / (2025 - 2000)]

2016 Opt. A

Estimate: = (2000 Baseline) + [(2025 Opt. A) - (2000 Baseline)] \* (Opt. A % Complete)

2016 Opt. C

Estimate: = (2000 Baseline) + [(2025 Opt. C) - (2000 Baseline)] \* (Opt. C % Complete)





## MEMORANDUM

Date: April 17, 2017  
To: Chris Kern, San Francisco Planning Department  
From: Teresa Whinery and Eric Womeldorff, Fehr & Peers  
Subject: **Updated Eastern Neighborhoods Traffic Counts**

*SF16-0908*

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Fehr & Peers recently contracted with a traffic count firm to perform additional vehicle counts at key intersections studied in the Eastern Neighborhoods Plan Environmental Impact Report (EIR). These counts were used for analysis of transportation trends presented in a January 12, 2017 letter discussing Eastern Neighborhoods / Mission District Transportation and Demographic Trends.

Traffic counts were originally performed on Tuesday, December 13, 2016 due to the need to provide analysis prior to the appeal hearing for 2675 Folsom Street. While traffic counts are not generally conducted in December, care was taken to perform the counts while local schools were in session, on a day with average weather. The additional counts, taken on Tuesday, April 4, 2017 and on Tuesday, April 11, 2017 are intended to supplement the original counts, and provide a second data point taken in a typical spring month. San Francisco schools were in session on both of the April count dates.

The amended **Table 8** below shows the vehicle counts collected in April. Three of the four intersections are within three percent of PM peak hour traffic volumes collected in December. At the fourth intersection (Valencia / 16th), total PM peak hour vehicle volumes were around eight percent higher, though still within an industry-accepted daily fluctuation level of 10 percent during peak hours. Updating the prior analysis concerning contributions and expected vehicle volumes with these new April counts does not result in any substantive differences in findings presented in Fehr & Peers' January 2017 letter.



**TABLE 1: COMPARISON OF OBSERVED AND ESTIMATED TRAFFIC VOLUMES AT MISSION INTERSECTIONS**

<b>Intersection</b>	<b>2000 Baseline Total Volume</b>	<b>2025 Option C Projected Volume</b>	<b>2017 To Date Projected Volume<sup>1</sup></b>	<b>2017 Observed Volume<sup>2</sup></b>	<b>Net Difference (2017 Observed – 2017 Projected)</b>	<b>% Difference</b>
Guerrero / 16 <sup>th</sup>	2,704	2,895	2,729	2,652	-77	-3%
S. Van Ness / 16 <sup>th</sup>	2,513	2,682	2,534	2,688	154	6%
Valencia / 15 <sup>th</sup>	1,848	2,168	1,885	1,616	-269	-14%
Valencia / 16 <sup>th</sup>	2,287	2,438	2,311	2,089	-222	-10%
<b>Average</b>					-104	-4%

1. 2017 to date projected volume is derived from the 2000 baseline volume plus 10 percent of Option C added project trips. Actual completed development analyzed in Option C amounts to 25% of studied residential units, and 4% of non-residential new development.

2. Observed volumes are from traffic counts conducted at three intersections on April 4, 2017, and at Guerrero/16<sup>th</sup> on April 11 2017. Counts at Guerrero were rescheduled due to vandalism of the count equipment.

Source: Fehr & Peers, 2017; Eastern Neighborhoods TIS, 2008

Attachment C

Fehr & Peers

Transportation Analysis Memorandum

June 5, 2018





## MEMORANDUM

Date: June 5, 2018  
To: Manoj Madhavan, San Francisco Planning Department  
From: Jesse Cohn & Eric Womeldorff, Fehr & Peers  
Subject: **2918 Mission Transportation Analysis**

SF18-0978

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### Introduction

On November 30, 2017, the San Francisco Planning Commission approved the Community Plan Evaluation for the proposed development at 2918 Mission Street (Proposed Project). An appeal was filed by Calle 24 Latino Cultural District Council on January 1, 2018, based on concerns that the Eastern Neighborhoods Area Plan and subsequent 2008 EIR analysis are outdated, and that their determination of limited impacts to transit, traffic, and circulation is no longer accurate.

This memo summarizes new data collection in the Mission District, including vehicle volumes at key intersections in the neighborhood, and transit reliability as a result of new development. These observations reveal the following key findings:

- Intersection volumes at key locations in the Mission District do not exceed forecasts from the Eastern Neighborhoods Area Plan EIR, and in some cases are lower than the 2000 baseline.
- Transit speeds have improved along Mission Street in the past 10 years.

### Project Description

The Proposed Project Site, 2918 Mission Street, is located on the west side of Mission Street between 25<sup>th</sup> and 26<sup>th</sup> Streets in the Mission Street Neighborhood Commercial Transit (NCT) Zoning District. The property is currently developed with a single-story, 5,200 square foot commercial building (a laundromat) and an associated surface parking lot. In total, the site is approximately 11,653 square feet. With the exception of two spaces that are rented to the adjacent bank, all spaces in the surface parking lot are for customers of the laundromat (and there is a sign posting this parking restriction). Laundromat staff watch for people using the parking lot and not visiting the laundromat, and warn them if observed.



The Proposed Project would include the demolition of the existing building and new construction of an eight-story, 67,314 square foot mixed-use building with 75 dwelling units and 6,724 square feet of ground floor retail. The Proposed Project would not include any off-street vehicle parking, but would include 76 Class I bicycle parking spaces and 14 Class 2 bicycle parking spaces. The dwelling unit mix includes 18 studios, 27 one-bedroom units, and 30 two-bedroom units. The Proposed Project would include 9,046 square feet of usable open space.

Buildings immediately adjacent to the project site are the Zaida T. Rodriguez Early Education School to the south and to the west across Osage Alley, Chase Bank to the north at the corner of Mission and 25th Street, and a mix of two- and three-story buildings used for a variety of uses including automobile repair, retail stores, residences, restaurants, and the Instituto Familiar de la Raza across Mission Street to the east.

The project site is well served by public transportation. The Bay Area Rapid Transit (BART) 24th Street station is located one block north of the project site. Several MUNI bus lines including the 14-Mission, 14R-Mission Rapid (both 14 Muni lines run in their own exclusive travel lane), 48-Quintara/24th Street, 49-Van Ness/Mission and the 67-Bernal Heights are within one quarter mile.

## Intersection Volumes

The Eastern Neighborhoods EIR analyzed several intersections within the Mission District. Fehr & Peers worked with the Planning Department to select three of these intersections and conduct one-day PM peak hour turning movement counts in April 2018: Potrero Street/23<sup>rd</sup> Street, Mission Street/24<sup>th</sup> Street, and South Van Ness Avenue/26<sup>th</sup> Street. These counts were then compared to the Eastern Neighborhoods EIR expected level of traffic growth based on the total change in housing units constructed in the Mission from 2011 to 2018. In addition, traffic counts were compared to observed traffic volumes collected in 2015 included in the 1515 South Van Ness Avenue Transportation Impact Study (TIS).

The Eastern Neighborhoods PEIR included growth forecasts under Options A, B, C, and the B/C preferred alternative. The Preferred Alternative included fewer estimated households than the maximum analyzed under Option C. These forecasts represented projections of likely, anticipated development through the year 2025, using best available information at the time that the PEIR was certified, rather than “caps” on permissible development or estimates of maximum capacity at buildout under the rezoning. The Eastern Neighborhoods PEIR projected that implementation of the Mission Area Plan could result in an increase of up to 2,054 net dwelling units and 700,000 to 3,500,000 sf of non-residential space (excluding PDR loss).





Overall, the current level of reported development from the Eastern Neighborhoods Monitoring Report was estimated to represent around 65 percent of background, no project growth (based on progress from 2000 baseline year to 2018 relative to the 2025 projections), and around 10 percent complete<sup>1</sup> for the growth projected under EIR Option C. While the preferred alternative does not precisely match any of the three options set forth in the EIR, Fehr & Peers selected Option C for comparison purposes as it showed the highest level of residential growth in the Mission.

**Table 1** shows a summary of observed and estimated traffic volumes from the Eastern Neighborhoods EIR for the intersections analyzed. On average, observed traffic volumes in 2018 were around 25 percent lower than expected based on the Eastern Neighborhoods EIR and the percentage of estimated development complete<sup>2</sup>. At two of the three intersections counted, total traffic volume had in fact decreased from the 2000 baseline count data. The observed traffic counts include only one day of count data, which introduces a chance that the observations are not representative; however, traffic volumes at urban intersections tend to be fairly stable with respect to the amount of peak hour traffic. Overall, this reflects that the Eastern Neighborhoods TIS and EIR took a fairly conservative approach to modeling the levels of local traffic generated by the changes in land use allowed by the Plan.

Table 1. Comparison of Observed and Estimated Volumes (Eastern Neighborhoods EIR)

Intersection	2000 Baseline Volume	2025 Option C Projected Volume	2018 Projected Volume <sup>1</sup>	2018 Observed Volume	Difference (2018 Observed – 2018 Projected)	% Diff.
Potrero / 23 <sup>rd</sup>	2,663	2,837	2,680	2,546	-134	-5%
Mission / 24 <sup>th</sup>	1,615	1,935	1,647	1,142	-505	-44%

1. 2018 to date projected volume is derived from the 2000 baseline volume plus 10 percent of Option C added project trips. Actual completed development analyzed in Option C amounts to 25% of studied residential units, and 4% of non-residential new development.

Source: Fehr & Peers, 2018; Eastern Neighborhoods TIS, 2008

**Table 2** shows a summary of observed traffic volumes from the 1515 South Van Ness TIS compared with these 2018 traffic counts for the intersections analyzed. On average, observed traffic volumes in 2018 were around 8 percent lower than the observed volumes in the 1515 South Van Ness TIS. At Mission Street/24<sup>th</sup> Street, total traffic volume decreased from the 2015 observed volumes. At 26<sup>th</sup> Street and South Van Ness, there was an increase in traffic volume traveling northbound and

<sup>1</sup> Estimate of 10 percent complete includes 25 percent of estimated increase in housing units and 4 percent of estimated increase in non-residential square footage from the 2000 baseline. This does not include the reduction in total PDR square footage.

<sup>2</sup> Projected traffic volumes for EIR Option A (at 30% complete) and the No Project scenario were similar to those for Option C, and were on average higher than the observed 2016 traffic volumes.



southbound. This likely reflects shifts from other north/south streets such as Mission Street that have seen changes in their roadway configurations with the installation of bus-only lanes in 2015.

Table 2. Comparison of Observed Volumes (1515 South Van Ness TIS)

Intersection	2015 Observed Volume	2018 Observed Volume	Net Difference (2018 Observed – 2015 Observed)	% Difference
Mission / 24 <sup>th</sup>	1,476	1,142	-334	-29%
S. Van Ness / 26 <sup>th</sup>	1,534	1,759	225	13%

Source: Fehr & Peers, 2018; 1515 South Van Ness TIS, 2017

## Transit Effects

Three bus routes run along Mission Street past the Proposed Project Site: 14 Mission, 14R Mission Rapid, and 49 Van Ness/Mission. Increased development and density throughout the Mission District has resulted in an increase in demand for transit in the neighborhood, and the 2918 Mission Street appeal cites concerns about transit reliability. In addition, the increased prevalence of on-demand transportation, such as Uber and Lyft, has resulted in an increase in passenger loading. When curb space is unavailable, loading and unloading vehicles may stand in the transit-only lane or travel lane, potentially delaying transit vehicles.

**Table 3** shows transit speeds between 2007 and 2017, along Mission Street between 14<sup>th</sup> Street and Cesar Chavez. Transit travel speeds have generally increased. Speeds increased from 7.8 miles per hour (mph) to 9.3 mph (19 percent) in the southbound direction during the AM peak period, and from 5.2 mph to 7.3 mph (35 percent) in the southbound direction during the PM peak period. Transit travel speeds decreased from 8.5 mph to 8.1 (5 percent) in the northbound direction during the AM peak period between 2011 and 2017, and increased from 7.1 mph to 7.9 mph (11 percent) in the northbound direction during the PM peak period. It should be noted that transit-only lanes were implemented on Mission Street during this time (in 2015), which has contributed to the increase in speed noted between 2015 and 2017.



Table 3. Transit Travel Speeds Along Mission Street (14<sup>th</sup> Street to Cesar Chavez)

Time Period	AM Peak Period		PM Peak Period	
	Southbound	Northbound	Southbound	Northbound
2007	7.8	N/A	5.4	7.1
2009	8.4	N/A	6.6	7.1
2011	8.8	8.5	6.9	7
2013	8.6	8.3	6.6	6.8
2015	8.9	8.3	6.7	6.8
2017	9.3	8.1	7.3	7.9
% Change (2007-2017)	19%	-5%	35%	11%

Source: SFCTA Congestion Management Program, 2018