

**TREASURE ISLAND / YERBA BUENA ISLAND  
REDEVELOPMENT PROJECT  
Volume 3 – Chapter IX**



**CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT  
CASE NO. 2007.0903E**

**STATE CLEARINGHOUSE NO. 2008012105**

**DRAFT EIR PUBLICATION DATE: JULY 12, 2010**

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TREASURE ISLAND / YERBA BUENA ISLAND  
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**Final Environmental Impact Report  
Volume 3 – Chapter IX**

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**TREASURE ISLAND / YERBA BUENA ISLAND  
REDEVELOPMENT PROJECT FINAL EIR**

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## 1. INTRODUCTION

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### 1.1 PURPOSE OF THE COMMENTS AND RESPONSES DOCUMENT

The purpose of this Comments and Responses (“C&R”) document is to present comments submitted on the Draft Environmental Impact Report (“Draft EIR”) for the proposed Treasure Island / Yerba Buena Island Redevelopment Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (“CEQA”) Public Resources Code Section 21091 (d)(2)(A) and (B), the City has considered the comments received, evaluated the issues raised, and herein provides written responses that describe the disposition of each environmental issue that has been raised by the commentors. Comments were made in written form (letters, emails, and facsimiles) during the public comment period from July 12 to September 10, 2010, and as oral testimony received before the Planning Commission and the Treasure Island Development Authority (“TIDA”) Board at the public hearing on the Draft EIR held on August 12, 2010. A hearing on the Draft EIR was also held before the Historic Preservation Commission on August 4, 2010.

### 1.2 ENVIRONMENTAL REVIEW PROCESS

The San Francisco Planning Department prepared the Draft EIR for the Treasure Island / Yerba Buena Island Redevelopment Project in accordance with CEQA and the *CEQA Guidelines* in Title 14 of the California Code of Regulations. The Draft EIR was published on July 12, 2010. A public review and comment period extended from July 12 to September 10, 2010, to solicit public comment on the adequacy and accuracy of information presented in the Draft EIR.

The Draft EIR, together with this C&R document, will be presented to the Planning Commission and the TIDA Board in a public hearing for certification as a Final Environmental Impact Report. The Planning Commission and the TIDA Board will be asked to certify that the EIR was completed in compliance with CEQA and Chapter 31 of the SF Admin Code. The Final EIR will consist of the Draft EIR, the comments received during the public review period, responses to the comments, and any revisions to the Draft EIR that result from public agency and public comments and from staff-initiated text changes. The City decision-makers will consider the certified Final EIR, along with other information received or considered during the public process, to determine whether to approve, modify, or disapprove the Proposed Project, to adopt findings as required by CEQA (Pub. Resources Code, Section 21081), and to specify any applicable environmental conditions as part of project approvals in a Mitigation Monitoring and Reporting Program.

If the City decides to approve the Proposed Project with significant effects that are identified in the Final EIR, but which are not avoided or reduced to a less-than-significant level, the City must

indicate that any such unavoidable significant effects are acceptable due to overriding considerations as described in *CEQA Guidelines* Section 15093. This is known as a Statement of Overriding Considerations. In preparing this Statement, the City must balance the benefits of a proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (*CEQA Guidelines* Section 15093). If an agency makes a Statement of Overriding Considerations, the statement must be included in the record of project approval.

### 1.3 DOCUMENT ORGANIZATION

This chapter concludes with a list of the persons commenting on the Treasure Island / Yerba Buena Island Redevelopment Project EIR. Commentors who provided written comments are listed first, followed by commentors who spoke at the public hearing. Each listing includes the corresponding written communication or transcript designation for the commentor.

Chapter 2, Comments and Responses, presents verbatim excerpts of the substantive comments, organized by topic. Each comment from a comment letter is identified, at the end of the comment, with the number of the comment letter from which it is excerpted, and a comment number denoting its sequence within the letter. Each oral comment from the transcript is denoted by “TR,” a sequential number assigned to the speaker, and a sequential comment number.

- Appendix J to this Comments and Responses document presents copies of the bracketed written comment letters from which the excerpts are derived, and Appendix K presents the bracketed transcript of the oral testimony received at the public hearing on the Draft EIR from which the transcript comments are derived.

Following each comment or group of comments is the Planning Department’s response. Similar comments are grouped together by topic and may be addressed by a single response. The responses generally provide clarification of the Draft EIR. The responses may also include revisions or additions to the Draft EIR. Revisions to EIR text show as indented text. New or revised text is underlined, and deleted material is shown as ~~striketrough~~ text. The subject matter of one topic may overlap with that of other topics, so the reader must occasionally refer to more than one group of comments and responses to review all the information on a given subject. Cross-references are provided in these instances.

Chapter 3 presents text changes to the EIR reflecting both text changes made as a result of a response to comments as well as staff-initiated text changes identified by San Francisco Planning Department staff to update, correct, or clarify the EIR text. The changes have not resulted in significant new information with respect to the proposed project, do not identify any new significant unmitigated environmental impacts, and do not identify new mitigation measures that are not included as part of the Proposed Project. Therefore, recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5 is not required.

This Comments and Responses document will be incorporated into the Final EIR as a new chapter. The changes to the EIR's text and figures called out in the responses and the staff-initiated text changes will be incorporated into the Final EIR.

## 1.4 LIST OF COMMENTORS

### WRITTEN COMMENTS

The following persons submitted written comments about the EIR between July 12 and September 21, 2010. Some letters were received after the comment period expired on September 10, 2010, but were accepted for consideration.

<b>Written Comment Designation</b>	<b>Commentor</b>	<b>Date of Written Comments</b>
1	Will Travis, Executive Director, San Francisco Bay Conservation and Development Commission	August 4, 2010
2	Bernard Choden	August 5, 2010
3	Michael Lynes, Conservation Director, Golden Gate Audubon Society	August 12, 2010
4	Jorge Garcia	August 21, 2010
5	Christopher Pederson	August 22, 2010
6	William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District	August 25, 2010
7	Ron Miguel, President, San Francisco Planning Commission	August 27, 2010
8	Treasure Island/Yerba Buena Island Citizens' Advisory Board	August 30, 2010
9	Ron Downing, Director of Planning, Golden Gate Bridge, highway and Transportation District	August 30, 2010
10	P. M. McMillin, Captain, U. S. Coast Guard	September 3, 2010
11	Donald Forman	September 3, 2010
12	Todd Brennen, Secretary, YBI-Residence Association Inc., YBI Residence Mutual Benefit Corporation	September 6, 2010
13	Anthony F. Gantner, Attorney-at-Law	September 8, 2010
14	Judy Irving, Executive Director, Pelican Media	September 8, 2010
15	Johannes Hoffman, AIA, Contracting Officer's Technical Representative, U.S. Department of Labor	September 9, 2010
16	Lisa Carboni, District Branch Chief, Local Development – Intergovernmental Review, California Department of	September 9, 2010

<b>Written Comment Designation</b>	<b>Commentor</b>	<b>Date of Written Comments</b>
	Transportation	
17	Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission	September 9, 2010
18	Mike Buhler, Executive Director, San Francisco Architectural Heritage	September 9, 2010
19	Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters	September 9, 2010
20	Kathrin Moore, Commissioner, San Francisco Planning Commission	September 10, 2010
21	Hisashi Sugaya, Commissioner, San Francisco Planning Commission	September 10, 2010
22	John Elberling, Director, TIDA Board	September 10, 2010
23	Cory LaVigne, Director of Service Development and Planning, AC Transit	September 10, 2010
24	Grace Kato, Public Land Management Specialist, California State Lands Commission	September 10, 2010
25	Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail	September 10, 2010
26	Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District	September 10, 2010
27	William Robberson, President, San Francisco Boardsailing Association	September 10, 2010
28	Saul Bloom, Arc Ecology	September 10, 2010
29	Michael F. McGowan, Arc Ecology	September 10, 2010
30	Eric Brooks, Sustainability Chair, San Francisco Green Party	September 10, 2010
31	Ruth Gravanis	September 10, 2010
32	Mike Lynes, Conservation Director, Golden Gate Audubon Society	September 10, 2010
33	Mark R. Connors, President, Good Neighbors of Treasure Island and Yerba Buena Island	September 10, 2010
34	Mark R. Connors	September 10, 2010
35	Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group	September 10, 2010
36	Tom Radulovich, Livable City and Walk San Francisco	September 10, 2010
37	Tom Radulovich, Livable City	September 10, 2010

<b>Written Comment Designation</b>	<b>Commentor</b>	<b>Date of Written Comments</b>
38	Jennifer Clary, President, San Francisco Tomorrow	September 10, 2010
39	Vedica Puri, President, Telegraph Hill Dwellers	September 10, 2010
40	Paul T. Currier	September 10, 2010
41	Andy Thornley, Program Director, San Francisco Bicycle Coalition	September 10, 2010
42	Chris Stockton	September 14, 2010
43	Dave Campbell, Program Director, East Bay Bicycle Coalition	September 21, 2010
44	Neil Malloch	September 13, 2010

### **PUBLIC HEARING COMMENTS**

The following persons made oral comments about the EIR at the public hearing on August 12, 2010:

<b>Public Hearing Comment Designation</b>	<b>Commentor</b>
TR.1a	Michael Theriault
TR.1b	Karen Knowles Pierce
TR.1c	Bernie Choden
TR.2	Tim Colen, Executive Director, San Francisco Housing Action Coalition
TR.3	Manny Flores, Carpenters Local 22
TR.4	Sherry Williams, Executive Director, Treasure Island Homeless Development Initiative
TR.5	Nick Rossi, in co-counsel with Rupert Hanson of Cox, Wootten Griffin, Hansen and Poulos, representing Ken Masters
TR.6	Paul Currier
TR.7	Richard Weller, Pile Drivers, Local 34
TR.8	Karen Weiss, Bay Conservation and Development Commission
TR.9	Ken Masters
TR.10	Tony Gantner
TR.11	Melanie Williams

<b>Public Hearing Comment Designation</b>	<b>Commentor</b>
TR.12	Mike Lynes, Conservation Director, Golden Gate Audubon Society
TR.13	Kate Kelley, Sierra Club
TR.14	Patrick Huniacke, GAA Athletic Association
TR.15	Joel Koppel
TR.16	Sal Bloom, Executive Director, Arc Ecology
TR.17	Rosie Masters
TR.18	Atta Pilram
TR.19	Michael Antonini, Commissioner, San Francisco Planning Commission
TR.20	Kathrin Moore, Commissioner, San Francisco Planning Commission
TR.21	Christina Olague, Commissioner, San Francisco Planning Commission
TR.22	Claudine Cheng, Director, TIDA Board
TR.23	John Elberling, Director, TIDA Board
TR.24	William Lee, Commissioner, San Francisco Planning Commission
TR.25	Ron Miguel, President, San Francisco Planning Commission
TR.26	Jean-Paul Samaha, Director, TIDA Board

## 2. COMMENTS AND RESPONSES

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Section 2, Comments and Responses, presents the oral and written comments on the Draft EIR received by the City and responses to the comments that raise substantive environmental issues related to the Proposed Project. Comments are organized by topic, and each comment or group of related comments is followed by a response. Appendix J to this Comments and Responses document presents copies of the bracketed written comment letters, and Appendix K presents the bracketed transcript. Statements made during the public hearing and in written comments that do not relate to the Proposed Project or do not raise potential environmental issues have not been bracketed and are not responded to in this C&R document. Those statements may be taken into consideration by decision-makers during their deliberations on the approval actions requested by the Project Sponsor, to the extent that they are relevant to the Proposed Project.

## 2.1 PROJECT DESCRIPTION

### 2.1.1 STATE AND FEDERAL OWNERSHIP

#### Comments

I believe that “due diligence” has not been exercised for findings regarding the ownership of Treasure Island and the proposed seismic safety mitigation for associated development proposals.

1. The State of California owns the development site in perpetuity by virtue of federal law “The Arkansas Act of 1850” gave all states stewardship of coastal wetlands below mean high tide as of September 1850. Authenticating correspondence by state officials involving Hamilton Airbase, an analogous situation, is appended. The DEIR on page IV.A.12 asserts that state legislation in 1942 and 1997 both empowered the transfer of Treasure Island to the Navy, a wartime exercise as with Hamilton Airbase, and the release of Treasure Island from the terms of the Tidelands Trust. State law does not trump federal law despite many invalid challenges by the state attempting to do so. The question of ownership underlies the legality and efficacy of the control of uses and resources needed to mitigate the impacts of the proposed development. This issue is fundamental to the integrity and accuracy of the DEIR. (*Bernard Choden*) [2.1]

[T]he question of whether due diligence has been exercised regarding title to Treasure Island, that must be cleared in accord with the federal law, the Arkansas Act of 1850 that said that lands below mean high tide, including state Louisiana, Texas -- belong to states of Louisiana, Texas, Florida -- belong to the State of California forever in perpetuity. Clearing that title is for most because the mitigations that will be required to pay for the -- for the environmental defects of the island will not be operable. Also federal laws will either put certain operational constraints that need to be cleared first, then you can do your job. (*Bernard Choden*) [TR.1.1]

**4. Ownership of the Land.** Legal ownership of the submerged lands has not been resolved. The State of California owns the development site in perpetuity by virtue of federal law (“The Arkansas Act of 1850”) which gave all states stewardship of coastal wetlands below mean high tide as of September 1850. Regarding a similar situation, the turnover of Hamilton Airbase, state officials commented on the Tidelands Trust situation as revealed in contemporary correspondence. Clearing title does not prevent the developer's proposal; it only affirms the need to go through the State Lands Commission for permission to LEASE the site instead of outright ownership. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.24]

The DEIR on page IV.A 12 asserts that state legislation in 1942 and 1997 both empowered the transfer of Treasure Island to the Navy, a wartime exercise as with Hamilton Airbase, and the release of Treasure Island from the terms of the Tidelands Trust. But State law is trumped by Federal law despite many attempts by the State to invalidate this principle. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.25]

There is a great deal of clear graft and corruption here in San Francisco, which must come to a halt forward. We might as well start the arrest of this specific project, which contains all the elements of a coordinated pattern of official misconduct, fraud, and collusion, which appears on face to violate the Racketeering Laws of the People of the United States of America

This project which I will refer to as “TI/YBI” forward, as presented in this Draft EIR is nothing more than a transparent attempt to steal approximately four hundred and fifty acres of California State Land, which is situated within the boundaries of the City and County of San Francisco, and commonly known as Treasure Island and Yerba Buena Island, and referred to by the City and County of San Francisco Planning Department as Case No, 2007-0903E. (*Paul T. Currier, Candidate for Mayor of San Francisco 2011*) [40.1]

All these City Lawyers know that according to both the Federal Law that governs the use, seizure of and return of State Wetlands (which I believe was enacted in the year 1850) by the Federal Government, and the Federal Law that governs the seizure, use and return of State Property from any State for use in National Emergency, that all of Treasure Island and Yerba Buena Islands, while these State Lands may exist within the boundaries of the City and County of San Francisco, and were confiscated by the US Navy and the Federal Government for use in World War II, that the US Government must clean all this land of environmental hazard and return the property to the People of the State of California.

As such, and spelled out in my paragraph that immediately precedes my statement now, the City and County of San Francisco can not seize State Land, without compensation.

Clearly, the work of Congresswoman Nancy Pelosi and Mayor Gavin Newsom does not address the fact that the US Navy does not have clear title to these 450 acres of California State land. (*Paul T. Currier, Candidate for Mayor of San Francisco 2011*) [40.2]

I’d like to ask a simple question. Are we going to charge ourselves for what we already own, or are we going to delegate that to corporations to charge us rent for the resources that are already ours? Is that what we’re going to do here? Or are we going to disrespect the fact that this property was already owned by the federal government, and there’s a claim -- a title claim that one of the other gentlemen has already spoken to today.

We’re going to disregard the people of the City and the State of California and the claims of the Coastal Commission to regulate the coastal properties and waters of the State of California. We going to do that? That’s what we’re going to do? I caution us to pay attention to what’s going on here. I want to speak about three simple concepts. One is them is called secrecy. The next one is called craft. Another one is called corruption. Maybe some of you have profited from this, maybe not. How come there’s no inspector general function in any of this?

We’re privatizing 150 acres in the City and County of San Francisco. There’s money at stake here. This is public property. Where’s the cops? Where’s the oversight? (*Paul Currier*) [TR.6.1]

Maybe it’s because there’s a lot of money in those high-rise developments; right?

I want to close with a concept. It appears that we have an organized theft of public property going on with a process of methodology, where incrementally we meet and we take this, we take that, we take this, we take that, and then 30 to 50 years, what’s going to be left? Treasure Island’s a gem. It belongs to the people of the Bay Area as much as it -- it has concerns for supervisor of District 6. Hopefully the next supervisor will speak up to this. I’m surprised Chris Daily hasn’t been more vocal. (*Paul Currier*) [TR.6.4]

### **Response**

The comments state that the project site is owned by the State of California; some make this assertion citing the Arkansas Act of 1850. This statement is incorrect. As explained in the EIR in Chapter I, Introduction, on p. I.1, and Chapter II, Project Description, on p. II.1, Treasure Island is presently owned by the United States and is under the jurisdiction of various federal agencies. The United States acquired its interest in the property in a 1942 condemnation action from the City and County of San Francisco. The land underlying Treasure Island, which is within the City limits, was originally owned by the State of California. The State became the owner of the property at statehood. Under the “equal footing doctrine,” upon admission to the Union, California had acquired title to all lands within its borders that were below the line of mean high tide at statehood (i.e., tide and submerged lands) by virtue of its sovereignty. This included the lands comprising Treasure Island, which were historically submerged. The Arkansas Act grant referenced in the comments pertained to federally owned wetlands *above* the historic mean high tide line, and therefore did not include any portion of Treasure Island.

#### **2.1.1.1 Mitigation Responsibility**

### **Comments**

While the ownership is still an open question, there is no possibility of assigning mitigations. Who would be charged under the law with any given mitigation? (*Jennifer Clary, President, San Francisco Tomorrow*) [38.26]

The question of ownership underlies the legality and efficacy of the control of land uses and resources needed to mitigate the impacts of the proposed development. This issue is fundamental to the integrity and accuracy of the DEIR. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.27]

### **Response**

- The Treasure Island Development Authority (“TIDA”) has been established as the agency to redevelop the project site (see EIR Chapter I, Introduction, pp. I.3-I.4, and EIR Chapter II, Project Description, p. II.1). Because of uncertainties regarding the legal status of redevelopment agencies, a redevelopment plan is no longer proposed; however, TIDA would continue to be an agency of the City and County, as well as the Trustee for the Tidelands Trust properties. TIDA and the Planning Department or Planning Commission would have the responsibility for ensuring that mitigation measures included in the Proposed Project or imposed as conditions of approval are carried out following actions to approve the Area Plan, Special Use District, Development Agreement, Disposition and Development Agreement, and related transactional documents. For many mitigation measures, TIDA would contractually obligate Treasure Island Community Development, LLC (“TICD”), as the Master Developer, to assume responsibility for

implementation in the Disposition and Development Agreement and related transaction documents for the Proposed Project. Mitigation measures adopted by the City would be fully enforceable (as required in CEQA Section 21081.6). Detailed information about mitigation implementation and reporting will be provided in the Mitigation Monitoring and Reporting Plan that would be presented to decision-makers for their

consideration as part of the entitlement documentation. See also the response in Section 2.1.1, State and Federal Ownership, above, for a discussion of ownership of the project site.

### 2.1.1.2 Tidelands Trust Areas

#### Comment

Page II.15 shows that most of the uplands on the Navy-owned portion of YBI are proposed to be brought into the Trust. Unfortunately, the diagram fails to differentiate between what is already in the Trust and what is proposed to be brought into the Trust by virtue of the exchange.

*(Jennifer Clary, President, San Francisco Tomorrow)* [38.28]

#### Response

The Navy is a Federal agency and, as such, lands owned by the Navy are not subject to the Tidelands Trust. Thus, no lands are currently subject to the Tidelands Trust. The Draft EIR provides the following description of lands that will become subject to the Tidelands Trust upon transfer of the project site to TIDA: “These areas include all of Treasure Island, approximately 2 acres of land on Yerba Buena Island, and all of the tidal and submerged lands within the Redevelopment Plan Project Area. The approximately 37-acre Job Corps campus would not be subject to the Tidelands Trust as long as it remains in Federal ownership.” (EIR p. II.14; see also EIR Chapter III, Plans and Policies, pp. III.12-III.13). The project also proposes an exchange of land between TIDA and the State Lands Commission. The Trust Exchange Agreement (discussed on EIR pp. II.14 and III.14) would result in removing approximately 150 acres of land on Treasure Island from the Tidelands Trust and designating approximately 80 acres as Tidelands Trust lands on Yerba Buena Island on the north side of the Bay Bridge in the Development Plan Area, as shown on F II.3: Tidelands Trust Land Exchange, on EIR p. II.15 (see also EIR p. IV.A.26). None of this approximately 80 acres is currently subject to the Tidelands Trust.

Since publication of the Draft EIR, there has been some clarification regarding Tidelands Trust land on Yerba Buena Island. The statement that approximately 2 acres of land on Yerba Buena Island within Naval Station Treasure Island would become subject to the Trust upon transfer to TIDA is not correct. None of land above the mean high tide line on the island would be subject to the Trust. EIR text on the following pages in Chapter II, Project Description, Chapter III, Plans and Policies, and Section IV.A, Land Use, is revised.

The second sentence in the second paragraph on EIR p. II.14 is revised to delete reference to the 2 acres on Yerba Buena Island (deleted text is shown in ~~strike out~~):

These areas include all of Treasure Island, ~~approximately 2 acres of land on Yerba Buena Island,~~ and all of the tidal and submerged lands within the Redevelopment Plan Project Area.

The last partial paragraph at the bottom of EIR p. III.12 is revised to delete references to the 2 acres on Yerba Buena Island and to correct the total acreage of Yerba Buena Island (deleted text is shown in ~~strike-out~~ and new text is underlined):

Treasure Island is composed of landfill placed on former tidelands and submerged lands. Upon conveyance to TIDA by the Navy,<sup>12</sup> all 367 acres of conveyed land on Treasure Island (excluding the Job Corps campus), ~~along with approximately 2 acres of tidelands on Yerba Buena Island,~~ and all of the other tidal and submerged lands within the Redevelopment Plan Project Area will be subject to the Tidelands Trust Doctrine and the statutory trust created by the Treasure Island Conversion Act of 1996 (the “Conversion Act”) The statutory trust created by the Conversion Act and Tidelands Trust Doctrine are collectively referred to as the “Tidelands Trust.” The approximately 37-acre Job Corps campus would not be subject to the Tidelands Trust so long as it remains in Federal ownership. ~~Except for the approximately 2 acres of existing tidelands on Yerba Buena Island,~~ None of the 450160 acres of land above the mean high tide line on Yerba Buena Island is subject to the Tidelands Trust.

There is no change to Footnote 12, cited in the text above.

The second full paragraph on EIR p. IV.A.12 is revised to delete the reference to the 2 acres on Yerba Buena Island (deleted text is shown in ~~strike-out~~ and new text is underlined):

The Conversion Act designates TIDA as the agency responsible for administering Tidelands Trust property on the Islands once the property is transferred to it by the Navy.<sup>18</sup> Upon transfer, about 367 of the approximately 404 acres of land on Treasure Island would become subject to the Tidelands Trust; the 37 acres of land remaining under Federal jurisdiction on the Job Corps campus would not be subject to the Tidelands Trust.<sup>19</sup> ~~Except for approximately 2 acres of existing tidelands,~~ The land on Yerba Buena Island transferred from the Navy to TIDA would not be subject to the Tidelands Trust upon transfer.

There is no change to Footnotes 18 and 19, cited in the text above.

The first sentence in the second paragraph on EIR p. IV.A.26 is revised to remove the reference to the 2 acres on Yerba Buena Island (deleted text is shown in ~~strike-out~~ and new text is underlined):

~~Currently, only approximately 2 of~~ None of the 450160 acres on Yerba Buena Island would be subject to the Tidelands Trust upon transfer.

## 2.1.2 ZONING AND HEIGHT

### 2.1.2.1 Zoning Map

#### Comment

**2. A Zoning Map is needed as part of the Proposed Project.** The Zoning Map which will be sought for height allowances should be presented now so that the maximum heights can be analyzed as “the worst case” in this document. The Figure that calls for “flex” zones is insufficient and ambiguous because there is too great a range in heights (e.g. a range such as 70’

to 450' cannot be analyzed). A Zoning Map should be provided that shows the maximum height allowed in that zone, e.g. 450'. Treasure Island is no different from any other part of the City in this respect. After examining the variants, the options and the flex zones and looking at the mitigation measures devised to address them, one wonders what the actual project being studied is; there are too many variables which are unresolved. The worst case must be what is being studied.

(*Variants—Vol. II, Ch. VI, pp. VI.1-54*)

*Recommendation: Provide the current and proposed zoning maps for the project so that the proposed changes can be clearly understood and studied. (Jennifer Clary, President, San Francisco Tomorrow) [38.6]*

### **Response**

The EIR provides an accurate description of potential building heights that would be authorized if the City approves the Proposed Project. As described in the EIR in Chapter II, Project Description, p. II.14, and Chapter III, Plans and Policies, p. III.1, the height and use designations for the site are currently controlled by Planning Code Section 105. Neither Treasure Island nor Yerba Buena Island is included in the current San Francisco zoning maps. Pursuant to Section 105, any property that is owned by the Federal, State or local government is declared to be within a P (Public) use district. Section 105(f) specifically designates Treasure Island and Yerba Buena Island to be within a 40-X Height and Bulk limit.

● The proposed height limits would be incorporated into the Planning Code through an amendment adding a Special Use District (“SUD”), proposed to be adopted as part of the Proposed Project. The SUD would set forth the Island-wide maximum heights, and would refer to the proposed *Design for Development*, to be adopted by TIDA and the Planning Commission, for the more detailed height limits within each designated zone. The more fine-grained height zones set forth in the proposed *Design for Development* would govern development on the Islands, and allow for a range of heights within each zone up to a maximum.

The proposed new height limits on Treasure Island and Yerba Buena Island are presented in the EIR in Figure II.6a: Treasure Island Maximum Height Limit Plan, on EIR p. II.25, and Figure II.6b: Yerba Buena Island Maximum Height Limit Plan, on EIR p. II.27, respectively. The heights on Treasure Island are variable within zones. In many of the height zones a limited number of towers would be allowed that exceed the basic height limit in many of the height zones. The areas where taller towers would be allowed are called “tower flex zones” and are shown as striped overlays on Figure II.6a. Within the tower flex zones, a limited number of towers would be allowed up to the height limits of each of the flex zones (see the response in Subsection 2.1.2.2., Height Limits, below, for more details). Therefore, the height controls cannot be represented as specific height limits on individual parcels, as is more typically shown on the Height District maps in the Planning Code, although every parcel would be subject to a maximum height.

As noted on EIR pp. II.20-II.21, maximum development was assumed in each district for environmental analysis purposes, including a conservative analysis that assumed a higher number of towers would be built in each district than would be reasonably likely, and analyzed those towers at the maximum allowable height and bulk. This represents a reasonable worst case scenario for analysis, and is more conservative than required by the California Environmental Quality Act (“CEQA”).<sup>1</sup> See further discussion in the response in Subsection 2.1.2.2, Height Limits, below.

### 2.1.2.2 Height Limits

#### Comments

24. Why does the “construction program” referred to at Page IV.B.19 only allow for some limited flexibility in the siting of tower volumes? (*Anthony F. Gantner, Attorney-at-Law*) [13.12]

Vol. 1, S-3, Summary: The description of proposed buildings, and their respective heights is written for promotional purposes, it doesn’t objectively describe the project. We request revising all references to low-, medium-, and high-rise buildings to what is typically used in building codes, and construction/ industry lingo.

**Low-Rise:** 40’0” or less from grade at the entry level to the roof line (either flat or average height of sloped roof)

**Mid-Rise:** less than 75’0” from grade at the entry level to the top-most floor of occupancy

**High-Rise:** 75’0” or more from grade at the entry level to the top most floor of occupancy

Why is this EIR consistently using misleading language to describe the project? We expect language to be corrected. (*Kathrin Moore, San Francisco Planning Commission*) [20.6]

Sometimes the options are called “**flex**”, as in height “flex” zones; these vary, for example, from 70’ to 350’ or from 70’ to 450’ (*see Vol 1, Fig. II.6a.*) That is like having no height limits at all. But CEQA requires that the worst case be studied as the proposed project. Furthermore, the graphics in this figure are very difficult to read and require a magnifying glass; the overlay “flex” zones are hard to differentiate as they are rendered in hatch patterns and in colors that are hard to discriminate. Please revise Figure II.6a to make it easier to perceive the distinctions among the various height districts and flex zones. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.2]

- The DEIR reveals that new construction is to be placed on sites of existing buildings. Which buildings will be demolished and replaced?
- What are the existing heights of the buildings to be demolished and what are the heights of the buildings to be built in their place? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.30]

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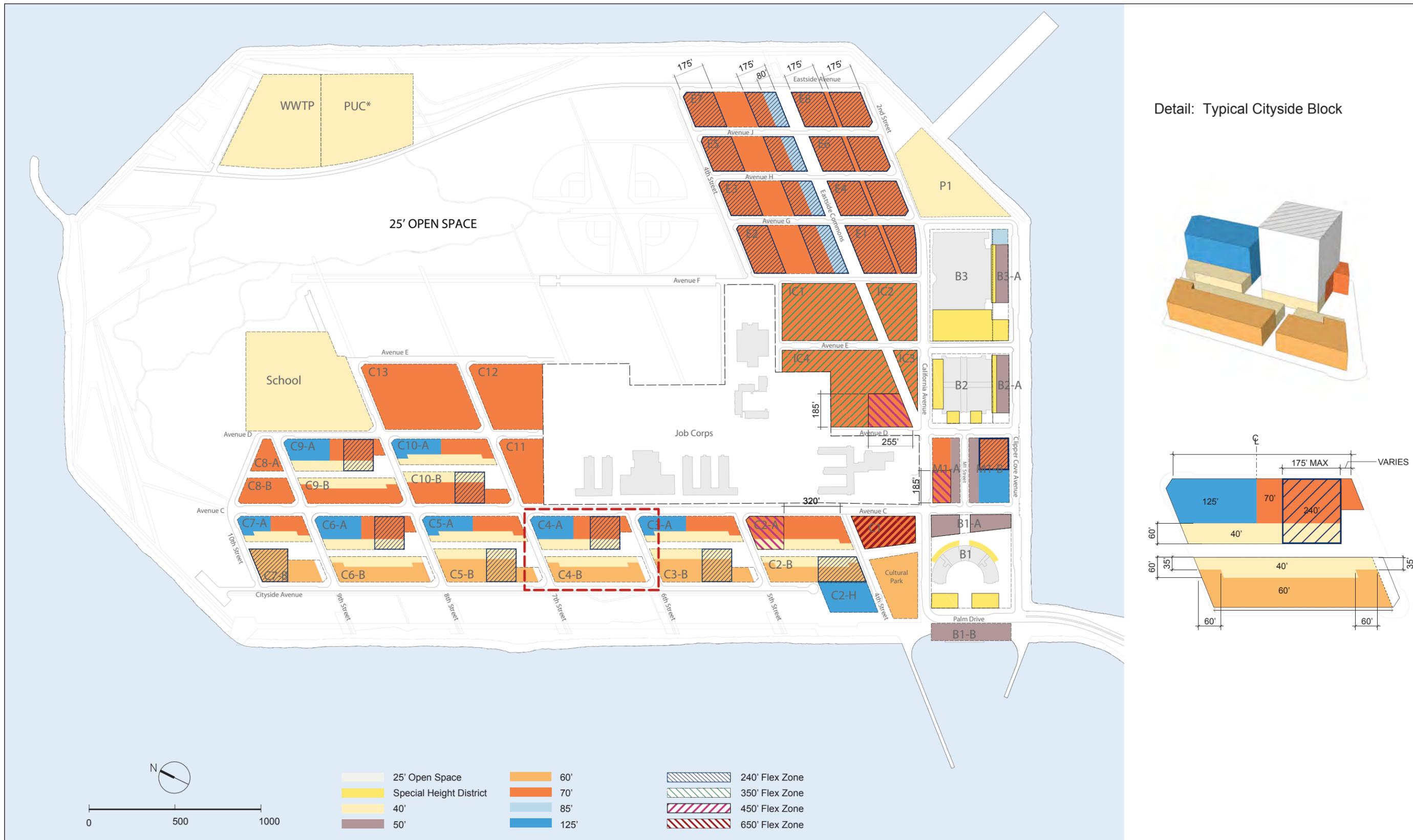
<sup>1</sup> Under CEQA, an EIR is not required to provide a worst case analysis; rather, it is to analyze the impacts that are reasonably likely to occur as a result of implementing the proposed project (*see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4<sup>th</sup> 324, at 373).

**Response**

Proposed building heights are described in the EIR in Chapter II, Project Description, on pp II.24- II.27, including Figure II.6a: Treasure Island Maximum Height Limit Plan, and Figure II.6b: Yerba Buena Island Maximum Height Limit Plan, and in Section IV.B, Aesthetics, on pp. IV.B.19-IV.B.23, including Figure IV.B.10: Proposed Representative Massing Diagram. Buildings are described as “low-rise,” “mid-rise,” and “high-rise” to provide a simple differentiation. The terms as used in the EIR are explained on p. II.24 and again on p. IV.B.19. Neither the California Building Code nor the San Francisco Building Code are cited as the source for the terms, and the use of these terms in the EIR was not intended to parallel the specific definitions found in the building codes, where a “high-rise” building is specifically defined as a building where occupied floor levels are 75 feet or more above the entrance level. Thus, a 70-foot-tall building (measured to the roof of the building as is typical for urban design purposes) would not be a high-rise under the Building Code definition. The State and local building codes do not define low-rise or mid-rise buildings.

The Special Use District and the accompanying proposed *Design for Development* for the Proposed Project would not include zoning and height districts typical of those adopted in the San Francisco Planning Code. The proposed *Design for Development* includes tiered height limits in designated areas on Treasure Island. The lower tiers would establish base height limits for a particular area, and a smaller subarea or “tower flex zone” within that area would have a higher height limit. Each flex zone would allow a limited number of taller buildings to be constructed and would provide flexibility in the locations of the taller buildings. Each flex zone would have a maximum tower height (the uppermost tier). Tower separation requirements would limit the number of towers that could be constructed in each zone. The tower separation requirements provide for views between towers, limit shadows on public open space, and provide privacy for dwelling units. The details of the tower separation requirements are provided in the proposed *Design for Development* (Section T4.5, Building Separation). A representative massing diagram showing the locations within which towers could be constructed is presented in Figure IV.B.10 on p. IV.B.20. The wire frames in this diagram would not be allowed to be filled with towers; instead, a narrower tower could be built within the wire frame, based on tower separation requirements and other requirements for setbacks established in the bulk and massing standards found in Section T4.6, Bulk and Massing in the proposed *Design for Development*. A revised and enlarged version of Figure II.6, Treasure Island Maximum Height Limit Plan, is presented on the next page to help clarify proposed height limits. See also the responses in Section 2.3, Land Use, Subsection 2.3.4, Height Limits.

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SOURCE: Perkins+Will



The EIR identifies the buildings that would be demolished as part of the Proposed Project (see EIR p. II.21 [demolition of Building 111] and pp. II.80-II.81 [demolition as part of phasing plan]). Impacts associated with demolition of existing structures are analyzed in appropriate topics in Chapter IV, Environmental Setting and Impacts; the analysis in Section IV.D, Cultural and Paleontological Resources, in Subsection D.2, Historic Architectural Resources, focuses on the potential historic character of buildings located on the site.

### 2.1.3 TRANSPORTATION PLAN

#### 2.1.3.1 Transportation Facilities

##### Comments

###### Facility Design Guidelines

The EIR discusses the creation of a Treasure Island Transit Hub on pages II.35 and following. The hub would be served by ferries, on-island buses, and off-island buses, and would be a focal point for bicycle activity. It is important that this facility be designed well to both support transit operations and to provide passenger amenities. It would be appropriate at this time to develop design guidelines for facilities such as bus loading bays, bus layover locations, bus shelters and benches, restroom facilities, wayfinding and real time passenger information.

Design guidelines are also now needed for bus-served roadways and bus stops along them. Particular attention should be paid to how buses and bicycles will interact safely and efficiently along these roads and at these stops.

AC Transit's design manual—*Designing With Transit*—provides some guidance on these issue. (*Cory LaVigne, Director of Service Development and Planning, AC Transit*) [23.4]

The shuttle route shown on page II.40 varies considerably from the route shown on page IV.E.34. How is the reader to know which one applies? The one on page II.40 does not serve the historic buildings called the "Great Whites." If that's the one that applies, then what will be the environmental impacts of people having to take private cars there? How many fewer cars would be brought to the islands if people knew they would be able to take a shuttle between the transit hub and the Great Whites? (*Ruth Gravanis*) [31.12]

On page IV.E.33 of the DEIR, footnote 11 states that the 2006 *Transportation Plan* was an exhibit to the 2006 Redevelopment Plan and Term Sheet that was endorsed by the Board of Supervisors. The footnote further reveals that the current Development Plan does not include some of the improvements listed in the 2006 *Transportation Plan* because "*full funding for these improvements has not been identified.*" Given the very significant traffic impacts that are identified in the DEIR and the lack of full funding to implement the transit improvements, this raises many questions about the elements of the Redevelopment Plan that contribute to increased traffic impacts.

- According to the DEIR, the following transportation improvements and services are included as a part of the proposed Redevelopment Plan: Construction of the Ferry Terminal and Transit Hub improvements and funds for the lease of one ferry vessel (providing service at 50 minute intervals and operating only between 5 AM and 9 PM); the continued operation of

MUNI's existing line 108-Treasure Island to the Transbay Terminal at existing service levels (one line); and the initiation of a new bus service to downtown Oakland (one line) to be operated by AC Transit.

Please respond to the following questions/comments:

- Please describe exactly which transportation improvements and services were included in the 2006 *Transportation Plan*.
- Please compare each improvement recommended in the 2006 *Transportation Plan* to those included in the Proposed Project analyzed by this DEIR.
- Which improvements from the 2006 *Transportation Plan* [have] been eliminated from the Proposed Project because “full funding” is not available?
- Please compare the levels of ferry and bus service recommended in the 2006 *Transportation Plan* to those included in the Proposed Project analyzed by this DEIR.
- How many ferries were included in the 2006 *Transportation Plan* and what was the frequency of service? How many ferries are included in the Redevelopment Plan analyzed by this DEIR and what is the frequency of service?
- What was the level of Muni service to operate between TI and San Francisco under the 2006 *Transportation Plan*? How is this different from what is included in the Proposed Project analyzed by this DEIR? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.59]

### **Response**

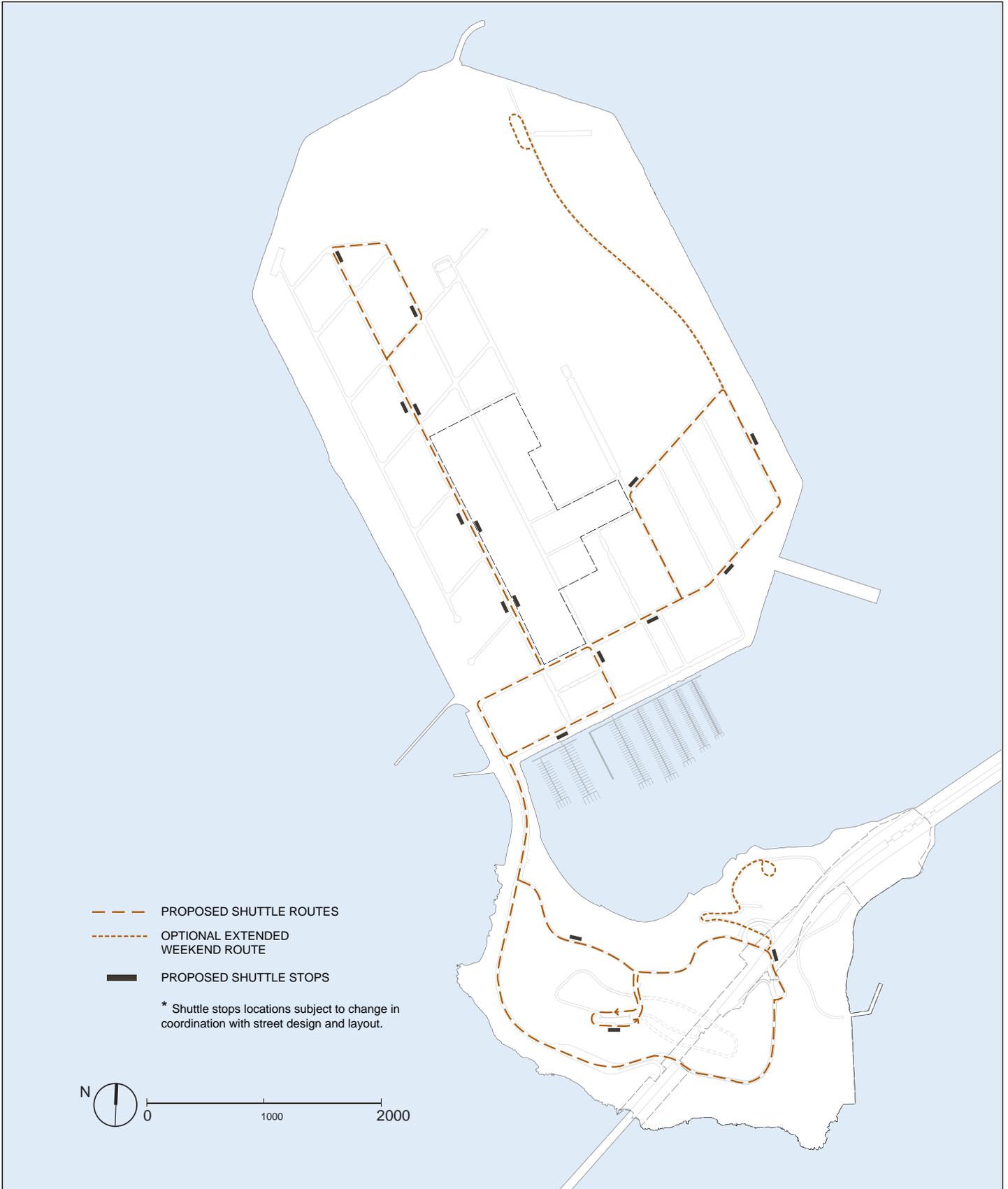
The transportation facilities included in the Proposed Project are described in Chapter II, Project Description, in Section F, Proposed Transportation Facilities, on EIR pp. II.35-II.51. The Transit Hub is described on EIR pp. II.35 and II.38-II.39. Bus routes, bus stops, and bus layover areas are shown on Figure IV.E.9: Proposed Transit Circulation Plan, on p. IV.E.34 in Section IV.E, Transportation, and the Transit Hub and bus service are described in detail in that section on pp. IV.E.33-IV.E.36. Pedestrian and bicycle facilities are described on pp. II.45-II.49, and the key bicycling and pedestrian pathways are shown on Figure II.12: Proposed Bicycle Routes, on p. II.46. Additional discussion of the proposed transportation facilities is provided on pp. IV.E.30-IV.E.45.

Details regarding design of transit facilities would be established by TIDA and TICD in consultation with the San Francisco Municipal Transportation Agency (“SFMTA”) as part of infrastructure design and construction activities. The project description in the second paragraph on EIR p. II.35 is revised as follows to indicate that consultation with SFMTA, AC Transit and the Water Emergency Transit Authority (WETA) would be included in the Proposed Project (new text is underlined):

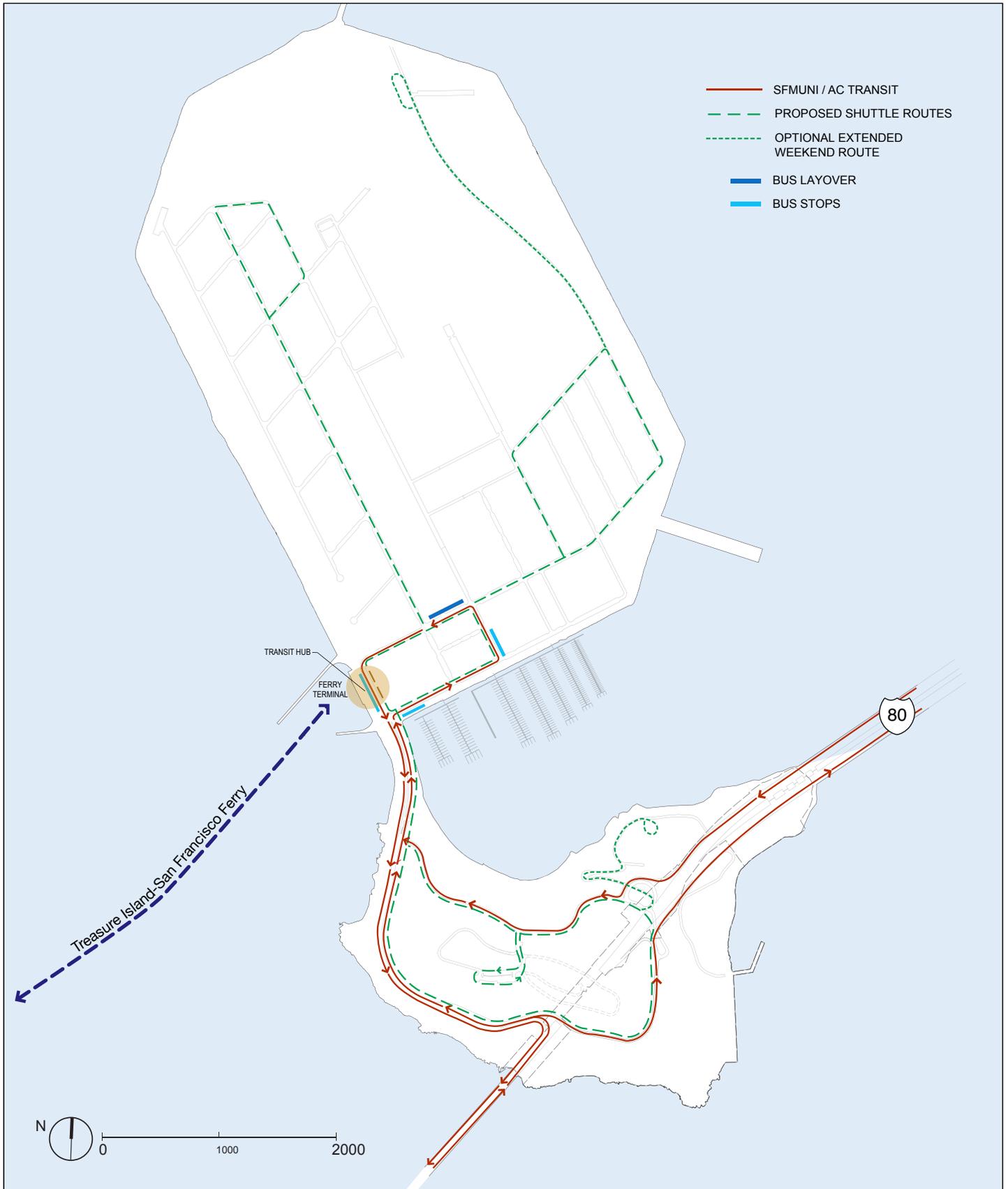
Bus stops and facilities for East Bay and San Francisco bus service providers, shuttle service stops, bicycle parking, a pool of shared bicycles (“Bicycle Library”), a car share pool, and administration/office space for the new Treasure Island Transportation Management Agency (“TITMA”) would be located at or near the Transit Hub (see “Encouraging Use of Transit and Discouraging Automobile Use,” EIR p. II.51, for a discussion of TITMA’s responsibilities.) TIDA and TICD would prepare the designs for transit facilities in consultation with SFMTA, AC Transit, and WETA.

One comment states the on-island shuttle route shown in Figure II.9: Proposed Shuttle Routes, on p. II.40, is different from the one shown in Figure IV.E.9: Proposed Transit Circulation Plan, on p. IV.E.34). The comment is correct. Figures II.9 and IV.E.9 have been revised to show both regular, weekday routes and optional routes to the Great Whites on Yerba Buena Island and the Great Park on Treasure Island. The revised figures are presented on the next two pages. As stated on p. II.39, the graphic presents the proposed on-island shuttle routes, but they are intended to be flexible and could be adjusted to meet demand. If the on-island shuttle were not to serve the Great Whites on Yerba Buena Island, the difference in vehicle trips would be small in relation to the total numbers of vehicle trips assumed to travel to and from the Islands during the peak hours studied for the EIR. There would be about 25 to 35 person trips generated by this location during the weekday AM and PM peak hours out of a total number of external person trips ranging from about 5,375 to 7,570, and about 100 person trips out of a total of about 7,580 in the Saturday peak hour. (Only a portion of this small number of person-trips was forecast to use the shuttle. Therefore, the increase in vehicle trip generation associated with not providing the shuttle would be negligible.)

The Class I mixed bicycle and pedestrian use paths proposed around the entire perimeter of Treasure Island would afford long-range views of the San Francisco mainland from the west and northwest sides of the island, and views of the East Bay from the east side of the island. As explained on EIR p. IV.E.43, the roadway at the Bay Bridge ramps includes a bridge structure that is not wide enough to provide for a separate, Class II bike lane or any viewing areas. Therefore, viewing overlooks are not proposed in these locations. However, there is level ground available adjacent to the lower, northern portion of Treasure Island Road on Yerba Buena Island approximately 500 feet south of the intersection with Macalla Road, where a scenic overlook can be provided that would provide panoramic views of the San Francisco mainland and the west span of the Bay Bridge. This new overlook and a bi-directional, 16-foot-wide Class 1 bicycle/pedestrian path on the west side of Treasure Island Road have been added to the Proposed Project’s circulation facilities. This Class 1 facility would preserve right-of-way for access to a bicycle/pedestrian facility on the Bay Bridge west span if one is constructed in the future. Figures II.12, Proposed Bicycle Routes, on EIR p. II.46, and IV.E.11, Proposed Bicycle Circulation, on EIR p. IV.E.38, are revised to show this new Class 1 facility and the proposed new scenic overlook. The revised figures and additional discussion are provided in the responses



SOURCE: Perkins+Will



SOURCE: Perkins+Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.9: PROPOSED TRANSIT CIRCULATION PLAN**

in Section 2.7, Transportation, Subsection 2.7.7, Bicycles. See also the discussion of Bicycle Access – View Area in this subsection.

The transportation improvements that are assumed for analysis purposes in the EIR are described in Section IV.E, pp. IV.E.30-IV.E-45. Most of the policies and programs described in the *Treasure Island Transportation Plan* (“2006 Transportation Plan”) that is part of the 2006 *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island* have been included in the Proposed Project analyzed in the EIR. Features such as providing on-island shuttle service, providing a Transit Hub, staffing a full-time travel coordinator, limiting residential parking ratios to one space per unit, unbundling parking from sale or rental of residential units, providing a car-share program, establishing a congestion pricing program, and charging each residential unit for a transit pass (see Section 2, Proposed Transportation Measures, on pp. 12-15 of the *2006 Transportation Plan*), are all included in the Proposed Project. As noted in the comments, some of the features in the *2006 Transportation Plan* are not assumed in the EIR analysis to be included the Proposed Project. These include increasing ferry service from ferries every 50 minutes to ferries every 15 minutes in the peak period; increasing San Francisco bus service from buses every 15 minutes to buses every 5 to 7 minutes in the peak period; and adding a second bus line to San Francisco. This has been done to provide a conservative impact analysis in the EIR, because funding for these features has not been identified. If unfunded facilities were assumed to be part of the Proposed Project, transportation impacts could be underestimated.

Many of the facilities in the *2006 Transportation Plan* that were not assumed in the “base case” for the transportation analysis have been included as mitigation measures in the EIR. For example, the *2006 Transportation Plan* includes provision of ferry service at approximately 10-minute headways (a ferry leaving every 10 minutes) during peak commute periods, using three ferry vessels. The Proposed Project would supply one ferry vessel, to be operated at 50-minute headways (see EIR p. IV.E.33). Mitigation Measure M-TR-2, Expanded Transit Service, on EIR pp. IV.E.74-IV.E.75, would provide ferry service at approximately 15-minute headways during the morning and afternoon peaks, similar to the service identified in the *2006 Transportation Plan*. The provision of additional, more frequent ferry service under the Enhanced Transit Scenario is uncertain because providing the decreased headways requires expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port, the Board of Supervisors, and WETA. Therefore, the EIR assumes only the base level of transit services. Ferry service to San Francisco was proposed to operate from 5 AM to midnight every day in the *2006 Transportation Plan*; the EIR assumes that ferries would operate between 5 AM and 9 PM. The changes in operating hours and peak headway frequency were made by the project sponsors after consultation with WETA and operating analyses showed that the 10-minute frequencies could not be reliably operated at this time and the late night service would not be supported by rider demand.

Similarly, Muni service in the “base case” for the EIR analysis is assumed to remain as it exists now, with Muni line 108-Treasure Island operating at 15-minute headways during peak periods and providing overnight “owl” service (see EIR p. IV.E.33). Mitigation Measure M-TR-2, Expanded Transportation Service, would provide peak period Muni bus service to the Transbay Terminal at approximately 7-minute headways in the AM peak and as low as 5-minute headways in the PM peak (see EIR p. IV.E.74). Mitigation Measure M-TR-2 is comparable to the approximately 5-minute headways included in the *2006 Transportation Plan*, and would provide bus service to another location such as the Civic Center, as in the *2006 Transportation Plan*. Level of service for buses serving the Proposed Project would ultimately be determined by the SFMTA based on demand.

### **Comment**

Furthermore the entire DEIR, as well as the Treasure Island and Yerba Buena Island Redevelopment Plan itself must be extensively and dramatically revised so that they will set forward clear mandates by which the project will begin achieving quantifiable net reductions in greenhouse gas emissions by at least 2050 (and beginning to achieve such reductions by 2030 or even earlier is far more prudent and should be an aggressive goal of the project.)

Such net greenhouse gas reductions are possible, and can be achieved through;

1) Establishing a long term transportation plan which will transition virtually all transportation in the project area to mass transit and car sharing (and perhaps taxis) which are all powered by renewable electricity sources by 2030 (2050 at the latest). DEIR section IV.E. ‘Transportation’ does not reference such an aggressive plan, and so it, and the project plan itself, should be extensively revised to mandate and adopt such a plan. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.7]

One of the curious features about the island, its relative isolation in terms of its connection to the bridge and the rest is actually, I think, going to turn out to be a huge plus for it, because of the way the project is approaching transportation and minimizing the influence of the CAB [car]. (*Tim Colen, San Francisco Housing Action Coalition*) [TR.2.2]

### **Response**

While these comments relate to greenhouse gas (“GHG”) emissions, they also suggest that the Proposed Project be revised to mandate a transportation plan that would require that “virtually all transportation” be by public transit and car sharing, all powered by renewable electricity sources. The comment’s support for a transition to a transportation system for the Proposed Project powered by renewable source-generated electricity, by 2030 or 2050, is acknowledged.

See the response to Comment 30.6 in Subsection 2.10.3, Greenhouse Gas Analysis Data and Assumptions, in Section 2.10, Greenhouse Gases, of this Comments and Responses document for a discussion of the analysis of greenhouse gas emissions from the Proposed Project and the conclusions regarding significant impacts. In addition to the information presented there, the

suggestion to revise the Proposed Project and EIR to mandate use of only alternative-fuel vehicles is infeasible for a number of reasons.

First, the methodology applied in this EIR is consistent with State regulations, specifically the recently adopted amendments to the State *CEQA Guidelines*.<sup>2</sup> In conformance with those regulations, the City and County of San Francisco has chosen in this EIR to refer to the CEQA guidance developed over more than a year<sup>3</sup> by the Bay Area Air Quality Management District (“BAAQMD”) regarding how to assess greenhouse gas impacts.<sup>4</sup> The BAAQMD’s suggested thresholds of significance for GHG emissions, and their appropriate application to the Proposed Project, are described in detail in Section IV.H, Greenhouse Gases, on EIR pp. IV.H.18-IV.H.19.

Second, stated in a different way, BAAQMD’s CEQA guidance does not indicate that if a project fails to provide a vehicle fleet that is entirely operated by electricity generated only from renewable resources, it would necessarily have a significant effect. See, for example, pp. 4-6-4-7 of the BAAQMD’s guidance (applying standards of significance to emissions estimates).<sup>5</sup>

Third, in keeping with the State *CEQA Guidelines* and the BAAQMD guidance, the Proposed Project includes many features that encourage use of transit and discourage use of single-occupant automobiles, which would, in turn, reduce GHG emissions. Transportation facilities included in the Proposed Project and analyzed in the EIR are described in Chapter II, Project Description, on EIR pp. II.35-II.51, and in Section IV.E, Transportation, on EIR pp. IV.E.30-IV.E.45. However, limiting all transportation facilities to use of renewable electricity sources or requiring this limitation by a particular future year would be infeasible and beyond the authority of the project sponsors. Alternative fuel shuttle buses are assumed for on-island transit service, and car-share services would be part of the Proposed Project’s transportation system. Plug-in facilities for electric vehicles would be allowed in any new buildings constructed pursuant to the Proposed Project. The Proposed Project does not include any prohibition on the use of gasoline

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<sup>2</sup> See State *CEQA Guidelines*, Section 15064.4 (“Determining the Significance of Impacts from Greenhouse Gases”), which provides: (a) that Lead Agencies “should” make a good faith effort to quantify GHG emissions from a project and (b) that Lead Agencies “should” consider the following factors in assessing significance: (1) extent to which project would increase or decrease emissions, (2) whether the project emissions would exceed a threshold of significance selected by the Lead Agency, and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHGs. EIR pp. IV.H.16-IV.H.18 discuss this regulation.

<sup>3</sup> BAAQMD web page, “Updated CEQA Guidelines,” available at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, accessed October 26, 2010 (showing first draft of related document in April 2009).

<sup>4</sup> EIR, p. IV.H.19.

<sup>5</sup> BAAQMD, *California Environmental Quality Act: Air Quality Guidelines*, June, 2010; pp. 4-6-4-7 (see “Step 3” on p. 4-6), available via a link at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, accessed October 26, 2010.

or diesel-fueled vehicles, because alternative fuel vehicles are not yet in general use. Both Muni and AC-Transit have a few biodiesel buses and more are planned; however, it is not yet feasible to provide only biodiesel or other alternative fuel buses for all of the transit service to and from the Islands. All-electric ferry vessels are not available; the Water Emergency Transportation Authority is investigating alternative-fuel ferries but has not purchased any yet. As alternative fuel buses and ferries become available, they could be used in the Treasure Island transit system; if this occurs, GHG and criteria pollutant emissions may be less than estimated in the EIR, with no change in transit service.

Fourth, the State of California has undertaken a number of efforts to reduce GHG emissions from vehicles. However, none of them attempt to reach the comment's proposed goal of a vehicle fleet running solely on renewably generated electricity. Section IV.H, Greenhouse Gas Emissions, EIR p. IV.H.11, discusses Assembly Bill 1493 and its intent to reduce GHGs from passenger vehicles and light-duty trucks. EIR p.IV.H.13 discusses Executive Order S-1-07, which establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least ten percent by 2020, and is related to the Low Carbon Fuel Standard. EIR pp. IV.H.13-IV.H.14 discuss SB 375, intended to create land use changes that would reduce miles driven. EIR pp. IV.H.15-IV.H.16 discuss the California Air Resources Board's Scoping Plan for GHG reductions. The comment's scenario is not within the recommended GHG reduction measures proposed by the California Air Resources Board.<sup>6</sup>

Fifth, the City may lack legal authority to prohibit vehicles, other than transit vehicles and those that rely on renewable fuel, from the site. The City does have authority to ensure that the Proposed Project provides transit options, to provide incentives to encourage their use, and to exact costs on vehicle use as a means of supporting transit. The project incorporates these features.

Finally, Assembly Bill 981, which authorizes establishment of the Treasure Island Transportation Management Agency, prohibits interference with public access to Tidelands Trust lands. Prohibiting access by fossil-fueled vehicles would interfere with public access at least while fossil-fueled vehicles predominate in the vehicle fleet and, therefore, would not comply with this statutory provision.

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<sup>6</sup> California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, Dec. 2008, p. 17, Table 2, "Recommended Greenhouse Gas Reduction Measures." A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

### 2.1.3.2 Bicycle and Pedestrian Facilities

#### Comments

Based on Transportation Policy No. 4, the bicycle and pedestrian access along Treasure Island and Yerba Buena Island should all be designated to San Francisco Bay Trail standards. In addition, the San Francisco Bay Plan Map No. 4 states that in regards to the open spaces on Yerba Buena Island (YBI), and from the Bay Bridge, the project should provide, “a linkage system of trails near the shoreline and at the upper elevations that connect vista points and open spaces.” As further discussed in this letter under Public Access and Recreation, we are concerned about the linkage of the trails for bicycles and pedestrians from the east span of the Bay Bridge through Yerba Buena Island to Treasure Island. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.5]

We are also concerned that the project lacks a view overlook on Treasure Island Road for bicycles and pedestrians to take advantage of the views toward the City from YBI. The FEIR should also address this public access opportunity. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.20]

To address these discrepancies, the FEIR must show contiguous sidewalks fully encircling the islands in addition to the trails and pathways currently proposed. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.3]

The Bay Trail Project’s comment letter regarding the Design for Development Document suggested a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the 80 west onramp from Treasure Island Road. We suggested that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. This public access amenity would be a brilliant addition to the project, and would afford new and unique views of the San Francisco shoreline. Please include discussion of such an overlook in the FEIR, and include complete Class I multi-use paths to this location from both sides of the Island. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.4]

Livable City and Walk San Francisco share the concern of the Bay Trail Project and San Francisco Bicycle Coalition that the Bay Trail project regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the San Francisco-Oakland Bay Bridge to the Islands. A fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island and well connected to Treasure Island and to the future path on the West span of the Bay Bridge must be included in the project description.

The mission of the Bay Trail is to complete a Class I, multi-use pathway along the shoreline. The proposed development of Treasure and Yerba Buena Islands represents an unprecedented opportunity to connect both islands to the Bay Trail with Class I bicycle paths. Doing so will help the project meet the CEQA requirements for an "environmentally superior" alternative, and which will better accomplish the Project Objectives, as adopted by TIDA and TICD (DEIR pp. II.4 - II.6), as well as the policies and objectives of San Francisco’s General Plan.

The new eastern span of the San Francisco-Oakland Bay Bridge will feature a multi-use path connecting Oakland to Yerba Buena Island. The proposed project for Treasure Island includes a

multi-use shoreline path around its perimeter. Both of these facilities are proposed to become part of the region-wide Bay Trail system, and will improve the environmental performance of the project by providing sustainable transportation access to the island for residents and visitors, in keeping with the stated objectives of the project. Unfortunately, the current plans as depicted in the DEIR fail to deliver for bicycles and pedestrians on several important regards.

The Bay Bridge pathway and Treasure Island pathways are designed to accommodate residents, workers, visitors, and tourists of all cycling abilities. It is difficult to envision that if Macalla is the primary road for traffic from the Bay Bridge, that a bike lane running in the opposite direction of a constant flow of traffic with no discernable separation will “invite riders of all ages and capabilities”. (*Tom Radulovich*) [36.1]

To address these discrepancies, the FEIR must show contiguous sidewalks fully encircling the islands in addition to the trails and pathways currently proposed. (*Tom Radulovich*) [36.3]

#### Open Space and Recreation

A shoreline path for pedestrians and bicycles around the entire perimeter of Treasure Island; pedestrian and bicycle paths would continue on Yerba Buena Island to connect to the new pedestrian and bicycle path on the east span of the Bay Bridge and from there to the Bay Trail in the East Bay. The proposed alignment would also allow the Yerba Buena Island pedestrian and bicycle facilities to connect to any future pedestrian and/or bicycle path added to the west span of the Bay Bridge”

Throughout the document, reference is made to “bicycle paths” on Yerba Buena Island. The following are Caltrans definitions of bicycle facilities from Section 1001.4 of the Highway Design Manual:

“The Streets and Highway Code Section 890.4 defines a "Bikeway" as a facility that is provided primarily for bicycle travel.

(1) Class I Bikeway (Bike Path). Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.

(2) Class II Bikeway (Bike Lane). Provides a striped lane for one-way bike travel on a street or highway.

(3) Class III Bikeway (Bike Route). Provides for shared use with pedestrian or motor vehicle traffic.”

Despite eight years of commenting through various channels regarding the need for such paths, none are proposed. Until such time as a Class I path is proposed on Macalla, Treasure Island Road and Hillcrest, please make proper reference to the proposed facilities using the above definitions. (*Tom Radulovich*) [36.9]

In order to meet the requirements of CEQA, the project must, to the extent feasible, accommodate the Class I, fully separated multi-use pathway along the shoreline, consistent with the mission and intent The Bay Trail Project. When this is absolutely infeasible, the Bay Trail Steering Committee may choose to adopt Class II bike lanes and sidewalks in particular situations. Class III bike lanes or the type of facility proposed on Macalla Road do not constitute “complete” Bay Trail, and the Bay Trail Steering Committee is unlikely to adopt them into the regional system, thus precluding the City from pursuing grant funding from the Bay Trail

Regional Development Program. With 20 traffic impacts that are significant and unavoidable with or without mitigation, the need for a safe and continuous bicycle and pedestrian infrastructure on the island is clear. (*Tom Radulovich*) [36.12]

**1. Project Description fails to include integral elements of the project:** The Project Description and numerous other areas of the DEIR present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the project area, namely continuous Class I pathways encircling both islands. The DEIR must describe and analyze complete and continuous walkways fully encircling the islands, in addition to the trails and pathways currently captured in the Project Description. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.1]

**4. Right-of-way classifications are imprecise and contradictory:** Throughout the document, reference is made to “bicycle paths” on Yerba Buena Island. The following are Caltrans definitions of bicycle facilities from Section 1001.4 of the *Highway Design Manual*:

The *Streets and Highway Code* Section 890.4 defines a “Bikeway” as a facility that is provided primarily for bicycle travel.

(1) Class I Bikeway (Bike Path). Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.

(2) Class II Bikeway (Bike Lane). Provides a striped lane for one-way bike travel on a street or highway.

(3) Class III Bikeway (Bike Route). Provides for shared use with pedestrian or motor vehicle traffic.

Similarly, California Vehicle Code section 231.5 states:

A “bicycle path” or “bike path” is a Class I bikeway, as defined in subdivision (a) of Section 890.4 of the Streets and Highways Code.

Despite eight years of comment by the SFBC and Bay Trail Project through various public channels regarding the need for such Class I bike paths, none are proposed. Until such time as a Class I path is proposed on Macalla, Treasure Island Road and Hillcrest, please make proper reference to the proposed facilities using the above definitions. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.8]

### **Response**

Bicycle access is planned throughout Treasure Island and Yerba Buena Island. A Class I mixed bicycle-pedestrian pathway is planned for the entire perimeter of Treasure Island, as described in Chapter II, Project Description, on EIR p. II.48, and shown on Figure II.12: Proposed Bicycle Routes, on EIR p. II.46. This Class I facility would fulfill the requirements of a fully separated, multi-use pathway along the shoreline consistent with the San Francisco Bay Trail Project. As stated on EIR p. IV.J.16, this pathway is planned to be an extension of the Bay Trail but has not been designated as such. Class II bicycle lanes are planned for California Avenue and Avenue C on Treasure Island. Class II bicycle lanes are proposed on Yerba Buena Island, also shown on Figure II.12. Additional detail is provided in Section IV.E, Transportation, on EIR pp. IV.E.36-

IV.E.40 and IV.E.108-IV.E.110. These facilities are proposed as elements of the Proposed Project.

Because the specific improvements requested in the comments do not address a significant environmental impact, there is no CEQA requirement that mandates including any particular type of bicycle lanes and paths.

The sidewalk planned for Macalla Road is designated in the Proposed Project as the extension of the Bay Trail on Yerba Buena Island, connecting to the mixed-use pathway on the Bay Bridge east span (see Figure IV.E.10: Conceptual Yerba Buena Island Pedestrian Circulation Plan, EIR p. IV.E.37). In response to these and other comments on the Draft EIR and the proposed *Design for Development*, the project sponsors have revised the Proposed Project to add a Class I mixed-use, two-way bicycle/pedestrian path on the north side of Macalla Road, as well as a Class II bicycle lane in the downhill direction (the same direction as vehicular travel is proposed). The bicycle/pedestrian path is proposed to become part of the San Francisco Bay Trail system and would connect to the Class I mixed-use bicycle and pedestrian path on the east span of the Bay Bridge. As stated on EIR p. IV.E.110, a study is underway for a new bicycle/pedestrian mixed-use path on the west span of the Bay Bridge; because this path has not been designed or funded, it is not assumed to be in place in the EIR analysis. However, the facilities in the Proposed Project would not preclude such a path, or foreclose providing connections to it.

See also the information about bicycle access and the bicycle lanes proposed on Macalla Road in Subsection 2.7.7, Bicycles, in Section 2.7, Transportation, of this Comments and Responses document. The revisions to the Proposed Project to widen portions of Macalla Road and provide a Class 1 mixed-use bicycle/pedestrian path are discussed and shown in Subsection 2.7.7.1, Bicycle Access – Macalla Road.

Bicycle and pedestrian access are not proposed around the full perimeter of Yerba Buena Island; the south side of the island is under the jurisdiction of the U.S. Coast Guard and no public access is permitted.

The comments are correct in stating that the EIR occasionally uses bicycle “path” incorrectly. The following revisions to the EIR text correct the terminology (deleted text is shown in ~~strikeout~~ and new text is underlined).

The first full paragraph on p. II.48 is revised in Section 2.7, Transportation, Subsection 2.7.7.1, Bicycle Access – Macalla Road, on p. 2.7.77, with new text related to the revisions on Macalla Road, using bicycle path and bicycle lane correctly..

At the end of the next-to-last bullet on p. II.48, “paths” is changed to “routes”, as follows:

The walkways and bicycle routes would be designed to allow for possible future connections to other pedestrian and bicycle ~~paths~~ routes.

In the seventh line from the top on p. IV.J.16, “paths” is changed to “facilities”, as follows:

Pedestrian and bicycle ~~paths~~ facilities would continue on Yerba Buena Island to connect to the new pedestrian and bicycle path on the new east span of the Bay Bridge.

### 2.1.3.3 Parking

#### Comment

- As to total parking spaces proposed, we note that the number of parking places has increased significantly from the number included in the 2006 Redevelopment Plan. Comparing the 2006 Redevelopment Plan to the Plan being analyzed in the DEIR, there has been a 26% increase in the number of off-street parking places and a 40% increase in the number of on-street parking places for a net increase of 2,888 parking spaces on the island. Please explain how and why this increase occurred and how such an increase affects traffic impacts.
- How many parking places were included in the 1996 Draft Reuse Plan that was analyzed in the 2003 EIS? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.61]

#### Response

By the “2006 Redevelopment Plan” it is assumed the comment is referring to the development program contained in the *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island* (Term Sheet) endorsed by the TIDA Board and the TIDA Citizens Advisory Board in October 2006, and by the San Francisco Board of Supervisors in December 2006, and briefly described on Chapter I, Introduction, EIR p. I.6. A modified version of the Term Sheet project is analyzed in the EIR in Alternative B, Reduced Development Alternative, in Chapter VII, Alternatives, pp. VII.15-VII.48.

The differences in numbers of parking spaces between the Proposed Project and the development program in the Term Sheet relate to differences in the amounts and types of land uses. In general, parking ratios remain the same for both. The project defined in the Term Sheet included one parking space for each dwelling unit, or 6,000 residential parking spaces. The Proposed Project includes the same ratio, with 2,000 more residential parking spaces because there would be 2,000 more residential units. The Proposed Project includes approximately 100,000 sq. ft. of office space that was not included in the Term Sheet land uses; at a maximum of 1 space for each 1,000 sq. ft. of office space, this use adds 100 parking spaces to the Proposed Project compared to the non-residential parking assumed for the Term Sheet project.

The Term Sheet land use program included 420 hotel rooms, whereas the Proposed Project includes 500 rooms. The parking ratio was reduced for rooms on Treasure Island from 0.8 spaces per room to 0.4, resulting in 220 parking spaces in the Proposed Project, about 116 fewer than in the Term Sheet project. Less new retail space is included in the Proposed Project (140,000 sq. ft.) than in the Term Sheet project (235,000

sq. ft.); therefore, fewer parking spaces would be provided using the same ratio of 2 spaces for each 1,000 sq. ft. For open space, the amount of parking is related mainly to the size of the athletic field area in the regional sports complex: the Term Sheet land use program assumed about 32 acres of playing fields while the Proposed Project assumes up to 40 acres. The same parking ratio was used, resulting in about 30 more parking spaces for the open space in the Proposed Project.

- The uses in the flex space in the three historic buildings on Treasure Island, Buildings 1, 2, and 3, were undefined in the Term Sheet, and a relatively small amount of parking—150 spaces—was identified in the *2006 Transportation Plan*. The Proposed Project analyzed in the Draft EIR established likely land uses for adaptive reuse in the three historic buildings, as shown in Table II.1: Proposed Development Plan, on EIR p. II.18. A parking ratio of 2 spaces for each 1,000 sq. ft. of occupied space was used, consistent with Planning Code parking ratios for neighborhood retail space. Adaptive reuse of these buildings, together with parking ratios set forth in the Planning Code, results in about 390 more parking spaces than estimated in the *2006 Transportation Plan*.
- With the reduced parking ratio of 1 space for each 1,000 sq. ft., there would be about 55 more spaces than in *the 2006 Transportation Plan*.

The amount of on-street parking identified in the *2006 Transportation Plan*, 640 spaces, did not account for all on-street parking that could be available along the proposed new streets, mainly on Treasure Island. The current counts were prepared after more detailed street designs were completed. On-street parking was recalculated for the Proposed Project using the more detailed design information and it was found that space for about 1,035 vehicles would be available.

A comparison of parking assumed in the *2006 Transportation Plan* and the Proposed Project is presented in the following table:

● **(Revised)**

Land Use	2006 Term Sheet and Transportation Plan Parking Spaces	Proposed Project Parking Spaces
Residential	6,000	8,000
Hotel	336	220
Retail	470	414
Flex Space	150	205
Office	0	100
Open Space (fields)	168	204
Open Space (other)	267	260
Marina	236	236
On-Street	640	1,035
<i>Totals</i>	<i>8,267</i>	<i>10,674</i>

The alternative development programs analyzed in the 2005 Final EIR,<sup>7</sup> including the 1996 Reuse Plan, are no longer under consideration. The types of land uses considered and evaluated in the 2005 Final EIR were substantially different from those in the Term Sheet and the Proposed Project analyzed in the current EIR. They included major visitor attractions such as a theme park, conference center and substantially more hotel rooms, and over 5,000 fewer residential units than in the Proposed Project. The alternative development programs analyzed in the 2005 Final EIR would not avoid or substantially lessen any of the significant effects associated with the Proposed Project (see EIR pp. II.4-II.6). Therefore, a detailed comparison of numbers of parking spaces between these alternative development programs and the Proposed Project would not provide relevant information for decision-makers and the public. See Chapter VII, Alternatives, Section D.2, 2800 Housing Unit Alternative with an Amusement Park, on EIR pp. VII.74-VII.75, for additional discussion.

#### **2.1.3.4 Transportation Funding**

##### **Comment**

Moreover, the Project further attempts to raise revenue from parking. However, in the City of San Francisco, it seems parking fees go to public bus service, while commercial parking fees are split between its public bus service, the general fund and the elderly. It is unclear that the parking revenues generated here would go to TI/YBI's own transit funds. Therefore, this identified impact and resulting mitigation measure analyzing the need and source of a transportation subsidy should be studied. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.34]

##### **Response**

Commercial parking fees on the Islands would not be managed by the San Francisco Municipal Transportation Agency, as they are from parking facilities in downtown San Francisco. As authorized under State legislation (Stats. 2008, Chapter 317), the Treasure Island Transportation Management Agency ("TITMA") would collect and manage revenues from parking facilities as part of the comprehensive transportation management program included in the Proposed Project (see EIR p. II.51); such revenues would be exclusively reserved to TITMA for use on the Islands. The base transit scenario assumed in the EIR's analysis of transportation impacts includes the existing Muni line 108-Treasure Island service, which would not require any increase in funding, as well as provision of one ferry vessel and bus service to the East Bay, both of which would be funded by TITMA in part from commercial parking fees and congestion pricing fees. See also the response in Section 2.7, Transportation, Subsection 2.7.15.3, Funding.

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<sup>7</sup> San Francisco Planning Department, *Transfer and Reuse of Naval Station Treasure Island Final Environmental Impact Report*, Case No. 94.448E (State Clearinghouse No. 199602073), certified May 5, 2005.

## 2.1.4 PROJECT LAND USE

### Comments

Unfortunately, the concept as articulated in the DEIR, presumably by the developer, is not that of an additional San Francisco neighborhood as was originally envisioned, promulgated, and sold to San Francisco citizens in 1994 when the Citizen's Reuse Committee (CRC) was formed, or as noted in early discussions of the TI Citizens Advisory Board, but a re-conceived vision of a stand-alone community - a major tourist attraction assessable by automobile. Unaccountably, there is specific reference to *Regional-serving retail uses which could include specialty foods, specialty gift or crafts, and entertainment uses.*"; as well as "...regional-serving retail uses." [II.33]. These proposals demand a totally different transportation system than would a standard San Francisco residential neighborhood with a mix of Neighborhood Serving Retail (NCD) facilities which might include some entertainment and recreational opportunities. The DEIR thus has a very basic flaw – it is confused as to what is actually meant to be analyzed. One must wonder if the vision is that of San Francisco citizens, or the developer. No logic is given for so small a community, 18,500 residents, to become "regional-serving". It is as if the intent of the developer is to emulate the former World's Fair in modern terms. (*Ron Miguel, Planning Commission*) [7.3]

Vol. 1, S-2, Summary: Why is the Development Program described in vague ranges, using approximations like: up to 8,000 residential units? The Treasure Island Development Plan, its Transportation Plan, its Sustainability Plan, its Habitat Management Plan, describe the project with 5,800 dwelling units on TI and 200 units on YBI why is the DEIR deviating from this program?

Vol. 1, S-3, Summary, Vol. 1 II.33: What regional entertainment uses are being described? In II.33 Commercial: there is reference to uses that were never described in the actual plan (*Kathrin Moore, San Francisco Planning Commission*) [20.5]

Other, General: Why does the January 2008 Notice of Preparation of an EIR describe the project as a sustainable redevelopment project with 6000 Residential Units, to be built in four phases between 2009 and 2018?

Why then, on July 12, 2010, has the description of the project studied in the DEIR become a DEVELOPMENT PROJECT ( note the word sustainable has been dropped) ? Why has the residential number of units increased to 8000 units? Why have other program elements like regional retail and office been increased? (*Kathrin Moore, San Francisco Planning Commission*) [20.38]

- Given the significant traffic impacts that will result from the implementation of the Proposed Project, please explain why "regional-serving" retail and entertainment uses are being proposed? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.62]

Refer to: II. 17, 21: Heartily agree with recommendation for a Museum, presumably to focus on Pan Am Clippers, GGIE, the Navy, etc. Possibly also YBI history could be included. Also Covarrubias mural and Great Map of California (formerly in Ferry Building). (*Neil Malloch*) [44.4]

...scoping comments call for density, but did it call for this level of density? We don't think so. We have concerns about this level of density. (*Sal Bloom, Arc Ecology*) [TR.16.3]

### **Response**

The description of the Proposed Project in EIR Chapter II, Project Description, provides information about the likely maximum development that would occur if the proposed *Redevelopment Plan* were fully implemented. There is no requirement in the *Redevelopment Plan* or the proposed *Design for Development* that all of the residential units, retail space, and other uses be constructed. It is possible that fewer residential units would be constructed, fewer hotel rooms would be built, or less office space would be built and occupied. Therefore, the Project Description and other sections of the EIR use terms such as “up to 8,000 residential units” and “up to 500 hotel rooms.” If less development were to occur than described and analyzed in the EIR, in general the impacts identified in the EIR would be less to some degree.

The proposed redevelopment of Treasure Island and Yerba Buena Island has included region-serving uses beginning with the initial planning efforts in the 1990s. As noted in the response in Subsection 2.1.3.3, Parking, above, the alternatives described in the 2005 FEIR included major visitor attractions such as a theme park, conference center and substantially more hotel rooms, and over 5,000 fewer residential units than in the Proposed Project. While the Proposed Project includes substantially fewer region-serving uses than prior proposals that were considered and rejected, the project sponsors' objectives for the Proposed Project, presented on EIR p. II.5, include the goal of making the project a regional attraction (emphasis added):

- Provide a comprehensive new regional waterfront system of parks and public open spaces that is programmed with a variety of uses, including recreation, passive open space, arts, cultural, and educational uses, and *that establishes the Development Plan Area as a regional destination...*
- Activate and link the area surrounding the historic structures by providing a dense, urban retail/mixed-use environment *that attracts residents and visitors to the area.*

The basis for these objectives is, in part, to fulfill TIDA's obligations as Trustee under the Tidelands Trust, and to ensure that the uses on land subject to the Trust are open to the public. Commercial uses on public trust lands must serve a region-wide purpose. As stated in the policy on the Public Trust adopted by the State Lands Commission in 2007, uses that do not accommodate, promote, foster, or enhance the statewide public's need for essential commercial services or their enjoyment of tidelands are not appropriate uses for public trust lands. Strictly

local or “neighborhood-serving” uses that confer no significant benefit to Californians statewide are generally not permitted.<sup>8</sup>

The land use program analyzed for the Proposed Project includes both neighborhood-serving uses and region-serving uses. Neighborhood-serving retail uses are expected to include a grocery store or market, restaurants and cafés, health and fitness clubs, and similar uses (see EIR p. II.33) although many of these uses could also serve visitors to the Islands. Neighborhood parks and childcare facilities would serve residents in the residential areas (see EIR pp. II.29 and II.33). Some of the office space could house neighborhood-serving offices such as accountants, insurance brokers, or dentists. Region-serving uses such as specialty foods and gifts or arts/crafts boutiques are expected to be in the adaptively reused spaces in historic Buildings 1 and 2, and entertainment/recreation uses such as movie theaters and/or sports facilities that would potentially serve both residents of the Islands and visitors are planned for Building 3. The hotels and the museum that could be constructed in the Cultural Park would both be region-serving uses that would be expected to attract visitors to the Islands. Uses on land subject to the Tidelands Trust are required to benefit and attract the greatest number of people to the waterfront, and cannot be limited to uses that serve only the local neighborhood.

Neighborhood-serving and region-serving uses are accounted for in the EIR analysis insofar as there is a difference in impacts. Both are generally described in Chapter II, Project Description (see, e.g., EIR p. II.33). The transportation analysis assumes that most neighborhood-serving retail space would not generate substantial numbers of external trips, and includes trips generated from the region-serving open space, retail, and entertainment uses in the analysis of traffic and transit impacts. Air quality, noise, and greenhouse gas emissions related to transportation activities account for visitor travel as appropriate, and the discussion of recreational impacts describes region-serving recreational facilities (see EIR pp. IV.J.12-IV.J.16 and IV.J.18-IV.J.19). The majority of the vehicle trips generated from the Proposed Project during the peak travel times would be from residents on the Islands, with a smaller volume of travel generated by region-serving uses.

A museum (serving both regional visitors and residents of the Islands) is one possible use that could be located in the Cultural Park north of Building 1. If a museum is constructed, the operator could consider including materials from the Golden Gate International Exhibition and the military, and/or the map of California that was in the Ferry Building prior to its renovation. Note that Building 1 currently includes historic exhibits from the military use of Naval Station

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● <sup>8</sup> State Lands Policy on Public Trust, adopted September 17, 2001, available at [http://www.slc.ca.gov/Policy\\_Statements/Public\\_Trust/Public\\_Trust\\_Policy.pdf](http://www.slc.ca.gov/Policy_Statements/Public_Trust/Public_Trust_Policy.pdf).

Treasure Island and the Golden Gate International Exhibition and other features related to the Islands, operated by the Treasure Island Museum Association.<sup>9</sup>

The Proposed Project analyzed in the EIR includes more housing than was originally proposed in the *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island* (“Term Sheet”) endorsed by the TIDA Board, the Treasure Island/Yerba Buena Island Citizens Advisory Board (“CAB”) and the Board of Supervisors in 2006. The proposal to increase residential density occurred in response to public comments during the public scoping process for this EIR and continued input from City agencies and the public. The increase in density was ultimately documented in an Update to the Term Sheet that was endorsed by the TIDA Board and the CAB in April 2010, and after hearings before the Land Use Committee of the Board of Supervisors by the full Board of Supervisors in May 2010.

The increase in residential density would provide a larger population base to support transit services and would enhance the viability of neighborhood retail uses and community services. The total amount of retail space in the Proposed Project is less than the amount in the Term Sheet development program, at 207,000 sq. ft. rather than 235,000 sq. ft.; of the 207,000 sq. ft., 140,000 sq. ft. would be new construction while the balance would be part of the adaptive reuse of the historic structures on Treasure Island. The addition of office space in the Proposed Project would provide job opportunities for some residents of the Islands, as well as providing the opportunity for neighborhood-serving office uses, as discussed above. An analysis of a reduced density alternative similar to the development program in the Term Sheet is provided in Alternative B, Reduced Development Alternative, in Chapter VII, Alternatives, on pp. VII.15-VII.48. As discussed there, traffic impacts would be slightly reduced compared to those of the Proposed Project, but would continue to be significant and unavoidable at nearly all of the same locations as the Proposed Project (see pp. VII.21-VII.26), and the same mitigation measures would be applicable.

The Notice of Preparation published in 2008 uses the word “sustainable” two times in the 23-page document; neither use is in conjunction with the description of the Development Program in the proposed Redevelopment Plan. The *Sustainability Plan* that is part of the 2006 Term Sheet is discussed in several locations in the Notice of Preparation, as is the intent of the project sponsors to meet sustainability goals. This has not changed since publication of the Notice of Preparation. The EIR discusses the proposed *Sustainability Plan* in the Summary on p. S.5; in Chapter II, Project Description, on pp. II.77-II.79; and in other sections as relevant, such as Section IV.K, Utilities, on p. IV.K.17. See also the response in Subsection 2.1.7, Sustainability Plan, below.

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<sup>9</sup> Information about the museum is available online at <http://www.treasureislandmuseum.org>, accessed October 30, 2010.

### 2.1.4.1 Recreation and Open Space

#### Comment

Further, the FEIR should clarify if all neighborhood parks at the Project site would remain open to the general public or would be restricted for use in any manner. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.14]

The Bay Plan recreation policies state partly that marina development “should include public amenities, such as viewing areas, restrooms, public mooring docks or floats and moorages for transient recreational boaters, non-motorized small boat launching facilities, public parking, [and] substantial physical and visual access....” While the marina is not a part of this DEIR, the FEIR should further clarify the proposed upland marina facilities amenities along the Clipper Cove Promenade, and how the amenities would be utilized if the marina expansion project were not built. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.16]

One of the premises upon which we have based our access discussions has been the “Proposed Actions and Alternatives” as stated in the “Transfer and Reuse Naval Station Treasure Island Final EIR 2006,” which states in Chapter 2-8:

#### *Recreation Facilities*

*Several recreation facilities continue to be used on Treasure Island as a venue for regional sports activities. These include the baseball field which serves as the home field for the San Francisco Little League, including regional competitions; the soccer field located in the middle of the Island, which is used by soccer and rugby teams from around the Bay Area; the Great Lawn; and various other open space recreational facilities such as parks, trails and ball-fields. **Boardsailors and users of other water oriented recreational crafts use the shoreline of Treasure Island, launching from the boat ramp at the northern corner and landing regularly along the northern shoreline of the island.***

Based upon previous experiences with EIR decision documents we believe it necessary that the public components of the *Plan* be clearly summarized and articulated in the Final EIR for them to carry any weight during the development process. The objective of an EIR is that it look for adequacy and completeness and a good faith effort of full disclosure. Our impression of the project scope presented in this DEIR is one of a “market driven” development, with little priority placed upon the implementation of public improvements so frequently presented during planning discussions.

While our expectation is that the draft “*Design for Development for Treasure and Yerba Buena Islands*” (“*Design for Development*”) will be formally adopted in connection with the *Redevelopment Plan*, it is also our understanding that the *Design for Development (D4D)* document will exist as a guideline for future “*Island*” development, more or less in place of building and zoning codes as applied in non-redevelopment. As such, the *D4D* is more of a guideline for Island development and should not be misconstrued as law. To be more specific, “Section 2:: T1 Public Open Space” of the *D4D* states in the Standards Column that “T1.6.5.9 – Two loading areas and amenities for boardsailing shall be provided in two locations near parking

areas.” While we applaud this description, either this type of specificity needs to be included in the final EIR, or the *D4D* needs to be adopted as is, and as an appendix to the EIR such that it carries the same force of law. (*William Robberson, President, San Francisco Boardsailing Association*) [27.1]

- 1) Why is there complete omission of any specific reference to interim and future boardsailing access and facilities in the DEIR? (*William Robberson, President, San Francisco Boardsailing Association*) [27.4a]

It is also our wish that when these, the 40-acre fields are complete, that the proposed 40-acre fields are complete, that provision be made or legislation drafted, to keep amateur and voluntary and community-based organizations, such as ourselves, be a permanent part of the proposed athletic fields. (*Patrick Huniacke, GAA Athletic Association*) [TR.14.4]

### Response

All neighborhood parks would be open to use by both residents of the Islands and the public at large. Access to community garden areas might be restricted to prevent loss of produce, as is common in other parts of San Francisco.

TIDA would be responsible for operation and maintenance of the Sports Park. It is likely that TIDA would enter into a contractual arrangement with a third party to carry out day-to-day operations. TIDA plans to engage existing users as it develops the long-term parks programs. This does not affect the environmental analysis and findings in the EIR.

Sailboarding is one of the water-related recreational activities expected to occur on Treasure Island during and after development of the Proposed Project. As stated in EIR Section IV.J, Recreation, on p. IV.J.4, “Sailboarders and other water-oriented recreationalists use the north end of Treasure Island to launch watercraft into the Bay.” The Northern Shoreline Park would include sailboat and small-craft launch sites, as listed in Table IV.J.1: Proposed Parks and Open Space, EIR p. IV.J.13. There is no plan to remove the existing boat launch ramp at the north end of Treasure Island or limit its use for boardsailing. The March 5, 2010, draft *Design for Development* identifies three potential water access points on Treasure Island in Figure T1.a on p. 62, including the boat launch ramp at the north end of the island. In the discussion of the Northern Shoreline Park on pp. 72 and 73 of the proposed *Design for Development*, two water access areas are identified at the boat launch ramp and to the west along the shoreline (see Figure T1.g: Illustrative Concept for Northern Shoreline Park), and a parking area and warming hut are proposed near each access point. Standard T1.6.5.9 states “Two loading areas and amenities for boardsailing shall be provided in two locations near parking areas.” Thus, facilities for boardsailing would be provided as part of the recreational facilities of the Proposed Project.

### 2.1.5 BAY FILL

#### Comments

In addition, Section IV.M mentions new docks at the proposed sailing center, including new pilings, a boat launch and new pier. In the FEIR, please further describe the proposed work at the sailing center, including the area and volume of fill in the Bay and how the proposed work meets the McAteer-Petris Act's Bay Fill policies. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.3]

Further, the project description for the Ferry Terminal Site Plan lays out three Breakwater Variants under consideration: (1) symmetrical breakwaters with a 200-foot west-facing opening; (2) two symmetrical breakwaters plus a third, separate, detached breakwater, and a 300-foot opening facing southwest; and (3) phased construction of breakwaters, with the northern, longer breakwater constructed first, along with the ferry slips and passenger facilities. Based on a cursory review, the third proposal or preferred breakwater plan involves the least amount of fill in the Bay to achieve the project purpose; therefore, this proposal may provide the greatest consistency with the McAteer-Petris Act's Bay Fill policies. In the FEIR, please further explain how the proposed project is the minimum fill necessary and why public access may not be provided along the southern breakwater in the preferred variance. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.4]

#### Response

The Sailing Center waterside facilities are described in EIR Chapter II, Project Description, on p. II.31. The following text is added to the second bulleted item on that page, to provide more detail on the amounts of dredge and fill material (new text is underlined):

- The existing Sailing Center near Pier 1 would be improved with new vessel launch and retrieval facilities. The improvements would include a new pier on pilings to accommodate two vessel launch and retrieval cranes, entry landings and gangways, and floating docks. The waterside facilities would require dredging about 1,500 to 3,700 cubic yards, and would result in about 0.25 to 0.4 acre of pile-supported fill and 0.4 to 0.45 acre of floating fill in the Bay. Landside facilities would include restrooms, laundry facilities, and other improvements to serve the tenants of the Sailing Center (as well as future tenants of the separate Marina Project, if approved).

The impacts of the proposed waterside facilities at the Sailing Center are identified and analyzed in various sections of EIR Chapter IV, Environmental Setting and Impacts. For example, impacts on biological resources of constructing the launch facilities are discussed in Section IV.M, Biological Resources, in several places: construction noise impacts on marine life are discussed on pp. IV.M.43-IV.M.47 (see Mitigation Measure M-BI-1e on pp. IV.M.46-IV.M.47); construction impacts on eelgrass beds are discussed on p. IV.M.48-IV.M.49 (see Mitigation Measure M-BI-2c on p. IV.M.49); and impacts on intertidal and subtidal habitats are discussed on pp. IV.M.56-IV.M.61. Water quality impacts of in-water construction at the Sailing Center are discussed in EIR Section IV.O, Hydrology and Water Quality, on p. IV.O.37, and include a list of

best management practices that would be applicable to construction activities at the proposed Ferry Terminal and Sailing Center.

Breakwater Variant B3, discussed in Section VI.B, Ferry Terminal Breakwater Variants, in EIR Chapter VI, Project Variants, on pp. VI.20-VI.31, would result in the least amount of fill compared to Breakwater Variants B1 and B2 and the Proposed Project in its initial phase as noted in a comment, but would ultimately result in the same amount of fill as the Proposed Project when the southern breakwater would be constructed in phase 2. Estimates of amounts of fill for the breakwaters provided in the *Treasure Island Ferry Terminal Project Coastal Engineering Assessment*<sup>10</sup> indicate that Breakwater Variants B1 and B2 would result in slightly more fill than would the Proposed Project or Breakwater Variant B3. More specific volumes of dredge materials and fill would be further refined as more detailed designs are prepared for the selected variant; these designs and dredge and fill volume estimates would need to be provided to the San Francisco Bay Conservation and Development Commission (“BCDC”) as part of the required permit application for the variant selected. As stated on EIR p. II.36, the northern breakwater would not be available for public access because the engineering analysis of the breakwaters showed that waves could occasionally overtop this breakwater<sup>11</sup> and result in potentially hazardous conditions for pedestrians.

Both the Ferry Terminal and the Sailing Center launch facilities would require approval by BCDC. A discussion of the Proposed Project’s general consistency with BCDC policies is presented in EIR Chapter III, Plans and Policies, on pp. III.9-III.12, and concludes that no inconsistencies were found with BCDC policies. More specific information regarding BCDC’s policies will be required as part of that agency’s permit process. As stated on EIR p. III.12, BCDC will make the final determination as to consistency with relevant policies related to bay fill as part of its action on each of these facilities, after the Final EIR is certified. See also the response in Subsection 2.2.4, BCDC Regulations, in Section 2.2, Plans and Policies, of this Comments and Responses document.

## 2.1.6 HOURS OF CONSTRUCTION

### Comments

6. There are no hours of construction reflected in the DEIR. The CAB urges the DEIR reflect that construction’s operation hours to be clearly defined – and limited – to weekday “normal” working hours (8:00a – 5:00p), **and** that there be will be no construction occurring on weekends. This would include elements of construction such as pile driving, etc. (*Treasure Island/Yerba Buena Island Citizens’ Advisory Board*) [8.6]

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<sup>10</sup> Skidmore, Owings & Merrill, LLP, and Moffatt & Nichol, *Treasure Island Ferry Terminal Project Coastal Engineering Assessment*, September 2009, p. 6.

<sup>11</sup> *Ibid.*, p. 3.

18. City regulations state that construction cannot occur between 8 p.m. and 7 a.m. seven days a week. Currently are construction activities for the Treasure Island development anticipated to occur during weekends? (*Johannes Hoffman, AIA, Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.16]

### **Response**

The EIR discusses the regulatory framework for construction noise in Section IV.F, Noise, pp. IV.F.8-IV.F.12. It notes that project construction would comply with a variety of statutory restrictions on construction activity and noise, including, but not limited to, the San Francisco Noise Ordinance (in Police Code Article 29). This ordinance restricts construction activity to the hours between 7:00 a.m. and 8:00 p.m. unless a special permit has been applied for and granted by the Director of Public Works or the Director of the Department of Building Inspection.

Construction activity may occur on weekends. By nature, some elements of construction work consist of continuous activities that cannot be suspended because of the onset of the weekend.

## **2.1.7 SUSTAINABILITY PLAN**

### **Comments**

Vol. 1, S-5, Summary: Why are the goals of the Sustainability Plan described in such tentative language when the main objective of the Plan has been to design the first fully sustainable neighborhood for San Francisco?  
*that would enable installation of photovoltaic panels on most roof tops ....* (*Kathrin Moore, San Francisco Planning Commission*) [20.7]

General comment. We are concerned that what is called a sustainability plan is in actuality an environmental impact mitigation strategy. The two are quite different approaches. Sustainability approaches a development from the ground or in this case Bay up. A mitigation plan is layered on top of a proposed land use to reduce its effects. We believe the latter is a more reasonable way to describe this plan which does have numerous important and beneficial attributes but is nevertheless largely mitigation. (*Saul Bloom, ArcEcology*) [28.8a]

### **Response**

EIR Chapter II, Project Description, pp. II.77-II.79, describes the Project's proposed *Sustainability Plan* in detail. The Proposed Project includes a stand-alone document describing the proposed *Sustainability Plan* in detail.<sup>12</sup> (Appendix I of that document, pp. 107-108, lists specific obligations of TICD relative to sustainable development practices.) The EIR analyzes

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<sup>12</sup> *A Sustainable Future for Treasure Island, Exhibit K: Sustainability Plan*, October 2006, Treasure Island Community Development (hereinafter "*Treasure Island Sustainability Plan*"). This document is on file and available for public review at the San Francisco Planning Department, 1650 Mission Street, 4<sup>th</sup> Floor, as part of case file 2007.0903E.

the whole of the Proposed Project. The proposed *Sustainability Plan* is part of the Proposed Project and therefore is fully addressed in the EIR, not in mitigation measures, but as part of the project that was presented to the Planning Department for environmental review. The EIR does not evaluate the effectiveness or appropriateness of the proposed *Sustainability Plan*.

The proposed *Sustainability Plan* includes a variety of specific proposals to maximize sustainability, such as green building specifications for all new buildings, high-density residential development in close proximity to transit facilities, a comprehensive Transportation Demand Management system, etc., as well as a variety of aspirational goals and strategies that would allow the Proposed Project to become increasingly sustainable over time as technological and economic feasibility allow. The proposed *Sustainability Plan* includes measures that TICA would commit to implementing, as well as approaches for achieving higher levels in the future. Future updates to the proposed *Sustainability Plan* would allow future TICA Boards to adopt, for instance, changes to the approaches (e.g., timelines, measuring, monitoring, and reporting plans, etc.) associated with its efforts to achieve a Climate Positive Development.

Further, the proposed *Design for Development for Treasure and Yerba Buena Islands* (“*Design for Development*”) that is the basis for future review and approval of newly constructed buildings on site includes a number of standards and guidelines that are intended to enable the Proposed Project to meet its sustainability goals (see Section T5.2 of the proposed *Design for Development*). Two of these standards that relate to the comment are T5.2.1, which requires all new buildings to comply with the Green Building Specifications for Treasure and Yerba Buena Islands, and T5.2.4, which requires that all buildings must “provide ‘solar ready’ infrastructure such as solar panel standoffs, conduit, and roof water spigots that minimize the cost and effort of adding solar capacity at a later date.”<sup>13</sup>

The comment seems to suggest that the referenced recommendation, “enable installation of photovoltaic panels on **most** roof tops” (emphasis added), implies that sustainability goals of the Proposed Project are unacceptably ‘tentative’. In any given large-scale development, not all rooftops will be situated such that solar panel installations are appropriate or feasible. For example, structural or sun angle issues may limit the feasibility of solar panels for certain buildings or locations. The intent of the Proposed Project, as reflected in the proposed *Design for Development* standards noted above, is to include rooftop solar panels whenever feasible. For this reason, the phrase “most rooftops” is correct.

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<sup>13</sup> *Treasure Island + Yerba Buena Island Design for Development*, Public Review Draft, 03.05.10, Treasure Island Development Authority, see pp. 179 and 259. This document is on file and available for public review at the San Francisco Planning Department, 1650 Mission Street, 4<sup>th</sup> Floor, as part of case file 2007.0903E.

## 2.1.8 PHASING

### Comments

Vol. 1, IV.E.48, Transportation: Does the statement that “Actual phasing of development would be market-driven” make this project de-facto unsustainable? Can stop-start construction that is market-driven over 20+ years, ever be sustainable? (*Kathrin Moore, San Francisco Planning Commission*) [20.32]

Other, General: Why now is the project no longer being analyzed as distinctly phased (4 Phases)? Why has the time frame for construction been increased from originally ten years to fifteen (15) to twenty (20) years? Clarify how the increase in years of project realization - construction increases cumulative impacts of noise, construction disruption, air pollution, etc.? (*Kathrin Moore, San Francisco Planning Commission*) [20.39]

**Phases.** While a 15 to 20-year period to completion is anticipated, it would be useful to have the project studied in discrete phases; for each phase, there would be a separate time-line; the impacts would be assessed and appropriate mitigation measures suggested within that time frame. These phase-specific numbers are not in the DEIR and for massive projects such as this one, the document is of little use to the public and decision-makers to actually use in their approval decisions.

#### *Recommendation:*

- *provide a timeline that indicates when impacts would occur and mitigations be required (Jennifer Clary, President, San Francisco Tomorrow)* [38.15]

### Response

The EIR is a project-level EIR and analyzes the Proposed Project at full buildout, providing an analysis of all phases of the Proposed Project. The amount of time that may be necessary to reach buildout is assumed in the EIR to be about 20 years. The NOP for the Proposed Project stated that the estimated buildout time period would be about 10 years; the project sponsors have since revised that estimate following the change from 6,000 to 8,000 residential units, and in response to changing economic conditions. A comparison between a 10- and 20-year buildout would not provide useful information, since a 10-year buildout is no longer considered achievable.

A 20-year time frame is not unusual for a development program of the size of the Proposed Project. The *Yerba Buena Center EIR* was prepared in 1978 - 1979 and was followed by a Subsequent EIR that addressed substantial revisions to the Redevelopment Plan prepared in 1992; the last development site was under review in 2010, an approximately 30-year buildout. The *Mission Bay EIR*, covering the Mission Bay North and Mission Bay South Redevelopment Plans, was completed in 1998; much of Mission Bay North has been built out in the intervening 12 years, but considerable land in Mission Bay South remains to be developed.

Providing an analysis of the impacts of each interim phase would result in significant redundancy, without meaningfully aiding an understanding of the impacts of the Proposed Project. In general,

impacts of individual phases may be less than those of the Proposed Project at buildout. For example, transportation impacts and traffic-generated noise impacts would be greatest when the largest number of residents, employees, and visitors were on the Islands, which would occur at full buildout. However, the air quality impacts of construction activities would not be less for all phases of construction; therefore, Impact AQ-3, in EIR Section IV.G, Air Quality, on pp. IV.G.30-IV.G.36, discusses the air quality impacts of each phase on existing residents and on residents who may have moved to new residential buildings constructed in an earlier phase while construction was continuing for later phases. Similarly, wind impacts may differ during construction; therefore, Impact WS-3, in EIR Section IV.I, Wind and Shadow, on pp. IV.I.50-IV.I.52, discusses the potential for wind hazards during construction and proposes a mitigation measure to lessen those potentially significant impacts. Thus, the EIR addresses interim impacts (e.g., air pollutant emissions associated with construction) when such a discussion is relevant to a full understanding of the environmental impacts of the Proposed Project.

The Mitigation Monitoring and Reporting Plan for the Proposed Project, one of the documents that will be provided to decision-makers for action on the Proposed Project, will include information on the timing of mitigation measures, where appropriate. Those project features or mitigation measures that are relevant to the construction process or to interim conditions will be tied to the specific period when the measure must be implemented. Thus, for example, the EIR identifies Best Management Practices that would be implemented to avoid water quality impacts during construction of improvements at the Sailing Center (EIR Section IV.O, Hydrology and Water Quality, p. IV.O.37).

## 2.1.9 APPROVALS

### Comments

15. As to the San Francisco Bay Conservation and Development Commission (“BCDC”) and its “Bay Plan” policies relating to “Appearance, Design, and Scenic Views”, please explain how: . . . (e) the nature, type and extent of BCDC advice, input, comments, and observations to date, on appearance and design of the project, particularly with regard to the proposed high-rise towers. (*Anthony F. Gantner, Attorney-at-Law*) [13.5]

The Commission’s jurisdiction under state law as it applies to the Project includes all tidal areas of the Bay up to the line of mean high tide (MHT) or to the inland edge of wetland vegetation in marshlands, and all areas formerly subject to tidal action that have been filled since September 17, 1965, and a shoreline band extending 100 feet inland from and parallel to the Bay. The Commission also has jurisdiction over priority use areas designated in the Bay Plan on Yerba Buena Island. Within the Commission’s jurisdiction, authorization is required for construction, dredging, fill placement, land subdivisions, and substantial changes in use.

The Project would be subject to the Commission’s permit application review and authority under state law. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.1]

**Biological Resources.** Section IV.M discusses the possible biological resource impacts related to the proposed project. While this section correctly outlines the Commission’s jurisdiction, the FEIR should include a discussion about the Commission’s regulatory requirements governing the protection of the Bay’s natural resources. In evaluating Bay projects for authorization, the Commission must find that marshes, mudflats, and subtidal habitat would be “conserved, restored and increased.” Further, pursuant to the Bay Plan policies on Fish, Other Aquatic Organisms and Wildlife, “[t]he Commission should: (a) Consult with the California Department of Fish and Game and the U.S. Fish and Wildlife Service or the National Marine Fisheries Service whenever a proposed project may adversely affect an endangered or threatened plant, fish, other aquatic organism or wildlife.” Thus, this project may trigger consultation with these various resource agencies, which would be a filing requirement before the Commission can take action on this proposed project. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.8]

It is necessary to obtain a BCDC permit prior to undertaking most work in San Francisco Bay or within 100 feet of the shoreline, including filling, dredging, shoreline development and other work; thus the Project is subject to BCDC’s jurisdiction and such should have been thoroughly addressed in the DEIR. Although the DEIR does include BCDC within the regulatory section of the analysis, it does not include any reference to consultations or compliance with any permits or regulations. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.2]

Please explain what regulatory authority City and County of San Francisco will retain over future individual projects, including projects that will alter historic buildings and landscapes? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.7]

I demand that the California Coastal Commission be included in any and all decisions regarding the transformation of TI/YBI into first a Neighborhood of a hand full of 60 story high-rises, and then into a neighborhood of hundreds of new Sky Scrapers in the 100 to 250 Story size, that will occur over time, given the money at hand now. (*Paul T. Currier, Candidate for Mayor of San Francisco 2011*) [40.3]

No. 2. We believe that the Coastal Commission, because this project involves rezoning and general plan amendments, a discussion of its requirements should have been included and it was omitted. Under Government Code Section 65860A, it requires that the land uses that are authorized by the ordinances be compatible with the policies, objectives, programs, in general, and specific uses of the general plan. And we think the omission of the Coastal Commission’s involvement is a serious violation of that (*Nick S. Rossi, representing Ken Masters*) [TR.5.3]

### **Response**

The comments provided by BCDC regarding the scope of their jurisdiction and review procedures are noted. As described in the EIR in Chapter III, Plans and Policies, pp. III.9-III.12, BCDC is empowered by State law to regulate the use of the Bay and its shorelines. Generally, BCDC has jurisdiction over areas subject to tidal action and a 100-foot shoreline band surrounding the Bay from the mean high tide line. The EIR states on p. III.9 that, “BCDC has permit authority for the placement of fill, extraction of materials, or substantial changes in use of land, water, or structures within its jurisdiction, and to enforce policies aimed at protecting the Bay and its shoreline, as well as maximizing public access to the Bay.”

Action by BCDC is one of the approvals listed in EIR Chapter II, Project Description, pp. II.83-84. The tenth item on p. II.84 indicates that BCDC approval would be required for any fill or dredging within the area of their jurisdiction. The next bullet on that page lists consultations that might be required with the U.S. Fish and Wildlife Service, NOAA (of which the National Marine Fisheries Service is a part), and other agencies as part of U.S. Army Corps of Engineers permit review. In response to the comments, a similar phrase is added to the bullet describing BCDC permit review. On EIR p. II.84, the tenth bullet is revised to read as follows (new text is underlined):

- Permits for fill and dredging in San Francisco Bay and improvements within the 100-foot shoreline band (San Francisco Bay Conservation and Development Commission), which may include consultation with the California Department of Fish and Game or other agencies as directed by BCDC.

The Regulatory Framework subsections in the topic sections of Chapter IV, Environmental Setting and Impacts, provide detailed explanations of State and local laws and regulations applicable to the Proposed Project. See, for example, Section IV.F, Noise, EIR pp. IV.F.8-IV.F.12, IV.G, Air Quality, EIR pp. IV.G.13-IV.G.18, and IV.M, Biological Resources, EIR pp. IV.M.31-IV.M.38.

As a Responsible Agency under CEQA, consultation with BCDC is required by law. BCDC was sent a Notice of Preparation (“NOP”), along with other Responsible Agencies, seeking their early input and comment on the environmental analysis for the project. BCDC sent a letter of comment on the NOP. BCDC has also provided comments on the Draft EIR. The project sponsors have met several times with BCDC staff to solicit feedback on the Proposed Project; public presentations to BCDC’s Design Review Board were made on two occasions, on November 9, 2009, and on February 8, 2010. Further meetings and public hearings are anticipated.

Comments from BCDC on the NOP for the Proposed Project, including comment on the project design, are reflected in the EIR in Chapter III, Plans and Policies, pp. III.9-III.12, which discusses the Project’s relation to specific policies of the Bay Plan.<sup>14</sup> As described on EIR p. III.11, the Bay Plan policies concerning Design and Appearance focus on ensuring views of the Bay and shoreline. The impacts of the Proposed Project on the Bay and shoreline views are discussed in the EIR in Section IV.B, Aesthetics. EIR p. IV.B.19 notes that building height limitations established in the proposed *Design for Development* would ensure that development would not substantially interfere with existing views from hilltop public park areas. Height standards proposed for new towers mandate separation of towers to provide for view corridors between these structures.

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<sup>14</sup> Comment letters from BCDC on the NOP are included in Appendix B, Public Scoping Report, in the EIR. Comments on the Draft EIR are included in an appendix to the Comments and Responses document and will be included with the Comments and Responses in the Final EIR.

As explained on EIR p. II.83, the procedures for future local design review and permitting activities for the Project Site will be governed by the *Design Review and Document Approval Procedure* adopted by TIDA. All City departments having jurisdiction over any permitting on the project site would approve and enter into an Interagency Cooperation Agreement setting forth procedures for permit review. These departments would include the Department of Public Works (for street improvements), the San Francisco Municipal Transportation Agency (for transportation-related improvements), the San Francisco Fire Department (for fire fighting infrastructure and facilities), the Arts Commission (for structures on property to be owned by the City), and others. As described on EIR p. II.3, another document, the proposed *Design for Development* would be adopted in connection with the *Redevelopment Plan*. These documents would be used by TIDA to implement land use controls and design standards and guidelines for the project site. On pp. 294-295 of the proposed *Design for Development*, it is noted that TIDA would administer review of permits affecting designated historic structures (including Buildings 1, 2, and 3) and any proposed rehabilitation and reuse of these historic resources would have to comply with the Secretary of the Interior's Standards for Rehabilitation. Potential impacts of reuse and rehabilitation of historic resources, including landscape areas where applicable, are discussed in EIR Section IV.D, Cultural and Paleontological Resources, pp. IV.D.51-IV.D.61. See also the response in Section 2.6, Historic Resources, Subsection 2.6.3, Impact on Buildings 1, 2, and 3.

Comments suggest that the California Coastal Commission should be included in reviewing the Proposed Project. The Coastal Commission has no jurisdiction in San Francisco Bay. As noted on the California Coastal Commission's website, "The coastal zone established by the Coastal Act does not include San Francisco Bay, where development is regulated by the Bay Conservation and Development Commission."<sup>15</sup>

#### **2.1.10 EMERGENCY WATER SUPPLY**

##### **Comments**

On September 16, 1965, EBMUD and the U.S. Navy entered into an agreement to provide an intermittent and interruptible water supply for the sole use of the Navy station at Treasure Island. EBMUD is not the primary supplier for the area and any use of water is for emergency use when full water service is not readily available from San Francisco Public Utilities Commission (SFPUC). Given the changes in land use that are envisioned in the project described in the Draft EIR, EBMUD requests that the 1965 agreement be updated. It is recommended that a new agreement be negotiated upon the termination of the San Francisco - Navy Cooperative agreement. (*William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District*) [6.1]

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<sup>15</sup> California Coastal Commission's website, <http://www.coastal.ca.gov/whoware.html>, accessed October 22, 2010.

1. On page II.11, under EXISTING INFRASTRUCTURE, first paragraph, revise the fourth sentence to read “A water supply pipeline (used only in emergencies) extends under the east span of the Bay Bridge and is supplied by the East Bay Municipal ~~Utilities~~ Utility District (EBMUD).” (William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District) [6.2]
2. On page II.52, under Proposed Water Supply, second paragraph, delete the word “supplemental” in the first and third sentences. The water supply from EBMUD to TI/YBI is strictly an emergency supply, and the only permissible use of EBMUD water other than emergency is the quantity of water needed to assure water quality in the pipeline. Any and all additional references throughout the Draft EIR utilizing “supplemental” in regard to EBMUD should also be deleted and replaced with emergency. (William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District) [6.3]
3. On page II.52, under Proposed Water Supply, second paragraph, revise the second sentence to read: “Capacity of the new 12-inch water main will be equivalent to the in place 12-inch main on the existing east span of the Bay Bridge.” (William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District) [6.4]

### **Response**

EIR Chapter II, Project Description, pp. II.11-II.12 and pp. II.52-II.53, discusses the East Bay Municipal Utility District’s (EBMUD) existing and future provision of emergency water to Treasure Island. EBMUD notes that this provision is under a 1965 agreement between EBMUD and the Navy, and recommends that a new agreement be negotiated between EBMUD and the project sponsors. The comment is noted and the project sponsors have received the information.

The fourth sentence in the last paragraph on p. II.11 is corrected to read as requested in the comment (deleted text is shown in ~~strikeout~~ and new text is underlined):

A water supply pipeline (used only in emergencies) extends under the east span of the Bay Bridge and is supplied by the East Bay Municipal ~~Utilities~~ Utility District (“EBMUD”).

The text in the last full paragraph and following paragraph on p. II.52, continuing to p. II.53, is corrected to read as follows in response to the comments and to make additional technical corrections (deleted text is shown in ~~strikeout~~ and new text is underlined):

The Proposed Project would continue to use the existing primary water supply. Water is provided by the SFPUC through a 10-inch-diameter steel pipe attached to the west span of the Bay Bridge. Water is pumped across the bridge by a pumping station located on Spear Street in San Francisco. The maximum output of the pumping station is ~~1,800~~ 1,500 gpm. The SFPUC chloraminates the water prior to transmission, and the water does not require additional treatment on Treasure Island. A ~~standby~~ booster chlorine station is available at the water line entry point to Treasure Island for emergencies.

The ~~supplemental~~ (emergency)-water supply would continue to be provided by EBMUD, through a new 12-inch water main that is being constructed by Caltrans as part of the new

east span of the Bay Bridge. ~~Capacity of the~~ ~~The~~ new service will be equivalent to the ~~current service~~ in-place 12-inch main on the existing east span of the Bay Bridge. A new 12-inch pipe would be constructed along North Gate Drive on Yerba Buena Island to connect the replacement ~~supplemental~~ emergency water supply line to the proposed new storage tanks (described below). The system has been designed to deliver approximately ~~1,800~~ 1,500 gpm during emergency situations, with a typical average annual flow of ~~61~~ 35 gpm, in keeping with current operations. The water would continue to be chloraminated by EBMUD prior to delivery. The system would only be used in emergencies when the water supply from San Francisco to the Islands is disrupted and for operational flows to maintain water quality.

Similar revisions related to emergency water supply are made to the text in Section IV.K, Utilities, on p. IV.K.47, shown in the response in Subsection 2.13.3.1, Emergency Water Supply, in Section 2.13, Utilities, of this Comments and Responses document.

### **2.1.11 PROJECT LOCATION**

#### **Comment**

Vol. 1, S-2, Summary: What does reference to “immediately surrounding waters” actually mean? Please explain in the context of what is described. (*Kathrin Moore, San Francisco Planning Commission*) [20.4]

#### **Response**

Figure II.3: Tidelands Trust Land Exchange, in EIR Chapter II, Project Description, p. II.15, shows the boundaries of the TIDA property, which includes a portion of the surrounding San Francisco Bay. As described on EIR p. II.6, the former Naval Station Treasure Island included all the land on Treasure Island, 94 acres of the land of Yerba Buena Island, and approximately 540 acres of unfilled tidal and submerged lands adjacent to the Islands in San Francisco Bay. As noted on EIR p. II.7, “the proposed Redevelopment Plan Project Area includes...the adjacent unfilled tidal and submerged lands mentioned above.”

### **2.1.12 VISUAL FEATURES**

#### **Comment**

Vol. 1, II.24, Project Description, Prominent Visual Features: Residential: Program Ranges are overstated for both TI and YBI. At Plan release, documents show TI with 5800 units and YBI had a maximum of 200 units, but never a range of 150 - 300 units

The 2006 Transfer & Reuse of Naval Station TI Final EIR clearly describes visual features Fig 3-2 attached.

Why does this EIR fail to describe prominent visual features and resources? We ask this to be added. (*Kathrin Moore, San Francisco Planning Commission*) [20.8]

**Response**

The text on p. II.24 in EIR Chapter II, Project Description, does not use the term “prominent visual features.” The text on that page describes proposed building height limits in the proposed residential districts on Treasure Island, including one area that would allow a tower of up to 650 feet in height in the “Main Tower” zone in the Island Center District. The Project Description does not evaluate the visual effects of the Proposed Project; that evaluation is provided in Section IV.B, Aesthetics. The visual features of the Proposed Project are described and analyzed on EIR pp. IV.B.19-IV.B.29, including eight photosimulations in Figures IV.B.2 through IV.B.8 that illustrate the change in views of Treasure Island without and with a representative massing of possible new buildings based on the proposed height limits and building massing controls included in the proposed *Design for Development*.

The words “prominent visual features” are not used in the Significance Criteria for aesthetic impacts on pp. IV.B.17-IV.B.18, and therefore were not specifically used in the aesthetic impact analysis. However, the discussion in Impact AE-1 on EIR p. IV.B.21 states that “Implementation of the proposed Redevelopment Plan would create a prominent new cluster of high rise buildings on Treasure Island at the center of San Francisco Bay.” Another sentence later on the same page states, “From these vantage points new construction on Treasure Island would be a prominent new visual presence within scenic vistas of San Francisco Bay...” Similar words are used elsewhere in the analysis of aesthetic impacts. The EIR identifies the substantial change in views of the Proposed Project from the eastern waterfront of San Francisco, the eastern shoreline of the East Bay, Telegraph Hill, and the Bay Bridge east span as significant adverse impacts. Thus, the EIR describes important visual features of the Proposed Project. See also the response in Section 2.4, Aesthetics, Subsection 2.4.6, Impact Analyses.

See the response in Section 2.1.4, Project Land Use, above, for a discussion of the change in numbers of residential units following endorsement of the 2006 Term Sheet.

**2.1.13 OBJECTIVES**

**Comment**

I am both concerned and confused, because the project assumptions, particularly those regarding parking, traffic, and auto use, depict a backward mindset modeled on 1950-1990 parameters and fail to properly address the second Land Use Objective, “*Provide a model of 21<sup>st</sup> century sustainable urban development...*” [II.4]; nor do they “*Demonstrate leadership in sustainable design and provide new benchmarks for sustainable development practices...*” [II.5]. (Ron Miguel, Planning Commission) [7.1]

**Response**

Considerable transit service is included in the Proposed Project, as described on EIR pp. II.35-II.38 and IV.E.33-IV.E.36. The proposed Transportation Demand Management Plan is described on EIR pp. IV.E.45-IV.E.46; its features include ramp metering at the entrances to the Bay Bridge and a congestion management fee proposed to be applied to Island residents. These and similar features of the Proposed Project help to meet project objectives related to sustainability and reduced automobile use listed in Section II.B, Project Sponsor's Objectives, on EIR pp. II.4-II.6. The Expanded Transit System in Mitigation Measure M-TR-2 has been identified in the EIR as potentially infeasible because providing decreased headways for ferry service would require expansion of the San Francisco berthing facilities and because sources for full funding have not been identified (see EIR p. IV.E.75). However, the project sponsors are working with WETA and SFMTA to implement the additional transit service, further supporting use of transit and discouraging automobile use.

The project sponsors intend to discourage vehicle use and promote alternative forms of transit, consistent with the basic Project Sponsor Objective to "Implement a land use program with high-density, compact residential and commercial development located within walking distance of an Intermodal Transit Hub to maximize walking, bicycling, and uses of public transportation and to minimize the use and impacts of private automobiles." (See also the discussion on EIR p. II.45 regarding discouraging automobile use.) The land use plan provides for high-density, compact development, with a combination of residential and commercial uses. An Intermodal Transit Hub and Ferry Terminal are part of the Proposed Project (see EIR pp. II.35-II.38), to be located in the Island Center District, the area with the highest residential density (see EIR p. II.21). A fare-free on-island shuttle service is proposed to provide access for those who do not walk or bicycle to the Transit Hub.

As discussed in EIR Section IV.Q, Mineral and Energy Resources, the Proposed Project includes a renewable energy component, with a commitment to meeting 5 percent of peak electric demand with on-site renewable energy sources (see, e.g., EIR p. IV.Q.11). These features of the Proposed Project are identified in the *Sustainability Plan* summarized in EIR pp. II.77-II.79.

See also the response in Subsection 2.1.7, Sustainability Plan, above.

**2.1.14 INFRASTRUCTURE - WATER**

**Comment**

On page II.61 it states that the use of grey water is currently not allowed. Please update this section to reflect the changes in state and local law that are currently in the works. (*Ruth Gravanis*) [31.20]

**Response**

While regular use of gray water may be allowed in the future, its use is currently allowed only under certain circumstances. The discussion of gray water on EIR pp. II.61 and IV.K.19 is revised to clarify this point. The second full paragraph on p. II.61 is revised and a new footnote is added, as follows (deleted text is shown in strike through and new text is underlined):

The California Department of Housing and Community Development allows the use of ~~grey~~ gray water (water from sinks, showers, and similar sources, captured for local reuse) under certain circumstances.<sup>38</sup> ~~is not currently allowed. If changes are made in applicable State and local laws and regulations, individual residential buildings may be constructed with the necessary capture facilities and piping systems for grey water.~~ Use of gray water is not part of the Proposed Project at this time; Any future proposed use of ~~grey~~ gray water would conform to all applicable State and local requirements. Because it is not known where or whether these ~~grey~~ gray water sources would be used, they are not evaluated further in this EIR.

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>38</sup> California Code of Regulations, Title 24, Part 5, Chapter 16A. See footnote regarding gray water on p. IV.K.19 in IV.K. Utilities and Services.

The third paragraph on p. IV.K.19 is revised and a new footnote is added, as follows:

The California Department of Housing and Community Development allows the use of ~~grey~~ gray water (water from sinks, showers, and similar sources, captured for local reuse) in residential buildings under certain circumstances.<sup>45</sup> ~~is not currently allowed. If changes are made in applicable State and local laws and regulations, individual residential buildings may construct the necessary capture facilities and piping systems for grey water.~~ Use of gray water is not part of the Proposed Project at this time; Any future proposed use of ~~grey~~ gray water would conform to all applicable state and local requirements. Because it is not known where or whether these ~~grey~~ gray water sources would be used, they are not evaluated further in this EIR.

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>45</sup> California Code of Regulations, Title 24, Part 5, Chapter 16A, available via Oasis Design (web site), "California Graywater Standard: Chapter 16A Nonpotable Water Reuse Systems," (with link to PDF of official text), available at <http://www.oasisdesign.net/greywater/law/california/currentcode/>, accessed Nov. 7, 2010. A few highlights are: (1) A gray water system limited to reuse of clothes washer water does not require a permit. Section 1603A.1.1. (2) "Simple systems" with a discharge of 250 gallons per day or less require a construction permit, unless exempted by the local enforcing agency. Section 1603A.1.2. (3) "Complex systems" are all other systems and may have more restrictions on them than the first two types of systems. Section 1603A.1.3.

### 2.1.15 PROJECT DETAILS

#### Comment

Section II, page II.1 - Add a sentence such as, “The areas of the Islands occupied by these entities are not included in this document” – make it clear the USCG Sector, Station, and residential facilities are not in this project.

Section II, page II.10 - Please include the USCG in the first sentence in the Yerba Buena Island section as follows: “Yerba Buena Island is a natural island that has been used by private parties and by the U.S. Army, Navy and Coast Guard since the 1840s.” (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.7]

#### Response

The discussion in EIR Chapter II, Project Description, p. II.1, referenced in the comment, provides an overview of the project site and describes existing conditions. Therefore, it would not be an appropriate place to discuss the exclusion of Coast Guard property from the Proposed Project. However, this fact is noted in several places in the EIR, including Chapter I, Introduction, pp. I.1, I.3, I.7 (including footnote 8), and Chapter II, Project Description, p. II.7.

The first sentence of the last paragraph on p. II.10 is revised as follows to note that the Coast Guard has been present on Yerba Buena Island, along with other military services, since 1840 (deleted text is shown in ~~strikeout~~ and new text is underlined):

Yerba Buena Island is a natural island that has been used by private parties and by the U.S. Army, ~~and Navy~~ and Coast Guard since the 1840s.

#### Comment

**1. Project Description is inadequate and misleading.** So many options are given, with the heights expressed as “flex” zones, that it is impossible to tell what the preferred project is. Apparently, completely open-ended “**mix-and-match**” of **component parts** is what is desired by the project sponsor. However, the variants are so great and the impacts so different that the Project Description cannot be relied on to describe the so-called preferred project. While one can appreciate that project sponsor wants flexibility, the proposed project must be more or less fixed so that it can be analyzed. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.1]

Sometimes the options are called **variants** and they comprise options regarding energy, water, air, greenhouse gasses, etc (Vol II, VI. 1-54);

Another example of options which are called variants are changes in the shape of the Ferry Terminal/Breakwater and size of the harbor and express a wide range in numbers of ferry boat berths and ferry service (*Jennifer Clary, President, San Francisco Tomorrow*) [38.3]

*Recommendation: Provide a single project description that provides the most extreme example of the proposed project in order to allow for appropriately conservative review and mitigation of the project’s environmental impact; (Jennifer Clary, President, San Francisco Tomorrow)* [38.4]

**Response**

The limited flexibility in tower heights provided in the Tower Flex Zones is described in EIR Chapter II, Project Description, and described and analyzed in Section IV.A, Land Use and Land Use Planning, and Section IV.B, Aesthetics. The flex zones are shown in Figure IV.B.10: Proposed Representative Massing Diagram, on EIR p. IV.B.20, in the wire frames that show the area within which a tower taller than the main height limit could be placed. Thus, the EIR provides a complete analysis of this feature of the Proposed Project.

Variants of some of the infrastructure features of the Proposed Project are described in Chapter II in appropriate subsections, and the variants are analyzed in Chapter VI, Project Variants. As explained in the introduction to Chapter VI, variants modify a single feature or aspect of the Proposed Project, unlike alternatives to a proposed project (p. VI.1). They are analyzed in a separate chapter in the EIR to make it easier to understand the differences in impacts that could occur if a variation to that particular part of the infrastructure were implemented. The variants provide optional means of providing transportation or infrastructure improvements necessary to serve the Proposed Project. The variants are provided in order to provide flexibility where there is uncertainty regarding which approach will be feasible or whether approval can be obtained from other agencies with permitting authority over that aspect of the Proposed Project. The impacts of the Proposed Project with variants are fully disclosed using this approach; if any of the variants were to be implemented, the EIR finds either that the impacts would be substantially similar to those of the Proposed Project, or, in the instances of Supplemental Firefighting Water Supply Variant C2 or Breakwater Variant B3, impacts on biological resources could be reduced to less-than-significant levels with implementation of mitigation measures M-BI-8 and/or M-BI-9 identified in Chapter VI, Variants.

**2.1.16 INSURABILITY**

**Comment**

One means of testing the viability of the proposed seismic security measure is for the developers and city to provide evidence of the fiscal insurability of both the survivability of the island's occupants and its structures and to demonstrate so before the DEIR is approved. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.31]

**Response**

Obtaining insurance for the development program in the Proposed Project at this stage of the process would not be timely, because entitlements have not been obtained and there is insufficient information about building foundation and structural details at this time. The availability or lack of availability of insurance does not provide any evidence of the appropriateness or "viability" of the geotechnical stabilization methods planned for the Proposed Project. The geotechnical stabilization methods proposed in the conceptual engineering reports for Treasure Island and

Yerba Buena Island were prepared by California Registered Professional Engineers, and peer reviewed on behalf of TIDA by an independent registered geotechnical engineer, who affirmed that the proposed seismic measures would provide effective ground stabilization.<sup>16</sup> The methods proposed are common methods of ground strengthening. All buildings would have to be designed to comply with current seismic and structural codes, taking into account both site-specific geotechnical characteristics gathered through on-site investigations that would follow the ground strengthening mentioned above, and the specific building foundation and structural systems selected by each building's developer. The EIR discusses seismic safety issues in Section IV.N, Geology and Soils, in Impacts GE-2 and GE-3, on pp. IV.N.24-IV.N.29.

### **2.1.17 PROJECT DESCRIPTION - 2005 EIR AND 2006 TERM SHEET**

#### **Comments**

- While the Transfer & Reuse of Naval Station Treasure Island Final EIR in June 2006 describes a project that is primarily focused on public oriented development, open spaces, recreation and residential uses, the 2010 DEIR describes a major private real estate development that seems to maximize investment at the expense of public interest values.
- While over the course of 10 years, well-intentioned planning efforts have tried creating the first green, sustainable neighborhood in San Francisco, the project today has morphed into an irresponsible, out-of-control development proposal, with obvious irreversible and immitigable impacts that this EIR fails to objectively evaluate. (*Kathrin Moore, San Francisco Planning Commission*) [20.2]
- 2) Why is there no reference to the “Proposed Actions and Alternatives” as stated in the “Transfer and Reuse Naval Station Treasure Island Final EIR 2006”, Chapter 2-8? (*William Robberson, President, San Francisco Boardsailing Association*) [27.4b]
- Please explain in detail the components of the 1996 Draft Reuse Plan that was analyzed in the 2003 federal Environmental Impact Statement (2003 EIS). Include at least the following:
  - Was any new development proposed for YBI?
  - If so, exactly what development was proposed for YBI?
  - Number of new buildings proposed for YBI and TI.
  - Heights of all proposed new buildings?
  - Number of residential units (rental vs. sales).
  - Square feet of commercial and retail space (resident serving vs. regional).
  - Square feet of office space.
  - Number of hotel rooms.
  - Transportation facilities.
  - Marina development – how many slips.
  - Acres of parks and open space.
  - Total number of parking spaces (on street and off street).

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<sup>16</sup> *Treasure Island Infrastructure Update*, Appendix C, cited in footnote 1 in EIR Section IV.N, Geology and Soils, on p. IV.N.1.

- Number of historic buildings proposed to be demolished.
- What were the transportation goals and objectives established by the 1996 Draft Reuse Plan that were considered in the 2003 EIS? Explain what “transit-oriented development” was incorporated into the 1996 Draft Reuse Plan to reduce automobile usage associated with suburban land uses? How many ferries were proposed? How many busses were proposed?
- Using the above list, please explain all changes made from the 1996 Draft Reuse Plan to the 2002 Development Plan, from the 2002 Plan to the Plan considered in the 2005 Transfer and Reuse Final EIR (2005 FEIR), to the 2006 Plan, and from the 2006 Plan to the plan now being considered in this DEIR. Include any other plans not mentioned. Include a chart comparing of all aspects of the Plans, including those items in the list above.
- Please explain how and why the project morphed from what was analyzed in the 2003 EIS to what is being considered in this DEIR. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.3]

The 2006 Term Sheet approved by the Board of Supervisors was accompanied by a *Transportation Plan, Land Plan, Sustainability Plan and Infrastructure Plan*.

- As to the 2006 *Sustainability Plan*, describe how the project being analyzed in this DEIR differs from the specific recommendations of the 2006 *Sustainability Plan*. What individual recommendations from that plan are *not included* or *not fully included* in the Redevelopment Plan being analyzed in this DEIR? Please list each such recommendation and explain why it has not been incorporated into the Proposed Project.

As to the 2006 *Transportation Plan*, describe how the Proposed Project being analyzed in this DEIR differs from the recommendations in the 2006 *Transportation Plan*. What individual recommendations from that plan are not included or not fully included in the Proposed Project / Redevelopment Plan being analyzed in this DEIR? Please list each such recommendation and explain why it has not been incorporated into the Proposed Project.

- Why [is] the Proposed Project being analyzed in this DEIR significantly different than the Proposed Project that was described in the Notice of Preparation of EIR? One example of the major differences between the project described in the Notice of Preparation and this DEIR is the increase in residential units from 6,000 to 8,000 (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.5]
- What were the mitigation measures proposed and adopted in the 2005 FEIR? Please list each proposed mitigation measure in relation to the significant impacts it addressed – transportation, aesthetics, historic resources, etc.
- What mitigation measures recommended in the 2005 FEIR are *not* recommended in this DEIR and explain why each such mitigation measure was excluded/not recommended in this DEIR.
- What is the difference in the significant impacts identified in the 2005 FEIR from those identified in this DEIR? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.78]

**Response**

The comments note that prior environmental analyses or plans were prepared for previous proposals at the project site and ask for comparisons and/or inclusion of components of that review such as mitigation measures and alternatives. The TIDA website states the following:<sup>17</sup>

In 2003, the Navy prepared a Final Environmental Impact Statement (“EIS”) for the Disposal and Reuse of Naval Station Treasure Island in accordance with the National Environmental Protection Act (“NEPA”), and in 2006, the City prepared a Final Environmental Impact Report for the Transfer and Reuse of Naval Station Treasure Island in accordance with the California Environmental Quality Act (“CEQA”). The 2006 EIR analyzed the conveyance of NSTI to the City at a programmatic level, and also analyzed the expansion of the Clipper Cove Marina at a project level. In certifying the 2006 EIR, the Planning Commission and TIDA, as lead agencies under that EIR, determined that subsequent project level review *would not be tiered from that document*, so a new project-level Draft EIR has been prepared for the Redevelopment Plan for the Treasure Island /Yerba Buena Island Redevelopment Project in accordance with CEQA [emphasis added].

The EIR discusses the 2003 EIS and 2005 EIR in Chapter I, Introduction (note that the 2006 EIR identified in the quoted paragraph is the EIR certified in 2005 and generally identified as the “2005 EIR” in this Comments and Responses document). Because the current EIR has been prepared for a specific development plan, it is different from the program-level proposals analyzed in the prior documents. The EIR provides a project-level analysis (see EIR p. I.6). The mitigation measures included in the prior EIR were reviewed and those that would be relevant to the Proposed Project were included or modified as necessary to apply to the current proposal, which is substantially different from the alternatives analyzed in the 2005 Final EIR. As stated on EIR pp. I.4-I.5, all mitigation measures proposed in the 2005 EIR applicable to the Proposed Project that are not expressly restated or restated as modified in this EIR are no longer applicable. Many of the mitigation measures and/or alternatives in the 2005 Final EIR are not appropriate or relevant to the proposal currently under review; others have been incorporated into the Proposed Project so mitigation is no longer necessary. While the current EIR incorporates elements of mitigation measures identified in the 2005 Final EIR where appropriate, the Proposed Project is assessed independently of prior proposals. The current EIR provides a new evaluation of the Project as proposed by the project sponsors, TICD and TIDA. It does not rely on the analysis or conclusions in the 2005 Final EIR, in accordance with the explicit request by the Planning Commission and TIDA. Comparisons of the analysis in the current EIR with those presented in prior environmental analyses are not necessary, required or relevant.

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<sup>17</sup> Treasure Island Redevelopment, Environmental Review Documents (n.d.), retrieved from <http://www.sftreasureisland.org/index.aspx?page=27>, accessed October 18, 2010.

Planning for the redevelopment of the former Navy base began at the local level in 1994, after the Base Closure and Realignment Commission selected Naval Station Treasure Island for closure. The Proposed Project has been developed over several years of public planning activities, beginning in 2000 when TIDA initiated a competitive process to select a master developer for the project site. The 2006 Term Sheet presented a proposed plan for development that reflected several years of discussion among multiple public bodies, including the TIDA Board of Directors, the Citizens Advisory Board, the Board of Supervisors, and interested members of the public (see EIR pp. I.5-I.6). The 2006 Term Sheet includes a *Sustainability Plan*, as well as infrastructure plans, a *Transportation Plan*, a *Land Use Plan*, and other documents outlining the proposed development program in detail. In response to comments received during the public scoping process for this EIR, and subsequent review of the development program by TIDA, TICD, and various public and City agencies, the Proposed Project was revised to provide an increased number of residential units. The project described in the 2006 Term Sheet is analyzed in the EIR as Alternative B, Reduced Development Alternative. Please refer to the response in Section 2.1.7, Sustainability Plan, above, for a discussion of sustainability.

## 2.2 PLANS AND POLICIES

### 2.2.1 TIDELANDS TRUST

#### Comment

The draft also indicates a legislatively approved trade of possible Tide Lands Trust sites for island perimeter sites that for the most part are very much below water and likely to remain so. The sea level is expected to rise 2.5 feet during the time expected for island's initial development and far more during the development's overall economic life. These deepening submerged lands traded to the Trust cannot be expected to be equivalent value for state purposes. This is a farcical replay of the fabled Florida scams related to sale of swamplands in the 1920's. (*Bernard Choden*) [2.2]

#### Response

The comment expresses concerns that potential future sea level rise will cause lands on which the public trust (also referred to in the EIR as the "Tidelands Trust") is to be imposed to become submerged, and that submerged lands would not have sufficient value to support the proposed trust land exchange. EIR Section IV.O, Hydrology and Water Quality, pp. IV.30-IV.O.35, discusses future potential climate-induced sea level rise. As stated on EIR p. IV.O.31, the rate of potential future sea level rise cannot be projected with certainty, and estimates vary substantially among the thousands of scientific research documents available on climate change and sea level rise.

As discussed under Impact HY-12, on EIR pp. IV.O.48-IV.O.50, a substantial portion of the Project Area at current elevations and without future improvements could potentially be at risk of inundation due to future potential sea level rise, in particular low-lying areas of Treasure Island and some low-lying areas along the western flank of Yerba Buena Island near the existing U.S. Coast Guard Station.

Based on the most widely accepted and credible literature, several elements have been incorporated into the Proposed Project to accommodate potential sea level rise under a reasonable range of low, medium, and high estimates (refer to EIR p. IV.O.31) of future potential sea level rise that could likely occur, ranging from 3 inches by 2050 and 12 inches by 2100, to 16 inches by 2050 and 55 inches by 2100. These elements include:

- Improvements that would be made as part of the initial infrastructure construction and site preparation in Phase 1;
- Implementation of a long-term adaptive management strategy, which would include future improvements as needed to accommodate actual sea level rise as it develops; and
- Periodic reporting on the status of the Proposed Project's adaptive management strategy.

With implementation of these elements, the Proposed Project would account for the effects of future potential sea level rise and would not result in substantial inundation of existing land areas.

As discussed above, the Proposed Project incorporates elements to address sea level rise. As discussed in EIR Chapter III, Plans and Policies, p. III.14, the proposed Public Trust Exchange Agreement authorized by the Treasure Island Public Trust Exchange Act would confirm or impose the public trust on approximately 217 acres of uplands on Treasure Island and about 80 acres of uplands on Yerba Buena Island, as well as approximately 540 acres of tidal and submerged land surrounding the Islands. The Treasure Island Development Authority ("TIDA") has determined that, even without considering the existing tidal and submerged lands, the value of the lands exchanged into the trust far exceeds the value of the lands to be removed from the trust. The approximately 540 acres of tidal and submerged land surrounding the Islands lands would retain the public trust designation after the Trust Exchange Agreement is executed. As such, the submerged lands would continue to remain available for public purposes such as marinas, docks, wharves, commercial and sport fishing, and boating, with or without the Trust Exchange Agreement, and would continue to provide value for Public Trust purposes. Upland areas subject to the Trust Exchange Agreement are not expected to be inundated, and therefore would not be expected to provide value for trust purposes.

### Comments

As the DEIR states, residential development is not a use consistent with the public trust doctrine, as residential development causes the privatization of public property resulting in a loss of its special character as public lands. General commercial, recreational, mixed-use office, and retail uses are also uses inconsistent with the Public Trust Doctrine, as such uses generally serve the local citizenry and are not water-related or visitor serving. Alternatively, commercial recreational, office, and retail uses, which are visitor-serving, cater to the regional or statewide general public, and are water-related, may be considered incidental and necessary in promoting the public's use of public trust lands and hence would be considered consistent with the Public Trust Doctrine. Also, general civic/cultural uses that are not water-related and are not visitor-serving in nature are not appropriate public trust uses as such uses cater to the local community and do not serve the regional or statewide general public. (Grace Kato, Public Land Management Specialist, California State Lands Commission) [24.1]

1. Energy Variant A1 Renewable Electricity Generation – Increased Solar Photovoltaic: According to the DEIR this variant would provide up to 20 acres of ground-mounted photovoltaic panels in open space areas on the eastern or northern shorelines of Treasure Island and/or in the center of the Island near the urban Agricultural Park. A total of 28 acres has been tentatively identified as potentially available for this use. Generally, energy generation that is not water-dependent and does not further or benefit the public trust is not consistent with TIDA's statutory trust grant or the Public Trust Doctrine. (Grace Kato, Public Land Management Specialist, California State Lands Commission) [24.2]
2. Open Space and Recreation: Permanent athletic fields or sports fields, off-leash dog areas, and the 20-acre demonstration organic urban farm, are not uses consistent with TIDA's statutory trust grant or the Public Trust Doctrine, as such uses purely provide a municipal benefit for the local community and are not water-related or visitor serving. (Grace Kato, Public Land Management Specialist, California State Lands Commission) [24.3]

3. Commercial: According to the DEIR, the proposed project includes a grocery store or market to serve local residents on the Island (about 30,000 square feet), along with approximately 22,000 square feet of food production uses. Building 2 is proposed for the location of the grocery store/market. Pursuant to Chapter 543, as amended, Building 2 and Building 3 are proposed to be within the area impressed with the public trust. Both Building 2 and Building 3 are considered to be structures of historic significance. Generally, a grocery store is not consistent with TIDA's statutory trust grant or the Public Trust Doctrine, as it benefits the local residents without any nexus or connection to the water. Additionally, according to the DEIR, Building 3 is proposed to be used for approximately 150,000 square feet of entertainment/recreation uses, such as a movie theater and/or indoor sports/recreational facilities that would also be regional-serving retail uses. Generally, a movie theater and indoor sports/recreational facilities are not consistent with the Public Trust Doctrine. It is important to keep in mind that the overarching principle of the Public Trust Doctrine is that trust lands and trust assets belong to the statewide public and are to be used for water-related purposes and must benefit the statewide public rather than primarily serve local community or municipal purposes. (*Grace Kato, Public Land Management Specialist, California State Lands Commission*) [24.4]
4. Institutional and Public Services: Space for a 75,000 square foot museum or other cultural institution is planned in the Cultural Park north of Building 1. Generally, a museum or cultural institution without any connection to the water is not consistent with the Public Trust Doctrine. (*Grace Kato, Public Land Management Specialist, California State Lands Commission*) [24.5]

The EIR should note that similar to how access promoted affection for and preservation of our wilderness and natural areas, the Bay will benefit by this increased access. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.9]

### **Response**

As stated in the comments, certain proposed uses on the Islands may not be generally consistent with the Public Trust. These uses are identified in Comment Letter 24 as the use of photovoltaic panels in open space areas; certain open space and recreation uses such as permanent athletic and sports fields, dog parks and urban farms; local retail uses such as a grocery store uses; entertainment/recreation uses such as a movie theater or indoor sports/recreational facilities; and museums or cultural institutions without any connection to the water.

As discussed in EIR Chapter III, Plans and Policies, on pp. III.12-III.15, the Public Trust (referred to in the EIR as the "Tidelands Trust") is a legal doctrine that limits the use of certain existing or former tidal and submerged lands in California. Whether a particular use is consistent with the Public Trust is generally determined on a case-by-case basis in court decisions and legal opinions by the State Lands Commission and Attorney General. The use of those portions of the Islands that are subject to the Public Trust is also subject to the statutory trust created by the Conversion Act, which sets forth the terms and conditions pursuant to which the TIDA is responsible for administering Public Trust property on the former Naval Station Treasure Island owned by the Navy.

Under the Treasure Island Conversion Act of 1997,<sup>1</sup> TIDA, as the grantee of the State's trust lands, has a statutory duty to ensure that uses on Public Trust property are consistent with the Public Trust. To ensure consistency with the Public Trust, the proposed *Design for Development* establishes a Trust Overlay zone which governs all property on the Islands that will be subject to the Public Trust. TIDA must review all uses proposed within the Trust Overlay zone for consistency with the Public Trust. Under Section 8 of the Conversion Act, TIDA has the authority to ground lease its property to others either on a long-term basis (not to exceed 66 years) solely for uses that are consistent with or ancillary to the Public Trust, or on a short-term basis (not to exceed 5 years) for uses that would not interfere with the Public Trust. This trust consistency review for third-party users would occur prior to the approval of ground leases or other agreements with those parties. TIDA would also review all of its uses of trust property for consistency with the Public Trust prior to TIDA's implementation of such uses. In both cases, such determination will occur when the specifics regarding the proposed use and surrounding circumstances are known. In making a consistency determination, TIDA will consider a number of factors specific to the proposed use, including whether the use is water-related or ancillary to the Public Trust, the overall mix of uses within a particular building, the project design, the amount of public access provided, whether the use is proposed within a National Register historic resource, and whether the use is allowed as an interim non-Trust use or otherwise permitted under the Conversion Act.

While certain uses, such as residential, are almost never consistent with the Public Trust, other uses such as commercial, open space, recreational or energy uses may be found to be consistent depending on the extent to which such uses further Public Trust purposes. For example, renewable energy facilities that support Public Trust uses and allow those uses to be sustainable and energy self-sufficient would have a direct benefit to the Public Trust and might be found to be consistent with the Public Trust. A cultural institution that draws regional and statewide visitors, takes advantage of its waterfront location, and promotes Public Trust values could also be found consistent. A commercial use that draws regional visitors and allows public access and viewing of a rehabilitated historic building within Public Trust lands might also be considered consistent with the Public Trust, depending on the overall circumstances.

Because each use on Public Trust property must be evaluated in light of all of the surrounding circumstances, it is premature to conclude whether a particular energy, commercial, open space and recreation, or cultural/institutional use on Treasure Island or Yerba Buena Island would be consistent with the Public Trust. However, it is important to note that the proposed *Design for Development* would allow uses within the Trust Overlay zone only upon a finding of trust

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<sup>1</sup> Assembly Bill 699, Treasure Island Conversion Act of 1997, October 12, 1997. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

consistency by TIDA. All proposed uses on Public Trust property would be evaluated by TIDA at the time that more details are known about any particular proposal. Certain uses specified in the comment, including permanent athletic fields or sports fields, are being located on the land outside of the Trust.

TIDA has a statutory duty under the Conversion Act to ensure that it acts in compliance with the Public Trust. As such, it may not approve any use that it finds to be inconsistent with the trust or otherwise not allowed under the Conversion Act. The State Lands Commission exercises oversight over all granted lands. Generally, this means the Commission carries out this responsibility by working cooperatively with grantees to assure that requirements of the legislative grants and the Public Trust Doctrine are carried out and to achieve trust uses. The Commission monitors and audits the activities of the grantees to insure that they are complying with the terms of their statutory grants and with the public trust. Most grantees, including TIDA, are not required to secure approval from the Commission before undertaking development projects on their trust lands nor before expending revenues generated from activities on these lands. However, where an abuse of the Public Trust Doctrine or violation of a legislative grant occurs, the Commission can advise the grantee (in this case, TIDA) of the abuse or violation and, if necessary, report to the Legislature, which may revoke or modify the grant. Alternatively, the Commission can file a lawsuit against the grantee to halt the project or expenditure<sup>2</sup>. Therefore, as a matter of practice, TIDA and the State Lands Commission will continue to cooperate throughout planning, design, and buildout of the Proposed Project.

One comment states the EIR should note that increased access created by the Proposed Project would promote affection for, and preservation of, the Bay. The Proposed Project would increase access to the Bay in a number of ways that would benefit the public. Consistent with the Trust Exchange Agreement, the project includes use of Public Trust lands to provide increased shoreline access, water-oriented recreational uses, and visitor parking to support trust uses. The Proposed Project would address access policies of the Bay Conservation and Development Commission's ("BCDC") *San Francisco Bay Plan* as discussed on EIR pp. III.9-III.12, including recreation access and public access features such as visitor parking. As discussed on EIR p. III.16, the Proposed Project also would extend the Bay Trail around the perimeter of Treasure Island and would provide new pedestrian and bicycle paths on Yerba Buena Island, thereby supporting goals of the *San Francisco Bay Trail Plan* to complete 500 acres of continuous shoreline access around the Bay (refer also to the response in Section 2.2.2, Bay Trail, below).

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<sup>2</sup> State Lands Commission, "Public Trust Policy for the California State Lands Commission," adopted September 17, 2001. Available at the State Lands Commission website, [www.slc.ca.gov/Policy\\_Statements/Public\\_Trust\\_Home\\_Page.html](http://www.slc.ca.gov/Policy_Statements/Public_Trust_Home_Page.html), accessed February 24, 2011. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

This comment does not address the accuracy or adequacy of the EIR; therefore, no further response is required.

### Comments

In view of the enormous voluntary, human and financial, investment, we have made on behalf of our kids and the young adults in the Bay Area, and because of the regional nature of our fields, we request that our usage of the existing athletic fields be interpreted as being compliant with the requirements of the Tidelands Trust. (*Patrick Huniacke, GAA Athletic Association*) [TR.14.3]

...I thought it was particularly instructive of the Tidelands Trust information in there. Because it's an issue regarding previously submerged lands that we don't have occasion to deal with as often. And I thought it was very important that it talked about the discretion that the Tidelands Trust has overuses, particularly recreational ones, which are very important. And that there was an emphasis on recreational uses that had a regional aspect to them. (*Michael Antonini, San Francisco Planning Commission*) [TR.19.1]

And then the comment that we heard today, which are new to me, about the athletic fields and the Tidelands Trust interpretation. I do want that to be looked at by staff, and hopefully when we revisit this in September we can look at that further. (*Jean-Paul Samaha, TIDA Board Member*) [TR.27.2]

### Response

As discussed in EIR Section IV.J, Recreation, pp. IV.J.26-IV.J.27, the Proposed Project would provide approximately 300 acres of parks, recreational facilities, and open space, including 40 acres of athletic and sports fields, near a waterfront setting that would serve residents of the Proposed Project and mainland San Francisco, as well as residents of the greater Bay Area. Not all of the proposed recreational facilities would be located on land subject to the Trust. Certain uses, including the athletic fields and the neighborhood-serving parks, would be located on land outside the Trust. Each use on Public Trust lands would be evaluated by TIDA based on a number of factors for consistency with the Public Trust. Refer also to information provided in the response above to the preceding comments concerning land uses consistent with the Public Trust on Treasure Island and Yerba Buena Island.

## **2.2.2 BAY TRAIL**

### Comments

We appreciate reference to the Bay Trail Plan. Please note that the Bay Trail is a planned 500-mile path encircling the Bay, and to date 300 miles have been completed. This section states that the Proposed Project includes extensions to the Bay Trail "and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified." The Bay Trail Plan, policies, and our project comments have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and polic[i]es.

**Bay Trail Plan Policy #12:** Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

**Bay Trail Plan Policy #13:** Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.5]

We appreciate reference to the Bay Trail Plan. Please note that the Bay Trail is a planned 500-mile path encircling the Bay, and to date 300 miles have been completed. This section states that the Proposed Project includes extensions to the Bay Trail “and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified.” The Bay Trail Plan, policies, and our commentary over the past 8 years have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and polic[i]es.

Bay Trail Plan Policy #12: Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

Bay Trail Plan Policy #13: Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern. (*Tom Radulovich, Livable City*) [36.5]

**2. Analyzed alternatives conflict with Bay Trail Plan and policies:** The DEIR’s Plans and Policies section references the Bay Trail Plan, stating that the proposed project includes extensions to the Bay Trail “and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified.” The Bay Trail Plan, policies, and staff commentary over the past 8 years have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and polic[i]es, to wit:

*Bay Trail Plan Policy #12:* Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

*Bay Trail Plan Policy #13:* Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern.

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.3]

**Response**

The following revisions are made to the second sentence in the paragraph under the heading “Bay Trail Plan” on p. III.12, in EIR Chapter III, Plans and Policies (deletions are shown in ~~strike through~~ and new text is underlined):

The Bay Trail is a planned multi-purpose recreational trail that, when complete, would encircle San Francisco Bay and San Pablo Bay with a continuous 500400-mile network of bicycling and hiking trails; to date, 300290 miles of the alignment have been completed.<sup>11</sup>

The new footnote for this text change is shown below, and subsequent footnotes in the section are renumbered accordingly:

<sup>11</sup> Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail Project, letter communication, September 10, 2010.

As stated on EIR p. III.12, the Proposed Project was reviewed against the policies of the *San Francisco Bay Trail Plan (Bay Trail Plan)*, and no conflicts were identified. Specifically, the Proposed Project was reviewed in the context of the general directive policies of the *Bay Trail Plan*, which fall into five categories: 1) trail alignment; 2) trail design; 3) environmental protection; 4) transportation access; and 5) implementation. In response to issues raised concerning bicycle access to the East Span of the Bay Bridge, the Proposed Project was reviewed against transportation access policies, particularly policies #30 and #31, which “reflect the need for bicycle and pedestrian access on Bay Area toll bridges, in order to create a continuous trail and to permit cross-bay connections as alternative trail routes.” As discussed in EIR Section IV.E, Transportation, on pp. IV.E.108-IV.E.110, the EIR analyses concluded that proposed bicycle lanes on Macalla Road, including design treatments at intersections and the roadway’s grade, met standard design guidelines and provided adequate bicycle facilities, such that the Proposed Project’s impacts on bicycle circulation would be less than significant. However, in light of this and several other comments regarding bicycle and pedestrian circulation on Yerba Buena Island, and in particular, connections between the Bay Bridge and Treasure Island, the project sponsors reviewed the available right-of-way and revised the planned improvements to Macalla Road. As discussed in the response in Subsection 2.7.7.1, Transportation, Bicycle Access – Macalla Road, in Section 2.7, Transportation, of this Comments and Responses document, the revised proposal includes (from south to north) a 16-foot two-way Class I bicycle path, an 11-foot travel lane, a 2- to 3-foot buffer, and a 6- to 7-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction could use the Class I facility, which would continue to follow the existing (relatively steep) contours of Macalla Road, but would provide a greater separation from vehicular traffic than the Class II facility previously proposed.

The project sponsors have also identified an opportunity to provide a 10-foot, two-way Class I path on Treasure Island Road between about 500 feet south of Macalla Road to Treasure Island, connecting to the Class I path proposed to encircle Treasure Island. The revised configuration for Macalla Road and for the northern portion of Treasure Island Road would allow a two-way Class I path between Treasure Island and the Bay Bridge, connecting to the Class I path on the new eastern span and potentially to the connection to a new path on the west span. With these proposed design revisions, the Proposed Project would include a Class 1 multi-use pathway<sup>3</sup> to connect to the East Span of the Bay Bridge. As such, comments raised concerning the need for a Class I multi-use pathway, and consistency of the Proposed Project with the *Bay Trail Plan* would be addressed.

The Proposed Project no longer includes a contra-flow bike lane on Macalla Road. Refer also to the response in Subsection 2.7.7.1, Transportation, Bicycle Access – Macalla Road. *Bay Trail Plan* Policy #12 and Policy #13 pertain to *Bay Trail Plan* trail design policies which “underscore the importance of creating a trail which is accessible to the widest possible range of trail uses, and which is designed to respect the natural or built environments through which it passes.”

As required by Federal, State, and City regulations, the Proposed Project’s transportation infrastructure improvements would be constructed to meet the requirements of the California Building Code in Title 24 of the California Code of Regulations (California Physical Access Laws), as applicable, which is designed to comply with the requirements of the Americans with Disabilities Act (“ADA”) and State statutes for physical accessibility. The sidewalk and bicycle lane improvements included in the Proposed Project on the east and west sides of Yerba Buena Island would comply with Title 24 standards, and the project design would be coordinated with Title 24-compliant east span pedestrian/bicycle path currently under construction by Caltrans. The proposed West Span bicycle and pedestrian mixed-use path would not be under the control of project sponsors, and that project, if constructed, would be required to connect to the roadway and sidewalk network at both the Yerba Buena Island and San Francisco touchdown locations. Therefore, consistent with *Bay Trail Plan* Policy #12, the Proposed Project would provide access to greatest range of users, regardless of physical limitations or disabilities. Refer also to the response in Subsection 2.7.2.1, Americans with Disabilities Act, in Section 2.7, Transportation, of this Comments and Responses document.

As described above, the revised design configuration of Macalla Road includes a 16-foot two-way Class I bicycle path, an 11-foot travel lane, a 2- to 3-foot buffer, and a 6- to 7-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility, and cyclists traveling uphill could use the Class I facility, which

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<sup>3</sup> Under the Bay Trail design guidelines, multi-use paths would meet Caltrans Class 1 bikeway standards. *San Francisco Bay Trail Plan*, Bay Trail Design Guidelines.

would widen the previously proposed 6-foot travel lane, and provide a greater separation from vehicular traffic than the Class II facility previously proposed. These travel options for cyclists and the 2- to 3-foot buffer would substantially reduce safety hazards of trail users, and potential conflicts with automobiles. As such, the Proposed Project would not conflict with *Bay Trail Plan* Policy #13.

### 2.2.3 SAN FRANCISCO GENERAL PLAN

#### Comments

It should also be noted that beginning January 1, 2011, when a circulation element may be subject to a substantive revision, there must be a plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads and highways for safe and convenient travel that is suitable to rural, suburban and/or urban contexts of San Francisco's General Plan. [See Government Code Section 65302, et seq]. The compliance with that requirement may create significant new impacts and otherwise identify additional alternatives that require analysis. However, the DEIR and the DTP fail to analyze and otherwise project the consequences of complying with this requirement. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.26]

#### Response

The comment opines that the Proposed Project would not comply with requirements for a balanced, multimodal transportation network under Government Code Section 65302.

The comment is referring to Assembly Bill 1358, the California Complete Streets Act, which was signed into law in September 2008 with the goal of fulfilling the State's commitment to reduce greenhouse gas emissions, make efficient use of urban land and transportation infrastructure, decrease vehicle miles traveled, and shift from short trips in private automobiles to biking, walking, and public transit. The Act affects local general plans by adding language to Government Code Section 65032(b)(2)(A) and (b)(2)(B) and requires that effective January 1, 2011, upon any substantial revision of the circulation element, the legislative body is required to modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of the streets, roads, and highways for safe and convenient travel in a manner that is suitable to the development context of the general plan. Users of "streets, roads, and highways" refers to bicyclists, children, persons with disabilities, motorists, goods movements, public transit riders, and seniors.

The Proposed Project would not result in a substantial revision to the Transportation Element of the *San Francisco General Plan (General Plan)*. As stated in EIR Chapter III, Plans and Policies, on p. III.3, implementation of the Proposed Project would require an amendment to the *General Plan* that would add a new Area Plan for the proposed Project Area. The Proposed Project would not require nor trigger substantial revision to the Transportation Element of the *General Plan*. As such, neither the EIR nor the Draft

Transportation Plan is required to address any revisions to the Transportation Element related to Assembly Bill 1358 and the California Complete Streets Act. Note, however, that the San Francisco Board of Supervisors adopted Ordinance No. 309-10, effective January 6, 2011. That ordinance, related to the City's Better Streets Plan, did amend the Transportation Element of the City's *General Plan* and made the following finding: "The Board of Supervisors also finds that the General Plan Amendments in this legislation and the San Francisco Bicycle Transportation Plan and General Plan Amendments related thereto are intended, in part, to satisfy the requirements of Government Code Section 65302(b)(2)(A), a provision of the California Complete Streets Act of 2008."

Even if the Proposed Project were to require amendments to the Transportation Element sufficient to trigger the requirements of Assembly Bill 1358, the project includes elements that would be consistent with the Act. Land Use objectives of the Proposed Project include implementation of a high-density, compact land use program located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles. Transportation objectives of the Proposed Project focus on discouraging automobile use, supporting public transit use, and providing a range of public transit choices (refer to EIR Chapter II, Project Description, pp. II.4-II.5). EIR pp. II.35-II.52 discuss the Transportation Plan for the Proposed Project, which includes an intermodal Transit Hub with ferry service and bus service; on-Island shuttle service; a proposed street system that addresses the needs of pedestrians, including seniors and the disabled; provisions for accessible and safe walking and bicycling, and Bay Bridge access for automobiles. These elements of the Transportation Plan would all be consistent with the objectives of Assembly Bill 1358, the California Complete Streets Act.

### **Comments**

- On DEIR page IV.D.50 reference is made to SF Planning Code Section 101.1: Master Plan Priority Policies as being applicable to this project. The DEIR then states that the City must find that the Proposed Project is consistent "on balance" with the eight Priority Policies. This is an incorrect statement. The Priority Policies are not to be "balanced," rather they are for the purpose of resolving inconsistencies of a project with the other General Plan policies. They were adopted by initiative of the voters to be "*the basis upon which inconsistencies in the City's General Plan are resolved.*" Please add this clarification to the DEIR. We agree that Priority Policy No. 7 would apply to the Proposed Project and would take precedent over any conflicting policy of the General Plan. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.48]

### **Response**

The comment states that Priority Policies are the basis for resolving inconsistencies of the Project with other *General Plan* policies, and that the EIR is incorrect in stating that the Proposed Project is consistent on balance with the Priority Policies.

The comment is referring to the third full paragraph in EIR Section IV.D, Cultural and Paleontological Resource, p. IV.D.50, which states that the “proposed project is consistent, on balance, with eight *Master Plan Priority Policies*,” and does not refer to *General Plan* policies as a whole.

The comment is accurate in stating that the Priority Policies are the basis upon which inconsistencies in the City’s *General Plan* are resolved, as cited in Section 101.1(a) of the Planning Code. For the purposes of general plan consistency, it is often the case that there is some balancing by decision-makers with respect to many of general plan policies, some of which may, in fact, be in conflict with each other. The Priority Policies are used by San Francisco decision-makers to take an overarching view of *General Plan* goals and objectives, rather than focusing exclusively on one particular policy to find a project inconsistent with the *General Plan*. As such, a project, on balance, may be consistent with the eight Priority Policies, although it may be inconsistent with a specific goal or objective of the *General Plan*. For these reasons, the text presented on EIR p. IV.D.50 is appropriate, and no further clarifications to the EIR concerning the *General Plan* Priority Policies are necessary.

Decision-makers would determine the consistency of the Proposed Project with Priority Policy 7, which pertains to preservation of landmarks and historic buildings, and how it should be evaluated with respect to any conflicting policies of the *General Plan*.

### **Comment**

The Project Description and numerous other areas of the document present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the Islands. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.2]

The Project Description and numerous other areas of the document present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the Islands. (*Tom Radulovich, Livable City*) [36.2]

### **Response**

The comments do not identify the goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with the Proposed Project. Transportation-related objectives of the Proposed Project are discussed in EIR Chapter II, Project Description, on pp. II.4-II.5, and relevant transportation policies and goals of the *General Plan*, *San Francisco Bicycle Plan*, and Transit First Policy are presented in EIR Section IV.E, Transportation, on pp. IV.E.25-IV.E.28. Refer also to the response in Section 2.2.2, Bay Trail. The transportation impact analysis determined that potential impacts on bicycles and pedestrians would be less than significant (please refer to Impacts TR-33, TR-34, TR-35, and TR-36, on EIR pp. IVE.108-IV.E.112). Therefore, potential conflicts with transportation goals and policies would be avoided or minimized as part of the Proposed Project.

The Proposed Project includes substantial new bicycle and pedestrian facilities intended to encourage their use and discourage the use of automobiles. These are described in Chapter II, Project Description, on EIR pp. II.45-II.49, and Section IV.E, Transportation, on pp. IV.E.36-IV.E.45. After publication of the Draft EIR, the project sponsors made revisions in the Proposed Project to provide additional bicycle and pedestrian facilities along Macalla Road and Treasure Island Road. These revisions include a 10-foot two-way Class I bicycle path on Treasure Island Road, an 11-foot travel lane, a 2- to 3-foot buffer, and a 6- to 7-foot Class II bicycle lane in the downhill direction. Refer also to the response in Subsection 2.2.2. Bay Trail, above.

Comments regarding the adequacy of proposed transportation facilities can be directed to decision-makers and are noted.

#### **2.2.4 BCDC REGULATIONS**

##### **Comment**

The following regulations (and others) applicable to the Project were adopted for the specific purpose of avoiding environmental effects on biological resources. In addition to the materials contained in Chapter IV of the DEIR, please answer the following as to the regulations listed below: (1) On what factual basis does the DEIR conclude that the project does not conflict with each of these regulations? (2) What are the results of the required consultations with the applicable regulatory agency(ies), including the dates of these consultations?...

- Regulations of the SF Bay Conservation and Development Commission (BCDC) (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.17]

##### **Response**

The comment requests information to support conclusions in the EIR that the Proposed Project does not conflict with regulations of the BCDC, and also asks about the results of required consultations with BCDC.

The comment does not provide specific guidance on BCDC regulations that should be addressed for the Proposed Project. A discussion of the Proposed Project's consistency with BCDC's *San Francisco Bay Plan* policies is presented in EIR Chapter III, Plans and Policies, on pp. III.9-III.12. That discussion provides information on project design, construction, and features and concluded that no inconsistencies were found with the BCDC policies discussed in the EIR. The policies addressed in the EIR are based on the specific policies identified by BCDC in response to the Notice of Preparation of the EIR as being applicable to the Proposed Project. A copy of this letter is available in EIR Appendix B, Public Scoping Report.

The project sponsors, TIDA and TICD, have met with BCDC staff since the inception of the project, and have continued to coordinate with BCDC throughout the EIR process. As part of this ongoing process, BCDC submitted a letter commenting on the Draft EIR which will be included

in the certified Final EIR (refer to Appendix A of this Comments and Responses document, Letter 1). One such example of coordination is provided in Section 2.17, Hydrology and Water Quality of this Comments and Responses document, under Subsection 2.17.1, Sea Level Rise. The first comment presented in that subsection, Comment 1.1, is from the Executive Director of the BCDC Commission and states that BCDC staff have worked closely with TIDA and TICD for the past three years on potential sea level rise issues and adaptation strategies to address this challenge.

In addition to formal consultations through the CEQA process, the project sponsors have met several times with BCDC staff to solicit feedback on the Proposed Project, and have made public presentations to BCDC's Design Review Board on November 9, 2009, and February 8, 2010. A third presentation will be made in 2011, likely after certification of the Final EIR.

As stated on EIR p. III.12, BCDC will make the final determination of consistency with *Bay Plan* policies for the portions of the Proposed Project that are within BCDC jurisdiction. As noted above, the EIR does address, but does not reach a conclusion, regarding whether the Proposed Project is consistent with BCDC regulations or policies on EIR pp. III.9 - III.12. The EIR did not identify any inconsistencies, however. This is within the purview of the BCDC and would be determined as part of the BCDC permit process, which would occur following certification of the Final EIR.

## 2.3 LAND USE

### 2.3.1 UNITED STATES COAST GUARD FACILITY

#### Comments

Thank you for inviting the U. S. Coast Guard (USCG) to review the Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island (YBI) Redevelopment Project. The USCG presence on YBI dates to 1872, when the Lighthouse Board constructed the first lighthouse on the Island. Over time the USCG has constructed many facilities of various types on 47.9 acres of USCG-controlled YBI land, immediately adjacent to the proposed development. These USCG facilities are essential to supporting the Maritime Homeland Security (MHLS) mission of the United States, and will be negatively impacted by the Redevelopment Project.

In particular the Vessel Traffic Service (VTS) maintains facilities on YBI that provide direct radar, radio, and visual contact with all vessels in the major shipping channels to the Ports of Oakland and Richmond. These facilities may be negatively impacted by the proposed project. Buildings over 300 feet in height on Treasure Island may eliminate the direct contact currently provided by the existing VTS facilities, creating an unacceptable maritime risk to both the vessels and the public without mitigation. The operation of the VTS equipment may also create electronic and radio interference, which may negatively impact Treasure Island residents on higher floors of the proposed buildings. To resolve these issues, the USCG is prepared to work with the developers to identify appropriate locations on Treasure Island for additional USCG facilities to maintain direct radio and radar contact with vessels in the navigable waters of the Bay. Any new facilities required by the USCG would be owned by the USCG, though their construction costs should be paid for by the developer. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.1]

Summary, p. S.7 – Need to list “Impact to CG operations on YBI” as a stand-alone summary in this table. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.6]

#### Response

The comment states that proposed buildings on Treasure Island that would exceed heights of 300 feet could interfere with direct radar, radio, and visual contact between the U.S. Coast Guard’s Vessel Traffic Service and vessels in the navigable waters of San Francisco Bay, which would create an unacceptable maritime risk to both the vessels and the public.

The U.S. Coast Guard Station and Sector Facility, through its Vessel Traffic Service (“VTS”) unit, maintains direct radar, radio, and visual contact with vessels in San Francisco Bay. As stated in the comment, construction of some of the new buildings on Treasure Island could eliminate direct contact provided by existing VTS facilities and create potential risks to maritime vessels and the public. Implementation of the Proposed Project could potentially interfere with the ability of the U.S. Coast Guard to carry out its mission to coordinate the safe passage of vessels in San Francisco Bay if appropriate design measures are not taken into account.

To avoid potential visibility conflicts with the U.S. Coast Guard, the proposed updated *Design for Development* would include a formal consultation process between the Treasure Island Development Authority (“TIDA”) and the U.S. Coast Guard to determine whether interference would occur; identify appropriate modifications to any proposed buildings that could cause interference; and require the building developer to make space available and provide access to the Coast Guard to place equipment on the roof of the building, identify alternate locations on Treasure Island for additional facilities, or establish some other similar solution, as necessary, for the purpose of maintaining direct radar and radio contact between the VTS and vessels in the navigable waters of San Francisco Bay. The footprint of such additional facilities, if needed, would be small in size, and land is available to site such facilities on the island so that they do not disturb sensitive habitat; accordingly, even if additional facilities are required, constructing those facilities would not result in significant environmental impacts. The project sponsors have met with the U.S. Coast Guard to develop the requirements for the consultation process that will be included in the proposed updated *Design for Development*.

### **Comment**

Section II, p. II.17 – The land use map shows that no high intensity development will occur on the project’s boundary with USCG property. This is desirable to ensure residential and mixed use redevelopment of the historic USN Officers Quarters is buffered from USCG operations. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.8]

### **Response**

The comment does not address the adequacy or accuracy of the EIR; it expresses support for the low-intensity land uses being proposed on Yerba Buena Island that are adjacent to the boundary of the U.S. Coast Guard property. The comment is acknowledged and may be considered by the decision-makers during their review of the project’s entitlements.

### **Comments**

Appendix C, p. 2 – The text refers to the size of USCG facilities as 47 acres. The main DEIR text often says the USCG owns 39 acres. The Appendix is correct. The USCG owns 47.9 acres of land on YBI – please correct the acreage number throughout the document and in all appendices. Please see comment 36 for further detail... (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.28]

General – Please note that it is not just a USCG Station located on the Island. It is a combined Station and Sector Facility. The Station is under the direction of the Sector Command indicating that the Sector is at a higher level in the USCG hierarchy. The Sector’s Area of Responsibility (AoR) includes most of Northern California from the Oregon border to just south of Monterey Bay. Therefore the facility near the water’s edge in total **MUST** be referred to Sector San Francisco (although the Station is collocated with the Sector).

The exact history of the USCG's real property interests is included on record of survey #20101960234 filed 04/28/2010 with the San Francisco Assessor Recorder's office. You may obtain this from the Assessor's office or we may provide you a copy. A brief history is provided below:

The USCG's presence on YBI predated the establishment of Naval Station Treasure Island (NSTI). Initially the lighthouse built by the Lighthouse Board in 1872 was located on land leased from the War Department. However, the USCG obtained full real property interests on these 26.51 acres of YBI on July 27, 1939 via an Act of Congress.

This area included the lighthouse and portions north of it up to Hillcrest/Treasure Island Road including the oldest buildings of Sector San Francisco.

The next major expansion of the USCG's property occurred on 6/14/1967 via the acquisition of 8.207 acres from the USN, via a form 1354 transfer, just north of the property acquired in 1939. The new buildings of the Sector Command were built in this area. An adjoining 2.71 acres were acquired through a direct transfer of land from the USN dated 8/20/1974.

On 4/17/1998, the USCG acquired 5 additional parcels of land, totaling 10.4831 acres from the USN through the transfer process. The parcels included Quarters 8 & 9, and the uphill site currently occupied by the Vessel Traffic Service (VTS).

Finally on 11/26/2002 the USN transferred ownership of 11.8 acres of submerged lands to the USCG.

Thus, in total, the USCG owns 47.9101 acres of land on YBI and another 11.8 acres of submerged lands. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.29]

### **Response**

The comments state that the U.S. Coast Guard owns 47.9 acres of land on Yerba Buena Island, not 39 acres, and request that this information be corrected throughout the EIR. The first comment also refers to EIR Appendix C, Transportation Impact Study, which states that the Coast Guard occupies approximately 47 acres of land on Yerba Buena Island. The correction to the Coast Guard acreage requires the total acreage of Yerba Buena Island to be corrected as well. The second comment clarifies the organizational hierarchy of the Coast Guard.

In order to address these comments, the following changes are made to the text of EIR Section IV.A, Land Use and Land Use Planning (deletions are shown in ~~strike through~~ and new text is underlined).

The third full paragraph on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active ~~station~~ Station and Sector Facility that covers approximately ~~39.48~~ acres on the southeast side of Yerba Buena Island.<sup>13</sup> This ~~station~~ Station and Sector Facility includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse that was built by the U.S. Army. ~~The station~~ The Station and Sector Facility is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.

Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island, on EIR p. IV.A.8, is revised as follows:

**(Revised) Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island**

Land Use	Treasure Island <sup>1</sup> (Units or Acres <sup>2</sup> )	Yerba Buena Island (Units or Acres)	Total (Units or Acres)
Residential	908 units <sup>3</sup> / 110 acres	97 units <sup>4</sup> / 19 acres	1,005 units <sup>5</sup>
Community and Institutional	30	—	30
Office and Retail	20	—	20
Industrial	20	—	20
Open Space and Recreation Facilities	90	80	170
Other <sup>6</sup>	37	<del>57</del> 66	<del>94</del> 103

Notes:

<sup>1</sup> Total acreage on Treasure Island equals approximately 404 acres; totals shown above are rounded.

<sup>2</sup> Does not include approximately 95 acres dedicated to parking and roads.

<sup>3</sup> Approximately 725 units are available for occupancy.

<sup>4</sup> Approximately 80 units are available for occupancy.

<sup>5</sup> Approximately 805 total units are available for occupancy.

<sup>6</sup> Includes the 37-acre Job Corps campus on Treasure Island, approximately 18 acres occupied by the California Department of Transportation, and ~~39~~approximately 48 acres occupied by the U.S. Coast Guard ~~station~~Station and Sector Facility on Yerba Buena Island.

Source: San Francisco Planning Department, 2005; Treasure Island Development Authority, 2010; and the U.S. Coast Guard, 2010.

The third full paragraph on EIR p. IV.A.21 is revised as follows:

The U.S. Coast Guard ~~station~~Station and Sector Facility on the southern portion of Yerba Buena Island is an adjacent land use that is outside of the Project Area. The physical topography and separation of the U.S. Coast Guard ~~station~~Station and Sector Facility would limit potential construction impacts on this facility. Construction activities would not result in the physical disruption or division of the U.S. Coast Guard ~~facilities~~Station and Sector Facility.

The first sentence of the third full paragraph on EIR p. IV.A.25 is revised as follows:

The only uses near the proposed Development Plan Area on Yerba Buena Island are the existing U.S. Coast Guard ~~station~~Station and Sector Facility and the Bay Bridge span and structure on the southern portion of Yerba Buena Island.

The first paragraph under the subheading “Yerba Buena Island” on EIR p. IV.A.26 is revised as follows:

~~Currently, only approximately 2~~None of the ~~150~~160 acres on Yerba Buena Island would be subject to the Tidelands Trust upon transfer.

The first full sentence at the top of EIR p. IV.A.28 is revised as follows:

The U.S. Coast Guard ~~station~~Station and Sector Facility, which is outside of the Project Area, is expected to remain and continue to operate at its existing site on Yerba Buena Island.

Additional text changes regarding the name of the U.S. Coast Guard facility and its acreage are made in other EIR chapters and sections, as shown below (deletions are shown in ~~strike through~~ and new text is underlined).

In EIR Chapter I, Introduction, the first sentence of the second paragraph on p. I.3 is revised as follows:

The U.S. Coast Guard also requested approximately ~~3948~~ acres plus water area for facilities on Yerba Buena Island, and received authorization from the Navy for property transfer effective March 3, 1998, and November 27, 2002.

In EIR Chapter II, Project Description, the last sentence of the first paragraph on p. II.1 is revised as follows:

The Islands also include a U.S. Coast Guard Station and Sector Facility, a U.S. Department of Labor Job Corps campus, and Federal Highway Administration (“FHWA”) land occupied by the San Francisco-Oakland Bay Bridge (“Bay Bridge”) and tunnel structures.

The second sentence of the first paragraph on EIR p. II.6 is revised as follows:

Treasure Island contains approximately 404 acres of land, and Yerba Buena Island, approximately ~~150~~160 acres.

The third sentence of the last paragraph on EIR p. II.6 is revised as follows:

The Navy has transferred approximately 37 acres in the center of Treasure Island to the U.S. Department of Labor for the Job Corps facility, approximately ~~3948~~ acres of land on Yerba Buena Island to the U.S. Coast Guard, and approximately 18 acres of land on Yerba Buena Island to the Federal Highway Administration.

The third full paragraph on EIR p. II.11 is revised as follows:

U.S. Coast Guard facilities occupy approximately ~~3948~~ acres of land on Yerba Buena Island adjacent to the Project Area. The U.S. Coast Guard Station and Sector Facility, on the southeast side of Yerba Buena Island, includes housing, administrative facilities, open storage and docks, buoy maintenance facilities, and a lighthouse built in 1872. Coast Guard facilities also include a vehicle tracking system facility on the northwestern part of Yerba Buena Island and Navigation Light No. 6 on the northern end of Treasure Island. The Coast Guard facilities are expected to remain in use in their present location for the foreseeable future.

In EIR Chapter III, Plans and Policies, the last sentence of the first paragraph on p. III.13 is revised as follows:

~~Except for the approximately 2 acres of existing tidelands on Yerba Buena Island,~~ Currently, none of the ~~150~~160 acres of land on Yerba Buena Island is subject to the Tidelands Trust.

The last sentence of the second full paragraph on EIR p. III.14 is revised as follows:

The Tidelands Trust lands subject to the Exchange Agreement affect about 367 acres on Treasure Island and about 94 acres on Yerba Buena Island within the Development Plan Area and excludes the Jobs Corps campus on Treasure Island and the Coast Guard Station and Sector Facility and Caltrans properties on Yerba Buena Island.

In EIR Section IV.D, Cultural and Paleontological Resources, the second sentence of the first paragraph on p. IV.D.28 is revised as follows:

Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard Station and Sector Facility.

Table IV.D.1: NRHP Listed Properties in the Development Plan Area, on EIR p. IV.D.31, is revised as follows:

**(Revised) Table IV.D.1: NRHP Listed Properties in the Development Plan Area**

Resource Number	Resource Name	Year Constructed
Yerba Buena Island		
1, 2-7, 83, 205, 230	Senior Officers' Quarters Historic District: The Nimitz House (Quarters 1); six other senior officers' quarters (Quarters 2-7), associated garages (Building 205, Building 230), family quarters (Building 83), and formal landscaping elements of the area.	1900 - 1905
1	Nimitz House (individually listed and a contributor to district)	1900
10/267	Quarters 10 and its contributing garage (individually listed)	1948
262	Torpedo Assembly Building (individually listed)	1891
Treasure Island		
1	Administration Building, Building 1 (individually listed)	1939
2	Hall of Transportation, Building 2 (individually listed)	1939
3	Palace of Fine and Decorative Arts, Building 3 (individually listed, Building 111 is identified as a component of Building 3)	1939

*Note:* This table excludes Yerba Buena Island buildings that are south of the Bay Bridge. They are currently located on the U.S. Coast Guard Station and Sector Facility. They are not within the Development Plan Area and are not subject to study in this EIR Section.

*Source:* San Francisco Planning Department, 2005 EIR.

In EIR Section IV.E, Transportation, the second sentence of the first full paragraph on p. IV.E.81 is revised as follows:

Primary access between the Coast Guard ~~station~~Station and Sector Facility and the eastbound on-ramp is via South Gate Road (which connects with North Gate Road).

The last sentence of the last paragraph on EIR p. IV.E.81 is revised as follows:

In addition, the longest potential queue the Coast Guard vehicles would have to wait in would be about one-tenth of a mile, based on the distance between the places such vehicles access the main YBI circulation route and the Bay Bridge. Accordingly, the Proposed Project would not be expected to substantially affect access to the Coast Guard ~~station~~Station and Sector Facility.

In EIR Section IV.J, Recreation, the first sentence of the first full paragraph on p. IV.J.5 is revised as follows:

Yerba Buena Island is an approximately ~~450~~160-acre island in the middle of San Francisco Bay.<sup>16</sup>

Footnote 16 on EIR p. IV.J.5 is revised as follows:

<sup>16</sup> The Caltrans right-of-way for the Bay Bridge takes up about 18 acres of land area. The U.S. Coast Guard owns and operates a ~~3948~~-acre facility south of the Bay Bridge. The Coast Guard Property is not included in the Project Area.

In EIR Section IV.K, Utilities and Service Systems, the second sentence of the last paragraph on p. IV.K.1 is revised as follows:

The eastern side of the island, including the Coast Guard ~~station~~Station and Sector Facility, has a gravity sewer system that drains to a pump station under the Bay Bridge at the eastern tip of Yerba Buena Island.

In EIR Section IV.O, Hydrology and Water Quality, the second sentence of the first full paragraph on p. IV.O.4 is revised as follows:

One small area of Yerba Buena Island near the Coast Guard ~~station~~Station and Sector Facility, on the eastern side of the island, contains sediments that hold groundwater.

The first sentence of the first paragraph on EIR p. IV.O.38 is revised as follows:

Near-surface groundwater is located in many portions of the Development Plan Area, including all of Treasure Island and low-lying portions of Yerba Buena Island (e.g., near the Coast Guard ~~station~~Station and Sector Facility).

The last sentence of the last paragraph on EIR p. IV.O.48 is revised as follows:

Because the Proposed Project encompasses many low-lying areas, in particular all of Treasure Island and some low-lying areas along the western flank of Yerba Buena Island near the existing U.S. Coast Guard Station and Sector Facility, a substantial portion of the

Project Area, at current elevations and without future improvements, could potentially be at risk of inundation due to future potential sea level rise.

The second sentence of the first paragraph on EIR p. IV.O.49 is revised as follows:

For instance, if no action were taken, under a 55-inch sea level rise scenario, shorefront areas along the existing Treasure Island perimeter would be inundated during a mean higher high water (“MHHW”) tidal event, and areas surrounding the U.S. Coast Guard Station and Sector Facility on Yerba Buena Island could also become inundated.

In EIR Section IV.R, Agricultural Resources and Forest Land, the sixth sentence of the first paragraph on p. IV.R.1 is revised as follows:

Yerba Buena Island has a U.S. Coast Guard ~~facility~~ Station and Sector Facility (about ~~3948~~ acres) and a portion of the San Francisco-Oakland Bay Bridge (about 18 acres).

In EIR Chapter VII, Alternatives to the Proposed Project, the third sentence of the first paragraph on p. VII.5 is revised as follows:

The U.S. Coast Guard also requested approximately ~~3948~~ acres plus water area and the Federal Highway Administration (“FHWA”) requested approximately 18 acres for facilities on Yerba Buena Island.

The last sentence of the second full paragraph on EIR p. VII.6 is revised as follows:

The U.S. Coast Guard would continue to occupy ~~3948~~ acres on the south and east sides of Yerba Buena Island.

### **2.3.2 LOCATIONS OF RESIDENTIAL USES**

#### **Comment**

North and East perimeters of T.I.: This side of the Island provides some excellent views of the Bay towards San Pablo Strait and the beautiful Berkeley Hills. At some future time it might be worth considering building some homes, only along the Perimeter Road, Such homes might also defray future increased expenses of the Project. (*Neil Malloch*) [44.3]

#### **Response**

The comment does not address the adequacy or accuracy of the EIR; it suggests that, in the future, the project sponsors should consider building residential uses along the perimeter road on Treasure Island. As discussed in EIR Chapter III, Plans and Policies, pp. III.12-III.15, approximately 217 acres on Treasure Island would be subject to the California Tidelands Trust Doctrine (“Tidelands Trust”). The Tidelands Trust is a legal doctrine that governs the use of tidal and submerged lands. Under this doctrine, residential uses are rarely allowed on land that is subject to the Tidelands Trust. The area along the northern and eastern perimeters of Treasure Island would be subject to the Tidelands Trust (see Figure II.3: Tidelands Trust Land Exchange,

in EIR Chapter II, Project Description, p. II.15). Therefore, residential uses would not be allowed in the area suggested in the comment.

### 2.3.3 ON-ISLAND SERVICES

#### Comment

In the land-use section of the EIR, it states that TIDI occupies the fitness center and gymnasium. For the record, we no longer operate the gym. It's operated by the YMCA. However, we do use the former fitness center as a community center, and this is a critical resource for existing residents. It is a site of numerous community meetings and events, a weekly food pantry program, a computer lab and workshops. It provides a venue for residents to come together as a community. (*Sherry Williams, Treasure Island Homeless Development Initiative*) [TR.4.3]

#### Response

The comment clarifies that the existing gymnasium on Treasure Island is operated by the YMCA, not the Treasure Island Homeless Development Initiative. In EIR Section IV.A, Land Use and Land Use Planning, the second sentence in the last paragraph on p. IV.A.9 is revised as follows (new text is underlined):

TIHDI occupies the fitness center, and the YMCA operates the gymnasium.

#### Comment

We're assuming at this point that the 48,500 square feet allocated to the community center and the 30,000 square feet for community services will be used to support everything from youth programming to a wellness center to a general purpose community center, like we have currently. It will be important to keep these basic services in place to support existing residents, as construction occurs, and until their replacements are developed. (*Sherry Williams, Treasure Island Homeless Development Initiative*) [TR.4.4]

#### Response

The comment asks for confirmation that the proposed community center and community services would be used to support a wide range of activities similar to those currently in place. The proposed community center and community services would be able to accommodate a variety of activities, including, but not limited to, a childcare facility, a general-purpose assembly space, a library, a senior center, a wellness center, or youth programs.

The comment states that it will be important to keep basic community services in place to support existing residents during construction until the new facilities have been completed. Basic community services will be maintained during construction until their replacements are developed.

**Comment**

1. To mitigate the significant transportation impacts of the project, an overall program level mitigation/principle measure is necessary: “As much as feasible, minimize the practical necessity for residents of the Project to leave the Island for routine (non-work) activities and purposes.” This will include not just essential services such as childcare, but also at build out occasional services such as dental care and popular activities like a neighborhood bar with entertainment.. Price levels must be taken into account too, given that 30% of the population will be households eligible for affordable housing. Of course the larger population of 20,000+ at build-out will support a wider variety of uses than earlier phases can. But as a guiding principle this will be very important throughout the life of the Project. (*John Elberling, TIDA Board Member*) [22.1]

**Response**

The comment proposes a program-level objective designed to encourage a variety of affordable neighborhood-serving uses in order to minimize the number of off-island trips that would be made by the future residents. The Proposed Project would provide a variety of neighborhood-serving uses intended to minimize the number of off-island trips that residents would need to make. Please see the response to Comment TR.26.1, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.3.13, Trip Generation, in Section 2.7, Transportation, of this Comments and Responses document.

As stated in EIR Chapter II, Project Description, p. II.79, the proposed Development Program is expected to involve four major phases that are anticipated to occur over a 15- to 20-year period. Phase 1 would include the installation of the infrastructure backbone and portions of the geotechnical stabilization; the subsequent phases would include the extension of infrastructure and ground improvements and development of the residential, commercial, open space/recreational, cultural, and institutional and public uses. Phase 2 is expected to overlap with Phase 1; Phases 3 and 4 may also overlap with other phases. As described in the response in Subsection 2.1.8, Phasing, in Section 2.1, Project Description, of this Comments and Responses document, the EIR is a project-level EIR and analyzes the Proposed Project at full buildout, providing an analysis that includes all phases of the Proposed Project. It does not analyze all impacts of interim phases in detail, because such an approach would result in a much longer and redundant document without aiding in the understanding of the Proposed Project’s impacts. Pursuant to Section 15378 of the *CEQA Guidelines*, a “project” is defined as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment ...” Under this definition, the environmental analysis of a project should not split a project into two or more segments. In addition, impacts of individual phases may be less than those of the Proposed Project at buildout. For example, transportation impacts and traffic-generated noise impacts would be greatest when the largest number of residents, employees, and visitors were on the Islands, which would occur at full buildout. Although at early periods of the development, residents are likely to need to

travel off the Islands for purchases and services that would be available on the Islands during later phases of development, the amount of travel that would occur in these early periods would be less than that generated at full buildout.

Pursuant to Section 15131 of the *CEQA Guidelines*, the economic or social effects of a project shall not be treated as significant effects on the environment. However, the economic or social effects of a project may be used to determine the significance of physical changes caused by the project. The construction of the proposed neighborhood-serving uses would represent a physical change to Treasure Island and Yerba Buena Island. If those neighborhood-serving uses are not affordable, some of the residents would have to make off-island trips for basic products and services. These trips could be made by automobile or by transit. The environmental impacts of off-island trips are discussed in EIR Section IV.E, Transportation, pp. IV.E.74-IV.E.108.

**Comment**

And I want to thank Mr. Elberling for bringing up the concerns about jobs on the island, particularly, those that deal with neighborhood serving, and I think it is well analyzed in the EIR that there are, I believe, a total of around 451,000 square feet, between the commercial, retail, square footage on there, and maybe a little bit more, when we consider the hotels and perhaps even some of the recreational uses. But I think it is important that the residents, as it is analyzed, be able to find those uses that they use on a daily basis to be present on the island. And I think that's good. (*Michael Antonini, Planning Commission*) [TR.26.1]

**Response**

The comment states that while the EIR adequately analyzes the jobs that would be provided by the proposed neighborhood-serving uses, it is important that the neighborhood-serving uses are actually developed. As discussed in EIR Section IV.A, Land Use and Land Use Planning, on p. IV.A.16, the Proposed Project would include a total of 207,000 square feet ("sq. ft.") of retail space, 150,000 sq. ft. of entertainment space, and 100,000 sq. ft. of office space.

The proposed *Treasure Island and Yerba Buena Island Design for Development* document (*Design for Development*) contains the standards and guidelines that apply to all future development within the Project Area. As shown in Table T3.c: Treasure Island Land Use Standards, on pp. 151-154 of the proposed *Design for Development*, examples of neighborhood-serving uses that would be allowed on the Islands include automobile service stations; bars, cafes, and restaurants; business, medical, and professional offices; childcare facilities; dry cleaners and laundromats; financial services; grocery stores; outpatient medical clinics; recreation uses; religious institutions; retail establishments; and theaters.

The Proposed Project provides for many of the neighborhood-serving uses listed above, which would provide residents with many of the essential day-to-day products and services that they would need. These neighborhood-serving uses would be within biking/walking distance of the

residential uses, thus minimizing the number of off-island trips that residents would need to make. The Disposition and Development Agreement between Treasure Island Community Development, LLC (“TICD”) and TIDA would include obligations that require TICD to provide a minimum of 60,000 sq. ft. of retail space, including the grocery store. The timing of such required improvements would be proportionate to the number of residential units constructed so that essential day-to-day products and services would be available to residents starting in the early phases of the Project.

In addition, as discussed in EIR Section IV.C, Population and Housing, on p. IV.C.17, proposed new uses under the Proposed Project include about 140,000 sq. ft. of new commercial and retail space; approximately 100,000 sq. ft. of new office space; adaptive reuse of historic Buildings 1, 2, and 3 with up to approximately 311,000 sq. ft. of commercial space, which includes about 67,000 sq. ft. of adaptively reused retail space; approximately 500 hotel rooms; 300 acres of parks and open space; bicycle, transit, and pedestrian facilities; a Ferry Terminal and intermodal Transit Hub; and new and/or upgraded public services and utilities, including a new or upgraded wastewater treatment plant, public school, and combined police and fire station. The operational employment anticipated from the Proposed Project is expected to total about 2,920 employees, with net new employment totaling about 2,600 jobs in the Development Plan Area. Much of the proposed commercial and retail space would serve residents of the Islands.

**Comment**

As we discussed today, the traffic analysis mitigation focuses on transit options, not providing the services on Treasure Island that would reduce transportation. Since public transportation is voluntary, it is difficult to determine the amount of traffic that would be reduced, but the majority of impacts are deemed significant and unavoidable. (*Rosie Masters*) [TR.17.2]

**Response**

The comment states that the traffic mitigation measures focus on providing public transit as a way of discouraging automobile use instead of providing a variety of neighborhood-serving uses within biking/walking distance of the future residential uses. The Proposed Project is designed to accommodate neighborhood-serving retail services to meet the day-to-day needs of residents. Please see the response to Comment TR.26.1, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.4.5, Travel Mode, in Section 2.7, Transportation, of this Comments and Responses document.

**Comment**

The Mews: This, or some nearby street in the SW sector should be brightly lit at least in the early hours of the night, for the restaurants, hotels, stores, cinemas, etc. that had better be there or else everyone on T.I will head to the city on most nights. (*Neil Malloch*) [44.2]

### **Response**

The comment states that the Mews and other streets leading to the restaurants, hotels, stores, cinemas, etc., located in the Island Center should be adequately illuminated at night. As discussed in EIR Section IV.B, Aesthetics, pp. IV.B.27-IV.B.29, implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area. Lighting for the Proposed Project would include exterior lighting of streets, sidewalks, parking areas, public spaces, and building entrances.

The comment stresses the importance of developing entertainment uses such as restaurants, hotels, stores, and cinemas in order to minimize the number of off-island trips that residents would need to make. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above.

### **Comments**

2. As I understand it, no public assembly facility, which might include a church at any location, is included in the development program that the EIR is evaluating, and so if some property owner proposed such a use in the future, it could not be allowed. This is a serious oversight. Per 1. above, such flexible multiuse facilities are potentially important to mitigate transportation impacts. Also, “zoning out” any kind of future religious facility for residents of faith would be ethically reprehensible. A cumulative total of 25,000 sq ft should be included in the Program for such non-commercial potential public assembly facilities, whoever may build them (not necessarily the Developer). Also, I see no potential location provided in the Plan and the DEIR for such a free standing building. An appropriate general area should at least be designated. (*John Elberling, TIDA Board Member*) [22.2]

The EIR cites that there is space allocated for community center and redevelopment, and we’re very pleased to see this. While we’re in an interim phase on the island now, over the past 13 or so years, we have tried to create and support community by providing, at least, basic services, such as childcare, youth programming, recreational programming, and so on. It’s very important to us and we believe the future of the new Treasure Island community to have such services in place and to plan for them.

The one particular detail that I couldn’t find in a document at all and I can’t find in a program is public assembly. There are all kinds of reasons that residents need to assemble in groups in order to do things. There is nothing in our program, and I asked, we don’t have any such facilities, specifically, in our development program today. I think that’s a glaring omission. It’s needed. (*John Elberling, TIDA*) [TR.23.6]

I wanted, though, to focus on one everyday thing that particularly stands out in my mind, which is communities of faith need places to gather on Fridays, Saturdays, or Sundays, and various holy days, respectively, throughout the year, to share their faith. And when I asked, where can there be -- could there be a church on Treasure Island? Where would congregations of any description gather, there is no provision for this. It just hasn’t been included. I asked if some organization could buy a piece of land and build a church, and, basically, the answer was no. And I really -- and I’m a secular person, but I understand clearly that communities of faith are really vital parts

of building real cities and real neighborhoods. And to exclude that almost -- well, I'm not saying it's conscious, but to exclude it de facto, it's something I really think is very inappropriate.

In an environmental sense, of course, if we do not accommodate them on the island, they will be driving on Fridays, Saturdays, and Sundays to various places elsewhere. And -- but even beyond that, we will lose the resource of their good energies to building our neighborhood, and I don't think it's right. There is, of course, a church on the island now. It's a Christian church, but it's a church. (*John Elberling, TIDA*) [TR.23.7]

### **Response**

The comments address the lack of public assembly uses in the proposed development program. As discussed in the response in Subsection 2.6.2, Navy Chapel, in Section 2.6, Historic Resources, of this Comments and Responses document, the project sponsors have decided to retain the existing chapel on Treasure Island. Although the development program evaluated in the EIR does not identify specific locations for other public assembly uses or religious institutions, these land uses are among the types of land uses that could be developed under the Proposed Project. As shown in Table T3.c: Treasure Island Land Use Standards, on pp. 151-154 of the proposed *Design for Development*, religious institutions would be allowed. Such uses would require a conditional use permit from either TIDA or the Planning Commission, depending on the location of the proposed use.

One of the comments states that the presence of religious institutions on the Islands would reduce the need for the future residents to make off-island trips on weekends and on holy days. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.3.13, Trip Generation, in Section 2.7, Transportation, in this Comments and Responses document.

### **Comments**

But out of that, I think there is a crucial missing overarching mitigation for the whole project that really needs to be stated as a mitigation, and it's an important one to guide its long-term development over the next 20 to 30 years. Which is that, the project should minimize the necessity for residents to travel off island for their everyday needs and lives. We have to, in other words, include on the island, as much of the facilities and services as feasible that residents routinely need. Because otherwise, they will have to go to -- onto the bridge or onto the ferry or onto something to come to the mainland. (*John Elberling, TIDA*) [TR.23.4]

I am using an example, which is noted in a document but not quantified, is childcare. All working parents are going to have arrangements for childcare. If it's not on the island, they are going to have to go off the island to do that, and they will almost certainly drive a car to do that. That's an obvious example of something that we have to be sure that there is the most adequate childcare we've ever seen in a Master Plan San Francisco neighborhood. And that concept is not in this document, although clearly it has an environmental impact. (*John Elberling, TIDA*) [TR.23.5]

### Response

The comments address the need to provide a variety of neighborhood-serving uses on the Islands in order to minimize the number of off-island trips that residents would need to make. Childcare is mentioned as a specific example of a neighborhood-serving use that should be provided. A childcare center currently operates on Treasure Island. Childcare would be a permitted use in the proposed *Design for Development*, and, as noted in Table II.1: Proposed Development Plan, in EIR Chapter II, Project Description, p. II.18, childcare is included among the basic community services that would be built on Treasure Island. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above.

### Comment

Whether or not Board Member Elberling is right or not about the 47 -- 1947 with the church issue there, I think this is an environmental document. Assembly could be one issue, but I don't remember any time that we have to address assembly issues in any other EIRs. (*William Lee, Planning Commission*) [TR.24.5]

### Response

The comment states that the purpose of the EIR is to analyze the environmental impacts of the Proposed Project, not to address the appropriateness of including or excluding certain types of land uses. Those decisions are described in Table T3.c: Treasure Island Land Use Standards, on pp.151-154 of the proposed *Design for Development*. The comment is acknowledged.

## 2.3.4 HEIGHT LIMITS

### Comment

**Significant Change in Height Limits:** Although the DEIR admits that increasing the height limit on TI/YBI from the existing 40X feet to heights up to 650 feet would conflict with existing zoning controls applicable to TI/YBI, and would require amendments to the General Plan and Planning Code, the DEIR concludes (**Impact LY-3**) that impacts on existing land use and land use planning would be *less than significant*. This is simply not an objective conclusion.

### **Please respond to each the following requests/questions/comments:**

As to the DEIR's conclusion that the Redevelopment Project would not have a substantial impact upon the existing character of the vicinity:

- Please explain objectively how the proposed height increase *from 40 feet to up to 650 feet* would *not* have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in terms aesthetics.
- Please explain how the proposed height increase *from 40 feet to up to 650 feet* would *not* have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in impacts upon cultural resources and their setting

- Please explain how the Project's conflicts with the existing 40 ft height limits (and associated population increases – residents and visitors) would *not* impact traffic, air quality and greenhouse gas emissions. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.13]

### **Response**

The comment states that the EIR is not objective in its conclusion that the increased height limits would have less-than-significant land use impacts and requests an explanation of how the increased height limits would not have significant impacts on aesthetics and cultural resources. The comment also requests an explanation of how the Proposed Project's conflicts with the existing height limit would not impact traffic, air quality, and greenhouse gases. Although the increased height limits being proposed by the project sponsors conflict with the existing height limit, the conflict itself is not a physical environmental effect. (See *Lighthouse Field Beach Rescue v, City of Santa Cruz* (2005) 131 Cal.App.4<sup>th</sup> 1170, 1207.) However, the buildings that could be constructed as a result of the increased height limits, in combination with the increased resident population that would result from this construction, would have physical environmental effects. Land use impacts are discussed in EIR Section IV.A, Land Use and Land Use Planning, pp. IV.A.23-IV.A.28. Impacts on aesthetics are discussed in EIR Section IV.B, Aesthetics, pp. IV.B.21-IV.B.27. For a discussion of impacts on cultural resources, see EIR Section IV.D, Cultural and Paleontological Resources, pp. IV.D.58-IV.D.61. Traffic impacts are discussed in EIR Section IV.E, Transportation, pp. IV.E.67-IV.E.141. Impacts on air quality are discussed in EIR Section IV.G, Air Quality, pp. IV.G.38-IV.G.58. For a discussion of impacts related to greenhouse gas emissions, see EIR Section IV.H, Greenhouse Gas Emissions, pp. IV.H.44-IV.H.46.

The EIR analyzes the environmental impacts of the Proposed Project based on maximum proposed building heights shown in Figure II.6a: Treasure Island Maximum Height Limit Plan, on EIR p. II.25, and on Figure T4.p: Maximum Height Limit Plan, on p. 157 of the draft *Design for Development*. The project sponsors have lowered some of the proposed maximum building heights (among other changes, the tallest tower would be reduced from 650 feet to 450 feet) in the final update to the proposed *Design for Development* that will be considered by the decision-makers. Therefore, the EIR provides a conservative analysis of the environmental impacts of the Proposed Project.

### **2.3.5 DENSITY**

#### **Comment**

**Significant Change in Density:** The DEIR discloses that the Planning Code's density would also have to be amended and would no longer apply to the Redevelopment Plan area. Instead, TI and YBI would be subject to a maximum number of residential units. According to the DEIR, this would increase the total number of dwelling units from the current 805 dwelling units to the

8,000 dwelling units – increasing the population from 1,820 persons to 18,640 persons, representing an increase of 16,820 net new persons on TI/[Y]BI.

**Please respond to the following requests/comments:**

- Please explain objectively how this increase in density limits, with the accompanying increase in resident population *from 1,820 persons to 18,640 persons* would *not* have a substantial impact upon the existing character of Treasure Island and Yerba Buena Island, and the entire region, in terms of traffic and air quality. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.14]

**Response**

The comment appears to state that the EIR erroneously concludes that the increased density limits, which would result in a population increase of approximately 16,280 residents, would not have a substantial impact on traffic and air quality. Some of the Proposed Project's impacts on traffic and air quality were determined to be Significant and Unavoidable with Mitigation or Significant and Unavoidable. For a discussion of traffic impacts, see EIR Section IV.E, Transportation, pp. IV.E.67-IV.E.141. Air quality impacts are discussed in EIR Section IV.G, Air Quality, pp. IV.G.38-IV.G.58. Land use impacts are discussed in EIR Section IV.A, Land Use and Land Use Planning, pp. IV.A.23-IV.A.28; the analysis concludes that the Proposed Project's impact on the character of the Islands would not be significant. The commentor's disagreement with this conclusion may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

## 2.4 AESTHETICS

### 2.4.1 REPRESENTATIVE MASSING

#### Comments

1. The massing reflected in Volume I, Pg. IV.B.2, in **no way** reflects the massing that has been presented to the CAB over the past 10 years, far exceeding previous programmatic parameters that have been presented to us. To say that the CAB is disappointed by these massing images is an understatement. To be brutally honest, the CAB was rather “horrified” by the images in the DEIR. We would like it clarified to reflect more clearly the images that the CAB has previously seen. (Although we fully understand that this massing picture is used in all DEIRs, it is no less disturbing to see buildings pictured in this massing simulation manner.) (*Treasure Island/Yerba Buena Island Citizens’ Advisory Board*) [8.1]

Vol. 1, IV.B.2, Aesthetics: The reference to the simulation of the maximum allowable massing (height and bulk) needs to be consistent with the ‘slender’ building simulations shown in all published plan documents, over the past year or two. We request that all simulations are being redone to fit the project as described in this DEIR. (*Kathrin Moore, San Francisco Planning Commission*) [20.10]

Vol. 1, IV.B.13, Aesthetics: View Points G & H show over-bulky massing simulations, not in keeping with the overall plan intent of ‘slender’ towers. New buildings as simulated dwarf and minimize the iconic view of historic buildings. Why does View Point G omit simulating the new Ferry Terminal? (*Kathrin Moore, San Francisco Planning Commission*) [20.17]

Vol. 1, IV.B.20, Aesthetics: Figure IV.B.10: Proposed Representative Massing Diagram - what is shown here is vague, and suggestive. If there is uncertainty in the proposed plan where buildings actually will be sited, then the Visual Analysis needs to evaluate the range of impacts, simulate all possible variants and analyze the full range of possible impacts. (*Kathrin Moore, San Francisco Planning Commission*) [20.19]

- *Relabel Figure IV.B.10 “Proposed Representative Massing Diagram” as “A Range of Possible Height and Bulk Scenarios”, or remove it entirely as misleading since many people who read an EIR are mainly guided by the diagrams;*
- *Add a new graphic (not outlines but fully blocked in) at this same scale to show that the worst case scenario is what is being studied in this EIR, as required by CEQA. (Jennifer Clary, President, San Francisco Tomorrow) [38.5]*

How were the photographic views simulated, given the fact that the location and siting of the tower volumes has not yet been determined? Please explain the method used in light of the fact that, as stated in the DEIR, “*the construction program allows for flexibility in the siting of tower volumes.*” “*Wire-frame*” boxes are presented in a massing diagram to “*represent the spatial limits within which the tower volumes may shift when the development program is implemented and specific building designs are proposed.*” This uncertainty makes the photographic views vague and potentially misleading. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.24]

Would hope "Main Tower" would truly be a beautiful structure. I can remember when the GGIE's "Tower of the Sun" glowed golden towards the city. The illustrated views in your EIR show the high rise buildings on T.I. colored (if that is the word) in a dreadful grayish-black, appropriate for an oil well, steel mill, or power plant, but not for what will be one of the finest urban settings in the world. (Neil Malloch) [44.1]

### **Response**

Comments express concern for the conceptual massing representations presented in the EIR. As explained in EIR Section IV.B, Aesthetics, on p. IV.B.2, for the purposes of the EIR, representations of the general location and maximum allowable height and bulk of proposed buildings are provided in the EIR. Such massing representations do not represent any specific building designs, which are to be determined in the future. The actual building designs would be shaped, articulated, and detailed, pursuant to the building design standards described in Section T5, Building Design on pp. 177-202 of the proposed *Design for Development*. As noted on EIR p. IV.B.26, when specific building designs are developed, either the Planning Commission or TIDA, depending on the location of the building, would review the proposed design against the standards and guidelines provided in the proposed *Design for Development* to ensure that it contributes visual interest, texture, and variety to the public and pedestrian realm. Figure IV.B.10: Proposed Representative Massing Diagram, on EIR p. IV.B.20, shows the maximum building volumes as "wire frame" boxes to delineate the spatial limits within which building volumes may be located when specific designs are proposed. To clarify, under no development scenario would the proposed buildings occupy the entire mass of the "wire frame" boxes; rather, the frames define the field in which a smaller or narrower structure may be sited. Although specific building locations are not yet determined, this massing diagram delineates the limits of potential building locations with sufficient specificity for analysis of visual impacts under CEQA. Furthermore, as shown on Figure T3.d: Key Plan to the Treasure Island Land Use Table, and Figure T4c: Development Block and Easement Plan, on p. 155 and p. 159, respectively, of the proposed *Design for Development*, the area and maximum allowable development footprint has been established from a permitted land use and two-dimensional land plan perspective. As such, massing simulations and massing diagrams are appropriately used as the basis for analysis of visual impacts under CEQA.

Massing simulations tend to overstate the actual aesthetic impact of the Proposed Project, because actual building designs would be less massive and have greater visual articulation and interest than the massing studies used in preparing the EIR. In this respect, the EIR provides a conservative, "worst-case" analysis of the visual impact of the Proposed Project.

In response to comments, to provide the reader with additional information to aid in the understanding of the general intent of the proposed *Design for Development* for building sculpting and articulation, the second full paragraph of EIR p. IV.B.26 is revised as follows to

present new representative isometric images reproduced from the proposed *Design for Development* (new text is underlined):

As a regulatory document, the proposed *Design for Development* is intended to ensure the enhancement of visual quality within the Project Area. It would inform the design and review of specific development projects within the Project Area. If the proposed *Design for Development* is adopted by the decision-makers, it would reflect the City's long-term vision for the visual character and quality of the Project Area. Presented below for illustrative purposes are representative isometric renderings, reproduced from the proposed *Design for Development*. These figures illustrate the intent of the proposed *Design for Development* that buildings be sculpted and articulated to contribute visual interest, texture and variety to the public realm. See Figure IV.B.17: Island Center District Isometric View; Figure IV.B.18: Cityside District Isometric View; and Figure IV.B.19: Eastside District Isometric View. Note however, that they do not illustrate any particular building design or specific placement. New construction within the Project Area would be subject to design review by TIDA for conformity with the *Design for Development* as specific designs are proposed in the future.

New Figures IV.B.17, IV.B.18, and IV.B.19 are shown on the following pages.

#### 2.4.2 SETTING

##### Comments

1. Please state why views of the Bay, including the project area, are of particularly high visual quality.
2. Please state why, the dramatic topographic features of the central portion of the Bay contribute to “highly recognizable, even iconic, scenic vistas.”
3. Please state why, the distinctive built environmental features of the central portion of the Bay contribute to “highly recognizable, even iconic, scenic vistas.” (*Anthony F. Gantner, Attorney-at-Law*) [13.1]

Treasure Island today is so low and inconspicuous that it almost disappears into the Bay, and that is its greatest aesthetic tribute. Its flatness is its greatest beauty; its flatness echoes the surrounding expanses of Bay water. Its flatness is in perfect contrast to the natural ruggedness of Yerba Buena Island, and the other islands and hills, in every direction, surrounding the Bay. It sinks into the Bay like a great barge at anchor. It is in harmony with its surroundings. (*Chris Stockton, Architect*) [42.1c]



This image is from the March 5, 2010 Draft Design for Development. The existing chapel is now being retained, and the Design for Development will be updated accordingly.

SOURCE: Perkins + Will

**TREASURE ISLAND AND TERBA PUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.17: ISLAND CENTER DISTRICT ISOMETRIC VIEW



- 1. Windrow Street
- 2. Waterfront Park
- 3. The Mews
- 4. Neighborhood Park
- 5. Neighborhood Residential Tower
- 6. School

SOURCE: Perkins + Will

**TREASURE ISLAND AND TERESA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.18: CITYSIDE DISTRICT ISOMETRIC VIEW



- 1. Midblock Passages
- 2. Garden Street
- 3. Eastern Shoreline Park
- 4. Neighborhood Residential Tower
- 5. Eastside Commons
- 6. Pier One
- 7. Sailing Center

SOURCE: Perkins + Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(NEW) FIGURE IV.B.19: EASTSIDE DISTRICT ISOMETRIC VIEW**

### **Response**

The Setting discussion in EIR Section IV.B, Aesthetics, on pp. IV.B.1-IV.B.2, supports the conclusion that existing views San Francisco Bay are of high visual quality, describing the visual characteristics that contribute to the distinctive visual setting of the Bay. The EIR describes how the Bay water and topographic features (e.g., Yerba Buena Island, Angel Island, San Francisco Hills, Mt. Tamalpais and the Marin Hills, and the East Bay Hills) combine with built features (e.g., San Francisco's skyline, Golden Gate Bridge, and the Bay Bridge) to create a distinctive, recognizable and coherent visual setting.

The Setting discussion on EIR pp. IV.B.12-IV.B.15 describes in detail the existing visual character of Treasure Island to establish the baseline against which the visual impacts of the proposed project are compared. It states,

Topography on the island is low and flat. Existing development is characterized by various low-scale, widely spaced military support facilities of a generally utilitarian character without a strong sense of spatial organization...Large expanses of open land contribute to a sense of spaciousness.

Likewise, in describing views of the Project Area from various viewpoints around the rim of the Bay, Treasure Island is described as a low and flat expanse of land in contrast to the vertical relief of Yerba Buena Island. "...Treasure Island is visible as a flat expanse to the north of Yerba Buena Island..." (EIR p. IV.B.4). "The low and flat Treasure Island is not a prominent feature in this view" (EIR p. IV.B.4). Given the exceptionally high visual quality of existing views of the Bay, and the visual prominence of the Proposed Project, the EIR concludes that the proposed development would result in a significant adverse impact on scenic vistas of San Francisco and San Francisco Bay from various public vantage points (EIR pp. IV.B.21-IV.B.23).

### **2.4.3 VIEWPOINTS**

#### **Comments**

4. Please describe the impact, and nature and extent thereof, of a series of high-rise towers in the project area on the panoramic vistas across the wide, flat expanse of open water from the perspective of three publicly accessible shoreline locations in each of (a) San Francisco; (b) East Bay; and (c) North Bay.
5. Same as Question # 4, except approximately one mile from the shoreline in the subject locations.
6. Same as Question # 4, except approximately two miles from the shoreline in the subject locations.
7. Same as Question # 4, except approximately five miles from the shoreline in the subject locations. (*Anthony F. Gantner, Attorney-at-Law*) [13.2a]

9. Please explain whether the project will impact, reorient or affect the views that are currently bounded and directed by the Golden Gate Bridge and the Bay Bridge from the perspective of three publicly accessible shoreline locations in each of (a)San Francisco; (b) East Bay; and, (c)North Bay.

10. Same as Question # 9, except approximately one mile from the shoreline in the subject locations.

11. Same as Question # 9, except approximately two miles from the shoreline in the subject locations.

12. Same as Question # 9, except approximately five miles from the shoreline in the subject locations. (*Anthony F. Gantner, Attorney-at-Law*) [13.2c]

16. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers would not have a substantial affect on scenic vistas from each of the following locations:(a) Rincon Park on the Embarcadero; (b) Telegraph Hill at Pioneer Park;(c) Twin Peaks; (d) Nob Hill; and, (e) Russian Hill. (*Anthony F. Gantner, Attorney-at-Law*) [13.6a]

20. Please list each and every location from which the photographer identified in response to Question #19, photographed the project area.

21. Please describe the methodology used by the Planning Department to select from all the locations listed in response to Question # 20, to choose the eight representative views shown in the DEIR. (*Anthony F. Gantner, Attorney-at-Law*) [13.10]

25. Please describe the nature and extent of how, "Proposed new construction on Treasure Island would adversely alter scenic vistas of San Francisco Bay" from **each** of the following vistas:(a) San Francisco waterfront; (b)The Embarcadero at Rincon Park; (c) Telegraph Hill; (d) Russian Hill; and, (e) Nob Hill.

26. Please describe the nature and extent of how "East Bay shoreline views would be significantly altered by the project from **each** of the following vistas:(a) Albany; (b) Berkeley; (c) Emeryville; (d) Oakland; and, (e) Alameda.

27. Please describe in detail how views of the project's proposed new buildings from each of the five East Bay Shoreline locations listed in Question #26, "would eclipse the San Francisco skyline in visual importance." (*Anthony F. Gantner, Attorney-at-Law*) [13.13a]

Pursuant to Transportation Policy No. 5, the FEIR should state whether the proposed design would provide adequate clearance for vessels and how the Ferry terminal breakwaters would affect visual access of the Bay from the ferry terminal and Building One. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.6]

**Appearance, Design and Scenic Views.** Sections IV.B pages 16-17 of the DEIR cites Bay Plan policies regarding appearance, design and scenic views applicable to the Project. While the DEIR shows eight locations as representative of proposed visual conditions of the Redevelopment Plan Project Area, the FEIR should include visual impacts from the downtown financial core near the Ferry Building toward Treasure Island and the visual impacts from the City of Oakland near the Bay Bridge, and the City of Emeryville at the Emeryville Marina. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.7]

Vol. 1, IV.B.3, Aesthetics: View Locations need to include views from the Embarcadero Promenade starting at the Ferry Building to Pier 39, an iconic sequence of eye level views. (*Kathrin Moore, San Francisco Planning Commission*) [20.12]

Vol. 1, IV.B.5, Aesthetics: View Point A: Existing and Proposed, needs to simulate views on a clear day, where the impact on long views to the East Bay Hills can be clearly evaluated. Using Photoshop to hide the hills is not a way to avoid showing impacts. We request that the view simulation is being redone. (*Kathrin Moore, San Francisco Planning Commission*) [20.14]

Vol. 1, IV.B.10, Aesthetics: Why is the Berkeley Marina the only East Bay location for simulating impacts on the East Bay? The DEIR needs to add East Bay View Simulation to address impacts as seen from other prominent vantage points like views from the Flat Lands as well as views from the Hills. (*Kathrin Moore, San Francisco Planning Commission*) [20.16b]

Vol. 1, IV.B.19, Aesthetics: Why is the 80 ft building proposed for YBI not shown in 3D anywhere in the DEIR? There needs to be a view simulation. (*Kathrin Moore, San Francisco Planning Commission*) [20.18]

Vol. 1, IV.B.6, Aesthetics: Figure IV.B.3: View Point B: Proposed, doesn't include the simulation of the proposed Ferry Terminal. Why is the ferry terminal not shown? (*Kathrin Moore, San Francisco Planning Commission*) [20.15]

Vol. 1, IV.B.24, Aesthetics: YBI - Impacts of New Construction: the DEIR fails to provide visual analysis to substantiate the findings. Why is there no view simulation? (*Kathrin Moore, San Francisco Planning Commission*) [20.24]

The diagrams on page II.23 are not useful for understanding what the views will be from YBI. Please extend the view cones all the way out to whatever the viewer would actually be looking at. Would any of these view corridors include views of the Bay? Please show renderings and or photographs of the actual views from these locations, looking in the directions specified. Also, please describe and illustrate the impacts on these view corridors of the island's trees, as they continue to grow over time. (*Ruth Gravanis*) [31.22]

There are two major ways that the public will experience this project: a) the distant view from San Francisco to the west, and the view from the East Bay cities; and b) the local internal views on the islands that island residents, visitors and other users will have of the new urban place that is created. Neither of these is well informed by the material that is presented in this DEIR.

There are presently no on- street views from within the new "downtown" Island high rise area to other parts of the development. Notably missing are visualizations of the row of massive medium and high-rise blocks along the southern shoreline park, as seen from the restored historic buildings and from the low-rise center-island area. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.21b]

*Recommendation:*

*Provide more views to give a sense of the vistas from the water and from the East Bay cities;* (*Jennifer Clary, President, San Francisco Tomorrow*) [38.22]

*Construct internal views to simulate the experience of looking down Island streets, walking along the shore within the linear shore park, within the low rise residential in the Central Island area*

*and from the open space and wetland to the north. (Jennifer Clary, President, San Francisco Tomorrow) [38.23]*

- The DEIR does not include adequate photographic views and visual simulations. Please include additional comparative views from each of the following vantage points:
  - (1) From the surface of the Bay from ferries
  - (2) From along the length of The Embarcadero along the Promenade and including at the following points:
    - Ferry Building (Ferry Terminal)
    - Exploratorium (end of Piers 15 & 17)
    - Open space designated at Pier 27
    - End of the Public Pier (Pier 7)
    - End of the Port's pedestrian-access Pier 14
  - (3) From the top of YBI looking to TI
  - (4) From the top of Ang[e]l Island
  - (5) From Alcatraz
  - (6) From East Shore State Park
  - (7) From Rincon Point from the railing on Herb Cane Way (eliminating the extensive foreground of lawn)
  - (8) Other views from the Marin (including but not limited to Tiburon)

*(Vedica Puri, President, Telegraph Hill Dwellers) [39.21]*

The angle of view in the photographs should be tightened to have less foreground. *(Vedica Puri, President, Telegraph Hill Dwellers) [39.23]*

- Why are the East Bay hills not visible in the view from Rincon Point (View Point A)? *(Vedica Puri, President, Telegraph Hill Dwellers) [39.27a]*
- The DEIR contains no photographic views or visual simulations of the proposed new construction on YBI. Please include these and address each of the following comments and questions:
  - Will any new construction on YBI be visible from San Francisco? Show in a visual simulation.
  - Will any new construction on YBI be visible from any points on the Bay Bridge? Show in a visual simulation. *(Vedica Puri, President, Telegraph Hill Dwellers) [39.29]*
  - The DEIR reveals that: “a mid-rise building up to 80 feet in height would be permitted in zone Y3.” Where is zone Y3? How does an 80-foot building relate to the heights of the historic buildings on YBI, including the Nimitz House, the Torpedo Factory and all the buildings in the Senior Officers’ Quarters historic district?
  - From what points around the Bay will this 80-foot tall building be visible? Show in a visual simulation.
  - The DEIR reveals that: “Building height limitations [on YBI] would be established by the *Design for Development* to ensure that development would not substantially interfere with existing views from hilltop public park areas.” This means, in effect, that views from the hilltop public park areas **would** be impacted. Show exactly where all development on YBI is proposed

and which buildings or areas of new development could interfere with views from the public hilltop park areas. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.31]

Include photographic views or visual simulations of the proposed new construction on YBI and TI from the public hilltop park areas. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.32]

As to whether the Redevelopment Plan would significantly alter existing scenic resources or impact the existing visual character and visual quality on YBI, the DEIR contains no photo views and does not contain sufficient information to reach a conclusion. We have requested additional information on YBI. See above. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.38]

Refer to: IV.B 1 to IV.B, 23 VISUAL IMPACT: Some specific impacts not mentioned Include- Telegraph Hill: Views mainly for Union and Calhoun Streets, Alta St, Lombard St. Lombard and Greenwich Streets have largely lost th[e]ir views as a result of tree growth. Coit Tower (and the Mark Hopkins Hotel on Nob Hill remain important tourist spots for views. On Russian Hill, Lombard, Chestnut and Fr[a]ncisco streets (and the Fort Mason bluffs) are the main view sights: Not mentioned: The new Cruise Line Terminal at Pier 27-23. This is the closest spot in mainland S.F. to T.I., will be open to visitor[s]: and residents and produce a fairly close-up view of the Towers.

Not mentioned: Main view loss from the city ,will not be of the Berkeley Hills generally, but of the UC Campus-Campanile possibly Grizzly Peak. (*Neil Malloch*) [44.7]

### **Response**

Comments request that visual representations from additional viewpoint locations and distances be presented and described, and that impacts on views of the Bay from these particular locations be analyzed in the EIR. Given the regional prominence of the project site within scenic views of the Bay, potential public vantage points for photo-simulations are innumerable. The Planning Department selected the off-site viewpoints presented in the EIR to represent a reasonable range of directions and distances from key public locations around the Bay. Views from San Francisco are represented by Viewpoints A (from Rincon Park), B (from Telegraph Hill), and C (from Twin Peaks). Views from Marin are represented by Viewpoint D (from Vista Point). Views from the East Bay are represented by Viewpoint E (from the Berkeley Marina). Views from the Bay Bridge East Span are represented by Viewpoint F. In response to comments, additional views have been selected for presentation in the EIR, from the San Francisco shoreline, and from the Berkeley Hills. Views from other public locations around the Bay would be comparable to the views selected for analysis in the EIR.

The EIR also presents and describes existing views from two on-site locations within the Project Area (from the Causeway, and east of Building 1). The Planning Department selected the on-site viewpoints to show the existing and proposed visual conditions that greet a visitor to Treasure Island at this important “gateway” to the island, and to illustrate Buildings 1, 2, and 3 in the context of proposed nearby construction.

While the selection of viewpoints presented and discussed in the EIR is not exhaustive, it is adequate for the purposes of CEQA. *CEQA Guidelines* Section 15151, Standards for Adequacy of an EIR, states:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

The range of representative off-site viewpoints presented and described in the EIR is adequate to allow the reader to generalize visual impacts on views of the Bay from multiple locations around the Bay (from San Francisco, Marin, and the East Bay) and from the Bay Bridge, even if a particular viewpoint location is not provided. Generally, impacts on Bay views from further inland from the Bay shoreline would be lessened by greater distance from the project site (to the extent that Bay views are available from inland locations).

Comments request that photographic views be “tightened to have less foreground.” The foreground is included to represent the visual context of the viewpoint location that a viewer would perceive when viewing the Islands. Tightening the shot of the Islands would eliminate this visual context as well as the visual context surrounding the Islands. This would not accurately represent how the Islands are viewed with the unaided eye.

#### *Views from the Surface of the Bay*

Comments request that views from ferries be provided in the EIR. Impacts on such views can be generalized from the range of shoreline views provided in the EIR. As discussed in EIR Section IV.B, Aesthetics, p. IV.B.22,

The Proposed Project would affect scenic vistas available to the public from the surface of the Bay (i.e., from ferries, cruise ships, tour boats, and private recreational craft). Viewed from some positions within the Bay, the impacts of the Proposed Project on scenic vistas would be similar in character to those described above for shoreline viewpoint locations on land, although the Yerba Buena Island landform and the proposed buildings on Treasure Island would be more prominent within such views, while distant features beyond would be comparatively less so. Unlike scenic vistas from fixed positions on land, views from boats are transitory, changing through time as the boat moves through space. Surrounded by flat, unobstructed expanses of water in all directions, persons on boats in the Bay would continue to have access to panoramic scenic vistas of the Bay that are unaffected by the Proposed Project and that are not available to viewers on land. For these reasons, the impact of the Proposed

Project on scenic vistas from the surface of the Bay would be less than significant.

Views from Angel Island and Alcatraz Island

Comments request additional views from Angel Island and Alcatraz Island. These areas are accessible only by boat and are therefore potentially available to fewer persons than mainland locations. Visual effects on views from these areas can be generalized from the view and description provided for the Marin Headlands in the EIR (Figure IV.B.5: Viewpoint D – View from the Marin Headlands at Vista Point, EIR p. IV.B.8.).

Views from San Francisco Shoreline

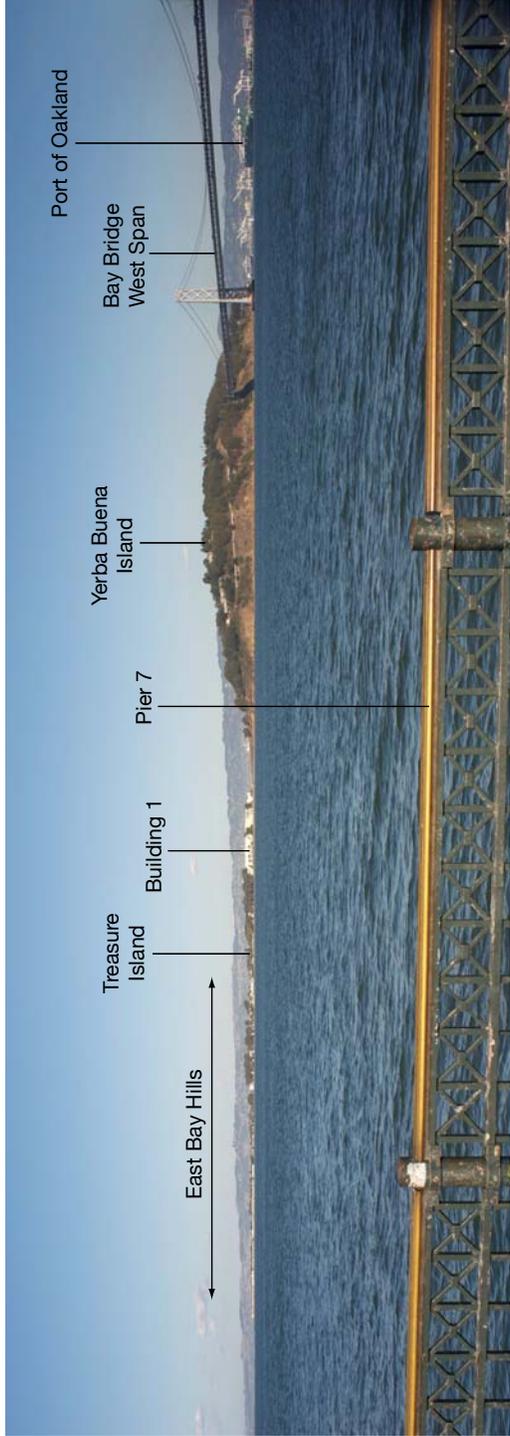
Comments note that views of the East Bay Hills are not prominent in Figure IV.B.2: Viewpoint A – View from the Embarcadero at Rincon Park. From this angle and elevation, and under the climatic conditions under which this photo was shot, the East Bay Hills are not seen as prominent visual elements rising beyond Treasure Island, although they are more visible to the right of Yerba Buena Island in this view. In response, EIR p. IV.B.4 is revised to introduce a new figure entitled “Figure IV.B.2a: Viewpoint Aa – View from Pier 7.” From this angle, the East Bay Hills are seen more distinctly in the distance, rising beyond Treasure Island (see revised EIR text and new EIR figure introduced in the next paragraph).

Comments request additional views from the San Francisco shoreline. In response the first full paragraph on EIR p. IV.B.4 is revised as follows to introduce a new figure entitled “Figure IV.B.2a: Viewpoint Aa – View from Pier 7” (deletions are shown in ~~strike through~~ and new text is underlined):

San Francisco’s eastern waterfront affords panoramic vistas of the Bay, the Bay Bridge, and the East Bay Hills rising in the distance. See Figure IV.B.2: Viewpoint A – View from The Embarcadero at Rincon Park (Existing). In this view, the lawn of Rincon Park occupies the foreground. In the middleground are Herb Caen Way and the Bay water beyond. At the far left in the photograph is the Port of San Francisco’s pedestrian-access Pier 14. See also Figure IV.B.2a: Viewpoint Aa – View from Pier 7 (Existing). In this view, the railing at the eastern end of Pier 7 occupies the foreground.

The Bay Bridge bounds views to the southeast, directing views to the western slopes of Yerba Buena Island rising prominently in the distance (about 1.6 miles). The western and southern shoreline of Treasure Island is visible as a flat expanse to the north of Yerba Buena Island (left in this view). Because of their size, prominent location, and light color, Buildings 1 and 2 are recognizable in the distance. The East Bay Hills rise in the distant background (about 10 miles away). ~~At the far left in the photograph is the Port of San Francisco’s pedestrian-access Pier 14.~~

New Figure IV.B.2a is shown on the following page.



Existing



Proposed

SOURCE: Square One Productions

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.2a: VIEW POINT Aa -  
VIEW FROM PIER 7

The EIR is also revised to discuss impacts on views from Pier 7. The third paragraph on EIR p. IV.B.21 is revised as follows (deletions are shown in ~~strike-through~~ and new text is underlined):

Proposed new construction on Treasure Island would adversely alter scenic vistas of San Francisco Bay from the eastern waterfront of San Francisco (see Figure IV.B.2: Viewpoint A – View from The Embarcadero at Rincon Park (Proposed), and Figure IV.B.2a: Viewpoint Aa – View from Pier 7 (Proposed)), and from Telegraph Hill (see Figure IV.B.3: View Point B – View from Telegraph Hill at Pioneer Park (Proposed)). From these vantage points new construction on Treasure Island would be a prominent new visual presence within scenic vistas of San Francisco Bay, occupying a wide expanse of an individual's field of view.

#### *Views from the East Bay Shoreline*

Comments request additional views from the East Bay shoreline. From the Oakland landing of the Bay Bridge, views of Treasure Island are limited by the existing bridge deck. This condition will be increased by the new Bay Bridge East Span, which curves further northward. From this location, views of the San Francisco skyline are partially obstructed by the vertical rise of Yerba Buena Island (likewise, in views from the Emeryville shoreline). The view from the Berkeley Marina was selected because it more clearly illustrates how topographic features of the Bay (Yerba Buena Island and the Hills of San Francisco and Marin) and built environment features (the San Francisco skyline, the Bay Bridge, and the Golden Gate Bridge) combine with views of water and sky to contribute to highly readable and memorable scenic vistas. However, impacts on scenic views of the Bay from the shoreline of other East Bay communities (Oakland, Emeryville, Albany and Richmond) can be generalized from the description and analysis provided by Viewpoint E from the Berkeley Marina.

#### *Views from the East Bay Hills*

Comments request additional views from the East Bay Hills. In response, EIR p. IV.B.9 is revised to insert a new discussion entitled “Views from the East Bay Hills” immediately after the discussion “Views from the East Bay Shoreline” after the second paragraph and to introduce a new figure entitled “Figure IV.B.6a: Viewpoint Ea – View from the Berkeley Hills Along Grizzly Peak Boulevard. This distant view offers an unobstructed panoramic vista of the Islands and the larger regional visual context of the Bay from the Berkeley Hills. Project impacts on scenic views and visual quality are greater in the closer view from the East Bay shoreline. See Figure IV.B.6 on EIR p. IV.B.10. New text is underlined.

### Views from the East Bay Hills

The scenic turnout along Grizzly Peak Boulevard is a popular public viewpoint in the Berkeley Hills, with panoramic distant vistas of the northern Bay Area region unobstructed by vegetation and structures. See Figure IV.B.6a: Viewpoint Ea – View from the Berkeley Hills (Existing). The foreground in this view is occupied by undeveloped foothills, and the East Bay flatlands beyond. The Bay is visible in the distance (about 4.8 miles away) as well as familiar features of the Bay including the Bay Bridge, Yerba Buena Island, and Treasure Island (about 8.5 miles away). On the opposite shore of the Bay rises the San Francisco skyline (about 11 miles away) and the hills of San Francisco. The Golden Gate Bridge (about 14.5 miles away) links San Francisco to the hills of Marin County. From this elevated vantage point, Bay water is visible separating Yerba Buena Island and Treasure Island from the San Francisco peninsula (unlike water-level East Bay shoreline locations, in which Treasure Island and Yerba Buena Island are not clearly discernible as features distinct from San Francisco).

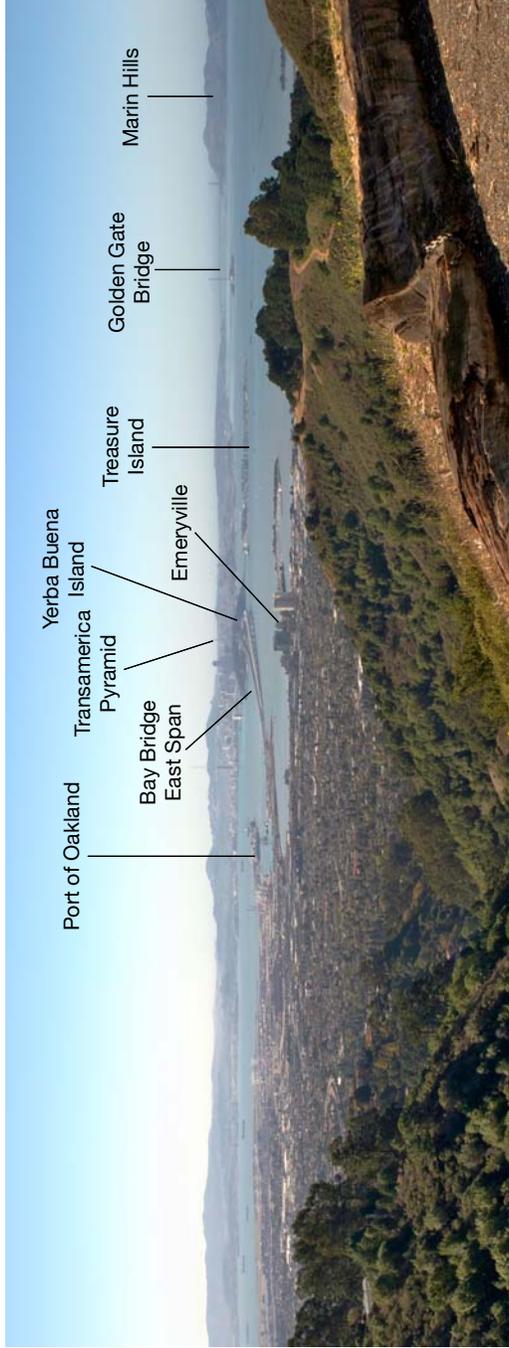
New Figure IV.B.6a is shown on the following page.

The EIR is also revised to discuss impacts on views from the East Bay Hills. The last paragraph on EIR p. IV.B.21 is revised as follows (new text is underlined):

New construction on Treasure Island would not have a substantial adverse impact on scenic vistas from more distant off-site locations. From Twin Peaks, the proposed new construction on Treasure Island would not be prominent, if discernible at all. (See Figure IV.B.4: View Point C – View from Twin Peaks (Proposed).) It would be largely obscured beyond dense, high-rise development of Downtown San Francisco. From the hills of Marin, the proposed new construction on Treasure Island would not be a dominant visual presence in the context of panoramic scenic vistas of the Bay that include the San Francisco skyline, the Golden Gate Bridge, the Bay Bridge, Yerba Buena Island, and the East Bay Hills. (See Figure IV.B.5: View Point D – View from the Marin Headlands at Vista Point (Proposed).) Similarly, from the East Bay Hills the proposed new construction on Treasure Island would not be a dominant visual presence in the context of panoramic scenic vistas of the Bay that include the East Bay flatland and shoreline, the San Francisco skyline, the Golden Gate Bridge, the Bay Bridge, Yerba Buena Island, and the hills of Marin County. (See Figure IV.B.6a: View Point Ea – View from the Berkeley Hills (Proposed).) From this elevated location, Treasure Island would continue to be visibly discernible as a feature distinct from San Francisco.

### Views of Yerba Buena Island and Views from Yerba Buena Island

Comments inquire why photosimulations of proposed new construction on Yerba Buena Island are not included in the EIR, including a proposed 8-story building. As discussed on EIR p. IV.B.24, visual changes on Yerba Buena Island would be minimally discernible to the unassisted eye, when viewed from mainland locations. That EIR discussion (the second full paragraph on EIR p. IV.B.24) is revised to refer to (New) Figure IV.B.2a: Viewpoint Aa – View from Pier 7,



Existing



Proposed

SOURCE: Square One Productions

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.6a: VIEW POINT Ea -  
VIEW FROM BERKELEY HILLS

presented on p. 2.4.14 of this Comments and Responses document, as follows (new text is underlined):

As described above and in Chapter II, Project Description, “Yerba Buena Island District,” p. II.22, new construction on Yerba Buena Island would be placed primarily on the sites of existing buildings and would be predominantly low-rise, stepping down hillsides. See (New) Figure IV.B.2a: Viewpoint Aa – View from Pier 7, on EIR p. IV.B.5a. Existing residential buildings that are now visible on Yerba Buena Island from San Francisco would be replaced by new residential buildings of comparable scale (some new buildings would be 1-2 stories taller than the existing buildings). A mid-rise building would be permitted in zone 4Y stepping down the north slope of the island facing Clipper Cove. Building height and placement limitations established by the *Design for Development* (see Figure II.5: Yerba Buena View Corridors, p. II.23, and Figure II.6b: Yerba Buena Island Maximum Height Limit Plan, p. II.27 in Chapter II, Project Description) would ensure that development would not rise above the ridgeline of Yerba Buena Island to substantially alter the existing visual character of the Yerba Buena Island landform as a scenic resource of San Francisco Bay. Proposed new development on Yerba Buena Island would not be substantially more prominent than existing development when viewed from locations around the Bay, if discernible at all.

Unobstructed scenic vistas of the Bay, the San Francisco skyline, and landforms beyond the Bay are not currently available from the ridgeline of Yerba Buena Island (the location of the proposed hilltop park). The peak of Yerba Buena Island is fenced and is not accessible to the public. From other areas along the ridgeline, publicly accessible views (from roads, lawn and parking areas) are limited by the mature cover of existing eucalyptus, and to a lesser extent by existing residences, on the surrounding slopes. To the extent that publicly accessible views are available from the ridgeline of Yerba Buena Island, they are intermittent, seen through gaps in vegetation and between buildings. For this reason, no photographic view from these areas was selected for presentation in the EIR. The proposed *Design for Development* includes restrictions on the height and placement of buildings that would ensure that existing scenic views of the Bay from the proposed new hilltop park on Yerba Buena Island are preserved. See Figure II.5: Yerba Buena View Corridors, in EIR Chapter II, Project Description, p. II.23. These restrictions also ensure that new buildings on Yerba Buena Island, including the proposed 8-story building, would be minimally discernible from mainland locations, remaining below the ridgeline of Yerba Buena Island on the north-facing slope overlooking Clipper Cove. Further, the proposed Habitat Management Plan as part of the project calls for the eventual phase-out of the non-native eucalyptus on Yerba Buena Island in favor of lower-growing native oaks. Implementation of the proposed Habitat Management Plan would thereby enhance and improve scenic vistas and visual quality from the proposed hilltop park, over that of existing conditions.

Although new construction on Yerba Buena Island would not be prominent when viewed from mainland locations due to building scale, placement, and distance, it would be visible to travelers on the Bay Bridge, particularly the westbound (top) deck of the Bay Bridge East Span. New buildings on Yerba Buena Island would be viewed against the backdrop of Yerba Buena Island

and would not interfere with sustained scenic views of the Bay that would be available from the open viaduct segment of the new Bay Bridge East Span. Before entering the cable stay suspension segment, the roadway will veer southward toward the tunnel through Yerba Buena Island, at which point sustained scenic views of the Bay will no longer be readily available. New construction, including the proposed 8-story building, would be visible to the right of the tunnel opening (about 350 feet north of the tunnel opening) to westbound travelers. This view of Yerba Buena Island is neither scenic nor sustained.

Comments request that the EIR include photosimulations of proposed new construction on Treasure Island as seen from Yerba Buena Island. The impacts on views from Yerba Buena Island can be generalized from the view from the Causeway presented by Figure IV.B.8: Viewpoint G – View Looking North to Treasure Island from the Causeway, EIR p. IV.B.13.

#### Views of the Ferry Terminal

Comments request that the proposed Ferry Terminal be represented in figures and that impacts of the proposed Ferry Terminal on views from Building 1 be considered. Ferry Terminal structures are modeled in the photosimulations presented in the EIR. As with other proposed buildings on Treasure Island, the Ferry Terminal is represented in the EIR as conceptual massing volumes rather than a developed building design. The Ferry Terminal is most prominently shown in Figure IV.B.8: Viewpoint G – View Looking North to Treasure Island from Causeway, but also distantly visible along the western shoreline of Treasure Island in front of Building 1 in Figure IV.B.2: Viewpoint A – View from The Embarcadero at Rincon Park, on EIR p. IV.B.5; in Figure IV.B.3: Viewpoint B – View from Telegraph Hill at Pioneer Park, on EIR p. IV.B.6; and in new Figure IV.B.2a: Viewpoint Aa – View from Pier 7, introduced previously in “Views from San Francisco Shoreline.” The Ferry Terminal structures are also shown in Figure IV.B.10: Proposed Representative Massing Diagram, on EIR p. IV.B.20.

In response to these comments, EIR p. IV.B.25 is revised to introduce a perspective architectural rendering of the proposed Ferry Terminal, entitled “Figure IV.B.14: Representative Rendering of the Ferry Terminal,” reproduced from the proposed *Design for Development*, to illustrate the general design intent for the Ferry Terminal (see revised EIR text and new EIR figure introduced below, under the heading “Internal Views of Treasure Island”). As shown in this figure, the design of the Ferry Terminal is intended to consist of a high, wide, open span that is intended to maximize views of the water’s edge, ferries, and the Bay beyond from Building 1 and its Plaza. The design guidelines would also call for the Ferry Terminal to be designed as a low, transparent structure that would permit views over its roof from Building 1. See proposed *Design for Development* T5.10.13, p. 196. The breakwaters that would be part of the Ferry Terminal are shown in plan in Figure II.8 on EIR p. II.37. Final designs for the breakwaters are not expected to obstruct visual access to the Bay from the Ferry Terminal or Building 1. The southern breakwater may be open to public access, providing additional opportunities for viewing the Bay

and features within and surrounding the Bay. As stated on EIR p. II.36, “public access to the northern breakwater is not proposed, as it could occasionally be overtopped by high waves.”

Internal Views of Treasure Island

Comments request that the EIR include close range internal views from Treasure Island to illustrate the proposed visual and urban design character of Treasure Island. Although massing-level photosimulations are an effective method of illustrating the visual effect of new building volumes within an existing distant or midrange visual context, they are not an effective method of illustrating close range streetscapes. In response to these comments, a new paragraph is added after the third paragraph on EIR p. IV.B.25 to introduce perspective architectural renderings to present streetscape perspective renderings reproduced from the proposed *Design for Development*, to assist the reader in understanding the urban design intent for Treasure Island (new text is underlined):

Figure IV.B.9 (Proposed) shows the view toward Building 1 from the open area west of Building 1. Low, 20-foot-tall retail pavilions in the foreground would symmetrically flank this view of Building 1. High-rise towers would rise from beyond Building 1. Its low horizontal form, curved façade, and distinctive architectural features would contrast with nearby new construction.

Presented below are representative perspective renderings of proposed development on Treasure Island, reproduced from the proposed *Design for Development*. These figures illustrate the urban design intent for Treasure Island as viewed from key public gathering spaces on Treasure Island. See Figure IV.B.11: Representative Rendering of the Ferry Terminal; Figure IV.B.12: Representative Rendering of Marina Plaza; Figure IV.B.13: Representative Rendering of Clipper Cove Promenade; Figure IV.B.14: Representative Rendering of Cityside Avenue and Shoreline Park; Figure IV.B.15: Representative Rendering of Eastside Commons; and Figure IV.B.16: Representative Rendering of Typical Garden Street.

As part of the Proposed Project, a *Design for Development* would be adopted and implemented. The *Design for Development* is a regulatory document that would establish design standards and guidelines that would direct future development of the Project Area...

New Figures IV.B.11, IV.B.12, IV.B.13, IV.B.14, IV.B.15 and IV.B.16 are shown on the following pages.



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

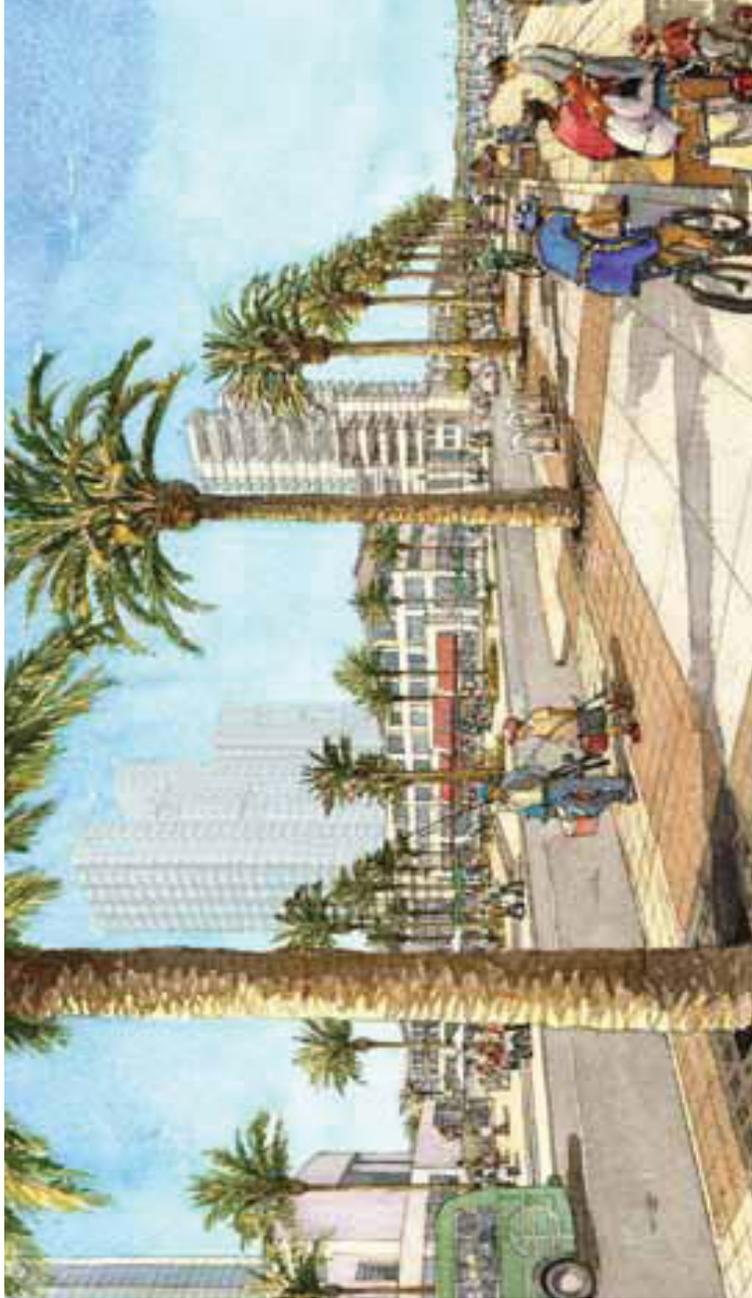
(NEW) FIGURE IV.B.11: REPRESENTATIVE RENDERING OF THE FERRY TERMINAL



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERESA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.12: REPRESENTATIVE RENDERING OF MARINA PLAZA



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

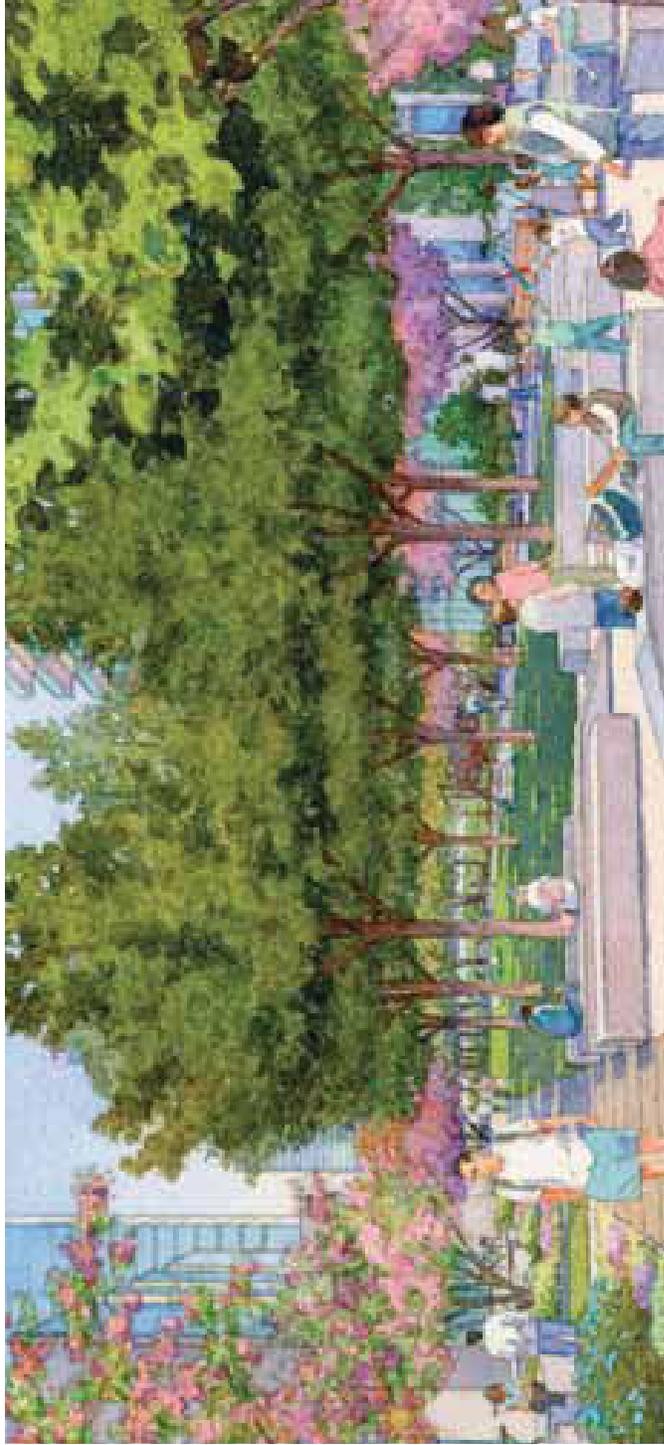
**(NEW) FIGURE IV.B.13: REPRESENTATIVE RENDERING  
OF CLIPPER COVE PROMENADE**



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(NEW) FIGURE IV.B.14: REPRESENTATIVE RENDERING OF  
CITYSIDE AVENUE AND SHORELINE PARK**



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.15: REPRESENTATIVE RENDERING OF EASTSIDE COMMONS



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.16: REPRESENTATIVE RENDERING OF TYPICAL GARDEN STREET

#### 2.4.4 NIGHTTIME VIEWS AND GLARE

##### Comments

8. As to Questions # 4-7, please provide similar information relevant to **nighttime** vistas. (Anthony F. Gantner, Attorney-at-Law) [13.2b]

13. Why are the selected photographic views from the eight locations of the project only during the daytime? (Anthony F. Gantner, Attorney-at-Law) [13.2d]

14. Were nighttime photographic views of the project also considered or taken? If not, why not? If such nighttime photos were taken, describe each and every location from which said photographs were taken. (Anthony F. Gantner, Attorney-at-Law) [13.3]

18. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers:

- (a) would or would not create a new source of substantial light or glare;
  - (b) the amount of light or glare that would be produced by **each** of the project's proposed high-rise towers;
  - (c) whether and to what extent, such light or glare would adversely affect daytime views; . . .
- (Anthony F. Gantner, Attorney-at-Law) [13.7]

18. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers: . . . (d) whether and to what extent, such light would adversely affect nighttime views. (Anthony F. Gantner, Attorney-at-Law) [13.8]

22. Did the photographer identified in response to Question # 19 take any nighttime photos of the project?

23. If the answer to Question # 22 is in the affirmative, from what locations were the photographs taken? (Anthony F. Gantner, Attorney-at-Law) [13.11]

31. Given that the project's "nighttime skyline of Treasure Island would become a prominent new visual presence within nighttime views of the Bay", why weren't existing and proposed nighttime photographic views provided in the DEIR as were daytime photographic views?

32. If the project's "nighttime skyline of Treasure Island would become a prominent new visual presence within nighttime views of the Bay", how could lighting standards and guidelines established by the *Design for Development* ensure "that project light would **not** adversely affect nighttime views from the mainland"? (Anthony F. Gantner, Attorney-at-Law) [13.14]

6. Please state why there are no illuminated night renderings of the proposed project's high-rise towers. (Judy Irving, Executive Director, Pelican Media) [14.4]

Vol. 1, IV.B.7, Aesthetics: Why do View Simulations only simulate day-time views? We request that the EIR simulates Night Time Views from all view points and with additional views added as being suggested in other DEIR comments. (Kathrin Moore, San Francisco Planning Commission) [20.16a]

Vol. 1, IV.B.27, Aesthetics: Why are Night Light impacts not analyzed? The visual impact assessment is incomplete. Night Light impacts need to address ALL planned uses, including the regional sports facilities. Comparable sports facilities in the region can provide data for prototypical nuisance levels of spill-over light to use for a complete assessment of night light impacts. We request an EIR revision to include this study. (*Kathrin Moore, San Francisco Planning Commission*) [20.26]

Vol. 1, IV.B.28, Aesthetics: Where is the visual simulation of nighttime lighting? Night light impacts potentially are greater than impacts during the day. Standards established in the D4D do not create guarantees, they are merely guiding ideas[.] The statement that the intensity of project light when viewed from mainland locations would be diffused by distance is grossly incorrect - the main land is only 1.6 miles away from TI as the crow flies. (*Kathrin Moore, San Francisco Planning Commission*) [20.27]

The aesthetic impacts at night could be even more significant. Please include comparative views from each of the above vantage points as well as from the vantage points included in the DEIR -- all against the night skyline. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.22]

- The significant impacts of the Proposed Project on the San Francisco's skyline is also shown in the view from the Berkeley Marina (View Point E) which reveals that the San Francisco skyline will be altered and muddled and will no longer read as a clear visual marker. Please include nighttime views from this viewpoint. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.26]

**Impact AE-4:** We disagree with the DEIR conclusion that the implementation of the Redevelopment Plan would not significantly increase nighttime lighting, increasing potential sources of glare. It would further cause light pollution.

- We disagree that the project area is not a prominent visual presence within nighttime views of the Bay from mainland locations. As we have requested, please include nighttime photographic views from Telegraph Hill and other locations along the Northeast Waterfront, which will show that Building 1, with its subtle lighting has a lovely visual presence at night with the backdrop of the East Bay Hills. This scene with the subtle lighting of the Bay Bridge is a scenic visual resource that will be significantly impacted by the Proposed Project.

- What are the light impacts associated with a 25-40 acre regional sports complex?

- Please provide nighttime simulations from the mainland comparing the existing views to the proposed dense collection of 19 new high-rise buildings, together with the high-intensity nighttime lighting of the Sports Park. These simulations will show that the intensity of the light that will be caused by the project would be significant. We disagree with the subjective conclusion of the DEIR that this intense new light would somehow "be diffused by distance." (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.39]

- Please provide a visual analysis of the glare that will reflect back to San Francisco from the setting sun on the proposed new 19 high-rise structures, as well as from the new construction proposed on YBI. We disagree with the subjective conclusion of the DEIR that this glare would somehow "be diffused by distance." This is simply untrue. We currently experience glare from Oakland and the East Bay Hills as well as from the current development on the west side of YBI (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.40]

- The DEIR concludes that “*the light levels resulting from build out of the Redevelopment Plan would be consistent with the urban character and associated ambient light levels of the City as a whole and would not exceed levels commonly accepted by residents in an urban setting.*” We disagree. This is not a development in the City, but a new “suburban city” in the middle of one of the most scenic places in the world. Such new lighting will significantly and permanently impact a prominent and unique scenic resource. This is particularly so at the central portion of the Bay, where dramatic environmental features combine to form iconic scenic views. Reliance on the *Design for Development* and voluntary “lights out” programs cannot prevent this significant impact on the nighttime views.
- Nighttime views of the Development Area from the Bay Bridge should also be analyzed in photographic simulations. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.41]
- Please analyze all potential light pollution increases to locations along the NE Embarcadero and on Telegraph Hill. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.77]

### **Response**

Comments request that the EIR include visual simulations of nighttime conditions to illustrate impacts on nighttime views. An independent expert in visual simulation, Steelblue LLC, has prepared nighttime architectural renderings to assist the reader in visualizing project impacts on nighttime views of the Bay, in the context of existing light conditions of the Bay. To date, the City has not provided nighttime visual simulations and is unaware of other EIRs that have done so. Nevertheless, based on the unique setting of the Proposed Project on an island in the middle of the Bay, and in response to comments requesting nighttime visual simulations, it was determined that illustrative nighttime simulations would be helpful in understanding the visual effect of the Proposed Project within the context of nighttime views of the Bay. Note, however, that the accuracy of nighttime visual representations is subject to numerous variables including existing light conditions at and around the project site; existing light conditions at the location of the viewer; the particular project lighting types and products used and their particular intensity and placement (not currently specified); a camera’s aperture and exposure settings, the ratio of solid wall to glazed area on a building façade; the reflectivity of surfaces; screening provided by vegetation; climatic conditions; and an individual viewer’s sensitivity to light and perception of light effects. Given these variables, objective accuracy in representation of existing and proposed nighttime views of the Bay is not possible. The visual simulations provided should be considered representative illustrations of the potential nighttime visual effect of the proposed project, as might be experienced by viewers in San Francisco and the East Bay shoreline.

The discussion of Impact AE-4, on EIR p. IV.B.27, is revised as follows to introduce and discuss two new figures entitled “Figure IV.B.20: Nighttime View from Calhoun Terrace on Telegraph Hill” and “Figure IV.B.21: Nighttime View from the Berkeley Marina” (deletions are shown in ~~strike through~~ and new text is underlined):

**Impact AE-4: Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area,**

**and would affect nighttime views of the Bay from public areas, and would increase potential sources of glare. (Less than Significant)**

Current levels of nighttime lighting within the Development Plan Area are relatively low, consistent with the relatively low intensity of existing land uses within the Development Plan Area. Current sources of nighttime light include exterior security lighting of buildings, yards, streets, parking lots, and light emitted from within occupied residential buildings. Given the distances to mainland locations around the Bay, the low-rise stature of buildings within the Development Plan Area, and a cover of vegetation, the Development Plan Area is not a prominent visual presence within nighttime views of the Bay from mainland locations around the Bay.

Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area. Lighting for the Proposed Project would include exterior lighting of streets, sidewalks, parking areas, public spaces, and building entrances. Light would also be emitted from the interiors of residential and non-residential buildings. The Proposed Project would also include a Sports Park located immediately north of the Eastside neighborhood. The Sports Park would include a range of sports facilities (e.g., for baseball, soccer, football, basketball, tennis, etc.). Nighttime use of the Sports Park would require elevated high-intensity outdoor lighting to illuminate the playing fields, creating the potential for spillover of intrusive amounts of light into nearby residential areas. The particular program and layout of the facility, the particular location and characteristics of Sports Park lighting, and of landscape screening around the facility have not been determined at this time.

New sources of nighttime lighting on Treasure Island and Yerba Buena Island would affect nighttime views of the Bay as seen from various public locations around the Bay. Figure IV.B.20: Nighttime View from Calhoun Terrace on Telegraph Hill, and Figure IV.B.21: Nighttime View from the Berkeley Marina, are representative renderings of nighttime views of Proposed Project within the Bay from San Francisco and the East Bay, prepared by an independent visual simulation consultant, Steelblue LLC.

The existing character of nighttime lighting as a feature of views of the Bay from these locations is consistent with the role of the central Bay as a regional center of population, commerce, industry and transportation. In nighttime views from San Francisco, the most prominent existing illuminated features include street lights and lighted buildings on Treasure Island, the Bay Bridge West Span, transportation infrastructure along the opposite shoreline, commercial and industrial activities in the East Bay flatlands including the Port of Oakland, and residences in the East Bay Hills. In nighttime views of the Bay from the East Bay, the most prominent illuminated features of the Bay include Treasure Island, the Bay Bridge East Span, the San Francisco skyline, and the Golden Gate Bridge. Unlike daytime scenic views of this portion of the Bay (as described on EIR pp. IV.B.1-IV.B.11) in which dramatic topographic features around the Bay combine with recognizable built features, water, and sky to create readable and memorable scenic compositions characterized by spatial and geographic clarity, nighttime views of the Bay are not characterized by such clarity. Unlit features recede in prominence, while the prominence of illuminated features is elevated. As such, the character and enjoyment of nighttime views of the Bay are largely based on the visual effect of light sources and the play of light on water.

The proposed development on Treasure Island would be a prominent new illuminated presence within nighttime views of the Bay, rising from the Bay water and reflected in

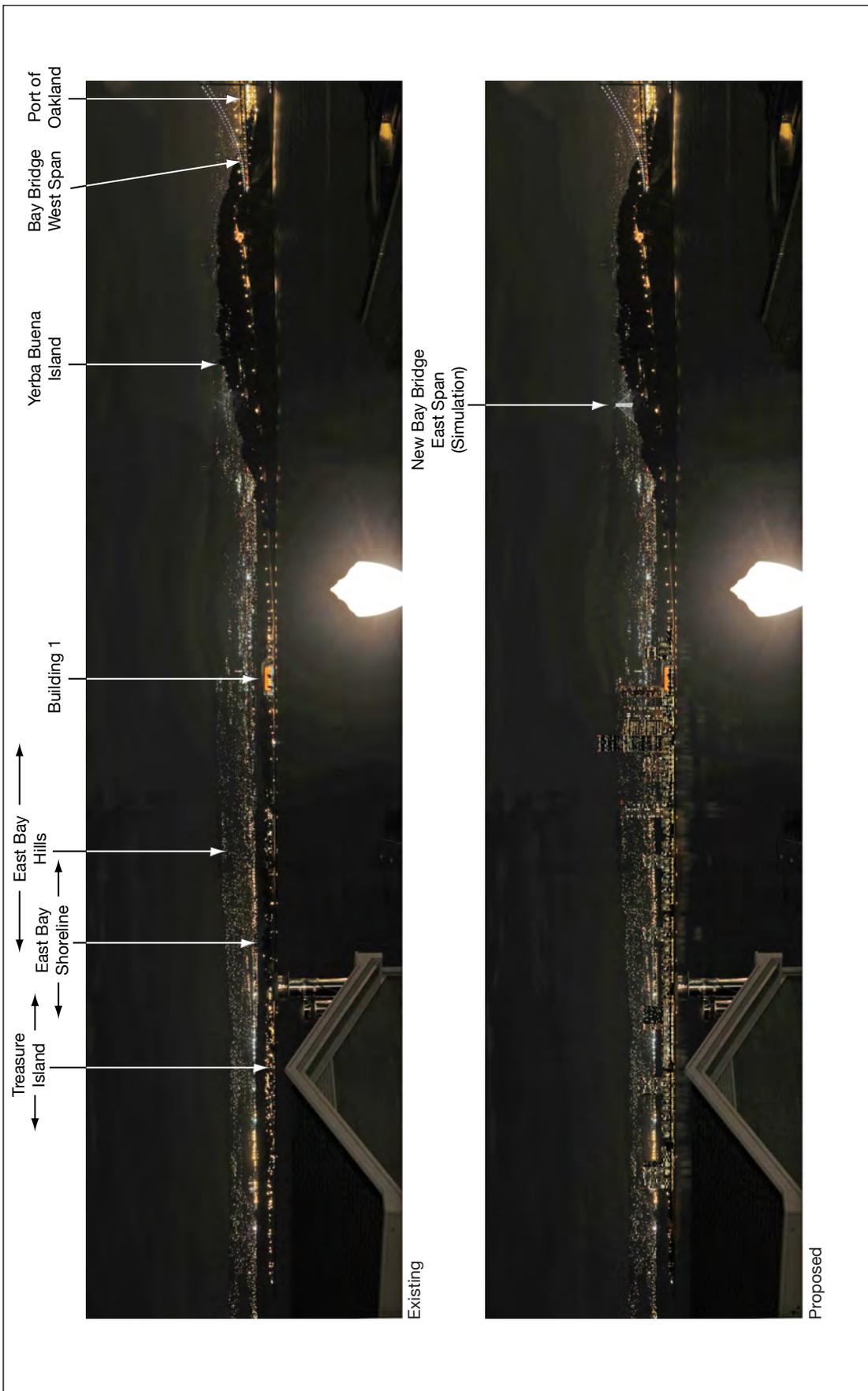
the Bay water adjacent to Treasure Island, particularly when viewed from San Francisco. However, viewed from the East Bay shoreline at the Berkeley Marina, against the background of San Francisco's downtown skyline, the visual change from existing nighttime conditions would be less discernible. The perception of this change is largely subjective. Some viewers who have grown accustomed to existing nighttime visual conditions of the Bay may experience the change as an undesirable consequence of the Proposed Project. Other viewers may perceive the nighttime lighting of Proposed Project as a new visual resource of the Bay. Light originating from the Proposed Project and visible from mainland locations would not contribute substantially to existing ambient light conditions on the mainland that could affect human comfort or disrupt sleep. The impact of Project lighting on mainland locations and on nighttime views of the Bay would therefore be considered less than significant.

The potential for project impacts from nighttime lighting would be greatest for the existing residential uses that would remain (like the Job Corps site), and the new residential uses that would be constructed under the Proposed Project....

New Figures IV.B.20 and IV.B.21 are shown on the following pages.

Comments express concern for potential glare resulting from reflection of sunlight on reflective surfaces on Treasure Island. The second complete paragraph on EIR p. IV.B.28 is revised as follows to augment the discussion of potential impacts related to glare:

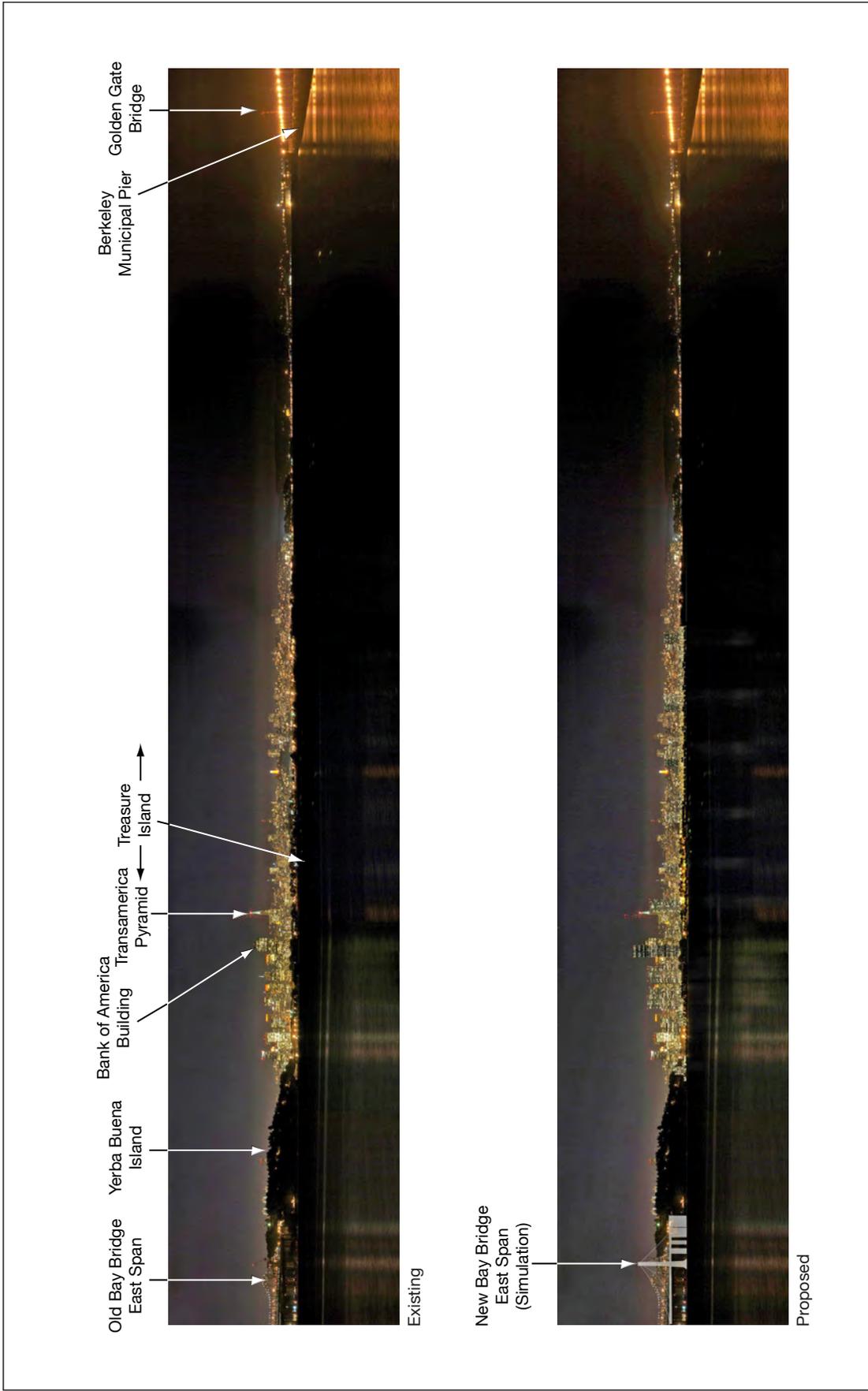
The Proposed Project would not result in excessive glare that could substantially affect human comfort. The effect of glare, resulting from sunlight reflected off of building surfaces and reaching the eye of a viewer is a transitory phenomenon that changes with the position of the sun and the position of the viewer, time of year and atmospheric conditions. As such, the quality and intensity of reflected sunlight is always in flux. The perception of this phenomenon is largely subjective. Some viewers who have grown accustomed to reflected sunlight from buildings located in the East Bay Hills as seen from San Francisco, or viewers who have grown accustomed to reflections of sunlight from buildings located in San Francisco as seen from the East Bay, the North Bay or other parts of San Francisco, may experience the change in sunlight reflected off building surfaces within the Proposed Project area as an undesirable consequence of the Proposed Project. Other viewers may perceive the same change as a new visual resource of the Bay. Implementation of the Proposed Project could create excessive daytime glare if new buildings include highly reflective materials. The potential for excessive daytime glare would be greatest for receptors within the Development Plan Area and travelers on the Bay Bridge. The intensity of reflected daytime glare on mainland locations around the Bay would be diffused by distance. The proposed *Design for Development* prohibits the use of reflective or mirrored glass in new construction. (Please see Guidelines T5.4.27 and T5.4.33 in Section T5.4, Pedestrian Scale, on p. 186, of the March 5, 2010 draft *Design for Development*. The guideline numbers and the page number cited above could change as part of an update to the proposed *Design for Development*.) New buildings within the Project Area would thus include transparent or lightly tinted glass rather than reflective glass, to minimize reflection of sunlight. Conformity with the *Design for Development* would ensure that the potential for daytime glare from project buildings would be less than significant.



SOURCE: Steelblue

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.20: NIGHTTIME VIEW FROM CALHOUN TERRACE ON TELEGRAPH HILL



SOURCE: Steelblue

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(NEW) FIGURE IV.B.21: NIGHTTIME VIEW FROM BERKELEY MARINA

## 2.4.5 PLANS AND POLICIES

### Comment

15. As to the San Francisco Bay Conservation and Development Commission (“BCDC”) and its “Bay Plan” policies relating to “Appearance, Design, and Scenic Views”, please explain how:

- (a) the project will enhance the pleasure of the user or viewer of the Bay;
- (b) the project will **not** impact visually on the Bay and shoreline;
- (c) the project will assure continued visual dominance of the Hills around the Bay from the shoreline perspective of (1) San Francisco; (2) East Bay; and, (3) North Bay;
- (d) the project’s proposed high-rise towers are in accordance with the Bay Plan; . . . (*Anthony F. Gantner, Attorney-at-Law*) [13.4]

### Response

An EIR must disclose inconsistencies with applicable plans and policies (*CEQA Guidelines* Section 15125(d)). Applicable *San Francisco Bay Plan (Bay Plan)* policies are presented on EIR Section IV.B, Aesthetics, pp. IV.B.16-IV.B.17. The EIR finds no inconsistency with applicable *Bay Plan* plans and policies. As discussed in EIR Chapter III, Plans and Policies, p. III.12, the Bay Conservation and Development Commission will make the determination as to whether the Proposed Project is, on balance, consistent or inconsistent with *Bay Plan* policies as part of its actions on aspects of the Proposed Project that are within its jurisdiction. BCDC’s determination would occur after certification of the EIR.

The *Bay Plan* does not require that a project “will not impact visually on the Bay and shoreline,” but rather calls for new development in and around the Bay be designed to preserve and enhance the visual quality of the Bay. As discussed on EIR p. IV.B.25, the proposed project would transform the existing visual character of Treasure Island. As discussed on EIR pp. IV.B.25-IV.B.27, as part of the proposed project, a *Design for Development* would be adopted and implemented to ensure that visual quality within the project site is enhanced. At the center of the Bay, the proposed development on Treasure Island would not obstruct the visual dominance of the Hills that surround the Bay. They would continue to rise from beyond the Proposed Project to form the backdrop to views of the Bay.

## 2.4.6 IMPACT ANALYSES

### Comments

For many, it is startling to see the nearly 600-foot One Rincon loom next to the Bay Bridge approach. What would it like to see, a series of towers, including one higher than One Rincon -- Treasure Island. Are we not comfortable with the historic scale of the buildings currently on the island? Is this not something to be maintained? Do we really want to alter the island profile with towers jutting up from the Bay, including a central tower exceeding the height of the Bay Bridge? (*Tony Gantner*) [TR.10.1]

17. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers would or would not degrade the existing character or quality of Treasure Island. (*Anthony F. Gantner, Attorney-at-Law*) [13.6b]

28. Please describe the basis and methodology by which it was determined that from the East Bay shoreline, "the new cluster of high-rise buildings on Treasure Island...would create visual ambiguity as to what the viewer is actually observing---the San Francisco skyline or the Treasure Island skyline."

29. Please describe in detail why, "the effect of the Proposed Project on scenic vistas of the Bay when viewed from the eastern waterfront of San Francisco, Telegraph Hill, the East Bay shoreline, and from the Bay Bridge east span would be considered significant."

30. Please state each and every reason why there is "no effective mitigation measure available that would avoid or substantially reduce a significant impact on scenic Bay vistas resulting from construction of a new, high-density urban community on Treasure Island." (*Anthony F. Gantner, Attorney-at-Law*) [13.13b]

In particular, the density, massing and height of the proposed project would result in unacceptable impacts on one of the most iconic settings in San Francisco Bay. (*Kathrin Moore, San Francisco Planning Commission*) [20.1]

Vol. 1, IV.B.2, Aesthetics: Impact AE-1: Disagree with statement about impact on Views from Twin Peaks - views from Twin Peaks with the proposed development would be substantially altered, effecting views of the City's icon skyline, with hills and valleys as its trademark. Proposed development would flatten out this distinct view of the skyline and of downtown, visually merging the two skylines and creating visual ambiguity. (*Kathrin Moore, San Francisco Planning Commission*) [20.20]

Vol. 1, IV.B.23, Aesthetics: Impact AE-2: the statement that new infill construction impacts in the vicinity of Buildings 1, 2, and 3 would be less than significant is wrong; the most prominent historic buildings appear dwarfed, diminished and overpowered by the excessive height and massing of the proposed buildings. (*Kathrin Moore, San Francisco Planning Commission*) [20.22]

Vol. 1, IV.B.25, Aesthetics: The DEIR text uses subjective interpretations to describe the visual character of the island as follows: *the island is not characterized by a strong sense of spatial or design cohesiveness*. The landform of the island is uniformly strong, a distinct green form punctuated by the view of the iconic form and massing of Building 1. We consider the impact of new construction to be Significant and request the findings to be revised. (*Kathrin Moore, San Francisco Planning Commission*) [20.25a]

Vol. 1, IV.B.26, Aesthetics: The assumption that the Implementation of Approved Design Guidelines will ensure that the Proposed Project would not cause a significant impact on the visual quality of the project area and therefore no mitigation measures are required, is false, unsubstantiated and not anchored in applicable codes. Guidelines, by definition, are there to guide, there are a statement of intent, not a guarantee. Guidelines don't substitute for a CODE. (*Kathrin Moore, San Francisco Planning Commission*) [20.25b]

Even though the EIR admits that the Proposed Project would adversely alter scenic vistas of San Francisco and San Francisco Bay, it underestimates the regional and international impact this

project would have on the image of San Francisco. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.19]

- The DEIR’s discussion of the view from Twin Peaks (View Point C) overlooks the fact that this view shows that the Proposed Project will have the effect of leveling out the familiar shape of the San Francisco skyline, which the DEIR describes on page V.B.1 as follows: “*The San Francisco skyline is a clear visual marker of San Francisco’s regional importance*” and further describes the views of the skyline as being characterized by “*a strong visual hierarchy.*” As shown by Viewpoint C, the Proposed Project would significantly alter this important visual marker and visual hierarchy. The nighttime view from this viewpoint could be even more revealing. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.25]

- The DEIR’s discussion of the view from New Bay Bridge East Span (View Point F) completely overlooks the fact that the Proposed Project will completely block the iconic, internationally famous “first view” one gets when arriving in San Francisco over the Bay Bridge, including views of the Golden Gate Bridge and the Marin Hills, and of the three most significant National Register-listed historic buildings on Treasure Island, which remain from the 1939-1940 Golden Gate International Exposition (views of Buildings 2 & 3 are completely blocked and Building 1 is obscured). Depending on the color of the buildings to be constructed on TI, Building 1 may not be at all visible. The nighttime view from this viewpoint will be further revealing. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.27b]

- The DEIR does not contain any discussion at all of the view from the TI Causeway (View Point G), a view that is shocking as to what it reveals. The Proposed Project appears as a new Walnut Creek right in the middle of our world-renowned Bay. Buildings 2 & 3 are buried beneath the proposed new high-rise buildings, and Building 1 is dwarfed by and is visually and aesthetically impacted by the surrounding super tall high-rise buildings. This view illustrates the severe visual impacts of the Proposed Project to the historic resources. The nighttime view from this viewpoint will be further revealing. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.28]

- Explain in detail why the DEIR fails to identify the “Avenue of the Palms” as a prominent visual feature that will be impacted by the Propose Project? According to the DEIR, the Avenue of the Palms will be completely destroyed by the Proposed Project.

- Please refer to Figure 3-2 “Prominent Visual Features and Major Views” from the 2005 FEIR attached to these comments as **Exhibit A**, which specifically identifies the Avenue of the Palms as such a feature.

- Please include an analysis in this DEIR of each of the visual feature and major view identified on the attached **Exhibit A**. What has changed since 2006? Is the project sponsor EIR shopping?

- Consistent with the 2005 FEIR, the removal of the Avenue of the Palms must be identified as a significant aesthetic impact in this DEIR. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.35]

- In addition to the Avenue of the Palms, what other “Prominent Visual Features” identified on the attached Figure 3-2 are proposed for demolition or removal as a part of the Proposed Project? Please describe in detail.

- Please provide a detailed analysis of the impact of the Proposed Project on each “Major View” identified on Figure 3-2. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.36]

Why has no attempt been made to at least fundamentally discuss the aesthetics of Treasure Island as currently developed versus the aesthetics of the island as proposed? Are the authors of the Draft EIR unwilling to confront this issue? Is the issue too subjective? Too difficult? Too controversial? Or, simply, too insignificant? Is there no alternative to a bunch of massive high-rise buildings? (*Chris Stockton, Architect*) [42.1b]

To take that great barge and build 19 high-rise towers is aesthetically very significant. To build one tower 45-stories (or more) tall and 205-feet higher than Yerba Buena Island is aesthetically very significant. To even build towers that are only 125-feet to 450-feet or 30-stories tall is aesthetically very significant. (*Chris Stockton, Architect*) [42.2]

### **Response**

The EIR, under Impact AE-1, in EIR Section IV.B, Aesthetics, pp. IV.B.21-IV.B.23, describes, analyzes, and evaluates impacts on scenic views of the Bay. It concludes that the Proposed Project would have a significant adverse impact on scenic views of the Bay from viewpoints in San Francisco, the East Bay shoreline, and the Bay Bridge East Span. This conclusion is based on the familiarity and exceptionally high quality of the existing San Francisco Bay scenic resource, the regional prominence of the Project Area within views of the Bay, and the scale of proposed new development on Treasure Island.

See the response in Section 2.6, Historic Resources, for information regarding impacts on the visual and historic character of Buildings 1, 2, and 3, and 111.

See the response in Subsection 2.4.4, Nighttime Views and Glare, above, for a response to comments regarding nighttime views.

As discussed under Impact AE-3, EIR pp. IV.B.25-IV.B.27, changes in visual character, even substantial and transformative changes such as those of the Proposed Project, do not in themselves constitute a significant adverse impact on visual character and quality. The EIR concludes that although the Proposed Project would have a transformative effect on the existing visual character of Treasure Island, as seen from Treasure Island, it would not have a significant adverse impact on the visual quality and character of Treasure Island. This conclusion is supported by ample evidence and analysis. Additional support, in the form of new EIR figures to illustrate the intended visual character of Treasure Island, is presented above in Section 2.4.3, Viewpoints.

The discussion of Setting on EIR pp. IV.B.1-IV.B.11 describes how dramatic landforms, familiar built features, water, and sky combine to create views of the Bay that are among the most scenic and recognizable in the world, characterized by spatial clarity and coherence. Impact AE-1, on EIR pp. IV.B.21-IV.B.23, describes how this scenic Bay setting would be affected by the

Proposed Project, introducing prominent new high-rise development at the center of the Bay, creating visual ambiguity, and undermining the visual coherence of Bay views. As discussed on EIR p. IV.B.23, the effect on the Bay scenic resource is considered unavoidable because no effective mitigation measure is available that would avoid or substantially reduce a significant impact on scenic Bay vistas resulting from construction of a new, high-density urban community on Treasure Island. However, unlike the One Rincon tower rising near the Bay Bridge footing, the proposed development on Treasure Island would be separated from the new Bay Bridge East Span by Clipper Cove (by about 2,000 feet).

As shown in Figure IV.B.4: Viewpoint C – View from Twin Peaks, EIR p. IV.B.7, proposed development on Treasure Island is minimally visible, obscured in the distance by San Francisco’s downtown Financial District. If discernible at all, the proposed development on Treasure Island would not detract from the visual primacy of downtown San Francisco in scenic views of the Bay from this vantage point.

As cited in the analysis of Impact AE-3, the discussion of Setting on EIR pp. IV.B.12-IV.B.15 describes the visual character of Treasure Island as viewed from Treasure Island. The existing visual character of Treasure Island is largely defined by Buildings 1, 2, and 3 at the southern end of the island, and by low-scale, widely spaced military support facilities of a utilitarian character. Given its disparate use as the site for the Golden Gate International Exposition and a Naval Station, the island is not characterized by a strong sense of spatial or design cohesiveness. The visual character of Treasure Island as a “green form punctuated by the iconic form and massing of Building 1” represents distant scenic qualities of the island within scenic views of the Bay, as viewed from mainland locations. Impacts on these qualities, as they contribute to scenic views of the Bay are addressed under Impact AE-1, on EIR p. IV.B.21.

The proposed *Design for Development* includes both design standards and design guidelines. Standards, including those governing building height, bulk, façade design and fenestration, and the like, are equivalent to Planning Code requirements, in that compliance with them is mandatory. Design guidelines, although not mandatory, are an effective and widely accepted regulatory tool to shape the future visual character of an area. They establish design standards at a level of specificity that is not typically appropriate for inclusion in zoning codes. Design guidelines inform project sponsors, designers, decision-makers and their staffs of the specific requirements and expectations for high-quality design. As defined in the proposed *Design for Development*, design guidelines are recommendations and preferred elements for projects; compliance with design guidelines is considered to implement the goals and objectives for improvements. TIDA will review all projects for consistency with the mandatory design standards and the design guidelines. Together, the standards and guidelines offer more, not less, regulatory control and predictability than the provisions of the Planning Code alone.

The EIR specifically identifies the Avenue of the Palms as a prominent visual feature that would be impacted by the Proposed Project. Visual impacts resulting from removal of the Avenue of the Palms are described and analyzed on EIR p. IV.B.24. Although it is a prominent and familiar formal visual feature that now defines the western edge of Treasure Island, the Avenue of the Palms was analyzed and found not to be a historical resource, as described in “D.2, Historic Architectural Resources” in EIR Section IV.D, Cultural and Paleontological Resources, pp. IV.D.25-IV.D.61. Therefore, impacts resulting from its removal do not, in themselves, result in a significant impact under CEQA, unless the Proposed Project would result in a significant degradation of the visual quality of the western shoreline of Treasure Island compared to existing visual conditions. The proposed Waterfront Plaza and Cityside Waterfront Park that would replace the Avenue of the Palms would not result in a significant degradation of visual quality with implementation of the requirements and standards of the proposed *Design for Development*.

See also the response above in Subsection 2.4.3, Viewpoints, for a discussion of viewpoints selected for presentation and analysis in the EIR. The 2005 EIR identifies prominent visual features and major views in Figure 3-2 on p. 3-10 of the 2005 EIR. The EIR for the Proposed Project is not bound to the scope of analysis and conclusions of the 2005 FEIR. The analysis and conclusions of the EIR for the Proposed Project are based on the specific information about the existing setting and impacts of the Proposed Project that were not available to the 2005 FEIR, including a detailed evaluation of the historic and architectural significance of the Avenue of the Palms (Prominent Visual Feature #5), and a proposed *Design for Development* which specifies the proposed visual character of the western edge of Treasure Island. Views from the shoreline perimeter of Treasure Island of the Bay and Clipper Cove (Prominent Visual Features #5, #8, and #2 on 2005 FEIR Figure 3-2) would not be substantially affected by the Proposed Project. Bay views from the Ferry Terminal are discussed above in the response under subheading “Views of the Ferry Terminal” in Subsection 2.4.3. Visual conditions at the entry of Treasure Island and Buildings 1, 2, and 3 (Prominent Visual Features, #3, #4, and #7) are discussed on EIR pp. IV.B.12-IV.B.13 and project impacts on these features are addressed on EIR pp. IV.B.23-IV.B.27. As discussed in EIR Chapter II, Project Description, pp. II.31-II.32, the Proposed Project includes a Habitat Management Plan, which identifies the approach for preservation, restoration, and enhancement of the vegetative cover of Yerba Buena Island (“Wooded Slopes of Yerba Buena Island,” Prominent Visual Feature #1 on 2005 FEIR Figure 3-2). The Conference Center Complex (Prominent Visual Feature #6 on 2005 FEIR Figure 3-2) is partially within the Job Corps campus. The portion of this feature that is within the Development Plan Area (bounded by Third Street to the north, Avenue F to the East, California Avenue to the south, and Avenue D to the West) now offers some landscaped visual relief from the built environment of Treasure Island. However, it is not identified as a scenic resource for the purposes of the EIR for the Proposed Project. As noted above, the EIR for the Proposed Project is not bound to the scope of analysis and conclusions of the 2005 FEIR. In any event, its aesthetic and recreational role of

this feature as a greenspace would be subsumed by the proposed open space program under the Proposed Project.

#### **2.4.7 VIEWPOINT MAP CORRECTION**

##### **Comments**

Vol. 1, IV.B.3, Aesthetics: Figure IV.B.1: View Point Locations needs to be corrected to show Alcatraz. Why is Alcatraz not being shown? (*Commissioner Kathrin Moore, San Francisco Planning Commission*) [20.11]

Vol. 1, IV.B.3, Aesthetics: Figure IV.B.1: View Point Locations needs to show View Point D as Fort Baker, not Vista Point. (*Commissioner Kathrin Moore, San Francisco Planning Commission*) [20.13]

##### **Response**

Figure IV.B.1: Viewpoint Locations, on EIR p. IV.B.3, is revised to show Alcatraz Island. It is also revised to show additional photosimulation views called for in these Comments and Responses. The revised figure is shown on the following page.

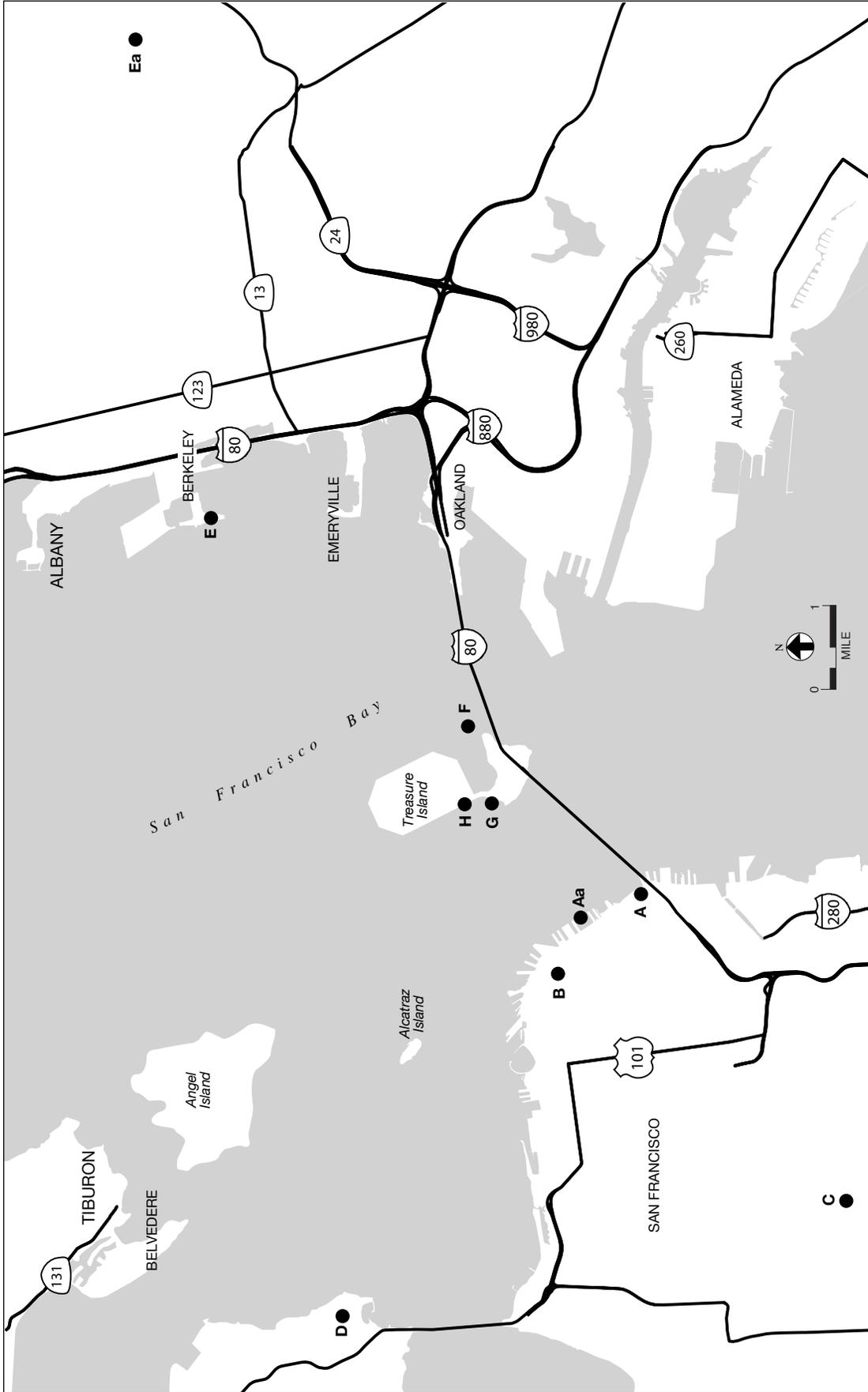
Viewpoint D is correctly identified as Vista Point, not Fort Baker. See the map of the Golden Gate National Recreation Area map at <http://www.nps.gov/goga/planyourvisit/loader.cfm?csModule=security/getfile&PageID=164520g>

#### **2.4.8 CUMULATIVE IMPACTS**

##### **Comment**

Vol. 1, IV.B.29, Aesthetics: Cumulative Impacts under AW-5 fail to analyze the cumulative visual impacts of TI Development with the new TransBay Tower, the tallest building planned in Downtown, close to the Bay. Why doesn't the analysis take into consideration the cumulative visual impact of the new TransBay and the bridge tower of East Span currently under construction? (*Kathrin Moore, San Francisco Planning Commission*) [20.28]

With regard to the Draft-EIR for subject project, item IV.B. Aesthetics, I am stunned that the discussion is so cursory and glib, concluding on page IV.B.30 that, "the proposed project would not have significant cumulative impacts related to Aesthetics." (*Chris Stockton, Architect*) [42.1a]



SOURCE: Turrstone Consulting

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.B.1: VIEWPOINT LOCATIONS**

### **Response**

Cumulative impacts are discussed in EIR Section IV.B, Aesthetics, on p. IV.B.29, which states:

Although the Proposed Project would have significant and unavoidable impacts on scenic vistas of the Bay, these impacts would not contribute to cumulative degradation of scenic vistas and visual quality when considered with anticipated projects on mainland locations around the perimeter of the Bay. There are no other development projects that are proposed nearby. The Project Area is located at the center of San Francisco Bay, physically separated from the surrounding mainland around the perimeter of the Bay by wide expanses of open water (distance from the San Francisco Peninsula, about 1.6 miles; from the East Bay shoreline, about 3.5 miles; from Marin, about 6 miles). To the extent that anticipated future development around San Francisco Bay would be visible when viewing the Proposed Project, it would be seen in expansive long-range views. Future development within these mainland areas would not be prominent (if discernible at all) when viewed in the context of the Proposed Project from distant vantage points around the perimeter of the Bay.

The analysis of impacts from the East Bay and Bay Bridge East Span includes photosimulations, descriptions, and analysis of the cumulative effect of the Proposed Project considered with the new Bay Bridge East Span.

Views of the TransBay Tower would be largely obscured by the vertical rise of Yerba Buena Island, and/or blend into the distant background context in views of the Bay (see Figure IV.B.6: Viewpoint E – View from the Berkeley Marina, and Figure IV.B.7: Viewpoint F – View Looking West from the New Bay Bridge East Span). TransBay Tower, where visible at all within views of the Proposed Project, would not participate prominently. Likewise, the Proposed Project would not participate prominently in views that would include the TransBay Tower (see Figure IV.B.4: Viewpoint C – View from Twin Peaks). As such, the Proposed Project’s impact on scenic views of the Bay would not combine with those of the TransBay Tower to result in a significant cumulative impact.

In addition, as explained in section 15130(b) of the *CEQA Guidelines*, the discussion of cumulative impacts need not provide “as great detail as is provided for the effects attributable to the project alone.” The analysis in the EIR is at the appropriate level mandated by CEQA.

### **2.4.9 BUILDING HEIGHTS**

#### **Comment**

According to the DEIR, the northern part of TI currently contains almost exclusively two-story buildings, the central part contains buildings up to three or four stories tall in height, and the south end of the island contain five-story buildings and hangers that are the tallest structures on the island. These buildings are typically widely separated over the island.

• In addition to the more specific information requested under Impact CP-11 and CP-12, below under our comments on Historic Resources, please provide the following information:

- Please provide a list of the heights of all of existing buildings on TI, including the NR listed buildings 1, 2 and 3.
- What is the average height of all existing buildings on TI?
- Please provide in list format the heights of all of existing buildings on YBI, including the historic Nimitz House and Senior Officers' Quarters and the Torpedo Factory.
- For both TI and YBI please show on a map a presentation of all existing buildings (with their heights) and indicate which buildings will be demolished as a part of the Proposed Project. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.33]

The DEIR says that 50 percent of the new housing units would be in “low rise buildings up to 70 feet,” Punctuated by “*mid-rise buildings from 70 to 130 feet and neighborhood high-rise towers up to 240 feet serving as neighborhood markers.*” The DEIR states that the tallest building would be 650 feet.

- What is a “*neighborhood marker*”?
- On what basis does the DEIR conclude that 70 ft tall buildings are “low rise” buildings, particularly when the tallest building on TI is 50 stories tall? Low-rise buildings in San Francisco are usually considered to be less than 40 feet tall.
- On what basis does the DEIR conclude between buildings between 70-130 feet in height are “mid-rise” buildings? Please compare these heights to buildings in San Francisco.
- Please compare the proposed heights of the 20 highest buildings proposed to be constructed on TI to the height of the west span towers of the Bay Bridge; the vertical clearance under the Bridge; and the height of YBI. Illustrate these height comparisons side by side for a visual comparison. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.34]

### Response

The EIR, in Chapter II, Project Description, p. II.9, states “Outside of the Job Corps campus, Treasure Island alone currently has approximately 725 occupiable housing units ... The housing units are mostly in two-, four-, and eight-unit two-story buildings; there are also barracks once used by military personnel (now unusable).” EIR Section IV.B, Aesthetics, states on p. IV.B.12 that Building 1 at the south end of the island is three stories. In discussing proposed building heights, the EIR, on p. II.24, states that “approximately 51 percent of all housing units are anticipated to be in low-rise buildings.”

The last sentence of the second paragraph on EIR p. IV.B.19 is revised as follows to delete the term “neighborhood marker” as redundant and unnecessary (deletions are shown in ~~strike through~~ and new text is underlined):

Within two residential districts, the Cityside and Eastside Districts, individual blocks would consist primarily of a dense, low-rise podium (up to 70 feet) punctuated by mid-rise buildings (between 70 and 130 feet) and neighborhood high-rise towers (up to 240 feet) ~~serving as neighborhood markers.~~

The EIR provides adequate information and analysis to enable decision-makers to make informed decisions that take into account the environmental consequences of the Proposed Project related to Aesthetics. The abstract numerical height comparisons and graphical material requested by the comment would not contribute substantially to the understanding of impacts on scenic views or visual character and quality, as the setting and impacts of the Proposed Project are not experienced in these terms, but would be viewed from an actual position on the ground in three dimensions in an actual visual setting.

See the response in Section 2.1, Project Description, Subsection 2.1.2.2, Height Limits, of this Comments and Responses document, for information regarding low- mid- and high-rise buildings as discussed in this EIR and regarding proposed height designations.

#### **2.4.10 AVAILABILITY OF THE DESIGN FOR DEVELOPMENT**

##### **Comment**

How come I can't go online and look at the pictures of the high-rises of the Financial District that you guys are proposing to build in the middle of the Bay? How come the people from Berkeley and Alameda and Sacramento and Stockton and Tracy can't look at what San Francisco? How come people can't see that? How come the secrecy? (*Paul Curriers*) [TR.6.3]

##### **Response**

The proposed *Design for Development* includes numerous images of the proposed development. It was posted to TIDA's website in March 2010, and is available to download as six separate pdf files under the heading Design for Development for Treasure Island and Yerba Buena Island – March 5, 2010 on the Master Development submittals page:  
<http://www.sftreasureisland.org/index.aspx?page=26>.

## 2.5 POPULATION AND HOUSING

### 2.5.1 IMPACTS AND AFFORDABILITY OF HOUSING RELOCATION

#### Comments

Furthermore, the Relocation Plan, as it stands today, will tear us apart. It will scatter us out onto Treasure Island indefinitely, not keep us together as a group, and then make it so onerous that we have no interest in staying. For example, I'm expected to move from a three-bedroom apartment with my wife to a one-bedroom on Treasure Island. And then after, that price us out of YBI after development. Why not designate land on Yerba Buena Island that will accommodate the residents who live there today? If we know we have somewhere to come back to, we can take care of ourselves during the redevelopment. We'll be fine (*Ken Masters*) [TR.9.1b]

Although economic impacts are not evaluated in an EIR, the project should include an analysis of funding sources to determine if the project can remain revenue neutral. The analysis should review the relocation of residents if they would not be able to afford the rates. Prior to decision making, it is important to know if San Francisco residents will be burdened by the costs, and if affordable rules can be guaranteed for Treasure Island residents.

The rate structure may limit the ability for middle-to-low-income residents to remain on Treasure Island. Once the rates are established, an analysis could be conducted for population and housing. Until then, it is unknown if the rates are acceptable and support middle-to-low-income residents. (*Rosie Masters*) [TR.17.1]

Regional housing needs allocation should be specifically reviewed to determine the personal affordable units and income levels, with the subset analysis on costs to those qualified for affordable housing application. (*Rosie Masters*) [TR.17.3]

#### Response

The comment correctly states that economic impacts are not evaluated in an EIR. Economic information regarding the cost of replacement housing and the affordability levels for such replacement housing will be provided to decision-makers as part of the material to be considered during deliberations about the replacement housing plan, which would be prepared in conjunction with the Infrastructure Financing District process.

In addition, as described in the EIR in Chapter II, Project Description, pp. II.28-II.29, and in Section IV.C, Population and Housing, pp. IV.C.13-IV.C.14, the Proposed Project would include a transition housing program that would provide the opportunity for existing, qualifying households on the Islands to move into new housing built during phased construction within the Project Area. The express intent of the transition housing program is to

avoid displacement of existing residents throughout the Project Area, including Yerba Buena Island residents. The transition housing program would be available for all eligible residents of the Islands at the time of the execution of the DDA who continuously remain Island residents in good standing during project development. As stated on pp. II. 28-II.29, at the time of the DDA's approval, TIDA would adopt a set of rules and regulations that would define the benefits available under the transition housing program, including the process for notifying and moving existing residents. Compliance with these transition housing rules and regulations would be a requirement under the Proposed Project's DDA.

As stated on pp. IV.C.13-IV.C.14, the new housing would be leased to the existing residents eligible for transition housing at a price no greater than their rent at the time of DDA approval, plus annual adjustments for inflation. Depending upon the income of the household, the housing may be leased at rents lower than the household's rent at the time of DDA approval, plus annual adjustments for inflation. New unit sizes for transitioning households are anticipated to remain the same as current unit sizes, with exceptions if a portion of the household moves out between the DDA date and the 'Notice to Move' date.<sup>1</sup> Transitioning households would also receive moving assistance to cover the costs associated with their move to the new units. Finally, the transition housing program would include down payment assistance for eligible transitioning households who wish to purchase a home on the island, as long as they can qualify to do so. These provisions of the transition housing program would help ensure that existing residents living on the Islands would be able to remain on the Islands, and have the opportunity to reside in housing that is affordable.

● The Proposed Project would include an Affordable Housing Program, which is described on EIR pp. II.28-II.29. Under the program, TIDA has agreed to provide up to 25 percent or 2,000 units that would be affordably priced at a range of below-market rates. At least 20 percent of the affordable units would be affordable to very-low-income residents.<sup>2</sup> The project would exceed the 15 percent inclusionary housing requirement of Section 415 of the Planning Code. The Proposed Project would also exceed the California Community Redevelopment Law requirement

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<sup>1</sup> In January 2011, the Draft Transition Housing Rules and Regulations were published and presented to the Citizen's Advisory Board and TIDA Board for their comments. TIDA will not approve the program unless and until the EIR is certified and the Proposed Project is approved.

<sup>2</sup> Moderate-income households are defined as earning no more than 120 percent of the area median income levels for San Francisco, as published by the California Department of Housing and Community Development (California Health & Safety Code Section 50093). Low-income households are those earning no more than 80 percent of area median income. Very-low-income households are generally those earning no more than 50 percent of area medium income.

that 15 percent of all new housing units be affordable to low- and moderate-income households, although this requirement would no longer be applicable. The Proposed Project would also exceed the requirements of State law for an Infrastructure Financing District (“IFD”). Under State law, within an IFD, if residential units housing low- or moderate-income persons or families are destroyed or taken out of the low- and moderate-income market as part the activities of an IFD, the district must cause replacement of those units with new or rehabilitated low- and moderate-income units within four years after they are destroyed or removed from the housing market. In addition, within an IFD, 20 percent of the units that are destroyed or removed that are occupied by persons or families above moderate income must be replaced within the four-year time frame. Replacement units may be located anywhere within the district. All of the replacement units must be affordable to low- or moderate-income households. The Proposed Project is expected to include approximately 5 percent of the affordable units (up to about 316) in market-rate buildings, which would be sold or leased as inclusionary housing. Up to around 1,684 units (which could be a mix of rental and for-sale units) would be in stand-alone, affordable buildings, of which up to around

1,249 units would be constructed by developers selected by TIDA, and approximately 435 units would be in programs developed and operated by the Treasure Island Homeless Development Initiative (“TIHDI”) or its designee.

The TIHDI units would consist of land and funding to replace 250 units in the existing housing managed and operated by TIHDI housing providers, as well as land for an additional 185 residential units. These TIHDI units would generally be for formerly homeless (extremely low-income) families.

A minimum of 20 percent of the proposed residences would be sized for families. EIR pp. IV.C.15-IV.C.16 describe the Proposed Project’s compliance with the affordable housing

- production requirements and compare them with the requirements under State law and the City’s Inclusionary Housing Program (Section 415 of the Planning Code).

The second bullet on p. II.28 is revised as follows to clarify the total number of stand-alone affordable housing units proposed (deletions are shown in ~~strike through~~ and new text is underlined):

- - Stand-alone Affordable Housing. Up to 1,684 units (which could be a mix of rental and for-sale units) would be in stand-alone, affordable buildings, of which up to around 1,249 units would be developed by developers selected by TIDA or its designee. ~~Up to 1,685 units would be in stand-alone, completely affordable buildings implemented by TIDA or others.~~ The TIDA units would likely include a mix of rental and for-sale units and would target very-low-, low-, and moderate-income households.

A comment also notes that the Association of Bay Area Governments’ (“ABAG”) regional housing needs allocation should be specifically reviewed to determine the affordability and

- income levels needed for the proposed units. As noted above, the Proposed Project, as a whole, would exceed the 15 percent affordable housing requirement of Section 415 of the Planning Code, and also would exceed the CRL requirement that 15 percent of all new housing units be affordable to low- and moderate-income households, although a Redevelopment Plan is no longer proposed and the CRL requirement would not apply. In addition, within an Infrastructure Financing District if residential units housing low- or moderate-income persons or families are destroyed, or taken out of the low- and moderate-income market as part of the activities of an IFD, the district must cause replacement of those units with new or rehabilitated low- and moderate-income units within four years after they are destroyed or removed from the housing market. In addition, within an IFD, 20 percent of the units that are destroyed or removed that are occupied by persons of families above moderate income must be replaced within the four-year time frame. Replacement units may be located anywhere within the district. All of the replacement units must be affordable to low- or moderate-income households. Compliance with these requirements would ensure that the housing programs on the Islands complement the City’s efforts to meet the Housing Element goals and objectives.

## 2.5.2 ECONOMIC EFFECTS

### Comment

Furthermore, the DEIR fails to study the job locations and effect on transportation and consequential trip generation for affordable housing residents. There has been a complete failure of the DEIR to study the project's social economic effects on the Project's demographics and surrounding communities. In particular, it is most likely that a non-profit affordable housing entity in partnership with the San Francisco Housing Authority will end up being the owners of the projected affordable housing units. As such, in anticipation of the future costs and burdens having to be sustained by that affordable housing partnership, there will be significantly less resources available to develop future affordable housing. This affordable housing would be in existing San Francisco housing locations that are more properly situated where such residents are likely to have access to local employment, readily-available, public transportation (i.e., transit villages), and retail/necessary services – all of which are not only major factors on the budgets of those individuals (and they are the ones that can least afford these budget burdens), but will also significantly reduce traffic greenhouse and air quality impacts. In fact, this very concept has been addressed by the passage of recent state laws, including but not limited to AB-32. Consequently, these matters constitute a significant impact that should be studied in the DEIR with viable proposed mitigation measures. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.36]

### Response

The comment raises concerns about the socio-economic effects the Proposed Project's demographics would have on surrounding communities, and asserts that the non-profit affordable housing on Treasure Island would likely be owned by the San Francisco Housing Authority. The comment also asserts that the proposed affordable housing would drain resources from development of other affordable housing at existing locations in San Francisco that would provide better access to employment, public transit, and retail services.

The comment does not provide data to support the conclusions stated. The affordable housing on the Islands is not expected to be owned or managed by the Housing Authority. The stand-alone affordable housing in the Proposed Project is assumed to be developed by experienced affordable housing developers selected by TIDA or by one of TIHDI's housing development member organizations. TIHDI is a coalition of approximately nine private, non-profit service and housing providers, some of which currently manages approximately 250 units of existing housing for the homeless and formerly homeless (extremely low-income) families on Treasure Island; refer also to the response presented in Section 2.5.1, Impacts and Affordability of Housing Relocation, above. Under the proposed DDA, TIHDI would continue to operate these units until an equivalent number of new replacement units is built, and would also be provided land on Treasure Island for an additional 185 residential units, expanding the program to a total of 435 units, subject to conveyance of the property from the Navy to TIDA and implementation of the Proposed Project. The Term Sheet between TIHDI and TIDA contemplates that the land for the

TIHDI housing would continue to be owned by TIDA, but could also be sold by TIDA to a qualified TIHDI housing developer.

The Proposed Project would provide a dense, mixed-use residential community that would be supported by neighborhood retail, community services, cultural facilities, recreation and open space, and new and improved transit service, all of which would provide opportunities for residents to meet their day-to-day needs on the Islands. Proposed new and improved inter- and intra-Island transit service would also maximize job access for residents. These characteristics of the Proposed Project would also help to reduce potential greenhouse gas emissions and air quality impacts. The analyses of greenhouse gas emissions and air quality in the EIR (Sections IV.H and IV.G, respectively) account for all residents in the proposed housing, including residents of the affordable units. Mitigation measures are identified in the EIR where needed to reduce identified significant impacts.

### **2.5.3 POPULATION PROJECTIONS**

#### **Comment**

Simple application of population to housing units (either present or 2030 ABAG projected) would place the islands' residents at around 18,500. In addition there would be the normal daytime influx of workers, tourists and recreational users, less those residents who go off-island. A usable comparison statistic might be the 2030 San Francisco Supervisorial District average of about 72,700 residents. The TI/YBI plan should consider what amount of retail, office, services, etc. is commensurate with a mere quarter of such a District. Obviously transit, both inter- and intra-island creates a unique situation due to the geography – and it must also account for the anticipated recreational and tourist use. (*Ron Miguel, President, San Francisco Planning Commission*) [7.2]

#### **Response**

The comment questions whether an adequate amount of services proposed for the daily population on the Islands, which would include residents, workers, recreational users, and other visitors, would be provided. As stated in the response in Section 2.5.2, Economic Effects, above, and in EIR Section IV.C, Population and Housing, p. IV.C.14, full occupancy of the 7,195 net additional residential units within the Development Plan Area would increase the existing on-site residential population from about 1,820 people to about 18,640 people in 2030. As described in EIR Chapter II, Project Description, p. II.2, the Proposed Project would replace the existing occupiable 805 units on Treasure Island (about 725 units) and Yerba Buena Island (about 80 units) with up to approximately 8,000 new residential units; and provide retail, commercial, and community services that include about 140,000 square feet (“sq. ft.”) of new commercial and retail space; approximately 100,000 sq. ft. of new office space; adaptive reuse of historic Buildings 1, 2, and 3 with up to approximately 311,000 sq. ft. of commercial space, which includes about 67,000 sq. ft. of adaptively reused retail space; approximately 500 hotel rooms;

and 300 acres of parks and open space supported by bicycle, transit, and pedestrian facilities; a Ferry Terminal and intermodal Transit Hub; and new and/or upgraded public services and utilities, including a new or upgraded wastewater treatment plant, public school, and a new combined police and fire station. The intended purpose of an EIR is to inform public agency decision-makers and the public of the significant environmental effects of a defined project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The intent of an EIR is not to evaluate the adequacy of programmatic features of a project. The adequacy of the proposed development program may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project; however, it is not a physical environmental impact that requires analysis in this EIR.

This comment questions population projections cited and analyzed in the EIR and asserts that more appropriate comparison statistics should be used. As stated above, full occupancy of the 7,195 net additional residential units within the Development Plan Area would increase the existing on-site residential population from about 1,820 people to about 18,640 people in 2030. As described on EIR p. IV.C.1, the existing and proposed population and employment projections presented in the EIR section are based on 2000 U.S. Census data, *American Community Survey 2006-2008* data, ABAG's *Projections 2007* data,<sup>3</sup> ABAG's *San Francisco Bay Area Housing Needs Plan 2007-2014*, and the City's 2009 *Draft Housing Element Part 1: Data and Needs Analysis*. Estimates of existing housing units and characteristics presented in the EIR are based on 2000 U.S. Census data and *Projections 2007* data. These various projections provide the most recognizable and widely used sources for population and employment data in San Francisco and throughout the San Francisco Bay Area region, and therefore provide the most reliable data for analysis in this EIR.

Comments are also raised about the adequacy of transit service, both inter- and intra-island. Potential effects on transit services, including impacts to Muni, ferry services, Golden Gate Transit, and SamTrans, are discussed in EIR Section IV.E, Transportation. Travel demand for the Proposed Project takes into account intra-and inter-Island trips as well as visitor/tourist/recreational trips to and from the Islands, as discussed on EIR pp. IV.E.55-IV.E.61. Refer also to information presented in EIR Appendix C, *Treasure Island and Yerba Buena Island Transportation Impact Study*, pp. 63-100.

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<sup>3</sup> ABAG is the regional agency responsible for preparing forecasts of population, housing, and job growth in the nine Bay Area counties and their cities. Though ABAG's 2009 edition (*Projections 2009*) of its biennial forecast of population, housing, jobs, and income for the nine-county San Francisco Bay region is available, this EIR analysis uses ABAG's 2007 edition (*Projections 2007*).

#### **2.5.4 IMPACTS ON EXISTING RESIDENTS**

##### **Comment**

Vol. 1, IV.C.7, Population and Housing: Where is an analysis of impact on the existing resident population on TI and YBI? When are they impacted, how often, and how long will they be impacted -when and where? (*Kathrin Moore, San Francisco Planning Commission*) [20.29]

##### **Response**

The impacts of the Proposed Project on the existing residents, including construction-related and project operational impacts, are addressed in the appropriate sections of the EIR.

As discussed in EIR Chapter II, Project Description, on p. II.78, construction and buildout of the proposed Development Program would be phased over an approximately 15- to 20-year period. Buildout of the Proposed Project is expected to result in a resident population of about 18,640 persons, an increase in about 16,820 persons from the existing 1,820 persons currently residing on the Islands. As discussed on EIR pp. IV.C.13-IV.C.14, and in the response in Section 2.5.1, Impacts and Affordability of Housing Relocation, above, existing residents would have the opportunity to move into new housing built during phased construction within the Project Area. The express intent of the transition housing program is to avoid displacement of existing residents throughout the Project Area. The proposed DDA, which is part of the Proposed Project, would require compliance with the Transition Housing Rules and Regulations that would be adopted by TIDA and attached to the Housing Plan.

Impacts on the existing population related to other environmental topics during project construction and operation, including the topics of land use, transportation, noise, air quality, recreation, utilities and service systems, public services, hazards and hazardous materials, are discussed in Chapter IV of the EIR in Section IV.A, Land Use; Section IV.E, Transportation; Section IV.F, Noise; Section IV.G, Air Quality; Section IV.J, Recreation; Section IV.K, Utilities and Service Systems; Section IV.L, Public Services; and Section IV.O, Hazards and Hazardous Materials. Mitigation measures have also been identified in these sections, where appropriate, to avoid or to minimize significant impacts to less than significant.

#### **2.5.5 EXISTING BUSINESS DISPLACEMENT**

##### **Comment**

I am writing as a resident on Treasure Island and ask that you consider the impact of redevelopment on current businesses on the Island.

For several years now businesses have added to our quality of life that have been unfulfilled by others. They have brought us services and in some cases, cultural opportunities.

Such companies as Treasure Island Wines, Jade Studio, the Gaelic Football League, the convenience store at the front gate, and others have brought services and a "flavor" to the island that has helped to build the sense of community.

I recognize that not all current business may be a good fit for the redevelopment, but certainly those listed above, and others, should receive consideration as they are contributing to the established community on Treasure Island.

Please help us find a place for these current business partners in future of Treasure Island. (*Mark Connors, Resident, Treasure Island*) [34.1]

### **Response**

The comment requests that existing businesses be afforded the opportunity to continue operating on the Islands as part of the Proposed Project. As identified in EIR Section IV.C, Population and Housing, p. IV.C.12, along with the approximately 8,000 new residential units, the Proposed Project includes about 140,000 square feet ("sq. ft.") of new commercial and retail space; approximately 100,000 sq. ft. of new office space; adaptive reuse of historic Buildings 1, 2, and 3 with up to approximately 311,000 sq. ft. of commercial space, which includes about 67,000 sq. ft. of adaptively reused retail space; approximately 500 hotel rooms; and 300 acres of parks and open space.

- Existing businesses, other than those that are on the Islands on an interim or temporary basis, would be extended a reasonable preference to reenter in business on the Islands.

Under CEQA, specific proposed retail and commercial tenants within the planned land uses on the Project Site are not required to be individually analyzed in an EIR. Decision-makers may consider project-related impacts to existing businesses along with other non-environmental considerations when deliberating on whether to approve or disapprove the Proposed Project.

## **2.5.6 HOUSING AND DESIGN CONCEPT**

### **Comment**

I think that this project, as much as any we've seen, is going to push the envelope, really expand what's possible, and where the direction of new housing and new community and design and balance is going to go in the United States. (*Tim Colen, San Francisco Housing Action Coalition*) [TR.2.1]

### **Response**

The comment expresses general support for the Proposed Project and states that it would provide a new direction for housing and community design. The comment, however, does not address the adequacy or accuracy of the information presented in the EIR and no further response is required. This comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project. EIR Chapter II, Project Description, pp. II.16-II.22, summarizes the development plan characteristics and overall development and design concept.

### **2.5.7 JOBS AND HOUSING OPPORTUNITIES**

#### **Comments**

The plan represents real opportunities to provide housing and jobs for 4 million homeless and very low income San Franciscans. EIR cites both the housing that will be available for TIDI and the job opportunities that will be created through redevelopment. We look forward to both expanding the number of formerly homeless people who will now have a place to call home, as well as those who will earn income through the TI Redevelopment.

A key component of this for us is that none of our existing residents will be displaced. (*Sherry Williams, Treasure Island Homeless Development Initiative*) [TR.4.2]

...but to the facts that the jobs that are needed in the entire California. It's a known fact that for every construction worker employed it creates many residual jobs in the process. (*Richard Weller, Local 34, Pile Drivers*) [TR.7.1]

We can support Treasure Island with many new jobs. It would also create jobs, full-time jobs, other than construction work. (*Richard Weller, Local 34, Pile Drivers*) [TR.7.3]

#### **Response**

The comments express general support for the Proposed Project, stating that it would provide needed housing, and employment opportunities on the Islands, both during construction and operation of the Proposed Project. The comments also state the opinion that is important that the Proposed Project provide facilities to serve the daily needs of Island residents.

EIR Chapter II, Project Description, pp. II.28-II.29, describes the Proposed Project's transition housing program, which would be established before existing residential units are deconstructed, to ensure that existing, qualifying, households have the opportunity to continue living on the Islands if they choose. The express intent of the transition housing program would be to avoid displacement of existing residents.

As described in the response in Section 2.5.1, Impacts and Affordability of Housing Relocation, above, and in EIR Section IV.C, Population and Housing, p. IV.C.15, the Proposed Project would also include land and funding to replace 250 units in the existing TIHDI housing, as well as land

for an additional 185 residential units, expanding the program to a total of 435 units subject to conveyance of the Property to TIDA and implementation of the Proposed Project. These TIHDI housing units would generally be for formerly homeless (extremely low-income) families.

The EIR identifies operational and construction employment opportunities and impacts in Section IV.C, Population and Housing, pp. IV.C.12-IV.C.14 and pp. IV.C.17-IV.C.19. Direct, but temporary, construction job growth within the Development Plan Area would occur as a result of the Proposed Project. Data on construction-generated worker trips is analyzed in the EIR both in Section IV.H. Greenhouse Gas Emissions, pp. IV.H.35-IV.H.36, and in Section IV.C, Population and Housing p. IV.C.13. The estimated number of daily average and maximum construction employment is presented in slightly more detail than the overall phasing described in Chapter II, Project Description. These analyses break construction employment into five construction phases: during Phase 1, an average of 930 and a maximum of 1,250 construction employees; during Phase 2, an average of 1,200 and a maximum of 1,350 construction employees; during Phase 3, an average of 1,200 and a maximum of 1,500 construction employees; during Phase 4, an average of 1,150 and a maximum of 1,300 construction employees; and during Phase 5, an average of 800 and a maximum of 950 construction employees.

These comments, which generally express support of the Proposed Project, may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

### **2.5.8 DEMOGRAPHICS**

#### **Comment**

And I don't find that essence of the story here. This project, of course, is creating a whole new neighborhood, actually the size of a small city, in a uniquely physically isolated location, in the Bay, in the City of San Francisco. That makes it very different than the other similarly-scaled projects at Mission Bay and Hunter's Point Shipyard, where there are adjacent neighborhoods right next to them, literally, physically, to support them. And in my mind, that's a critical thing that really is crucial when considering the environmental consequences of what we're doing.

I looked to find out the details of the population of this future new small city we're building in the Bay, and I could find a number of 18,000 and some in the Public Services section, but I really couldn't find anything else about who they might be in that location. Looking around, you could find a school-age population, but I couldn't find a preschool population. I couldn't find a senior population. I didn't see estimates for how many would be lower income households for affordable housing. I just really couldn't get a handle on who is going to live there. (*John Elberling, TIDA*) [TR.23.1]

#### **Response**

The comment raises questions about the environmental consequences of constructing the Proposed Project given its physically isolated location, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the EIR. The comment may be

considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

The comment further queries the potential demographics of the new residents who would occupy buildings constructed as part of the Proposed Project. EIR Section IV.C, Population and Housing, pp. IV.C.14-IV.C.17, states that the projected population of the Project Area at buildout would total about 18,640 persons. The Planning Department's Initial Study Checklist does not require analysis of specific demographic data, including gender, age, race, or income. EIR Chapter II, Project Description, pp. II.28-II.29, and pp. IV.C.13-IV.C.14 discuss the Proposed Project's transition housing program and the number of affordable units planned under the Project. See also the response in Section 2.5.1, Impacts and Affordability of Housing Relocation, above.

The comment also questions why preschool population information is not presented in the EIR. As stated above, the Planning Department's Initial Study Checklist does not require analysis of specific demographic data, including gender, age, race, or income in the Population and Housing section. However, the analysis of school capacity and the potential impacts on the school-aged population on the San Francisco Unified School District ("SFUSD") at full buildout is discussed in EIR Section IV.L, Public Services, pp. IV.L.25-IV.L.29. There would be an estimated 1,695 school-aged students that would enroll in SFUSD schools. Of these children, 808 would be of preschool and elementary school-age, 380 would be of middle school-age, and 507 would be teenagers of high-school age.

The last sentence on p. IV.L.25 and the paragraph at the top of p. IV.L.26 are revised as follows (deletions are shown in ~~strike through~~ and new text is underlined):

The new school would likely serve pre-kindergarten (preschool), elementary, and middle school students;<sup>25</sup> high school students would most likely continue to attend schools in other parts of San Francisco.<sup>26</sup> For planning purposes, about 48 preschool aged children were estimated.<sup>27</sup> The remaining 1,647 ~~1,695~~ students were distributed evenly by grade. ~~Currently, a~~ As shown in Table IV.L.1, a total of approximately 1,695 school-age children would live on the Islands following full build-out of the Project. As of 2009, approximately 320 students live on the Islands.<sup>28</sup>

The new footnote for this text change, to be added to p. IV.L.26, is shown below, and subsequent footnotes in the section will be renumbered accordingly. There are no other changes to the footnotes on this page.

<sup>27</sup> Factor is based on the 2010 SFUSD Child Development Center (CDC) enrollment of 1,559 students, or about 2.86 percent of total 2010 SFUSD student enrollment. (1,695 students x 0.0286 = about 48 preschool aged students.)

Table IV.L.1: Public School Enrollment at Project Buildout Compared to SFUSD Capacity, on p. IV.L.27, is revised as follows (deletions are shown in ~~strike through~~ and new text is underlined):

**(Revised) Table IV.L.1: Public School Enrollment at Project Buildout Compared to SFUSD Capacity**

Area	<u>Preschool / Elementary School (Grades Preschool-5 <del>K- 5</del>)</u>	Middle School (Grades 6-8)	High School (Grades 9-12)	Total
Project Area (estimated)	<u>808</u> <del>785</del>	<u>380</u> <del>390</del>	<u>507</u> <del>520</del>	1,695
2030 Citywide Enrollment <sup>1</sup>	33,036	16,518	22,024	71,573
2009 SFUSD Capacity	29,260	11,700	17,575	63,835 <sup>2</sup>
2030 Projected Shortfall	3,776	4,818	4,449	7,738
New Treasure Island School Capacity <sup>3</sup>	1,200	800	0	2,000

*Notes:*

<sup>1</sup> Categories may not add up to total due to rounding.

<sup>2</sup> Total includes capacity for 5,300 students in varying grade levels in alternative schools and public charter schools.

<sup>3</sup> Based on combined average size of elementary and middle schools within SFUSD. See Comparison of Number of Students Living in Each SF City Planning Neighborhood with Elementary and Middle School Capacity, found at <http://portal.sfusd.edu/data/epc/Comparison%20of%20Number%20of%20Students%20Living%20in%20Each%20SF%20City%20Planning%20Nhood.pdf>, accessed June 20, 2010.

*Source:* ABAG Projections, 2007; Turnstone Consulting, 2009.

## 2.6 HISTORIC RESOURCES

### 2.6.1 CONCURRENCE WITH EIR

#### Comment

The DEIR includes a comprehensive list of buildings and structures on Yerba Buena Island and Treasure Island that are considered historical resources for purposes of CEQA.<sup>1</sup> Those already listed in the National Register of Historic Places include Building 1 (the Administration Building), Building 2 (the Hall of Transportation), Building 3 (the former Palace of Fine and Decorative Arts), the Senior Officers' Quarters Historic District (also known as the "Great Whites"), Quarters 10 and its contributing garage (Building 267), and the Torpedo Assembly Building (Building 262).

The DEIR also evaluates thirteen individual extant buildings and structures that have reached 50 years in age. Of those thirteen, two were found to meet the criteria for inclusion in the California Register of Historic Resources (CRHR). The Damage Control Trainer *USS Buttercup* (housed in Building 341) is determined eligible under Criterion 3 -Design Construction, and the landscape elements that surround Buildings 1, 2, and 3 were found to contribute to the significance of the buildings under California Criterion 1 -Events, for their association with the Golden Gate International Exposition of 1939. Based on the information provided in the DEIR, Heritage concurs with these findings.

With regard to potential impacts on the above-mentioned historic resources, we agree that the proposed rehabilitation of Buildings 1, 2, and 3 will not result in a significant adverse impact, as the project's Design for Development guidelines require that all work be consistent with the Secretary of the Interior's Standards for Rehabilitation. Likewise, the proposed project would not alter the contributing landscape areas of Buildings 2 and 3 in a manner that would significantly diminish their ability to contribute to the significance of the resource as it exists now. However, as acknowledged in the DEIR, the proposed project will have a significant and unavoidable adverse impact on the *USS Buttercup* battleship simulator.

<sup>1</sup> Although not included in the DEIR, three previous historic resource surveys of Yerba Buena Island and Treasure Island are referenced in support of its findings. These surveys should be made available for public review in conjunction with the release of the Final EIR. In particular, Heritage would like to see if they contain information about the chapel, completed in 1943, which may potentially be a contributing resource, and which has been the subject of some public comment. (*Mike Buhler, Executive Director, San Francisco Architectural Heritage*) [18.1b]

#### Response

This comment expresses general concurrence with the analysis and basic conclusions of the EIR. The previous historic resource surveys referenced in the Draft EIR were and continue to be available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E as part of the record for the EIR. For more information regarding the chapel, see Subsection 2.6.2, Navy Chapel, below.

## 2.6.2 NAVY CHAPEL

### Comments

In addition, retention and preservation of the Base Chapel must be thoroughly explored. This should be done in light of its historic standing: serving the Navy, active duty, reserve and retired – as a site for regular services in addition to thousands of weddings and funerals. As a retired florist I personally serviced innumerable weddings and funerals in the Chapel during the later half of the 1900's – there is a long tradition here. Certainly, if the concept is one of 'community' for 18,500. people, providing a place of worship should be equal to providing an educational institution. (*Ron Miguel, President, San Francisco Planning Commission*) [7.7]

8. Concurring with TIDA Director Elberling, who made his feelings clear at the joint TIDA/Planning Commission meeting on August 12, 2010, the CAB considers the Navy Chapel an historic resource worthy of preservation. The DEIR doesn't address this resource and needs to be amended. The CAB strongly supports a preservation alternative which maintains the Chapel and keeps it on the island. (*Treasure Island/Yerba Buena Island Citizens' Advisory Board*) [8.8]

Vol. 1, IV.B.23, Aesthetics: Impact AE-2: Fails to identify the Naval Chapel as a Historic Resource. Nowhere in the DEIR is there a mention of the Chapel. Why isn't the chapel shown under: Existing Buildings? (*Kathrin Moore, San Francisco Planning Commission*) [20.21]

Of course the Chapel is the key building at issue in this matter, which is located on the site of the proposed Culture Park and thus may not necessarily be demolished, although the Program does not include it even as a contingency, which it should, and which the Program addition of 50,000 sq ft to the Program per 2. above would include. The Chapel is currently located where the Plan proposes a "culture park," but apparently the Chapel is demolished in the process. If that is the Plan, then this needs to be stated clearly. (*John Elberling, TIDA Board Member*) [22.4]

Please find attached our petition of 316 signatures to grant the chapel on Treasure Island the same status as the Great White Mansions on Yerba Buena Island and to preserve the building in a manner consistent with the other historic buildings on the base.

For decades the chapel served the millions of navy personnel that were stationed at or departed from Naval Station Treasure Island. For many it was the spiritual heart of the base and provided a non-denominational place for worship and comfort.

In addition, the chapel was one of the first buildings constructed utilizing materials from the deconstructed GGIE exhibits. It is an early expression of sustainable construction practices and reuse.

We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personal, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building. (*Mark R. Connors, President, Good Neighbors of Treasure Island and Yerba Buena Island*) [33.1]

- As to buildings on TI that are now 50 years in age or older that were not studied in the 1997 inventory:

- (1) Did the HRE conducted as a part of the environmental review for this DEIR evaluate the Treasure Island Chapel, which according to recent articles in the press has been a fixture on the island since 1943?
- (2) Why is the Treasure Island Chapel not considered a historic resource for purposes of evaluating the impacts of the Proposed Project?
- (3) Please include an evaluation of this potential historic resource. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.45]

3. It may be that the Navy's survey of pre-1947 historic resources is sufficient for CEQA review. But it is not in compliance with the City's higher standards for review of architectural/historic resources. Either the EIR needs to incorporate such a review - as it does for post-1947 buildings - or include as a condition that such a City-standard review will be conducted for pre-1947 buildings prior to their final disposition. (*John Elberling, TIDA Board Member*) [22.3]

When I looked at the historic section, I couldn't find a church in the EIR. I couldn't find a single mention of a Treasure Island Church, and I tried to understand this. The historic methodology was, the document relies on the Navy's evaluation of historic resources for everything built before 1947, and just kind of includes that as if it's a done deal. But as it notes, the Navy's methodology is not the same as the City's, that the City practices under our planning, you know, requirements and so on. And -- but it only applied those new standards to buildings built after 1947. So neatly, the Treasure Island Church, because it existed before 1947, just doesn't get considered. It's like it doesn't exist. That the Navy did not identify it as a historic resource.

And in looking at all these issues, and public assembly and so on, I was really struck with the fact that that church, obviously, played an important role in the history of the island all through the era of World War II, the Korean war, the Vietnam war, when it was a very central focus of community for the military personnel, who are certainly a part of the history of Treasure Island in San Francisco. And I really find its omission inexplicable in my mind.

So I just wanted it noted, that the Navy's assessment cannot be relied on as satisfactory for our local approval process. We have our own standards and they should be applied to the pre-1947 buildings as well as the post-1947 buildings. And perhaps that can help solve, at least, part of the problem that I referred to earlier. (*John Elberling, TIDA*) [TR.23.8]

### **Response**

Although the EIR finds that the chapel does not qualify as a historic resource for CEQA purposes, as more specifically described below, the Treasure Island Development Authority ("TIDA") and Treasure Island Community Development, LLC ("TICD") recognize that there is public concern regarding the possible removal of the Chapel. In response to public concern, TIDA and TICD have revised the Proposed Project to retain the Chapel in its current location and incorporate it within the proposed Cultural Park open space. Revisions to the EIR to reflect this change are described below, following a discussion of the historic resource evaluation.

As discussed in EIR Section IV.D, Cultural and Paleontological Resources, on p. IV.D.20, in 1997, the Navy completed a comprehensive survey and evaluation of Naval Station Treasure Island (“NSTI”) resources on Treasure Island and Yerba Buena Island, as part of Section 106 compliance for the transfer of Navy property out of Federal ownership (the “1997 Inventory and Evaluation”).<sup>1</sup> The 1997 Inventory and Evaluation evaluated the Chapel (Building 194, built in 1943) and found that the building does not qualify for listing in the National Register:<sup>2</sup>

Although a handsome building, the Treasure Island chapel does not appear to be a significant example of its type, whether considered in the context of Navy chapels, churches from the 1940s, or even in the more limited context of military chapels from World War II. The Navy has a long tradition of building excellent chapels; dozens of Navy-built chapels have been listed in the National Register. Many of these chapels were designed by private architects, including many of the nation’s best-known firms. Within this context, the Treasure Island chapel does not appear to represent a significant example. It is not the work of a master designer; very little is known of the firm of Blanchard and Maher, architects for the building. Neither is the building significant as an example of ecclesiastical design from the era, whether civilian or military in origin. Many military chapels from World War II were temporary in design; a chapel was included among the standardized plan sets used in cantonment design. Not uncommonly however, chapels were among the key buildings treated to a custom design, in recognition of the importance of the building. There are many noteworthy World War II-era chapels still in existence, including the Navy-designed chapel at the Naval Air Station in Alameda, which has been determined eligible for listing in the National Register as a contributing element to a historic district. Although a handsome and largely unmodified building, the chapel at Naval Station Treasure Island does not appear to qualify for listing in the National Register.

For similar reasons, the Chapel is likewise not eligible for inclusion in the California Register of Historical Resources (“CRHR”) under CRHR Criterion 3 (Design/Construction). It does not “embody the distinctive characteristics of a type, period, or method of construction, or represent the work of an important creative individual, or possess high artistic values.”

Although associated with World War II, the most significant historical event of the 20<sup>th</sup> century, which also had a transformative effect on California history, research has not uncovered any evidence that this resource played a sufficiently significant or central role in any of the decisive, transformative, or cataclysmic events of World War II that could justify inclusion of the Chapel in the National Register of Historic Places (“NRHP”) or California Register of Historical Resources based on NRHP Criterion A (Events) and the corresponding CRHR Criterion 1 (Events).

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<sup>1</sup> United States Department of the Navy, *Cultural Resources Inventory and Evaluation Investigations*, prepared by JRP Historical Consulting Services, January 1997.

<sup>2</sup> 1997 Inventory and Evaluation, p. 3-25.

Since its construction, the Chapel has been the site of numerous rites of passage marking important life events (e.g., christenings, weddings, and funerals). The use of the Chapel for these purposes, however does not establish a sufficient association with important events or persons in United States or California history to justify its inclusion in the National Register of Historic Places or California Register of Historical Resources based on NRHP Criterion B (Persons) and the corresponding CRHR Criterion 2 (Persons).

The Chapel dates from a relatively recent historic era that is well documented in the historic record. Study of its physical characteristics, features, and materials is therefore unlikely to yield any important information of broad scientific or historical interest that is not already readily available in the documentary record. For this reason, the Chapel is not eligible for listing in the National Register of Historic Places or California Register of Historical Resources based on NRHP Criterion D (Information Potential) and the corresponding CRHR Criterion 4 (Information Potential).

No new information about the historic or architectural significance of the Chapel has surfaced since preparation of the 1997 Inventory and Evaluation that would call for revisiting its analysis and conclusions regarding the Chapel. As such, the EIR for the Proposed Project continues to rely on the analyses and conclusions of the 1997 Inventory and Evaluation. Demolition of the Chapel would not result in a significant impact on an historical resource under CEQA.

Nevertheless, in effort to respond to public comments, TIDA and TICD have revised the Proposed Project to retain the Chapel in its current location, and incorporate it within the proposed Cultural Park open space, as stated above. The EIR Summary Chapter, Chapter II, Project Description, Section IV.A, Land Use and Land Use Planning, and Section IV.J, Recreation, are revised to reflect the retention of the Chapel as follows (deleted text is shown in ~~strikeout~~ and new text is underlined):

The first full paragraph on EIR p. S.56 is revised as follows:

Under the No Ferry Service Alternative, up to 5,100 residential units would be constructed, 2,900 fewer than with the Proposed Project. While the same amount of retail space would be developed, there would also be less neighborhood-serving retail than in the Proposed Project. Residential parking would also be reduced to about 8,255 parking spaces. Most other land uses would be the same as with the Proposed Project: 100,000 sq. ft. of office space; 500 hotel rooms, including 50 on Yerba Buena Island; adaptive reuse of about 311,000 sq. ft. of Buildings 1, 2, and 3 with retail, light industrial/food production, and entertainment uses; landside facilities to support the approved expanded Clipper Cove Marina; retention and continued use of the existing chapel for general assembly and non-denominational religious activities; new landside and waterside launch facilities at the existing sailing center on Treasure Island Sailing Center; and reuse or reconstruction of the existing Treasure Island elementary school at its current location.

The third sentence of the first full paragraph on EIR p. II.9 is revised as follows:

Current non-residential uses include offices, a small restaurant, a convenience store, several event venues, a guard shack, warehouse/storage/manufacturing facilities, a childcare center, a fire station and fire training academy, a wastewater treatment plant, a gymnasium, film production facilities, a chapel, and a yacht club.

The following new bulleted item is added to the listing under the heading “E. Development Plan Characteristics” on EIR p. II.16, to follow the sixth item (“Rehabilitation of the historic buildings on Yerba Buena Island”):

- Retention and continued use of the existing chapel in its existing location for general assembly and non-denominational religious activities;

The first paragraph under the heading “Island Center District” on EIR p. II.21 is revised as follows:

The Island Center District would occupy the southern portion of Treasure Island and would abut the southern/southeastern boundary of the Jobs Corps campus. This new neighborhood would include a dense mix of retail, restaurant, office, hotel, residential, transit, and community services uses. The Ferry Terminal and intermodal Transit Hub would be located in the Island Center at the southwestern shore of Treasure Island. A pedestrian link is planned between the Ferry Terminal and Clipper Cove, with pedestrian paths around and connecting to corridors through Buildings 1, 2 and 3, the historic structures (see Figure II.10: Proposed Street System, p. II.41). Buildings 1, 2, and 3 would be adaptively reused for commercial and recreation/entertainment uses. As part of the adaptive reuse, Building 111, which is an addition to Building 3, would be demolished. The existing chapel would be retained in its current location and used for general assembly and non-denominational religious activities.

The last bulleted item on EIR p. II.31 is revised as follows:

- A 3-acre Cultural Park adjacent to Building 1. The park would include a future building site for a cultural institution, such as a museum, of up to 75,000 sq. ft. The existing chapel would be retained in its current location.

The paragraph under the heading “Institutional and Public Services” on EIR p. II.33 is revised as follows:

The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and childcare also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1. The existing chapel, on the site of the proposed Cultural Park, would be retained in its current location and used for general assembly and non-denominational religious activities. The existing public grammar school on Treasure Island, now closed, would be improved or rebuilt as a K-8 public school in coordination with the San Francisco Unified School District. The existing wastewater treatment plant would be replaced by the SFPUC (as

discussed below in “Proposed Utilities”). A recycling program would be established, and a recycling center/corporation yard would be provided. A joint police/fire station would be provided on Treasure Island. The existing Job Corps facility would remain in use in its current location on Treasure Island, under the jurisdiction of the U.S. Department of Labor.

The fifth and seventh bulleted items under the heading “Phase 4 (Building Construction and Associated Infrastructure)” on EIR p. II.82 are revised as follows (the sixth bulleted item is shown for context):

- Development of the Cultural Park ~~and museum~~ around the existing Navy chapel, which would be retained;
- Renovation of Building 3 on Treasure Island;
- Development of the Senior Officers’ Quarters Historic District and landscaping improvements on Yerba Buena Island;

The paragraph under the heading “Community and Institutional Uses” on EIR p. IV.A.8 is revised as follows:

Community and institutional uses on Treasure Island include educational, religious, public service, and public works facilities. Educational facilities consist of a former elementary school, a portion of which is occupied by the Glide Foundation's YouthBuild Program, the San Francisco Sheriff's Five Keys Charter School, and the San Francisco Police Department's motorcycle training unit. Other educational facilities include the Life Learning Academy, the Treasure Island Clubhouse of the Boys and Girls Clubs of San Francisco, and a child development center. There is an existing chapel on the north side of California Avenue, in the southwest quadrant of the island. Public service facilities include a fire station, fire training academy, a police station, and a post office. The educational and public service facilities are concentrated in the interior of the island in the northwest quadrant. Existing public works facilities include two emergency power generators, steam plant substations, a wastewater treatment plant, and one water storage tank for both domestic and firefighting use.

The second paragraph on EIR p. IV.A.15 is revised as follows:

The Proposed Project, which includes Treasure Island and Yerba Buena Island, consists of a total of up to 8,000 dwelling units, up to 140,000 sq. ft. of new commercial retail space, up to 100,000 sq. ft. of new office space, and up to 500 hotel rooms (see Table IV.A.2). Buildings 1, 2, and 3 on Treasure Island would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space. The existing chapel would be retained in its current location and continue to be used for general assembly and non-denominational religious activities. In addition, the Proposed Project would include approximately 300 acres of open space in the form of athletic fields, bicycle and pedestrian paths, parks, playgrounds, plazas, shoreline trails, stormwater wetlands, an approximately 20-acre Urban Agricultural Park, and wildlife habitat. Approximately 220 acres of open space would be on Treasure Island, and the remaining 80 acres would be on Yerba Buena Island.

The sixth sentence of the first paragraph under Impact LU-3 on EIR p. IV.A.24 is revised as follows:

Existing buildings to be retained and reused as part of the Proposed Project include Historic Buildings 1, 2, and 3 and the existing chapel would be retained and adaptively reused as part of the Proposed Project, thus maintaining some of the existing land use character of the vicinity.

Figure IV.B.10: Proposed Representative Massing Diagram, on p. IV.B.20, is amended by showing the retention of the chapel. The revised figure is shown on the following page.

Item No. 9 in Table IV.J.1: Proposed Parks and Open Space, on EIR p. IV.J.13, is revised as follows:

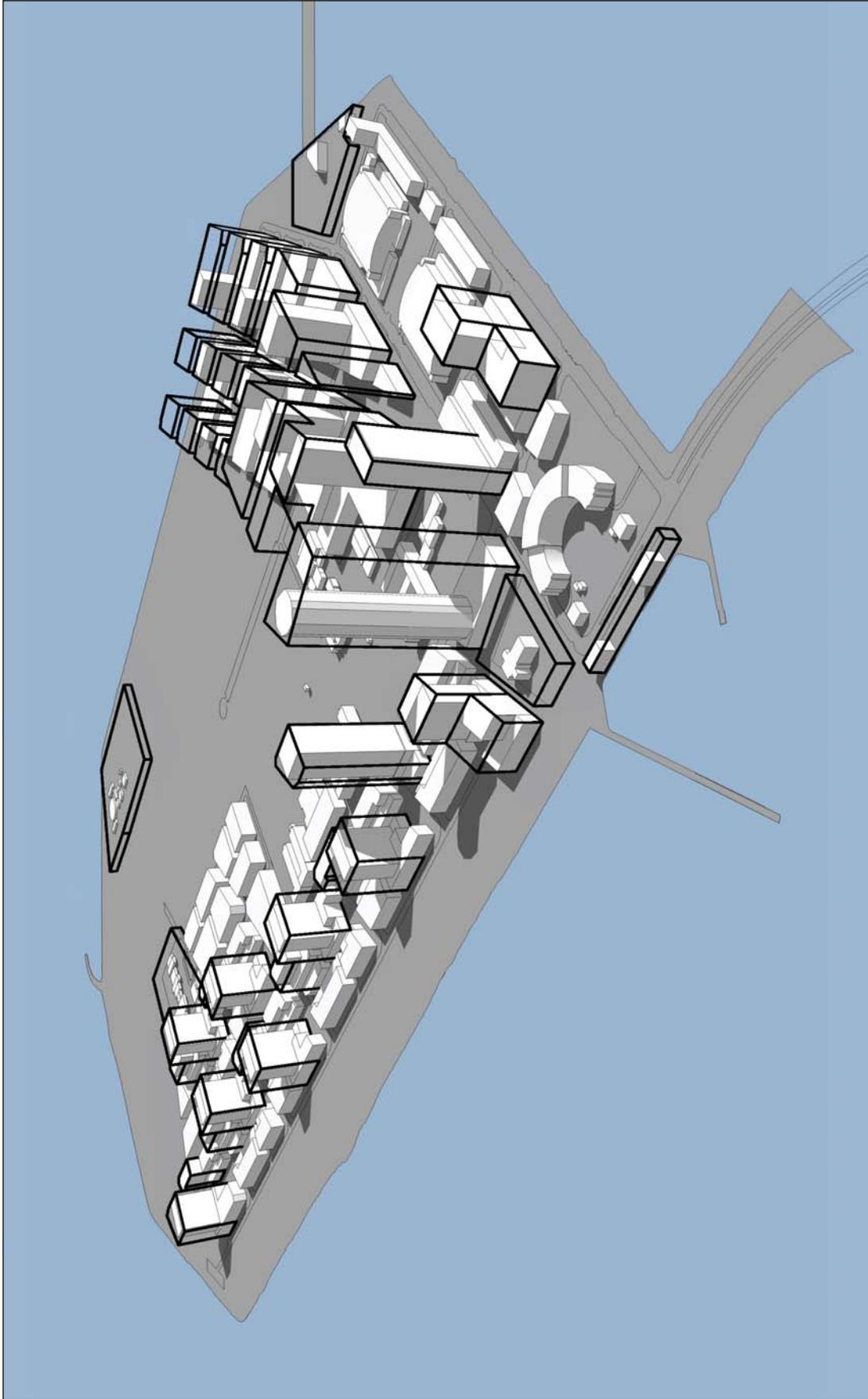
**(Revised) Table IV.J.1: Proposed Parks and Open Space**

Parks and Open Space	Description of Use	Acres (approximate) <sup>a</sup>
<i>Treasure Island</i>		
9. Cultural Park	Plaza designed to connect the Cityside District with the Transit Hub and Clipper Cove; includes potential site for a museum or other cultural institution <u>and the existing chapel, which would be retained</u>	3

The first paragraph under Impact RE-1 on EIR pp. IV.J.16-IV.J.17, is revised as follows:

Development of the parks and recreational facilities would require construction activities, which could vary depending on the location and type of work. Existing structures on identified park sites would require demolition, except for the existing chapel on the site of the proposed Cultural Park. The chapel would be retained in its current location. Sites would be cleared and graded, and utilities (electrical, water, sanitary sewer, and storm drainage), hardscape (e.g., concrete, asphalt, stone, walls, sport-court and play area surfacing, decking/boardwalks), and site furnishings (e.g., benches, picnic tables, drinking fountains, play equipment, fencing, artwork, lighting) would be installed. New structures (e.g., restrooms, picnic/shade shelters, kiosks, pavilions, overlooks, piers) would be constructed or existing structures would be renovated. If sites are proposed to include cultural or educational institutions or other buildings, such as a museum or an environmental education center, developable pads would be constructed. Site planting would include installation of irrigation systems and would focus on re-vegetation and restoration of native plant communities, where possible. The natural open space on Yerba Buena Island would be managed under a Habitat Management Plan (“HMP”), and construction activities in these areas would generally be limited to those for revegetation, creation of trails, removal of invasive species, and other low-impact activities.

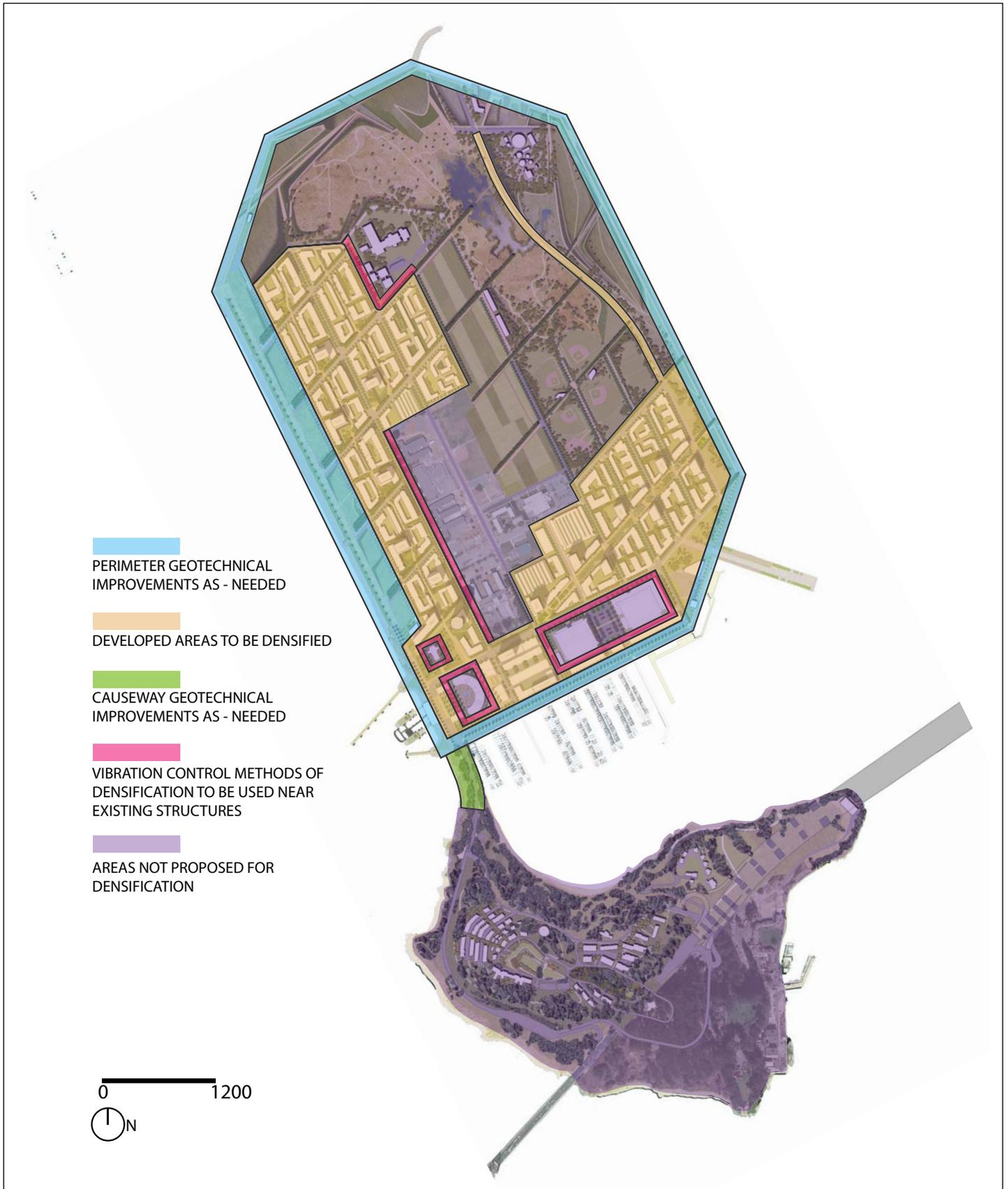
Figure IV.N.2: Areas of Proposed Geotechnical Improvements, on p. IV.N.26, is amended by showing the retention of the chapel, designating the area around the chapel as an area not proposed for densification, and indicating that vibration control methods of densification would be used around the chapel. The revised figure is shown on p. 2.6.10.



SOURCE: Perkins + Will

**TREASURE ISLAND AND TERBA PUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.B.10: PROPOSED REPRESENTATIVE MASSING DIAGRAM**



SOURCE: CMG, ENGEO

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.N.2: AREAS OF PROPOSED GEOTECHNICAL IMPROVEMENTS**

### 2.6.3 IMPACT ON BUILDINGS 1, 2, AND 3

#### Comments

3. Mitigation measures referencing TIDA review seem inadequate. Shouldn't the process of review and what it should consider be stated in the mitigation? At a minimum, review for compliance with the Secretary's Standards should be referred to the city's Historic Preservation Commission for its recommendations. The consultation process would be formalized by an agreement between TIDA and the City of San Francisco. (*Hisashi Sugaya*) [21.3]

An objective look at the photo views contained in the DEIR conclusively shows that the new buildings constructed in the vicinity of the historic buildings on TI would effectively bury Buildings 2 & 3 behind the proposed new high-rise buildings, and that Building 1 would be obscured and dwarfed by the tallest buildings on the Island. These scenic resources would thus be significantly altered. The statement contained in the DEIR that the tallest building on TI, a 650-foot tall tower rising behind Building 1 would "reinforce the centrality of Building 1" is a desperate attempt to avoid a finding of significant impact that simply does not work by any objective standard. The only conclusion that can be reached is that the proposed new construction on TI would significantly alter existing features considered scenic resources, and would alter the visual character and visual quality of these scenic resources. Further comments regarding these impacts are contained in the comments under Historic Resources, below. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.37]

**Impact CP-5:** The DEIR concludes that impacts upon historical resources from their reuse and rehabilitation under the proposed *Redevelopment Plan* would be "*Less than Significant.*"

We disagree and do not understand the basis for this conclusion given that the DEIR states, as to the three most significant National Register-listed buildings:

*"The specific nature and scope of such alterations have not been determined at this time but may include rehabilitation of the interior, rehabilitation of the exterior, and the addition of features (such as photovoltaic panels on Buildings 1, 2 and/or 3)"* and that the rehabilitation of these buildings "*may also include building additions.*"

The DEIR further states that the *Design for Development* "*establishes zones in which additions occur and the maximum height for the potential additions.*"

- Please include in your response to comments a copy of the referenced portions of the *Design for Development* that establishes these zones in which additions occur and the maximum height for the potential additions to Buildings 1, 2 and 3. Please provide illustrations of the application of these zones and maximum heights as they would apply to each of the National Register listed buildings (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.49]
- Does the *Design for Development* establish similar zones and maximum heights for other historic resources on TI and YBI? If so, please include a copy of the referenced portions of the *Design for Development* and provide illustrations of the application of such zones and heights to these other historic resources. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.50]
- Because the nature and scope of the alterations is unknown, there is no adequate basis for the DEIR conclusion that the impacts of future projects to alter historic buildings will have a "*Less than Significant*" impact. The DEIR improperly relies on TIDA to review the proposed

treatments to historic resources and to determine if the proposed work conforms to the Secretary of the Interior's Standards. A future review of an unknown project by a non-expert body is an inadequate basis for the DEIR's conclusion. Please respond to the each of the following questions:

- (1) How will review by TIDA be adequate to assure that historic resources will not be impacted by future rehabilitation projects?
- (2) Are members of the TIDA Board or its staff required to be trained and experienced experts in the field of historic preservation?
- (3) What public notice and process will be required as to each project that would alter or demolish a historic resource?
- (4) Did the DEIR consider other more effective ways to mitigate the potentially significant impacts on historic resources, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City's Historic Preservation Commission of each such project? Why are these not included in the DEIR? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

• The DEIR contains a general statement that "*Buildings 1, 2, and 3 would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space.*" Please respond to the following questions:

- (1) How many square feet does each building contain now?
- (2) What use is being proposed for each building?
- (3) How will the proposed new use impact the interior and exterior of each building?
- (4) Are additions planned for each building? How many square feet would be added to each building? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.51]

**Impact CP-6:** The DEIR concludes that proposed alterations to the contributing landscape areas of Buildings 1, 2, and 3 would be "*Less than Significant with Mitigation.*"

The DEIR reveals that the current plan for landscapes around Building 1 would remove character defining retaining walls and alteration of the driveways west of Building 1 causing:

*"a substantial change in the significance of an historic resource, although it is not possible to foresee the ultimate impact from the current concept-level design for the landscape."*

The DEIR further discloses that: "*Alterations to the contributing landscapes could result in a significant adverse impact on the individual historic significance of Building 1.*"

• Because the nature and scope of the alterations to contributing landscapes is unknown, there is no adequate basis for the DEIR conclusion that this identified "significant impact" be mitigated to "less than significant." Again, the DEIR improperly relies on a future review by TIDA to review proposed alterations to (and within) the contributing landscape areas to determine if the alterations conform to the Secretary of the Interior's Standards.

A future review of an unknown project by a non-expert body is an inadequate mitigation measure (M-CP-6). Please respond to the each of the following questions:

- (1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the *Design for Development* requiring that no project shall remove any character defining features of any contributing landscape? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact.

- (2) How would review by TIDA assure that historic landscapes and resources would not be impacted by future projects?
- (3) How would the proposed mitigation measure be enforced and who will enforce it?
- (4) Are members of the TIDA Board or staff required to be experienced and trained experts in the field of historic preservation and historic landscapes?
- (5) What public notice and process will be required as to each project that proposes to alter or demolish a historic resource or its contributing landscape?
- (6) Did the DEIR consider other ways to mitigate the potentially significant impacts on historic resources and their contributing landscapes, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City's Historic Preservation Commission of each such project? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

**Impact CP-7:** The DEIR concludes that proposed new construction within the contributing landscapes of Buildings 1, 2, and 3 would be “*Less than Significant with Mitigation.*”

Remarkably, the DEIR reveals that the current *Design for Development* allows new freestanding construction within the contributing landscapes of the National Register listed buildings 1, 2 and 3. How could this impact this possibly be mitigated? The DEIR states, once again, that: “*the specific design of these new features has not been developed enough at this time to assess their impact.*”

And again, the DEIR recommends as a Mitigation Measure (M-CP-7) a future review by TIDA, which would apply the Secretary's Standards. Based on the fact that the DEIR states that there will be construction of buildings *within* the contributing landscapes, the Proposed Project would clearly cause a significant impact to these cultural landscapes that could not be adequately mitigated. Please respond to the following comments:

- (1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the *Design for Development* prohibiting any construction of new buildings within the contributing landscapes of Buildings 1, 2 and 3? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact and that no buildings be placed within them. Please explain why this would not be the most appropriate approach under CEQA?
- (2) Again, the fact disclosed in the DEIR that the “*specific design of these new features has not been developed enough at this time to assess their impact*” is clear evidence that any such project within the contributing landscapes would require a later project specific EIR. Please explain why this would not be the most appropriate approach under CEQA?
- (3) Please respond to all of comments (2) though (5) under Impact CP-6, above, pertaining to review by TIDA. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.52]

**Impact CP-11:** The DEIR concludes that the construction of new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources. We completely disagree with this conclusion. A quick look at Figures IV.B.7 (View Point F) and IV.B.8 (View Point G) prove our point visually.

- The first sentence of this discussion states that new buildings are proposed outside of the contributing landscapes sites of Buildings 1, 2 and 3. This directly conflicts with the discussion under Impact CP-7, which specifically addresses the impacts of proposed new

construction within the contributing landscapes of these historic buildings. Please explain this inconsistency between Impact CP-7 and CP-11.

- Figure IV.D.6 is very hard to read and does not provide adequate information. Please add the following to this Figure:

- (1) A key to the colors and patterns used.
- (2) The heights of the three National Register buildings (1, 2 and 3). The lack of this information makes it difficult to compare the heights of the proposed new buildings in the immediate vicinity of the historic buildings.
- (3) The street names.
- (4) All proposed new buildings on the nearby and surrounding blocks – particularly all the proposed new buildings north of the historic buildings should be shown – including the heights of each of them.

- The height differences between the historic buildings and the proposed new buildings are extreme. Please list the heights of each historic building on TI and YBI and compare them to the heights of all proposed new buildings on TI and YBI.

- It appears that Buildings 2 and 3 will be completely hidden from all vantage points off the island. Please provide visual simulations showing these views.

- It appears that Building 1 will be dwarfed and overwhelmed by the buildings surrounding it, including the tallest building proposed on TI, and when viewing Building 1 it will be with the backdrop of the tallest buildings on the Island. Please provide visual simulations showing these views from Telegraph Hill and along the NE Waterfront at night and day. What color will the proposed new buildings be?

The determination of the DEIR that new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources is a subjective judgment regarding the relationship of the small scale historic buildings to the adjacent high rise towers – between Buildings 1 and 2 are two towers of 450 feet and 240 feet, and immediately to the north of Buildings 1, 2 and 3 are the tallest buildings on TI, one proposed at 650 feet. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.55]

- Please include in the DEIR an objective visual presentation of the transitions between the proposed new buildings and the small scale historic buildings. What materials and colors are anticipated for the new construction? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.56]

- Please include in the DEIR an impartial discussion of how the proposed new buildings would comply with each of the following objectives from the San Francisco General Plan:

*“Promote harmony in the visual relationships and transitions between new and older buildings”* [General Plan Objective 3, Policy 3.1]

*Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.* [General Plan Objective 3, Policy 3.4]

*Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.* [General Plan Objective 3, Policy 3.6]

*Design new buildings to respect the character of older development nearby.* [General Plan Objective 12, Policy 12.3]

- Include a discussion of how the Proposed Project would “promote harmony in the visual relationships and transitions” between the proposed new buildings and the historic building on TI, including Buildings 1, 2 and 3.
- Include a discussion of how the Proposed Project would relate the height of the new buildings to the height and character of the historic building on TI, including Buildings 1, 2 and 3.
- Include a discussion of how the design of the proposed new buildings would respect the scale and character of the nearby historic building on TI, including Buildings 1, 2 and 3.
- Based on the objectives listed above, discuss the Proposed Project could impair the significance of the National Register buildings on TI as visual and aesthetic resources?
- Please discuss how the construction of two new towers between Buildings 1 and 2 (of 450 feet and 240 feet) and a 650 foot high rise immediately north of these low rise historic buildings would be consistent with any of the General Plan policies listed above.
- Please include a detailed objective discussion of how the new construction described in the DEIR could alter the integrity of the setting, feeling and association of Buildings 1, 2 and 3.
- We agree with the statement in the DEIR that “*the new buildings would alter the existing visual, urban, and architectural context of Buildings 1, 2 and 3.*” However, we completely disagree with the DEIR’s conclusion that this is not an impact because: “*the historic character of this surrounding context has already been altered with the Navy’s occupation of the CCIE site, and later with the Navy’s own demolition and new construction.*” Alterations by the Navy were small in scale and did not alter the visual and architectural context of the National Register buildings to a significant degree. The proposed new construction will destroy all remaining visual and architectural context. Please discuss this issue further in the DEIR. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.57]
- Given this level of uncertainty and absence of accurate, stable and finite project descriptions, particularly as to historic resources and their contribution features, justify the adequacy of the DEIR’s recommended mitigation measures that rely on a future review of an unknown project by a non-expert body?
- Why does the DEIR not recommend mitigation measures requiring project-specific EIRs for each individual project that proposes to alter a historic property?
- Why does the DEIR not recommend mitigation measures requiring project-specific review of each individual project that proposes to alter a historic property by the City’s Historic Preservation Commission?
- Why isn’t a future project-specific environmental review and review by an expert body within a public review process the best way to adequately mitigate these yet unknown potentially significant impacts? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.79]

### **Response**

Some comments express general disagreement with the conclusions of the EIR regarding the impact of proposed new construction on Buildings 1, 2, and 3. Potential impacts related to proposed alterations to the contributing landscapes of Buildings 1, 2, and 3 are analyzed and evaluated under Impact CP-6 on EIR pp. IV.D.53-IV.B.54. Potential impacts related to proposed new construction within the contributing landscapes of Buildings 1, 2, and 3 are analyzed and

evaluated under Impact CP-7 on EIR pp. IV.D.54 – IV.D.55. Potential impacts related to proposed new construction outside of the contributing landscapes of Buildings 1, 2, and 3 are analyzed and evaluated under Impact CP-11 on EIR pp. IV.D.58 – IV.D.60. The analysis set forth in the EIR is based on historic resource surveys and investigations performed by experts qualified to perform such analysis.

As discussed in EIR Section IV.D, Cultural and Paleontological Resources, on EIR pp. IV.D.51-IV.D.52, CEQA defines a significant impact on an historical resource.

*CEQA Guidelines* (Section 15064.5(b)) establish the criteria for assessing a significant environmental impact on historical resources. They state, “[a] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” The *CEQA Guidelines* define “substantial adverse change in the significance of an historical resource” as a “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (Section 15064.5(b)(1)). The significance of an historic architectural resource is considered to be “materially impaired” when a project demolishes or materially alters the physical characteristics that justify the inclusion of the resource in the CRHR, or that justify the inclusion of the resource in a local register, or that justify its eligibility for inclusion in the CRHR as determined by the lead agency for the purposes of CEQA (Section 15064.5(b)(2)).

As discussed in EIR Section IV.B, Aesthetics, on pp. IV.B.23-IV.B.27, the implementation of the Proposed Project would result in substantial and transformative changes to the visual character of Treasure Island. Building 1 is about 80 feet tall from the top of its air traffic control tower. Buildings 2 and 3 are approximately 85 feet tall. Under the Proposed Project, a wide range of heights for new buildings is envisioned for Treasure Island from 40 feet to 650 feet, as discussed on EIR p. II.24 and shown in Figure II.6a on EIR p. II.25. Note, however, that the final update to the proposed *Design for Development* that will be considered by TIDA reduces the maximum proposed building height to 450 feet.

Comments request additional visual simulations from various locations (including Telegraph Hill and from the San Francisco waterfront) as presented in the EIR on pp. IV.B.5 - IV.B.14. An additional view from the San Francisco Waterfront on Pier 7 is presented in the response in Subsection 2.4.3, Viewpoints, in Section 2.4, Aesthetics, of this Comments and Responses document. New nighttime visual simulations are presented in the response in Subsection 2.4.4, Nighttime Views and Glare. Buildings 2 and 3 are not prominent from off-island locations, except when viewed from the Bay Bridge East Span (see Figure IV.B.7 on EIR p. IV.B.11), and the Causeway (See Figure IV.B.8 on EIR p. IV.B.13).

As discussed below and on EIR pp. IV.D.58-IV.D.60, Buildings 1, 2, and 3 are considered individual historic resources and do not together constitute an historic district; the setting of each

building is limited to the extant contributing landscape setting around each building. New construction outside of the identified boundaries of the contributing landscape setting of Buildings 1, 2, and 3 would not constitute a material impairment of an historical resource as defined by CEQA because the Proposed Project would not demolish or materially alter the physical characteristics of Buildings 1, 2, or 3 that justify their inclusion in the California Register of Historical Resources.

Buildings 1, 2, and 3 are each listed on the National Register of Historic Places as individual resources. For the purposes of determining how Buildings 1, 2, and 3 should be treated in the EIR's analysis of impacts, (i.e., each as individual resources, and/or collectively as an historic district), the EIR evaluates the potential collective eligibility of all remaining landscape features and buildings of the Golden Gate International Exposition ("GGIE") as a potential historic district under CRHR criteria (EIR pp. IV.D.39-IV.D.40). The EIR concludes that the remaining buildings and landscape features do not collectively constitute a coherent historic district and do not retain sufficient integrity to convey their collective significance as an historic district. For this reason, Buildings 1, 2, and 3 are each treated as individual resources for the purposes of evaluation of impacts under CEQA.

The contributing landscapes associated with Buildings 1, 2, and 3 under the National Register of Historic Places nomination are each described on EIR pp. IV.D.40-IV.D.47, and shown on Figure IV.D.3: Building 1 Contributing Landscape Areas, on EIR p. IV.D.43; Figure IV.D.4: Building 2 Contributing Landscape Areas, on EIR p. IV.D.45; and Figure IV.D.5: Building 3 Contributing Landscape Areas, on EIR p. IV.D.47.

The EIR and background Historic Resource Evaluation Report ("HRE") study the associated contributing landscape setting of Buildings 1, 2, and 3. For each of these buildings, the EIR and HRE identify an extended boundary for the contributing landscape setting under CRHR criteria for the purposes of identifying and evaluating potential effects on individual Buildings 1, 2, and 3 under CEQA.

As part of, and for the purposes of, this EIR, the HRE studies each of the landscapes associated with Buildings 1, 2, and 3. Information on the landscapes associated with each building is based on a review of plans from the Exposition that show the landscape features at a schematic level, historical photographs, and historical aerial photographs. The HRE identifies, describes, and evaluates their significance and integrity. Based on closer study of these features than has been conducted in previous studies, the HRE identifies the particular landscape features that contribute, or do not contribute, to the significance of each building under CRHR criteria, and delineates a boundary for the contributing landscape features associated with each building. This boundary does not modify the existing NRHP site boundary for each building. Rather, it supplements those boundaries for the purposes of this EIR. (EIR p. IV.D.41)

As such, the physical characteristics that justify each building's eligibility for inclusion in the California Register of Historical Resources are not premised on their existing visual or spatial relationship with each other, or any broader relationship with their wider surroundings. On this basis, the EIR concludes that new construction and alterations outside of the contributing landscape setting would not materially impair the physical characteristics that justify their individual eligibility for inclusion in the California Register of Historical Resources.

Comments raise concern about the visual character of new construction in the vicinity of Historic Buildings 1, 2, and 3 with respect to height, materials, and color and its impact on the significance of Buildings 1, 2, and 3. Specific building design details are not known at this time. As described in EIR Section IV.B, Aesthetics, on p. IV.B.25, as part of the Proposed Project, a *Design for Development* would be adopted and administered by TIDA. The *Design for Development* is a regulatory document that would establish design standards and guidelines that would direct future development of the Project Area. The *Design for Development* articulates the vision for the future visual character of the Project Area. It establishes specific requirements for buildings, streets, open spaces, and parking and loading to encourage high-quality design and materials, an inviting pedestrian orientation, and visual variety and interest while maintaining a cohesive visual identity for the Project Area. As noted on EIR p. IV.B.26, when specific building designs are proposed, TIDA would review them against the standards and guidelines provided in the *Design for Development* to ensure that they contribute visual interest, texture, and are consistent with the vision for the visual character and quality of the Project Area. The EIR analyzes impacts of new construction on historic resources on Treasure Island and concludes that implementation of approved design guidelines in the draft *Design for Development* would ensure that the Proposed Project would not cause a significant adverse impact on the visual quality of the Project Area, including Buildings 1, 2, and 3, and its surroundings.

The proposed *Design for Development* specifies height limitations for the blocks in the immediate vicinity of Buildings 1, 2, and 3. These height limitations are intended to limit the height and scale of new construction in the vicinity of Buildings 1, 2, and 3. The proposed height plan near Buildings 1, 2, and 3 is shown on the following page in (Revised) Figure IV.D.6: Height Plan Near Buildings 1, 2, and 3 (revisions to this figure include adding a legend designating existing and proposed building heights, and labeling surrounding streets). As discussed on EIR pp. IV.D.58-IV.D.59,

on block B1: 20 feet (west of Building 1) and below the finish floor (east of Building 1); on block B1-A: 50 feet (east of Building 1); on block M1-A: 50, 70, and 450 feet (between Buildings 1 and 2); on block M1-B: 50, 85, and 240 feet (between Buildings 1 and 2); on block B2: 25 feet (north, west, and south of



Building 2; on block B2-A: 25 and 50 feet (south of Building 2); on block B3: 25 feet (west of Building 3); and on block B3-A: 25, 30, 50, and 125 feet (south of Building 3). The draft *Design for Development* requires a minimum 20-foot separation between new buildings and the historic buildings.

Buildings 1, 2, and 3 are individual resources, rather than part of an historic district. This proposed new construction would not be within the contributing sites of Buildings 1, 2, and 3, and would not have a physical effect on those historical resources. It would not alter, damage, or demolish them. The Secretary's Standards apply to work carried out on historic properties; they are not applicable to properties that are not historic and are not within the site of an historic resource or within a historic district. The new construction described in the draft *Design for Development* would have the potential to alter the integrity of setting, feeling, and association of Buildings 1, 2, and 3, but it would not change their integrity of design, materials, workmanship, or location. The proposed new buildings in the vicinity of Buildings 1, 2, and 3 would not impair the physical characteristics that justify their eligibility for inclusion in the California Register. Although new buildings would alter the existing visual, urban, and architectural context of Buildings 1, 2, and 3, the historic character of this surrounding context has already been altered, first with the Navy's occupation of the former GGIE site, and later with the Navy's own demolition and new construction.

As discussed on EIR p. IV.B.23-IV.B.24,

New infill construction south of California Avenue in the vicinity of Buildings 1, 2, and 3 would not damage these visual resources of the built environment. Building 1 would continue to be a prominent visual presence, functioning as the visual centerpiece of Treasure Island. Buildings 2 and 3 would become less prominent when viewed from the causeway and from the Bay Bridge east span due to proposed new construction south of these buildings along Clipper Cove and proposed new infill construction west of Building 2. Buildings 2 and 3 would no longer occupy the water's edge at Clipper Cove. The basic form of Buildings 2 and 3, defined by the wide arched span of their roofs, and architectural features such as the distinctive corner pylons and upper fenestration

would continue to be prominent, rising from beyond the proposed new buildings along Clipper Cove.

Likewise, for these reasons, new construction outside of the contributing landscapes of Buildings 1, 2, and 3 would not impair the integrity of setting, feeling, and association of Buildings 1, 2, and 3.

Proposed new development north of California Avenue would not be subject to any special requirements for compatibility with Buildings 1, 2, and 3. Although the specific designs of new buildings on Treasure Island are not yet determined, implementation of the proposed *Design for Development* would likely result in new buildings that would contrast with the visual and historic character of Buildings 1,2, and 3 (in terms of height, orientation, materials, color, texture, fenestration, articulation). This differentiation between old and new is intended to emphasize, through contrast, the historic architectural character of Buildings 1, 2, and 3 and enhance their visual prominence within their proposed new visual setting.

With respect to alterations and construction within the contributing landscapes of Buildings 1, 2, and 3, a comment suggests a mitigation measure that would require retention of all contributing features, and prohibition of all new construction and additions within the contributing landscape areas. Although such a measure would be one way to ensure that the existing setting would be preserved, such a measure would be unnecessarily restrictive and is not required to ensure that this potential impact would be mitigated to a less-than-significant level under CEQA. The regulatory program established by the draft *Design for Development* (p. 293) relies on the following statement in *CEQA Guidelines* Section 15064.5(b)(3). “Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings...shall be considered as mitigated to a level of less than a significant impact on the historic resource.”

Conformity with the Secretary’s Standards, as called for by the regulatory program established by the draft *Design for Development*, and also by Mitigation Measure M-CP-7 on EIR p. IV.D.55, which requires review of new construction within the Contributing Landscape west of Building 1 under the Secretary’s Standards, would ensure that the potential impacts on historic architectural resources resulting from alterations and additions associated with rehabilitation and reuse of Buildings 1, 2, and 3, would be less than significant.

Comments express concern about the process by which TIDA would review designs for alterations and additions to historic architectural resources and new construction within their landscape setting under the Secretary’s Standards, and suggest that a mitigation measure require review of alterations by the City’s Historic Preservation Commission and/or require project-specific environmental review for future alterations to Buildings 1, 2, and 3 and their associated contributing landscape. The *Design for Development* establishes regulatory standards and a

regulatory procedure for review of alterations to historic architectural resources and new construction within contributing sites of historic architectural resources:<sup>3</sup>

TIDA has exclusive jurisdiction over design review of proposed treatment to historic resources identified on Treasure Island and Yerba Buena Island. Chapters T5 and Y5 of this Design for Development sets forth requirements for design related to historic resources, including requirements that rehabilitation of resources listed on the National Register of Historic Places comply with the Secretary of the Interior's Standards for Rehabilitation. TIDA shall conduct review to ensure that any alterations to historic resources on Treasure Island or Yerba Buena Island, or new construction within the contributing sites of such historic resources, as is defined in Chapters T5 and Y5 of this Design for Development, comply with the Standards and Guidelines of that Section. TIDA's review will be carried out in accordance with the DRDAP [Document Review and Design Approval Process], which shall include special protocol for the review of historic resources. Alterations to Historic Resources undertaken directly by TIDA that are not otherwise subject to the DRDAP process shall also follow the historic resource review protocol described in the DRDAP.

One comment asks whether members of the TIDA Board and its staff are required to be experts in the field of historic preservation. Members of the TIDA Board and its staff are not required to be preservation experts. However, the proposed *Design for Development* and Design Review and Document Approval Procedure (DRDAP) require for all historic resources identified in the proposed *Design for Development* (including Buildings 1, 2, and 3), that TIDA consult with a qualified professional preservation architect, planner, architectural historian or other professional experienced in the application of the Secretary's Standards for Rehabilitation to adaptive reuse projects, on a proposed project's compliance with the Secretary's Standards, where the project involves the rehabilitation and reuse of Buildings 1, 2, and 3.<sup>4</sup> The proposed DRDAP also sets forth the process that would be required for all design approvals, including those involving historic resources. This would ensure that review of proposals for alterations to historic resources is informed by appropriate preservation expertise. Review by the Historic Preservation Commission is not necessary. If TIDA's review and preservation consultation under the regulatory program established by the proposed *Design for Development* indicate by substantial evidence that a future specific design for alteration or addition does not conform to the Secretary Standards, such a proposal would require additional project-specific environmental review under CEQA at the appropriate level of CEQA documentation (e.g., Addendum, Supplemental or Subsequent EIR, Initial Study/Negative Declaration/Addendum). If review indicates conformity with the Secretary's Standards, no significant impact would result and no further environmental impact would be necessary.

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<sup>3</sup> Treasure Island Development Authority, *Design for Development for Treasure and Yerba Buena Islands*, Public Review Draft, March 5, 2010, pp. 294-295.

<sup>4</sup> *Disposition and Development Agreement, Design Review and Document Approval Procedure*, Draft, January 13, 2011, Sections 7.2.4 and 7.3.4.

Comments request an analysis of how new construction in the vicinity of Buildings 1, 2, and 3 would conform to the urban design policies of the *San Francisco General Plan*. As discussed on EIR p. IV.B.15:

As discussed in Chapter III, Plans and Policies, “San Francisco Plans and Policies,” p. III.1, although Treasure Island and Yerba Buena Island are located within the jurisdictional boundaries of the City and County of San Francisco, they are not included in the *San Francisco General Plan (General Plan)* and its related planning and policy documents, or in the San Francisco Planning Code (Planning Code).

As discussed in Chapter II, Project Description, “Proposed General Plan and Planning Code Amendments,” p. II.34, the Area Plan, SUD, and *Design for Development* documents would establish the land use controls and design standards for the Proposed Project. The Proposed Project includes amendments to the text and maps of the *General Plan* and Planning Code that would identify the geographic and physical boundaries of Treasure Island and Yerba Buena Island, and incorporate the land use controls and design standards specified in the Area Plan, SUD, and *Design for Development*.

As EIR Chapter III, Plans and Policies, states on p. III.2, the decision-makers will consider whether the Proposed Project is consistent with the goals, policies, and objectives in the General Plan as part of the approval process. This process is distinct from the evaluation of environmental impacts under CEQA. Plan consistency issues are relevant to the CEQA analysis to the extent those issues implicate significant environmental effects. In this case, as explained in the EIR and above, policies concerning the visual relationship of a transition between the Proposed Project and Buildings 1, 2, and 3 are policy issues that will be considered by decision-makers. If the EIR is certified, the decision-makers will also be required to consider and adopt *General Plan* consistency findings in connection with approval of the Proposed Project.

#### **2.6.4 BUILDING 111**

##### **Comments**

1. Impact CP-8. The reasoning that “Building 111 does not significantly contribute to the historic character of Building 3” and “Building 111 was included in the NRHP nomination because of its age, not because it was considered an integral feature of Building 3” and “Constructed with less-refined materials, this feature was an addition intended to serve a temporary function as a firehouse during the GGIE” are all flawed.

Why does 111 have to contribute to the historic character of Building 3 in order to have historic significance? Since it was constructed separately as a firehouse, was “completed by the time GGIE opened,” served as the firehouse during the exposition and is still extant today argues for its historic significance separate and apart from it being attached to Building 3. The two buildings functioned separately. It isn’t as though 111 was an addition to Building 3 intending to serve some use supporting those in the larger building. 111 was built as a firehouse and it only happens to be attached to Building 3.

You must evaluate Building 111 as its own entity, not as an “integral feature of Building 3.” Of course, it is not such a feature. It was never intended to be that; it is a separate building.

Whether it was constructed “with less-refined materials” is irrelevant. It was a utilitarian building not intended to be of the scale of Building 3 let alone be an addition with architectural details and materials of the Building 3.

Whether Building 3 was to “serve a temporary function as a firehouse during the GGIE” really doesn’t matter. It survived and currently stands. One would think a building, temporary or not, that served as a firehouse for the exposition and which still remains would be considered a historic resource. Using this line of thinking, the remaining earthquake shacks in San Francisco would not have historic significance since they were temporary housing (and also not well constructed). (*Hisashi Sugaya*) [21.1]

Section D.2 on Historic Architectural Resources is confusing and raises many questions and concerns, especially as to the apparent “opinion shopping” regarding the impacts to Building 3. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.42]

**Impact CP-8:** The DEIR concludes that the demolition of Building 111 would *not* be a significant impact on this historic resource. This conclusion is obviously based entirely on “opinion shopping” by the project sponsor to get the result desired. The impact on Building 3 of the demolition of Building 111 is significant and can only be avoided by changing the Proposed Project to avoid its demolition.

- Confirm that Building 3 (including Building 111 as a contributing feature) is listed on the National Register of Historic Places.
- Confirm that the HRE determined that the demolition of Building 111 would result in a significant adverse impact on the significance of Building 3 as a historic resource.
- Confirm that the Planning Department’s Preservation Planner initially agreed with the HRE’s conclusion.
- Please explain why Page & Turnbull was hired to “provide additional information about Building 111” in contradiction to the HRE consultant’s conclusion?
- Was Page & Turnbull hired by the environmental consultant, the Planning Department, or by the project sponsor?
- Why does the preparer of this DEIR use this “additional information” to reach the opposite conclusion from that contained in the HRE?
- Does this “additional information” contradict the National Register listing?
- The DEIR fails to reveal on page IV.D.25, in the 4th paragraph, that the project sponsor hired Page & Turnbull to come up with some “findings” to contradict the HRE and National Register listing for Building 3 in order to justify the demolition of a portion of the historic resource.
- Why couldn’t the project be changed to avoid the demolition of this historic resource?
- The DEIR reveals that Page & Turnbull was hired by the project sponsor to avoid a finding that the Proposed Project would cause a Substantial Adverse Impact on a National Register property that could not be mitigated. We disagree with the DEIR’s conclusion that a second opinion, which contradicts the HRE and the National Register listing, constitutes “*substantial evidence in light of the whole record to support the conclusion that the removal of the building would be consistent with the Secretary’s Standards, and would not result in a substantial adverse*

*change in the historic significance of the building.*” This kind of opinion shopping degrades the integrity of the CEQA process and should not be the basis for the DEIR’s conclusion that the demolition of a portion of a National Register-listed building would not cause a significant impact that cannot be mitigated. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.53]

### **Response**

Comments express concerns about the conflicting conclusions among historic resource experts related the impact of removing Building 111, which was constructed as an addition to Building 3. *CEQA Guidelines* Section 15151 states that “Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts.” EIR Section IV.D, Cultural and Paleontological Resources, on pp. IV.D.55-IV.D.56, discloses and describes the main points of disagreement.

As part of the rehabilitation and reuse of Building 3, Building 111, an addition to Building 3, would be demolished.

The HRE notes that Building 111 is included in the NRHP nomination for Building 3 as a part of Building 3. It was constructed to serve as a firehouse and was complete by the time the GGIE opened. The HRE reasons that demolition of Building 111 would remove a characteristic of Building 3 that conveys the development of the site and its association with the GGIE and that justifies the eligibility of Building 3 for inclusion in the CRHR. On this basis, the HRE concludes that the demolition of Building 111 would result in a significant adverse impact on the significance of the Building 3 historical resource.

The Planning Department has received additional information about Building 111 and its relationship to Building 3, provided in a memo to the project sponsors by historic architectural resource consultants Page & Turnbull. This additional information was not considered by the preparers of the NRHP nomination for Building 3. The Page & Turnbull memo presents supplemental evidence in support [of] its conclusion that Building 111 does not significantly contribute to the historic character of Building 3, and may therefore be removed without affecting the historic significance of the Building 3 resource. Building 111 was included in the NRHP nomination because of its age, not because it was considered an integral feature of Building 3. Constructed with less-refined materials, this feature was an addition intended to serve a temporary function as a firehouse during the GGIE.

After a review of the information submitted in the HRE as well as the additional information provided by Page & Turnbull, the Planning Department has determined (contrary to the conclusion in the HRE for this impact) that substantial evidence in light of the whole record supports the conclusion that the removal of Building 111 in the manner proposed would be consistent with the Secretary’s Standards, and would not result in a substantial adverse change in the historic significance of the Building 3 historical resource. In view of this finding, this impact would be considered less than significant. No mitigation is required.

As Lead Agency and author of the EIR, the Planning Department has disclosed and considered the conflicting opinions of experts and relied on its staff of historic preservation experts to independently consider the HRE against the additional information provided by historical resource experts Page & Turnbull (retained by the project sponsors). Based on additional evidence that was not available to the preparers of the National Register of Historic Places Registration Form, the Planning Department reviewed the relationship of Building 111 to Building 3, and independently concluded that Building 111 does not significantly contribute to the historic character of Building 3 and may therefore be removed without a significant adverse effect on the Building 3 historical resource.

In response to the comment that Building 111 must be evaluated as its own entity, the National Register of Historic Places Registration Form for Building 3 treats Building 111 as a component of Building 3. Since the time that the nomination form was prepared, no new information about the individual significance of Building 111 has arisen that would call for revisiting Building 111 as a separate resource.

### **2.6.5 U.S.S. BUTTERCUP AND ALTERNATIVES**

#### **Comments**

**Impact CP-9:** The DEIR properly concludes that demolition of the Damage Control Trainer (U.S.S. Buttercup) would be a significant impact on the significance of this historical resource that cannot be mitigated.

As disclosed in the DEIR, the U.S.S. Buttercup (Damage Control Trainer) is a rare and distinctive object, exhibiting specialized design and construction for military training, which is an important aspect of military history. One of only a handful in the US and the only such object on the West Coast, it is significant historic resource. Please respond to the following:

- According to the DEIR, its demolition is unavoidable because it overlaps two development blocks, which cannot be modified without substantial change. Why is its demolition unavoidable? How could the development in those two blocks be changed to avoid the site?
- Please add to the DEIR's discussion of the "No Project Alternative" consideration of the development of this historic resource as a museum.
- Could the demolition of this historic resource be avoided as a part of the "Reduced Development Alternative"?
- Was the demolition of this historic resource known and considered at the time of the Section 106 consultation? Was it considered as a part of the 2003 EIS? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.54]

Although Heritage concurs with the DEIR's identification of potential historic resources and evaluation of project impacts, we request that the Final EIR further explore creative alternatives and mitigation measures that would reduce or avoid the project's limited range of significant adverse impacts on cultural resources. (*Mike Buhler, Executive Director, San Francisco Architectural Heritage*) [18.1a]

**Response**

The *U.S.S. Buttercup* was identified as an historical resource for the purposes of CEQA in the HRE undertaken specifically for the Proposed Project. It was not identified as an historical resource in any earlier study of historic resources, nor was it considered in those earlier studies. As explained in EIR Section IV.D, Cultural and Paleontological Resources, on EIR p. IV.D.56, retention of the *U.S.S. Buttercup* cannot be accommodated as part of the Proposed Project. Retention would preclude construction on two development blocks, resulting in a substantially different project than the Proposed Project. While demolition is unavoidable under the Proposed Project, retention of this historic resource may be feasible under certain alternatives. Retention of the resource is considered and analyzed as a component of Alternative C - No Ferry Service Alternative. Retention of the *U.S.S. Buttercup* is also considered under Alternative A - No Project Alternative (which does not preclude reuse of the resource as a museum). Retention of the resource could also feasibly be a component of the Reduced Development Alternative, but as noted above, retention has already been incorporated into Alternative C.

A comment states that the No Project Alternative should consider the development of the *U.S.S. Buttercup* historic resource as a museum. The purpose of the No Project Alternative is to allow decision-makers to compare the effects of the Proposed Project with the effects of taking no action. *CEQA Guidelines* Section 12126.6(e)(3) requires that the No Project Alternative compare the environmental effects of the Proposed Project with the effects of Project Area remaining in its existing state under current conditions (i.e., the environmental setting). Under the No Project Alternative, the *U.S.S. Buttercup* would not be demolished and would be retained as under existing conditions, and no mitigation would be required. It would therefore not be appropriate for the No Project Alternative to consider the *U.S.S. Buttercup* as potential museum space.

A comment requests that the EIR further explore alternatives or mitigation measures to reduce or avoid significant adverse impacts on cultural resources. The only significant impact to historic resources identified in the EIR is the loss of the *U.S.S. Buttercup*. Preservation experts and the EIR preparers explored a range of preservation alternatives during the analysis of alternatives for the EIR. Retention of the *U.S.S. Buttercup* is identified and evaluated under Alternative C - No Ferry Service Alternative. As described in Chapter VII, Alternatives, on EIR p. VII.54, under the No Ferry Service Alternative, the *U.S.S. Buttercup* would be retained. It is assumed under this alternative that the *U.S.S. Buttercup* would be stabilized and repaired in conformity with the *Secretary of the Interior's Standards for Rehabilitation*, and that the resource would be made accessible to the public as part of the recreational program. For additional information regarding the reasonable range of alternatives, please refer to the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, in Section 2.21, Alternatives, of this Comments and Responses document.

At such time that decision-makers consider whether to approve or disapprove the Proposed Project, they will also consider whether to approve one of the alternatives to the Proposed Project analyzed in the EIR, such as Alternative C, which would retain the U.S.S. Buttercup.

### **2.6.6 AVENUE OF THE PALMS**

#### **Comments**

Vol. 1, IV.B.24, Aesthetics: There is no sufficient description of the historic importance of the Avenue of Palms, so the conclusion that it is not considered a Historic Resource for the purpose of this analysis, is an insufficient conclusion. The 2006 EIR Transfer & Reuse of Station TI 3-40 clearly states it to be a resource, why does this EIR fail to identify it? (*Kathrin Moore, San Francisco Planning Commission*) [20.23]

#### **Response**

The discussion in EIR Section IV.B, Aesthetics, of the impact that would result from removing Avenue of the Palms includes a cross reference to Section IV.D, Cultural and Paleontological Resources, for its analysis of the historic and architectural significance of Avenue of the Palms

The 2005 EIR did not analyze the historic significance of Avenue of the Palms; rather, it notes that correspondence from the California Office of Historic Preservation (“OHP”) leaves open the question of whether features remaining from the 1939 Exposition, such as Avenue of the Palms, would be an historical resource. Page 3-40 of the 2005 EIR states that:

The National Park Service analysis in 1987 concluded that insufficient resources from the exposition existed at Treasure Island to warrant additional eligibility recommendations or listing as an historic landmark. While none of these analyses addressed the historic landscape area of the Avenue of the Palms... the OHP’s letter of March 22, 1984, advised that “the 1939 Exposition is highly significant historically, and any features remaining from that era would have a strong likelihood of eligibility, even if some alteration to them had taken place.” This suggests that the avenue, which was part of the original exposition area, would contribute to the eligibility of the exposition buildings, or could in itself qualify as an historical resource.

The 2005 EIR did not identify Avenue of the Palms as a historical resource. Yet while this question is raised in the 2005 EIR, it is answered in the EIR for the Proposed Project. On EIR pp. IV.D.38- IV.D.40, the historic and architectural significance of Avenue of the Palms is evaluated under three contexts: as a contributor to a potential GGIE landscape historic district; as an individual landscape feature; and as a potential historic district consisting of remaining GGIE landscape features and buildings. In each of these contexts, the EIR concludes that Avenue of the Palms is not eligible for inclusion in the California Register of Historical Resources based on a lack of integrity of design, materials, workmanship, setting, feeling and association. Thus, the conclusion in the EIR for the Proposed Project does not contradict that of the 2005 EIR.

### 2.6.7 JOB CORPS CAMPUS

#### Comments

2. Please include an evaluation of the Job Corps site. In numerous EIRs historic resource evaluations include adjacent parcels and even neighborhoods. The evaluation may not find any historic resources, but we don't know that now and indirect impacts to historic resources could result from construction activities. (*Hisashi Sugaya, San Francisco Planning Commission*) [21.2]

- Because of the proximity of the proposed new buildings to the Job Corps campus, the buildings within the campus must be evaluated for their historic significance. Even if development would not occur on the campus, the scale and design of the proposed new construction in the vicinity could impact the integrity of setting, feeling and association of the campus buildings, resulting in potentially significant impact.
  - (1) Include an evaluation of the historic significance of each of the buildings located within the federal Job Corps campus.
  - (2) Analyze all potential impacts of the Project on historic resources within the Job Corps campus, including aesthetic impacts. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.46]

#### Response

The focus of the EIR's description of setting and analysis of impacts on historic architectural resources is on resources within NSTI and, more specifically, those within the Development Plan Area. No potentially significant impact related to historic architectural resources is anticipated outside of the Project Area as a result of the Proposed Project. All NSTI buildings that were 50 years old or more in 1997, including Job Corps campus buildings, were comprehensively studied and evaluated for their historic and architectural significance in the 1997 Inventory and Evaluation. The 1997 Inventory and Evaluation found no historical resources within the Job Corps campus. Even if such buildings were found individually or collectively eligible for inclusion in the California Register of Historical Resources if studied today, the Job Corps campus buildings would not be directly affected by the Proposed Project, as the Proposed Project does not include any physical changes to the Job Corps campus. In addition, as discussed in EIR Section IV.B, Aesthetics, on p. IV.B.12, the existing visual setting on Treasure Island is characterized by "widely spaced military support facilities of a generally utilitarian character without a strong sense of spatial or design cohesiveness." Likewise, the Job Corps campus site is not characterized by any cohesive or intact visual context contributing to its significance. As such, project-related changes to the visual setting surrounding the Job Corps campus would not be expected to indirectly result in a material impairment of the historic and architectural significance of the Job Corps campus. For these reasons, no additional study of the historic and architectural significance of the Job Corps campus is required in the EIR.

## 2.6.8 CALIFORNIA HISTORIC LANDMARK DESIGNATION

### Comments

- The DEIR states that Treasure Island was designated as State Historical Landmark No. 987 in 1989, and is therefore included in the California Register of Historic Resources. The DEIR further states that the basis for the island’s designation is its association with GGIE “*so only features associated with GGIE would be a part of the State Historic Landmark designation.*”
- How does the DEIR come to the conclusion that the basis for the island’s designation State Historical Landmark No. 987 is due only to its association with GGIE and that “*only features associated with GGIE would be* [emphasis added] *a part of the State Historic Landmark designation*”? Please explain the basis for this statement.
- What does the State designation include as being the significant buildings, features and periods that are the basis for Treasure Island’s designation as a State Historical Landmark? According to the California Office of Historic Preservation’s website, the island’s history from 1939 to 1944 as the landing site for flights of the *China Clipper*, as well as its history as a Naval Station also seem to be a part of the recognized historic significance of the island under this designation:

**“NO. 987 TREASURE ISLAND-GOLDEN GATE INTERNATIONAL EXPOSITION, 1939-40** - This artificial island was constructed of bay sand in 1936-7. It was the site of the Golden Gate International Exposition, February 18, 1939-September 29, 1940. Tall towers, gigantic goddesses and dazzling lighting effects turned the Island into a "Magic City." The exposition celebrated the ascendancy of California and San Francisco as economic, political and cultural forces in the increasingly important Pacific Region. From 1939 to 1944 the Island was the landing site for flights of the *China Clipper*. Treasure Island has been a U.S. Naval Station since 1941. Location: Naval Station, Treasure Island, San Francisco” (Vedica Puri, President, Telegraph Hill Dwellers) [39.43]

### Response

The State Landmark designation does not specify any particular features that are considered part of or contributing to the significance of the resource. As the title “State Historical Landmark No. 987 Treasure Island – Golden Gate International Exposition, 1939-40” indicates, the significance of the resource is premised on its association with the GGIE. Other associations (as an airport, as a Naval Station, and as an engineering achievement) are noted in the description but are subsidiary to its association with the GGIE under this designation.

As discussed on EIR p. IV.D.29, Treasure Island’s intended subsequent role as an airport was shortly abandoned with the advent of World War II when the Navy took possession of the island. Buildings 1, 2, and 3, will be retained to continue to convey their individual significance as features of the GGIE, and as their brief intended role (though abandoned) as airport facilities after the close of the Exposition.

As discussed in Section IV.D, Cultural and Paleontological Resources, on pp. IV.D.33-IV.D.38, the features of Treasure Island from the Navy's tenure on the island were studied and evaluated for their eligibility for inclusion in the California Register of Historical Resources. With the exception of the *U.S.S. Buttercup*, they were not found to be eligible as individual resources, and were also not found to be collectively eligible as contributors to a potential Navy historic district on Treasure Island.

As discussed in the 2005 EIR on p. 3-40, at the request of the OHP in 1998, the significance of Treasure Island was considered and evaluated as an engineering achievement. The evaluation concluded that the island did not appear to be a significant example of the dredge-and-fill techniques of the U.S. Army Corps of Engineers, which had been doing similar work throughout the Bay Area, California, and the United States decades before the island was built.

### 2.6.9 IMPACT ON YERBA BUENA ISLAND

#### Comments

- The DEIR fails to evaluate any buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory. The DEIR cannot exclude these from evaluation by simply concluding that they “would not be *directly* affected by the Proposed Project.” Please respond to the following:
  - (1) Provide a list of all buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory.
  - (2) Evaluate each building for its historic significance.
  - (3) Show the location of each building in proximity to all proposed new development on YBI, including the height and mass of the proposed new buildings.
  - (4) Evaluate whether the proposed new development on YBI could affect the integrity of the setting, feeling and association of any of these yet-to-be-identified historic resources.  
(*Vedica Puri, President, Telegraph Hill Dwellers*) [39.47]

**Impact CP-12:** The DEIR finds that new construction within and adjacent to the Senior Officers' Quarters Historic District on YBI would not have a significant impact on these historic resources because TIDA will review all proposed work to make sure the new construction complies with the Secretary's Standards.

- Please describe in detail and illustrate graphically exactly what new construction is proposed within the Senior Officers' Quarters Historic District and where it would be located in relation to the buildings in the district. Please include maps and plans depicting the proposed additions.
- Include the proposed height of any such new construction or additions within the Senior Officers' Quarters Historic District. Compare the height of proposed new construction or additions to the heights of the buildings within the historic district.
- Please describe in detail exactly what new construction is proposed *adjacent* to the Senior Officers' Quarters Historic District, including its height and design.
- Why is it necessary to build a parking lot adjacent to the historic district (per statement in DEIR)? Where would a new “fire station” be located?

- In lieu of relying on the TIDA board to ensure that the historic district will be protected from inappropriate, out of scale development, please discuss other, more effective ways to avoid or mitigate potentially significant impacts on these historic resources, including requiring a later project specific EIR for each project that proposes to alter historic district properties or add new construction within the historic district, and requiring review by the City's Historic Preservation Commission of each such project. As stated previously in these comments, additional project-specific environmental review, together with public review by an expert body is the only way potentially significant impacts could be avoided or adequately mitigated.
- The DEIR states that the historic Nimitz House and Senior Officers' Quarters will be "adaptively reused."
- What uses are being programmed for the Nimitz House? For the other Senior Officers' Quarters? For the Torpedo Assembly building? Discuss how each of these proposed uses would impact the significance of these historic resources?
- What standard will be used for alterations to these historic resources: preservation, rehabilitation or restoration?

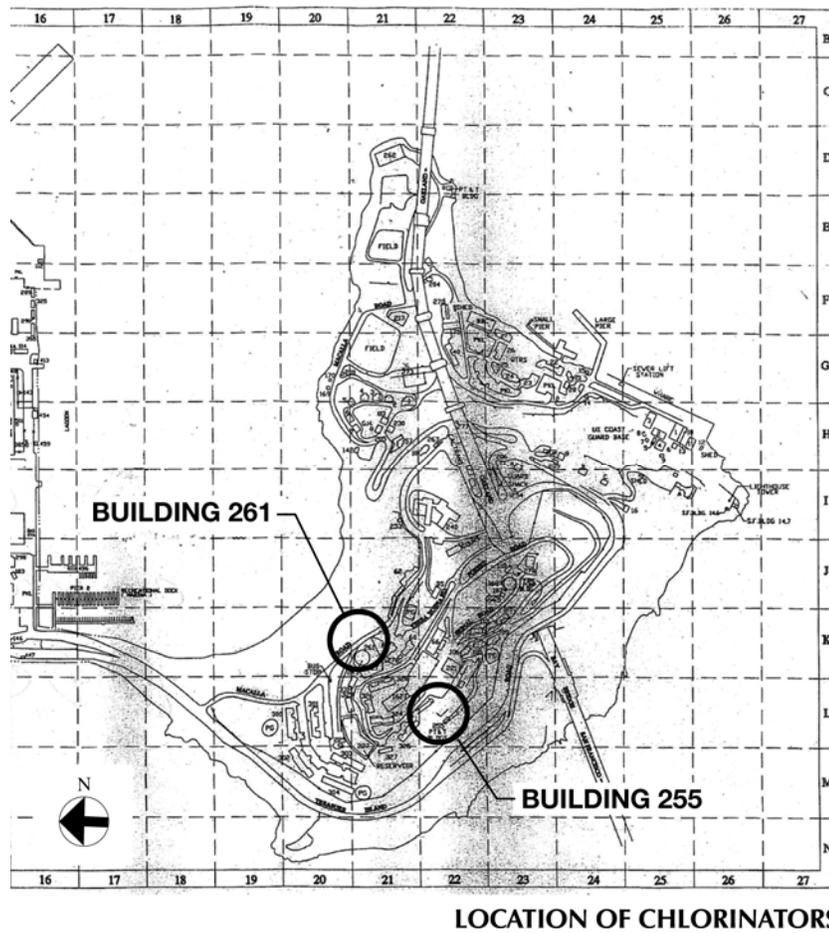
The term "adaptive reuse" is vague and insufficient to determine if there will be significant impacts on these historic resources under CEQA/NEPA without later project specific review under CEQA.

**Impact CP-13:** Whether the Proposed Project could contribute cumulatively to impacts on historic resources on YBI when considered with nearby projects depends on how the resources within the Senior Officers' Quarters Historic District are treated. Unless each proposed project on YBI is considered by a separate project specific EIR (see discussion under Impact CP-12 above), the impacts of the Proposed Project on this historic district could be cumulatively significant when considered together with those of the Bay Bridge East Span Project and YBI Ramps.

Further, given that the DEIR repeatedly says that: "*it is not possible to foresee the ultimate impact from the current concept-level design*" we do not believe the DEIR can possibly determine with any certainty what the cumulative impacts of the Proposed Project will be. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.58]

### **Response**

There are two structures on Yerba Buena Island now over 50 years old that were not studied in the 1997 Inventory and Evaluation: Building 255, built in 1947, and Building 261, built in 1948. Both buildings are known by the name "Chlorinator," and both are utilitarian structures. Building 255 houses equipment that was used to boost chlorine in the incoming water supply from the San Francisco main supply line to the Island. Building 261 houses equipment that was used to boost chlorine in the incoming backup water supply from the incoming water supply line from Oakland. The locations of these buildings are shown on the following page:



These buildings have been studied and evaluated in a supplement to the HRE by historic resource consultants Knapp & VerPlanck. Knapp & VerPlanck concluded that these features are ineligible for inclusion in the California Register of Historical Resources.<sup>5</sup> No evidence indicates that they are associated with important historical events or persons sufficient to qualify for inclusion in the California Register of Historical Resources under Criterion 1 (Events) or Criterion 2 (Persons). They are neither unique nor rare examples of public utilities infrastructure, and therefore do not qualify under Criterion 3 (Design/Construction). It is not necessary to evaluate whether the Proposed Project could affect the integrity of the setting or feeling of the buildings on Yerba Buena Island, since there is no evidence that indicates these buildings could potentially qualify for inclusion in the California Register of Historical Resources.

<sup>5</sup> Knapp & VerPlanck, Preservation Architects, Memo, *Evaluation Addendum for Chlorinator Buildings 251 and 261, Yerba Buena Island*, November 11, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

As discussed on EIR p. II.22, the Nimitz House and the other Senior Officers' Quarters of the historic district and the Torpedo Assembly Building would be rehabilitated and programmed for public uses. A parking lot adjacent to the historic district would serve the proposed new public uses. Potential new construction within the Senior Officers' Quarters Historic District is illustrated and described in the proposed *Design for Development* on pp. 274-275. The proposed *Design for Development* Standards Y5, 7, and 15 require that the rehabilitation of buildings and contributing landscape features within the Senior Officers' Quarters Historic District conform with the Secretary's Standards, and proposals for any such work would be subject to review under the process described in the response in Section 2.6.3 above. As also noted in the response in Section 2.6.3, *CEQA Guidelines* Section 15064.5 (b)(3) states that a project conforming to the Secretary's Standards would generally have a less-than-significant impact on an historical resources; therefore, although specific designs are not currently available for evaluation, enough information is known to conclude that the impact of the rehabilitation would be less than significant.

One comment inquires about the location of a possible fire station on Yerba Buena Island. While no fire station is currently proposed for development on YBI, it is a permitted use for parcel A-3, which sits just outside the boundaries of the Senior Officers' Quarters Historic District, as shown on Figure Y5d of the proposed *Design for Development*. While the amount of development proposed for Yerba Buena Island would not require a second fire station, the San Francisco Fire Department requested a location be identified in case one is required should certain development thresholds be exceeded.<sup>6</sup> As discussed in Section IV.L, Public Services, p. IV.L.18, a new joint Police-Fire station would be constructed on Treasure Island in Phase 2 on Block IC4, as shown in Figure IV.A.2: on EIR p. IV.A.17.

#### **2.6.10 SECTION 106**

##### **Comment**

- The DEIR refers to Section 106 compliance for Navy actions, including the transfer of Navy property out of federal ownership. Please respond to each of the following questions:
  - (1) When did compliance with Section 106 occur?
  - (2) What is the date of the MOA?
  - (3) What is the term of the MOA?
  - (4) Who were the parties to the MOA?
  - (5) Who signed the MOA on behalf of the City of San Francisco?
  - (6) Did the MOA include a list of historic resources to be protected?
  - (7) What uses were proposed for historic resources on TI and YBI as of the date of the MOA?

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<sup>6</sup> Memorandum from Jack Sylvan to Gary Massentani (San Francisco Fire Department), Re: Treasure island and Yerba Buena Island Fire Protection, June 29, 2010.

- (8) Explain in detail the specific provisions of the MOA.
- (9) What are the conditions of the MOA as to the treatment of each identified historic resource?
- (10) The DEIR states that upon conveyance to TIDA the MOA “expires.” Explain why.
- (11) Is TIDA a party to the MOA?
  - The DEIR refers to a 1997 Inventory and Evaluation undertaken by the Navy. Since this inventory is now over 13 years old, will the Navy undertake a new independent inventory prior to transfer in connection with its required NEPA and Section 106 compliance?
  - The DEIR states that the Navy notified the Advisory Council on Historic Preservation in connection with the proposed conveyance from the Navy to TIDA and “*received notification that the Council declined to participate in the consultation.*” In what month/year did this notification by the Navy to the Advisory Council occur? Have they been notified in 2010? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.44]

### Response

The *Memorandum of Agreement Between the Department of the Navy and the California State Historic Preservation Officer For the Layaway, Caretaker Maintenance, Interim Leasing, Sale, Transfer, and Disposal of Historic Properties on the Former Naval Station Treasure Island* (“MOA”) was executed on June 2, 2003.<sup>7</sup>

Signatory parties to the agreement were The Navy and the California State Historic Preservation Officer. The City of San Francisco is listed as an “Invited Signatory Party.” The Bay Miwok Band, the California Preservation Foundation, and San Francisco Architectural Heritage are listed as “Concurring Parties” to the MOA. TIDA is not a signatory party to the agreement. No uses were proposed for the buildings upon execution of the MOA. No conditions as to the treatment of historic architectural resources were stipulated in the MOA.

In partial compliance with its obligations under the MOA, the Navy prepared National Register of Historic Places Registration Forms and Historic American Engineering Record (HAER) documents for six properties at NSTI under its MOA obligations. As called for by the MOA, the nominations covered the Senior Officers’ Quarters Historic District, Quarters 10 (with Building 267); Building 262; Building 1; Building 2; and Building 3 (with Building 111). Notice of the Navy’s nomination submission to the Keeper of the National Register was sent to the Mayor of the City of San Francisco on May 7, 2007, as required under 36 CFR 60.9. On February 26, 2008, the Senior Officers’ Quarters Historic District was placed on the National Register of Historic Places, as well as Quarters 10 (with Building 267), Building 1, Building 2, and Building 3 (with Building 11) as individual resources.

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<sup>7</sup> A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

Overall, the Navy is in compliance with the terms of the MOA. However, there are some stipulations that are in process or that cannot be completed until the historic properties are transferred out of federal ownership/termination of the MOA. According to the Navy, these are:

- “1. Coordinate the transfer of documents and photographs with the National Archives.
2. Survey of submerged sensitive areas to determine the presence of potentially significant submerged resources. We’re coordinating with SHPO [State Historic Preservation Officer] on the determination that no significant resources exist in those areas based on the results from Caltrans surveys.
3. Coordinate with SHPO on the licensing and leasing uses of historic buildings that cannot be modified to conform to the Secretary of Interior Rehabilitation Standards. Currently there is none.
4. Report to SHPO on an annual basis of problems and unanticipated issues related to the management of historic properties. This is an ongoing responsibility until the property transfer or termination of the MOA.”<sup>8</sup>

When all of the terms of the MOA have been fulfilled, the Navy will issue a written notification of the termination to all parties.

### **2.6.11 COAST GUARD**

#### **Comment**

Summary, page S.1- Please reformat first paragraph to make it clear you are describing the former NSTI in the discussion of historic resources. Right now reference is to the Island and there are historic resources on property owned by the US Coast Guard (USCG). These are:

- Quarters A - Listed on the Historic Register in 1980.
- Quarters B and C - Determined to be eligible for listing on the Historic Register in 1997.
- Quarters 8 and 9 - Potentially eligible for listing on Historic Register. (This determination was made by Navy).

Please place a paragraph before the sentence starting, “The Islands also include...” and then reference USCG historical buildings. Or just make it clear you are focusing solely on the NSTI side of YBI for the discussion of historical resources. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.6]

Section IV, page IV.A.6 - The lighthouse was built by the Lighthouse Board which later became the Lighthouse Service and finally the US Coast Guard. The Army did not build the lighthouse. Please refer to page II.11 of this DEIR for The Cultural Resources Survey for Group San Francisco can be provided for reference.

Section IV, page IV.A.10 - Same as comment 4 above.

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<sup>8</sup> An H. Bui, U.S. Navy, e-mail to Michael Tymoff, San Francisco Mayor’s Office of Workforce and Economic Development, November 22, 2010.

Section IV, page IV.D.6 - There is no mention of the USCG's history on the Island during the Army period. Please include at a minimum discussion of the 1872 lighthouse.

Section IV, page IV.D.6 - The Lighthouse Board, not the US Army, built the lighthouse keeper's residence. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.9]

Section IV, page IV.D.27 - The US Coast Guard should be listed in the following sentence, "Yerba Buena Island is a natural island that has been used by private parties and by the Army and Navy since the 1840s" The USCG's presence on the Island dates back to 1872. We have a long history on YBI which should be acknowledged. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.10]

Section IV, page IV.D.28 - Lighthouse was built by the Lighthouse Board after receiving a permit for the construction by the War Department. Please see comment 9 and rectify this ownership issue throughout the document. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.11]

Section IV, page IV.D.30 - The USCG Historic Districts should probably be mentioned in this portion of the document. Although not in the project area, the boundaries of at least one run to Hillcrest Road and may be impacted by any development of a bike path. Again these sites are not within the Project Area but adjacent to it.

Section IV, page IV.D.61 - Although the USCG's historic districts are outside the project boundary – any additional work down to City of SF roads may require incursion onto USCG property. In that case, the project may have some impacts on adjacent USCG properties – so a brief mention of these impacts might be warranted in this document. It is believed that any impact to these resources will be slight and wholly able to be mitigated. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.12]

### **Response**

The focus of the EIR's description of setting and analysis of impacts on historic architectural resources is on resources within NSTI and, more specifically, those within the Development Plan Area. No potentially significant impact related to historic architectural resource is anticipated outside of the Project Area as a result of the Proposed Project. See Figure II.2: Proposed Project Area, in EIR Chapter II, Project Description, p. II.8. For this reason, the historic context of Coast Guard resources and potential impacts on these resources are not discussed and analyzed in EIR Subsection D.2, Historic Architectural Resources. In response to comments, the EIR Summary Chapter, Section IV.A, Land Use and Land Use Planning, and Section IV.D, Cultural and Paleontological Resources, are revised as specified below (deleted text is shown in ~~strikeout~~ and new text is underlined).

The last three sentences of the paragraph under the heading "Existing Uses" on EIR p. S.1 are revised as follows:

...The designated historic buildings within the Development Plan Area on the Islands are Buildings 1, 2 and 3 on Treasure Island, and the Torpedo Assembly Building, the Nimitz House, and Quarters 10 and its garage on Yerba Buena

Island. In addition, the National Register-listed Senior Officers' Quarters Historic District is located on Yerba Buena Island; it is comprised of Quarters 1 through 7, a family quarters, associated ~~their~~ garages and formal landscaping elements. The Islands also include areas that are not part of the Development Plan Area: U.S. Coast Guard facilities on Yerba Buena Island, a U.S. Department of Labor Job Corps campus on Treasure Island, and Federal Highway Administration ("FHWA") land occupied by the San Francisco-Oakland Bay Bridge ("Bay Bridge") and tunnel structures on Yerba Buena Island.

The paragraph under the heading "Adjacent Land Uses" on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active station that covers approximately 39 acres on the southeast side of Yerba Buena Island. This station includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse ~~that was built by the U.S. Army.~~ The station is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.

The last paragraph on EIR p. IV.A.10 is revised as follows:

Unlike Treasure Island, Yerba Buena Island is a natural island that features steep slopes and dense vegetation. The island has been used by private parties and by the U.S. Army, ~~and Navy,~~ and U.S. Coast Guard since the 1840s. Land uses on the island include residential, open space, and a portion of the Bay Bridge structure (see Figure IV.A.1).

The last sentence of the first paragraph under the heading "Army Period" on EIR p. IV.D.6 is revised as follows:

In ~~1875~~1872, the ~~Army~~ Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse, lighthouse keeper's residence and support buildings; these are still present at the southern end of the island outside of the Development Plan Area.

The second sentence of the last paragraph on EIR p. IV.D.27 is revised as follows:

Although the Navy has managed the portion of Yerba Buena Island under its control and Treasure Island (collectively, Naval Station Treasure Island, or "NSTI") as a single facility since 1940, the two islands have different histories. Yerba Buena Island is a natural island that has been used by private parties and by the Army, ~~and Navy,~~ and Coast Guard since the 1840s. Treasure Island is an artificial island, constructed in 1936-1937 in the rocky shoals north of Yerba Buena Island.

The third sentence of the first paragraph on EIR p. IV.D.28 is revised as follows:

The context for historic architectural resources on Yerba Buena Island begins with the Army's occupation of the island in 1867, when the Army asserted a claim and took possession of the island. Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard

Station. In ~~1875~~1872, the Army Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse and lighthouse keeper's residence at the southern end of the island (these buildings still stand, but they are outside of the Development Plan Area)...

## 2.7 TRANSPORTATION

### 2.7.1 SETTING

#### 2.7.1.1 Traffic Setting – Bay Bridge Demand

##### Comments

2. In Table 8 on page 45 of the TIS, the maximum observed AM queues for the Interstate (I) 80 approach on Tuesday, May 6, 2008 and Wednesday, May 7, 2008, of 5.45 miles and 1.69 miles, respectively, do not look typical. These queues were possibly due to incidents on the SFOBB. Based on the Department's observations, the maximum AM queue for the I-80 approach typically extends approximately 0.8 mile to 1.1 miles upstream of the Toll Plaza. If the queues on these days were indeed the result of incidents, the average maximum observed queues would overestimate bridge demand. In addition, if there were incidents on these days, the longer queue would be caused by reduced bridge output (i.e., less demand served) rather than higher demand, and using a "normal" bridge output for those days would not be appropriate to estimate demand.
3. As the queue from the Toll Plaza extends greater than 1.5 miles upstream from the Toll Plaza, it begins to combine other bottlenecks that are not associated with the Toll Plaza queuing. While some of the vehicles in queue at I-80 upstream of the Powell Street interchange are certainly headed to the Toll Plaza, it is not possible to use this part of the queue to estimate Toll Plaza demand because the destinations of this traffic cannot be determined. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.3]
4. The maximum observed queues are only shown for the local street approaches to the SFOBB in San Francisco. However, the eastbound I-80 mainline also experiences queuing during both weekday AM and PM peak periods. The analysis does not include the eastbound I-80 mainline approach to the SFOBB. This would underestimate the eastbound demand for the SFOBB. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.4]

##### Response

As described in the *Treasure Island and Yerba Buena Island Redevelopment Plan Transportation Impact Study*, included as EIR Appendix C, vehicle queues leading to the Bay Bridge Toll Plaza were observed over three days in May 2008, and, as shown in Table 8 on p. 45 of the TIS, queues can vary substantially from day to day depending on weather, special events, or incidents on the bridge. To account for this variation, the average queue length for each of the three freeways leading to the Bay Bridge (I-80, I-880, and I-580) was calculated to determine the extent of the demand on the Bay Bridge. In performing the transportation study, the City noted the difference between one of the three days (Tuesday, May 6) and the other two observation days (Wednesday and Thursday, May 7 and 8, respectively). Although the comment notes that two of the three days exceeded "typical" queues, only one of the three days exceeded "typical" lengths by a substantial amount. After careful consideration, the analysis ultimately concluded that collisions

on the bridge and other incidents are not infrequent, and regular commute-hour drivers are somewhat accustomed to the associated delays. Therefore, the three-day average queue length is considered a reasonable “snapshot” of typical traffic conditions on the Bay Bridge for the purpose of the transportation impact analysis, even if a collision or other event affected the results on at least one of the days.

Despite the reasonableness of including the effects of an incident in the assessment of existing conditions, as shown in the TIS in Figure 14, on p. 48, and in the EIR in Figure IV.E.4: Existing Freeway Travel Demand, on p. IV.E.10, the Bay Bridge operated at its full capacity of 9,000 vehicles per hour in the peak direction during the AM and PM peak hours, respectively, on each of the three observation days. Based on discussions with staff of the California Department of Transportation (“Caltrans”), it appears that an incident occurred prior to the peak period on one of the observation days, causing a lengthy queue to form. Traffic volume data provided by Caltrans show a substantial decrease in traffic flow across the bridge on Tuesday, May 6, likely corresponding to an incident, during which traffic flow decreased from capacity flow to as low as 6,000 vehicles per hour, between approximately 6:00 and 7:00 AM. Traffic flow returned to typical peak period capacity of approximately 9,000 vehicles per hour at approximately 7:30 AM. During the peak hour observations, traffic flow on the bridge was at capacity; however, the queues observed were exceptionally long. These exceptionally long queues were likely residual from the earlier incident. Therefore, including this observation in the calculation of average queue length, which, in turn, was used to estimate unserved demand, ultimately provides a more conservative analysis. However, if this data point were not included in the calculation, the Proposed Project impacts associated with westbound queuing in the AM peak hour would remain significant and the conclusions presented in the EIR would remain the same.

The comment correctly states that as queues on westbound I-80 extend beyond 1.5 miles upstream of the Bay Bridge Toll Plaza, vehicles destined for the Bay Bridge begin to mix with other vehicle traffic destined for I-580/I-880 South or Powell Street or Ashby Interchanges. The demand at the Bay Bridge Toll Plaza identified in Table 9 on p. 46 of the TIS and described on EIR p. IV.E.9 reflect vehicle queues observed in the right-most lanes approaching the I-80/I-580 split before the approach to the Bay Bridge Toll Plaza. Vehicles queuing in the three left-most lanes were excluded from the observations and queuing analysis and were assumed to be destined for I-580/I-880. As shown in Table 8 on p. 45 of the TIS, only one observation period (Tuesday, May 6, 2008) had recorded vehicle queues in the right-most lanes that extended beyond Powell Street that would have been affected by traffic merging onto the freeway from Powell Street or Ashby Avenue.

If adjustments to the analysis were made to reduce the amount of traffic in the right-most lanes assumed to be destined to the Bay Bridge for the Tuesday May 6, 2008, observation period, the TIS would show shorter queues and less unserved demand for the westbound Bay Bridge during

the AM peak hour. Although this may revise how the existing demand volumes for the bridge and the existing average queue length are described, it would not change the results of the analysis presented in the EIR. Since the bridge operates at capacity and would continue to do so in the future, the EIR presents a reasonable worst-case assessment of the conditions drivers would experience queuing at the Bay Bridge Toll Plaza.

The EIR does not quantify the extent to which eastbound queuing that occurs on the I-80/US 101 mainline within San Francisco constitutes unserved demand for the Bay Bridge because of the complexity of the network approaching the Bay Bridge from the south. Traffic congestion on the I-80/US 101 mainline approaching the Bay Bridge from the south often extends upstream of the Central Freeway merge, making it impossible to separate hourly traffic demand destined to the bridge deck from traffic that exits at Seventh Street, Fourth Street, Ninth Street, or the Central Freeway/Octavia Boulevard. Further, the eastbound approach to the Bay Bridge is unlike the westbound approach, where there is an uninterrupted queue storage area approximately 1.8 miles long approaching the Toll Plaza (between the Toll Plaza and Powell Street) on which queues can be identified and associated with the Bay Bridge with a reasonable degree of certainty. Rather, on the eastbound approach, there are five on-ramps and two off-ramps located along the 1.8-mile segment between the Central Freeway and the Bay Bridge itself, making a precise quantification of the amount of queuing that represents “unserved demand” impossible due to the complexity of the network. In fact, it is unclear whether the congestion in this area is due to actual capacity constraints on the Bay Bridge or to the weaving of vehicles between various entrances and exits throughout this complex system of freeway, and as a result, it is unclear how much or if any of the resultant queues should be considered unserved demand. Therefore, identifying and including unserved demand from the I-80/US 101 mainline in the analysis would be speculative. The EIR does quantify the amount of unserved demand for the eastbound Bay Bridge originating on the approaches to on-ramps from Downtown San Francisco and acknowledge that the amount of unserved demand may actually be greater due to queuing on the eastbound mainline. This is noted on Figure IV.E.4 on EIR p. IV.E.10.

### **2.7.1.2 Transit Setting – Downtown San Francisco**

#### **Comment**

The District requests that Page IV.E.19 be modified to state that Golden Gate Transit (GGT) Routes 2, 38, 56, 58, 74, and 97 also operate on surface streets in the vicinity of the Transbay Terminal. Routes 92 and 93 serve San Francisco but do not operate within the study area. While the route listing is correct at the time of publication of the DEIR, please note that Routes 26 and 73 will be discontinued effective September 12. (*Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District*) [9.1]

**Response**

The second full paragraph on EIR p. IV.E.19 is revised as follows (new text is underlined):

The **Golden Gate Bridge, Highway, and Transportation District** (“GGBHTD”) provides bus and ferry service between the North Bay (Marin and Sonoma Counties) and San Francisco. Within San Francisco, Golden Gate Transit bus lines 2, 4, 8, 18, 24, 26, 27, 38, 44, 54, 56, 58, 72, 73, 74, 76, 97, 10, 70, 80 and 101 operate on surface streets, with stops adjacent to the Transbay Terminal offering service to Marin and Sonoma Counties. Golden Gate Transit also operates ferry service between the Larkspur and Sausalito Ferry Terminals in Marin County and the San Francisco Ferry Building.

Since the EIR Setting section presents conditions at the time the impact analysis was prepared, the September 2010 termination of Golden Gate Transit Routes 26 and 73, which occurred after the Draft EIR was published, was not incorporated.

**2.7.1.3 Temporary Transbay Terminal**

**Comment**

Section IV, page IV.E.23 - Did the temporary Transbay Terminal just open recently? If so, please change the reference of a “spring 2010” opening to “summer 2010” (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.13]

**Response**

The temporary terminal was opened in August 2010. The last sentence of the third full paragraph on EIR p. IV.E.23 is revised as follows (deletions are shown in ~~strike through~~ and new text is underlined):

A temporary terminal, located on the block bounded by Main, Folsom, Beale and Howard Streets, opened in August ~~spring~~ 2010, and serves commuters during demolition and construction of the new Transit Center.

**2.7.2 TRANSPORTATION IMPROVEMENTS**

**2.7.2.1 Americans with Disabilities Act**

**Comment**

All improvements both on and off island, including the on-island shuttle, should meet the Americans with Disabilities Act standards. This includes providing adequate connections to the east span pedestrian/bicycle path currently under construction and the proposed west span multi-use path on the SFOBB. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.19]

### **Response**

As required by Federal, State, and City regulations, the Proposed Project's transportation infrastructure improvements would be constructed to meet the requirements of the California Building Code in Title 24 of the California Code of Regulations ("Title 24"), which is designed to comply with the requirements of the Americans with Disabilities Act ("ADA") and State statutes for physical accessibility. The on-island shuttle buses would also meet State and Federal accessibility requirements. Shuttle service would be administered by the Treasure Island Transportation Management Agency ("TITMA"), which would be a public agency, and would therefore be subject to the provisions of ADA/Title 24 applicable to public entities.

The sidewalk and bicycle lane improvements included in the Proposed Project on the east and west sides of Yerba Buena Island would comply with Title 24 standards, and the project design would be coordinated with the Title 24-compliant Bay Bridge East Span pedestrian/bicycle path currently under construction by Caltrans. The proposed West Span bicycle and pedestrian mixed-use path ("BPM") would not be under the control of project sponsors, and that project, if constructed, would include connections to the roadway and sidewalk network at both the Yerba Buena Island and San Francisco touchdown locations. As indicated on EIR p. IV.E.4, the West Span BPM Project Study Report ("PSR") is a separate study underway by Bay Area Toll Authority and Caltrans to evaluate potential alternative configurations for the proposed mixed-use pedestrian and bicycle path on the western portion of the Bay Bridge, but funding for its construction has not been identified, and it was not assumed to be in place for the transportation impact analysis.

#### **2.7.2.2 Alternative Fuel Vehicles**

### **Comments**

4. The transportation program does not include a fleet of small nonpolluting vehicles, such as very small electric cars, that residents might use individually for on-island travel on a shared basis, like car share (or I could not find this in the text). This would be very helpful for shopping and other local trips that they would otherwise use a car for. It will also be very helpful for households that own no cars, and for persons with disabilities. The on-island shuttle buses alone do not meet all foreseeable practical needs. There are various possible mechanisms to fund and implement such a program, and short term parking for them with battery charging access will be need at destination points. (*John Elberling, Director, TIDA Board*) [22.5]

Transit Oriented Development 1) Require the use of zero emission vehicles by government agencies and encourage their use by businesses and non profits on the island, preferred parking for visitors should be limited even more. (*Jorge Garcia*) [4.2a]

**Response**

The Proposed Project does not include a requirement or specific proposal for provision of a fleet of electric cars or any particular alternative fuel source or zero-emission vehicles, nor does it include requirements that government entities use alternative fuel vehicles. Plug-in stations would not be required either of the master developer or of the developers of individual buildings. Such uses would be permitted, however, under the proposed *Design for Development*, and TITMA could institute a program of small electric vehicles if and when demand for them materializes. While a fleet of small electric cars would be beneficial for Islands residents, given their limited range, they would not substantially reduce vehicle emissions associated with travel within the Islands or reduce significant air quality impacts. In addition, it would be speculative to assume that TITMA would have the ability to access funding sources suggested by the comment.

As indicated on EIR p. IV.E.46, a car-share program would be implemented on the Islands, providing members access to automobiles without having to purchase a car. The car-share program may include electric vehicles. However, because fleet selection is currently unknown and would be beyond the control of the project sponsors, it would be speculative to assume any particular fuel source for the car-share program. See also the second response in Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, and the response in Subsection 2.19.1, Alternative Energy Sources, in Section 2.19, Minerals and Energy, regarding alternative fuels. As indicated in EIR Section IV.E, Greenhouse Gases Emissions, on p. IV.H.42, San Francisco uses carbon-free electricity to power its electric buses and trolleys; however, these vehicles do not and would not serve the Island. Approximately 17 percent of the San Francisco Metropolitan Transportation Agency's non-electric bus fleet consists of hybrid buses.

Parking information related to the Proposed Project is presented on EIR pp. IV.E.136-IV.E.140.

- Overall, the Proposed Project proposes 10,675 parking spaces, including 1,035 on-street spaces. Preferential parking for visitors is not anticipated to be provided. Also please refer to the responses in Subsection 2.7.10.2, Parking Ratios, below, regarding parking supply.

**2.7.2.3 Funding Mechanisms**

**Comments**

- Exactly where is the “full funding” necessary to implement the improvements and service levels recommended in the *2006 Transportation Plan* supposed to come from?
- How will any additional MUNI or ferry service be paid for? To what extent will the taxpayers have to pay for the existing or any increase in MUNI service, AC Transit service, and ferry service to TI/YBI under the currently proposed plan? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.60]

- Will phasing of the development be limited until transportation infrastructure can be financed and built? Why isn't this a required Mitigation Measure for the Significant Traffic Impacts identified in the DEIR? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.67]

**Response**

Funding for the AC Transit and ferry component of the base transportation program identified as part of the Proposed Project would be provided by the Proposed Project. This includes project sponsor contributions for purchase of additional AC Transit buses and leasing of a ferry vessel, as well as revenues collected by TITMA. As the agency that would be responsible for managing revenue from congestion pricing, parking, and transit vouchers, TITMA would dispense funds to AC Transit and the Water Emergency Transit Authority (“WETA”). It is anticipated that TITMA would have available sufficient funds to cover operating costs for the level of AC Transit and WETA service proposed in the Proposed Project. The Proposed Project includes funding for transit operating subsidies for TITMA, during the interim period when congestion pricing, parking revenues, and transit vouchers are insufficient to cover the shortfall. Funding for the level of Muni service included as part of the Proposed Project is more particularly described in the response in Subsection 2.7.6.2.1, Transit Funding, below.

Sources of funding for elements of Mitigation Measure M-TR-2, the Expanded Transit Service for Muni operations, are more fully discussed in the responses in Subsection 2.7.6.2.1 and Subsection 2.7.15.3, Funding. Sources of funding for the lease of one ferry, and required expansion of berthing facilities at the Ferry Building to accommodate ferry service under Mitigation Measure M-TR-2 are discussed in responses in Subsection 2.7.6.5.2, Ferry Size, while funding for elements of the Expanded Transit Service to be operated by WETA are also discussed in the response in Section 2.7.6.2.1 (see also EIR Chapter II, Project Description, p. II.38). Funds for the San Francisco Municipal Transportation Agency (“SFMTA”) to operate the Muni line 108-Treasure Island bus route would continue to come from property taxes paid into the San Francisco General Fund. The cost of Muni operations to/from Treasure Island is currently projected to be substantially less than the amount of revenue generated by the Proposed Project to the General Fund, through property taxes, sales taxes, hotel taxes, and other sources; a fiscal impact study including analysis of the SFMTA service is being prepared for the Proposed Project and will be included as part of the final record for EIR certification. All of the transit services would also collect fares, although typically public transit fares do not generate sufficient revenue to fully support transit service.

A Disposition and Development Agreement (“DDA”) between TIDA and TICD would include a Transportation Implementation Plan and Schedule of Performance that would obligate TICD to provide adequate roadway and transit infrastructure improvements as the development progresses. The Transportation Implementation Plan and Schedule of Performance would also obligate TICD to provide a transit operating subsidy on a fixed schedule of payments, in order to

subsidize transit operations until the point at which on-going project-generated revenues from congestion pricing, commercial and on-street parking, and transit vouchers are projected to be sufficient to cover the project's share of operating costs for each transit service. Together, the infrastructure construction and operating subsidy payments are expected to enable each phase of development to have sufficient transportation infrastructure in place. A mitigation measure requiring phasing of transportation improvements is not included because, as noted above, a Transportation Implementation Plan and Schedule of Performance would be part of the Proposed Project.

#### **2.7.2.4 On-Island Transit**

##### **Comment**

5. Transportation and Parking: Staff supports the City's Transit First Policy for Treasure Island and Yerba Buena Island. The proposal for a fleet of alternative fuel shuttle-buses that circulate throughout the Islands, with timed transfers at the Transit Hub offering fare-free rides to residents and visitors of the Islands is consistent with TIDA's statutory trust grant and the public trust. Visitor serving parking and signage regarding the availability of the free shuttle-bus are encouraged throughout both islands. (*Grace Kato, Public Land Management Specialist, California State Lands Commission*) [24.6]

##### **Response**

The commenter's support for the Transit First Policy and the shuttle bus proposal is noted. The transportation improvements to support the City's Transit First Policy are presented on EIR pp. IV.E.30-IV.E.47. As indicated on EIR p. IV.E.46, the travel coordinator(s) in TITMA would be responsible for developing and distributing outreach and marketing materials, such as the signage regarding the availability of the fare-free shuttles.

#### **2.7.2.5 Shuttles to Mainland**

##### **Comment**

5. The transportation program does not include (or I can could not find it in the text) a required mitigation that large scale residential property managers provide shuttle van/bus services for their residents to mainland locations, such as shopping trips to major supermarkets etc. There are various possible mechanisms to fund and implement such services, which are routine in many master planned developments. This would be very helpful for shopping and other trips that they would otherwise use a car for. It will also be very helpful for households that own no cars, and for persons with disabilities. (*John Elberling, Director, TIDA Board*) [22.6]

##### **Response**

The transit and shuttle service for the Proposed Project was developed for the entire development program, rather than requiring individual developers to provide individual transit proposals. Additional shuttle van/bus service provided by individual developers would compete with, and

could affect the viability of the proposed service and required other transit mitigation measures by diverting riders from the proposed Muni and AC Transit routes. The existing Muni line 108-Treasure Island, the proposed AC Transit route between the Islands and Oakland, and the new ferry service between the Treasure Island Transit Hub and the San Francisco Ferry Building (described on EIR pp. IV.E.33-IV.E.35) would serve in a similar capacity as when dedicated shuttle van/bus service is provided for large scale developments located outside of San Francisco, in that they would provide point-to-point, non-stop service from Treasure Island to San Francisco and Oakland, where riders can make connections to other transit lines. Most of the large-scale master-planned developments referred to in the comment that provide private shuttle services consist of a single use, such as residential with no supporting retail, and are located in areas with substantially less transit service than is available in San Francisco and proposed for the Islands. In addition, the proposed fleet of fare-free shuttle buses that would circulate throughout the Islands would further benefit residents and visitors, including persons with disabilities, for trips within the Islands. The Proposed Project includes a set of transit improvements (see description of transit improvements on EIR pp. IV.E.33-IV.E.36). The EIR also identifies a mitigation measure to enhance transit (i.e., Mitigation Measure M-TR-2: Expanded Transit Service on EIR p. IV.E.74). Additional mitigation measures would not be required. Furthermore, the Project proposes about 75,000 square feet of neighborhood serving retail, which is expected to include a full service grocery store as well as other service establishments necessary for day-to-day activities.

#### **2.7.2.6 Streets and Grades**

##### **Comment**

The “Transportation Improvements” (page IV.E.31) need to be shown in comparison with existing transportation infrastructure, superimposed on topographic maps, as recommended in the CEQA Guidelines. The existing and proposed roads should be given names so that it is possible for the public and decision makers to discuss them, and the names should be consistent on all maps. The map on page IV.F.5, for example, calls Northgate Macalla Ct., among other confusions.

The proposed road segment that would connect Macalla Road with the Yerba Buena loop road appears to go straight uphill. What is the grade of this segment? Also, the new segment that would link Nimitz Drive with the real Macalla Court looks impossibly steep. What is the grade of the proposed new section? (*Ruth Gravanis*) [31.15]

##### **Response**

The purpose of Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31, is to identify the hierarchy of the street system described on EIR p. IV.E.30. Selected roadways on Treasure Island have been named for identification purposes only and are subject to change, and have been identified consistently on the EIR figures. The Proposed Project would largely remove the existing streets on Treasure Island and replace them with new streets in

a new alignment. If the proposed street system was overlaid on top of the existing system, it would be difficult to differentiate street systems as additional information related to the Proposed Project is also presented, and the graphic would not provide useful information for the purposes of the requirements of the California Environmental Quality Act (“CEQA”), as the street grid is proposed to be entirely redesigned and replaced. Unlike Treasure Island, the Proposed Project would not remove and replace the existing streets on Yerba Buena Island; rather, existing streets would be improved substantially in conformance with their existing alignments and grades. The names of existing streets on Yerba Buena Island would remain the same as they were as of the date of the Draft EIR. New streets on Yerba Buena Island, primarily contained within the new development areas, would have new names. Street labels on Yerba Buena Island on revised Figure IV.F.1: Noise Measurement Locations, in EIR Section IV.F, Noise, on p. IV.F.5, are corrected, as shown on the next page.

New and/or improved, public rights-of-way on Yerba Buena Island would be constructed consistent with San Francisco Department of Public Works Standards, and would meet access requirements for the San Francisco Fire Department. The slope of Macalla Road would range from approximately 4 percent to 20 percent, with an average slope of 10 percent<sup>1</sup>. The new road segment that connects Macalla Road to the loop road would have a grade of 15 to 20 percent. The street would start off at a slope of approximately 15 percent at its intersection with Macalla, steepen up to approximately 20 percent through the main portion of the street, and then level off at the top. The San Francisco Fire Department allows for a maximum street grade of 26 percent and maximum approach grades of 15 percent, and therefore, the new roadways would meet the San Francisco standards.

With respect to linking Nimitz Drive and Macalla Court, the project sponsors are proposing to construct new roads in these locations, rather than just connecting the existing ones. The two main legs of the “U” shape are expected to have an average slope of approximately 10 percent with increases in grade to up to 20 percent around the bend.

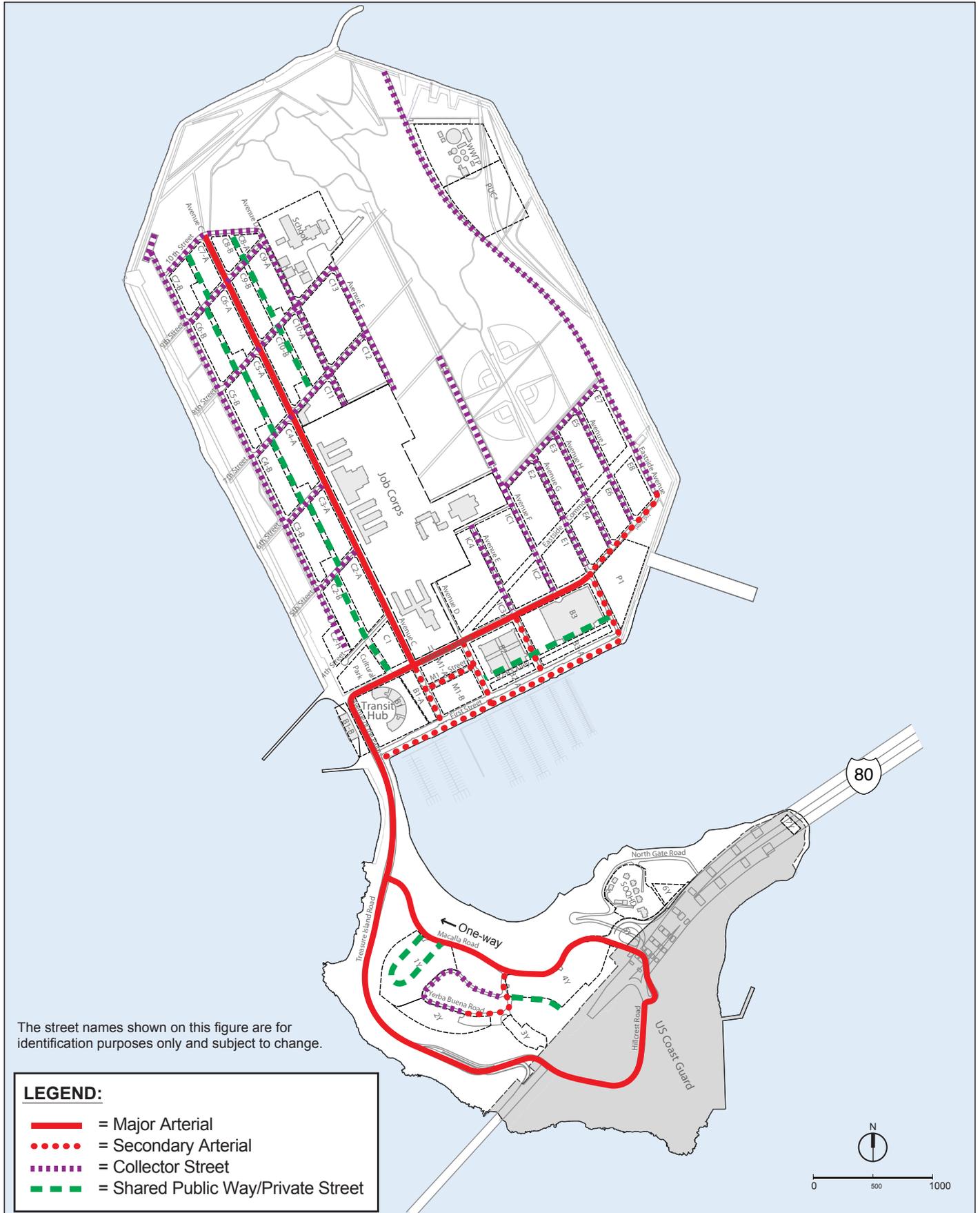
Figure II.10: Proposed Street System, on EIR p. II.41, and Figure IV.E.8 are revised to reflect minor corrections to the roadway classification of proposed streets on Treasure Island, and to correct the location of private streets on Yerba Buena Island. The shared public way on Development Blocks C12 and C13 on Treasure Island has been removed, because there would be no through access on these blocks. This change is consistent with the information presented in Section T2: Streets, on pp. 95-144, of the proposed *Design for Development*. The shared public way adjacent to Development Blocks 3Y and 4Y on Yerba Buena Island has been removed, because this land is on U.S. Coast Guard property, and it is not accessible to the public. These revised figures are presented on the following pages.

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<sup>1</sup> Macalla Road is not proposed to be regraded, so existing and future slopes are the same.







SOURCE: Fehr & Peers, 2009

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.8: PROPOSED TREASURE ISLAND AND YERBA BUENA ISLAND STREET SYSTEM**

### 2.7.2.7 Walking and Bicycling

#### Comment

In addition, the DTP does not adequately evaluate the needs of families with children (e.g. creating either a walkable and/or bikeable transit-oriented community), and lacks focus on those individuals that cannot afford cars (e.g. encouraging electronic transportation such as golf carts). It is notable that at the August 12, 2010 Planning Commission hearing, one commissioner took issue with the Project's demolition of the existing place of worship, and failure to replace such; he asked the question (but did not receive an answer) as to what effect/burden such demolition/lack of replacement would have on the residents and increased trip generation. The DEIR completely fails to take this fact into consideration when analyzing the traffic impacts. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.18]

#### Response

EIR pp. IV.E.30-IV.E.45 and revised Figure IV.E.8 shown above present the street network improvements on Treasure Island and Yerba Buena Island that would be provided to support higher density development within a walkable and bikeable transit-oriented community, consistent with the project sponsors' objectives as described on EIR pp. II.4-II.5. The Proposed Project would completely redesign and reconstruct existing streets on Treasure Island and provide a comprehensive network of new streets and shared streets that would facilitate travel to and from transit facilities, shopping, a school and recreational uses. Generally, sidewalks on Treasure Island would be about 6 feet wide, plus 4 to 5 feet of landscaping separating the sidewalk from adjacent roadways. An 80-foot-wide pedestrian-only linear park (Eastside Commons) would be provided as a primary source of connection between the Eastside Neighborhood and the Transit Hub. Shared public ways – a new City street type proposed for Treasure Island – would be narrow, low-speed facilities without separate pedestrian and auto accommodations, and instead pedestrians would be permitted to use and share the entire space. In addition to these internal rights-of-way focused on pedestrians, a continuous Class I mixed-use pedestrian and bicycle path would be provided around the perimeter of Treasure Island (as shown on Figure IV.E.11: Proposed Bicycle Circulation Plan, on EIR p. IV.E.38).

Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations sidewalks are not proposed.

However, several pedestrian paths would be provided through the open spaces and development areas on Yerba Buena Island. The Proposed Project would include new bicycle facilities on both Treasure Island and Yerba Buena Island, as illustrated on Figure IV.E.11. Please refer to responses in Subsection 2.7.7.1, Bicycle Access – Macalla Road and Subsection 2.7.7.2, Bicycle Access – View Area, and see Figure IV.E.11 for descriptions of revisions to the proposed bicycle network that were made in response to comments on the Draft EIR.

The Proposed Project would also include a new, fare-free on-island shuttle system with three proposed lines: two serving the neighborhoods on Treasure Island (including the Job Corps), and a third serving Yerba Buena Island. Each of the three shuttle lines would provide continuous service from early morning to late evening. The fare-free shuttles would stop at the Transit Hub on Treasure Island, facilitating transfers to ferry and outbound Transbay bus service. In addition to the Transit Hub stop, the shuttles would stop at the two other stops where express bus lines from downtown San Francisco and Oakland drop off in the City Center district, allowing for convenient connections. All residents, commuters and visitors would be able to use the on-island shuttle.

Please refer to responses to Subsection 2.7.2.2, Alternative Fuel Vehicles, for a discussion of small electric vehicles for on-island use.

As noted in the response in Subsection 2.6.2, Navy Chapel, in Section 2.6, Historic Resources, the project sponsors have decided to modify the Proposed Project to retain the existing Treasure Island Chapel. However, the use of the existing chapel on Treasure Island would not affect the transportation analysis presented in EIR Section IV.E, Transportation, which was conducted for weekday AM and PM, and Saturday midday peak hours. The existing Treasure Island Chapel is non denominational and can be used for all types of ceremonies and services, and has a capacity of 250 people. Events at the chapel typically occur during the non-peak travel periods, and would therefore, not affect the peak hour analyses. Transportation impacts during the non-peak periods would be less than those identified for the Proposed Project for the peak hour analyses.

### **2.7.3 METHODOLOGY**

#### **2.7.3.1 2005 EIR**

##### **Comment**

- What mitigation measures were required in the 2003 EIS and subsequent ROD to alleviate traffic impacts for a much smaller Reuse Plan?
- What were the peak AM and PM conditions assumed in the 1996 Reuse Plan and in the 2003 EIS?
- What are the are peak AM and PM conditions assumed in the DEIR? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.68]

##### **Response**

The *Record of Decision for the Disposal and Reuse of Naval Station Treasure Island California* was adopted on October 25, 2005 by the US Navy following completion of an Environmental Impact Statement conducted to comply with the National Environmental Policy Act (NEPA). In addition, the *Transfer and Reuse of Naval Station Treasure Island Final Environmental Impact Report* (State Clearinghouse #1996092073) was prepared by the City and County of San

Francisco and the Treasure Island Development Authority and was certified in May 2005 to comply with CEQA. Those documents evaluated the potential environmental impacts of a substantially different project than analyzed in the EIR for the Proposed Project (see EIR p. I.4 for a summary of the previous proposed project). However, transportation mitigation measures in the 2005 EIR consisted of the following:

- Implementation of a robust Transportation Demand Management program to reduce automobile trip generation and encourage carpooling, transit use, walking, and bicycling;
- Installation of traffic controls, such as ramp metering, on on-ramps to the Bay Bridge from Yerba Buena Island;
- Regular monitoring of ramp volumes, and a flexible and responsive TDM program that allows for adjustments based on monitoring results to improve the program's effectiveness;
- Coordination with other transit agencies to provide new transit service on the Islands;
- Encouraging traffic destined for the westbound Bay Bridge to use the on-ramp on the east side of Yerba Buena Island through signage or other physical means;
- Encouraging traffic on the eastbound Bay Bridge destined for Yerba Buena Island to use the east side off-ramp through signage or other physical means;
- Improvement of the eastbound ramps on the east side of the Bay Bridge;
- Limiting project traffic to no more than five percent of total traffic volume on the Bay Bridge during peak hours;
- Establishing transit service to the East Bay;
- Establishing ferry service to San Francisco;
- Providing priority transit access to the Bay Bridge; and
- Restriping Treasure Island Road to accommodate three travel lanes, instead of two present under existing conditions.

With the exception of the provision of signage or other physical improvements to encourage traffic to use the east side off-ramp from the eastbound Bay Bridge, each of these measures has been incorporated into the Proposed Project, included as mitigation measures to mitigate the Proposed Project's impacts, or, in the case of the improvements to the eastbound ramps on the east side of Yerba Buena Island, have been proposed as separate projects that are now under review. The transportation engineers working on the EIR for the Proposed Project concluded that travelers to the project site would likely be familiar with the area and that traffic would eventually reach an equilibrium between use of the west side and east side off-ramps from the eastbound Bay Bridge, making a requirement for extra signage alerting drivers to the existence of a second off-ramp on the east side unnecessary.

The development proposal in the 2005 EIR is included in the section of the EIR that discusses alternatives that were considered but rejected (see EIR pp. VII.74-VII.75). The Maximum

Development Alternative in the 2005 EIR included 2,800 housing units, a themed attraction, and three hotels with a total of 1,450 rooms. The 2005 EIR also included renovation and expansion of the existing marina at Clipper Cove from 100 to 400 slips. The Maximum Development Program was estimated to generate 7,020 person-trips and 1,410 vehicle trips during the AM peak hour (as compared to 7,950 person-trips and 1,613 vehicle trips for the Proposed Project); 13,280 person-trips and 2,530 vehicle trips during the PM peak hour (as compared to 11,689 person trips and 2,462 vehicle trips for the Proposed Project); and 12,390 person-trips and 2,220 vehicle trips during the Saturday midday peak hour (as compared with 12,274 person-trips and 2,861 vehicle trips for the Proposed Project). The impact assessment for the 2005 EIR identified the following impacts for the Maximum Development Alternative:

- Significant and unavoidable impacts associated with increased traffic volumes on freeway ramps and the Bay Bridge, specifically the eastbound on-ramp (east side) and the Bay Bridge approach – at the toll plaza and metering lights in the westbound direction, and on the ramps in downtown San Francisco in the eastbound direction.
- Significant and mitigable impacts on bus service between NSTI and the East Bay. (The plan did not include direct transit service between NSTI and the East Bay.)
- Significant and mitigable impacts on ferry service.
- Less than significant pedestrian, bicycle, goods movement, parking and construction impacts.

As with the 2005 EIR, the EIR analysis for the Proposed Project also identified significant and unavoidable impacts associated with increased traffic volumes, on the Yerba Buena Island ramps, at the toll plaza approach in the East Bay, and at intersections in downtown San Francisco. The Proposed Project EIR identifies a significant impact on AC Transit bus service between the Island and the East Bay related to operational delays associated with queuing extending from the on-ramps, and finds that this impact remains significant and unavoidable. The EIR also identifies a significant impact on Muni operations between the Island and the Transbay Terminal associated with queuing extending from the Bay Bridge on-ramps; however, this impact was reduced to a less-than-significant level with implementation of Mitigation Measure M-TR-24. Impacts on capacity of Muni bus service between the Islands and San Francisco were determined to be significant and unavoidable, because full funding for Mitigation Measure M-TR-2, the Expanded Transit Service, has not yet been identified, and its implementation remains uncertain. (Please refer to responses in Subsection 2.7.2.3, Funding Mechanisms, regarding funding of Mitigation Measure M-TR-2.) The Proposed Project would have less-than-significant impacts on other transit providers, including ferry service, BART, Golden Gate Transit, Caltrain, as well as pedestrians, bicycles, goods movement. The Proposed Project would have significant and unavoidable secondary parking impacts related to effects on transit capacity. Proposed Project construction impacts were determined to be significant and unavoidable.

Thus, the impacts identified in the EIR for the Proposed Project are similar to most of those identified in the 2005 EIR. However, the Proposed Project would not result in significant impacts on ferry service, unlike the project analyzed in the earlier EIR.

The EIR's traffic analysis focuses on weekday AM and PM peak conditions, and on Saturday midday peak conditions. The weekday AM peak is from 7:00 AM to 9:00 AM. The weekday PM peak is from 4:00 PM to 6:00 PM. The Saturday midday peak is from 1:00 PM to 3:00 PM. These times correspond to the periods when traffic congestion is at its highest levels and, as a result, the period during which Proposed Project impacts are likely to be highest.

### **2.7.3.2 2006 Transportation Plan**

#### **Comment**

Vol. 1, IV.E.33, Transportation: Footnote 11: What are the Planned Improvements referred to in the footnote? What population assumptions are they based on? What car ratios are they based on? The fact that full funding for improvements is currently not available doesn't justify a complete change in project intent. (*Kathrin Moore, San Francisco Planning Commission*) [20.30]

#### **Response**

The transit improvements identified in the 2006 *Treasure Island Transportation Plan* are similar to those included as part of Mitigation Measure M-TR-2: Expanded Transit Service, discussed on EIR pp. IV.E.74-IV.E.75. As noted in the footnote referenced in the comment, the EIR does not assume full implementation of these services as part of the Proposed Project due to funding uncertainty. Rather, the EIR assumes only those transit services that can be reasonably guaranteed by existing agreements and funding arrangements with relevant transit agencies so that all potential impacts are identified. With implementation of Mitigation Measure M-TR-2, the level and quality of transit service provided to the Proposed Project would be similar to that identified in the 2006 *Treasure Island Transportation Plan*.

The population assumptions associated with the Proposed Project are generally discussed in Chapter IV.C, Population and Housing. Tables IV.C.3 and IV.C.4, on EIR pp. IV.C.11-IV.C.12, present the population forecasts for the Proposed Project, in terms of new residents and new employment. At full buildout, the Proposed Project would increase the on-site residential population from about 1,820 people to about 18,640 people, and employment is expected to increase from 320 employees to about 2,920 employees. The transportation analysis and ridership projections as presented by the project sponsors in their 2006 *Transportation Plan* were based on 6,000 units; the analysis in the EIR is based on the current Development Plan uses, presented on EIR p. II.16, including up to 8,000 dwelling units.

It is not clear what the comment is referring to when inquiring about "car ratios"; however, the question is interpreted to mean automobile occupancy rates, or the number of people assumed to

be in each automobile trip. The EIR includes a discussion of the methodology by which vehicular trip generation was forecasted on pp. IV.E.55-IV.E.61. Footnote 2 in Table 19 of the project's Transportation Impact Study, included as EIR Appendix C, notes that for most uses, an average vehicle occupancy of 2.0 was assumed; however, trips to the cultural use were assumed to have an average occupancy of 2.3 persons per vehicle. These rates were generally based on the vehicle occupancy rates in the *SF Guidelines* for auto trips crossing the Bay Bridge for most uses. Exceptions include vehicle occupancy rates for travel to/from the museum/cultural uses, which were based on a study of travel characteristics for patrons of the New York Museum of Modern Art, and for the recreation/sports fields, which were based on previous analyses of sports fields in the Bay Area. Additional detail on the derivation of vehicle occupancy rates is included in the Technical Appendix D to the Transportation Impact Study, available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

If the comment is referring to parking supply ratios, Table IV.E.22: Permitted Parking Ratios and Maximum Off-Street Car Parking Spaces, on EIR p. IV.E.138, presents the proposed parking supply ratios for the various land uses. The parking supply ratios in EIR Table IV.E.22 are the same as in the *2006 Transportation Plan* for residential, retail, hotel, and marina uses. The only difference in parking supply ratios is in office/commercial uses, identified as flex space in the *2006 Transportation Plan*. While EIR Table IV.E.22 permits up to 2 spaces for every 1,000 square feet (with a maximum supply of 604 spaces), the *2006 Transportation Plan* includes less than 1 space per 1,000 square feet.

It is also possible the comment regarding "car ratios" is referring to the percentage of trips made by automobile or the number of auto trips generated per residential unit, since the comment was made in the context of population assumptions. Table IV.E.5: Person-Trip Generation by Mode on p. IV.E.60 of the EIR shows the net increase in person-trip generation due to the Proposed Project and the percentage of those trips expected to use each mode, including private automobile. The number of auto trips generated per residential unit is also summarized in the Technical Appendix D to the Transportation Impact Study. Specifically, the average auto trip generation rate for trips onto and off of the Islands due to the Proposed Project's residential uses is 0.14 trips per dwelling unit in the AM peak hour, 0.16 trips per dwelling unit in the PM peak hour, and 0.17 trips per dwelling unit in the Saturday peak hour.

The comment refers to a change in project intent. Traffic improvements identified as part of the Proposed Project in EIR Chapter II, Project Description, including all Transportation Demand Management program features, the base level of transit, congestion pricing, and ramp metering, or adopted as mitigation measures, will have to be implemented if the Proposed Project is approved. The project sponsors have also indicated their intent to work with outside transit agencies to secure the funding and facilities to implement Mitigation Measure M-TR-2.

### 2.7.3.3 Analysis Approach

#### Comment

- Please explain the disturbing statement in the Transportation Section of the DEIR which states as follows: “*Because the actual phasing of development would be market-driven and is unknown, it was determined that comparing the Proposed Project at full build out against two comparison points would best capture the full range of transportation impacts of the Proposed Project.*” (Vedica Puri, President, Telegraph Hill Dwellers) [39.70]

#### Response

The statement quoted in the comment is intended to explain that the analysis compares full project build-out against existing conditions and against year 2030 cumulative conditions without the Proposed Project. Impacts due to the Proposed Project, individually, can be identified by comparing full buildout of the project to Existing Conditions. The Proposed Project’s contribution to cumulative impacts can be identified by comparing full buildout of the Proposed Project to year 2030 cumulative conditions without the Proposed Project. This is consistent with most other environmental analyses conducted in San Francisco.

Analysis of full buildout of the Development Plan under Existing plus Project conditions provides a conservative assessment of project impacts, since trip generation would be less during the interim years prior to full buildout. Since the analysis included in the EIR presents a reasonable worst-case scenario, additional analysis of the Proposed Project on a phased basis was determined not to be necessary. See also the response in Subsection 2.1.8, Phasing, in Section 2.1 Project Description.

### 2.7.3.4 Cumulative Impacts

#### Comment

Vol. 1, IV.E.1f, Transportation: Why does the DEIR fail to provide a cumulative impact analysis that looks at this and other large projects in the pipeline, i.e. Eastern Neighborhoods, Market Octavia, TransBay, Rincon Hill, Bay View Hunters Point? (Kathrin Moore, San Francisco Planning Commission) [20.33]

#### Response

A cumulative transportation impact analysis was conducted for future year 2030 conditions. Cumulative impacts are identified in Impacts TR-39 through TR-62 in the section titled “Cumulative Impacts” on EIR pp. IV.E.117-IV.E.141. The year 2030 traffic projections used to assess the Proposed Project’s contribution to cumulative impacts account for the projects cited in the comment, as well as other reasonably-foreseeable development, consistent with the Association of Bay Area Governments (“ABAG”) land use growth projections, including growth outside of San Francisco that could affect the transportation facilities analyzed. Appendix M in

the Transportation Impact Study Technical Appendices provides additional detail regarding the future year 2030 cumulative conditions traffic forecasts.

### **2.7.3.5 Future Regional Improvements**

#### **Comment**

And while this isn't a subject for discussion today, it's a future subject for -- by other bodies, that being, BART and regional transportation agencies. But we know there will be a time when they look for redundancy to their present tube, and if there is ever a possibility to that linking up to Yerba Buena and Treasure Island, it makes a lot of sense to me. As an additional alternative, to allow people to travel into San Francisco, particularly, easily and quickly, even though the analysis of the Ferry Terminal and those things are quite well analyzed to address the transportation needs. (*Michael Antonini, San Francisco Planning Commission*) [TR.26.2]

#### **Response**

The suggestion that, as part of a future project, BART consider providing service to Treasure Island and Yerba Buena Island, is noted. With implementation of Mitigation Measure M-TR-2: Expanded Transit Service, transit service would provide adequate capacity, and additional transit service such as that suggested in the comment would not be required. Further, the high-frequency, direct bus and ferry service between the Proposed Project and Downtown employment centers in Oakland and San Francisco would offer a similar quality of service to BART, and would both provide direct connections to BART stations. Therefore, it is unlikely that introducing BART service to the Islands would result in a substantial decrease in automobile traffic compared to implementation of M-TR-2. As a result, while the Proposed Project does not preclude BART service in the future, it is neither planned nor required as a mitigation measure or alternative to reduce significant transportation-related impacts associated with the Proposed Project.

### **2.7.3.6 Accounting for Density**

#### **Comments**

... we have a totally different area, not connected to the mainland, other than by very attenuated transportation roads. What I'm concerned about is the density of the project as it's proposed. Density transportation services are intimately linked. (*Ron Miguel, San Francisco Planning Commission*) [TR.25.1]

But I do believe that the density and transportation issues need further examination. In my mind, they have not been linked successfully. (*Ron Miguel, San Francisco Planning Commission*) [TR.25.3]

### Response

The comments correctly note a link between density and transportation – a link that is often not adequately accounted for in traditional methods of forecasting travel behavior. In this EIR, the effect of the Proposed Project’s density with respect to influencing vehicle trip generation and its ability to support high-quality and high-frequency transit service is incorporated into the transportation impact analysis. Specifically, EIR pp. IV.E.55-IV.E.61 describe the methodology by which the Proposed Project’s vehicle trip generation was forecasted. As noted in the EIR, traditional methods of calculating trip generation apply static rates to the size of development. However, these methods are insensitive to three of the four factors that have been shown to have a direct influence on travel behavior, known as the 4D’s:

- **Development Scale** – The amount of trips generated increases as the amount of development increases. This is the only one of the 4D’s that is most commonly used to forecast travel demand for new development.
- **Density of the Project** – As development density increases, fewer vehicle trips are generated per unit of development, although the total number of vehicle trips generated may increase. For example, constructing 50 dwelling units on one acre of land may generate 50 peak hour vehicle trips. Constructing 100 dwelling units on that same acre of land may generate 75 vehicle trips – a higher total, but a lower rate per unit of development and fewer trips than if that same 100 units had been constructed over two acres. This phenomenon occurs primarily because as land uses are provided closer together, the distances one must travel between destinations become shorter. Shorter trips are more likely to be made by walking or bicycling, and therefore trips are less likely to be made by automobile in higher density environments. In addition, higher density development, particularly adjacent to transit stops, can encourage transit use, which can then support a higher quality of transit service. As a result, as density increases, vehicle trip generation rates decline.
- **Diversity of Uses** – Proximity of a variety of land uses to each other can also serve to reduce automobile traffic. This occurs because as uses are mixed together, uses become closer together which shortens distances between destinations and trips can be more easily linked together (e.g., a trip from home to a doctor’s office to the grocery store and back home). As a result, as the diversity of proximate uses moves toward an ideal balance, vehicle trip generation rates generally decline.
- **Design** – A walkable, pedestrian- and bicycle-oriented circulation system can help to reduce automobile dependence within a project site. A traditional grid pattern, for example, can substantially reduce distances between destinations compared to a more modern suburban development pattern with curvilinear streets and cul-du-sacs. Similar to density and the diversity of uses within a development, reducing trip distances can encourage walking and cycling and therefore, a development with a more pedestrian- and bicycle-friendly design, including a grid street pattern with good sidewalk coverage can reduce automobile traffic generation.

Unlike traditional transportation analyses, which only account for Development Scale, the analysis conducted for this Proposed Project includes the combined effects of each of the 4D’s

listed above. As a result, the analysis is based on the latest research regarding travel behavior, including the effects that density has on reducing travel demand. Thus, the analysis does link the Proposed Project's density to the assessment of transportation impacts and does so in a much more robust manner than typical transportation analyses.

As summarized in Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, the Proposed Project has been designed and planned in a way such that its relatively high density, mix of uses, and pedestrian- and bicycle-oriented street design would effectively reduce the Proposed Project's vehicle trip generation by approximately 40 percent, compared to a traditional development pattern and design.

### **2.7.3.7 Marina – Trip Generation**

#### **Comments**

- Why was the Clipper Cove Marina project not analyzed in this DEIR? It represents a 400% increase in the size of the Marina, which could have substantial impacts on traffic. It does not matter that it was analyzed in a 2005 FEIR. In 2005, the Development Plan for TI was an entirely different and much smaller project. The impacts of the Clipper Cove Marina project must be analyzed cumulatively in this EIR. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.12]
- Why is the Clipper Cove Marina project not analyzed in the DEIR for its cumulative impacts on traffic? This project represents a 400% increase in the size of the Marina and includes the addition of 246 parking spaces (plus 94 temporary parking spaces), which could have a substantial additional impact on traffic that not considered in this DEIR. See the attached Site Plan for the Clipper Cove Marina from the 2005 FEIR, which is attached as **Exhibit B**. It is irrelevant that the Marina project was analyzed in a 2005 FEIR. Not only was the Treasure Island development plan in 2005 a different and smaller project, but also traffic impacts of the Marina Cove project should have been cumulatively analyzed in this DEIR as a part of Proposed Project in this EIR. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.66]

#### **Response**

The effects of the Clipper Cove Marina expansion have been incorporated into the cumulative conditions analysis as part of reasonably foreseeable background growth and not as part of the Proposed Project. Although the Marina is not part of the Proposed Project, Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58, includes the trip generation of the Marina use as expanded, for information purposes only. Footnote 2 in the table notes that the trip generation of the Marina is shown for informational purposes, as the Marina is not part of the Proposed Project, but is included as part of the background growth in the cumulative conditions analysis. (See also EIR p. II.10, which states that “The Marina Project waterside improvements are not part of the Proposed Project and are therefore analyzed only as part of the cumulative scenario in this EIR.”)

The 400-slip Marina analyzed in the cumulative conditions analysis in the EIR is consistent with the Marina analyzed under the Maximum Development Alternative in the 2005 *Transfer and*

*Reuse of Naval Station Treasure Island Final Environmental Impact Report* (State Clearinghouse #1996092073). As explained in Chapter II, Project Description, on EIR pp. II.9-II.10, the Marina Project analyzed in the 2005 EIR included both landside and waterside improvements. The landside improvements are no longer being pursued as part of the Marina Project; however, the Proposed Project includes landside improvements along Clipper Cove that would serve either the existing Marina or the expanded Marina Project in the event that the Marina Project is implemented. Construction and operational impacts of these landside improvements are analyzed as part of the Proposed Project in the current EIR.

### **2.7.3.8 Multimodal Assessment**

#### **Comment**

But taking a step back, I think many people need to understand that this is an environmental document, and the role of the “CEQA” document here is looking at alternatives in impacts in mitigation. If you just look at the transportation area, which I think is the No. 1 issue with Treasure Island, there’s 141 pages of Section 4E.

If you review this section and compare this to other “CEQA” documents that we have produced as a City, this is the most comprehensive look for getting on and off the island, whether it’s through water taxis or hydrofoil or mass transit for the future. And I think if we take a step back and look at this document, that it’s been very well-prepared when it comes to the transportation era, which actually surprised me. (*William Lee, San Francisco Planning Commission*)  
[TR.24.1]

#### **Response**

This comment provides general support for the analysis and conclusions described in EIR Section IV.E, Transportation. No additional response is necessary.

### **2.7.3.9 Traffic Analysis Assumptions**

#### **Comments**

1. The Traffic Impact Study (TIS) assumes that the ramp meter would be operated at a fixed rate of 550 vehicles per hour (vph). This is not a realistic assumption. The ramp meter would operate in a traffic responsive mode such that the sum of the upstream mainline flow rate and the ramp metering rate would not exceed the downstream mainline capacity. In the westbound direction, the existing mainline meter at the San Francisco Oakland Bay Bridge (SFOBB) Toll Plaza operates to maintain capacity flow on the bridge. We understand that the analysis assumed that the mainline meter would be operated such that the flow on the bridge would be less than capacity to the extent that a 550 vph metering rate at the Yerba Buena Island (YBI) on-ramp could be absorbed by the mainline traffic stream on the SFOBB. Due to current levels of congestion, the Department cannot commit to operate the mainline meter in this manner. It is also questionable whether this level of coordination between the mainline meter and the ramp meter would even be possible. Accordingly, it would be prudent to assume that the current mainline meter operating strategy would be maintained. The analysis should also assume that maximum metering rate at the westbound YBI on-ramp would be set such that the downstream mainline

capacity would not be exceeded. Practically speaking, this would mean that the metering rate would be approximately equal to the flow rate for the westbound YBI off-ramp. That being the case, the ramp metering rate would be significantly lower than the 550 vph used in the analysis. Therefore, to fully and accurately evaluate the impacts from the proposed redevelopment project, please revise your traffic analysis to use a metering rate that does not exceed the off-ramp flow rate (projected to be 219 vph in the AM peak). (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.1]

10. In Appendix D3 of the TIS, “Congestion Pricing and Ramp Metering Analysis”, the information does not include an analysis of the effect of ramp metering on eastbound vehicle trips from Treasure Island during the PM peak hour. The meter on the on-ramp to eastbound I-80 would likely operate during the PM peak period. Was this analysis performed? (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.10]

1. ...Should the expected delays be significant, consideration should be given to restricting on-ramps to high occupancy vehicles (HOV) only in the morning and afternoon peak periods. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.2]

5. In Section 4.2 of the TIS, freeway mainline and ramp metering impacts analysis appears to only evaluate peak hours. The report should note that the peak hour impacts would be greater if the demand for the preceding time periods is higher than the capacity, which is likely to occur in the westbound direction for the AM period and the eastbound direction for the PM period. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.5]

6. The analysis of ramp metering impacts appears to assume that HOVs originating on Treasure Island would reach the HOV ramp meter bypass when in the mixed-flow queue. This is not a realistic assumption due to the physical constraints on the roads approaching the on-ramp. If the HOVs remain in the mixed-flow ramp meter queue before reaching the HOV bypass, the ramp meter delays, queue lengths, and number of unserved ramp vehicles should be included in the HOV volumes. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.6]

7. In Section 4.2.1.1 of the TIS, it indicates that VISSIM was used to evaluate the impacts of ramp metering. There is no discussion of model calibration in the report or appendices. Was the model properly calibrated before the analysis? What were the procedures and criteria used for the calibration? (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.7]

8. In Table 38 on page 108 of the TIS, the ramp meter queue lengths are shown for the westbound on-ramp during the AM and PM peak hours. What average vehicle length was used to estimate the queue length? The average vehicle length in ramp meter queues is typically 29 to 30 feet per vehicle. This is slightly greater than the vehicle length used at controlled intersections because vehicles in ramp meter queues are moving rather than stopped. In addition, as noted in a previous comment, the number of unserved ramp vehicles in the peak hour would be higher if ramp demands for the preceding time periods are higher than the metering rates. (*Lisa Carboni,*

*District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.8]

**Response**

The assumptions used to forecast traffic for and to analyze impacts of the Proposed Project to the regional freeway system, including the on- and off-ramps at Yerba Buena Island, as well as approaches to the Bay Bridge in both San Francisco and the East Bay are as follows:

**Yerba Buena Island Ramps**

A number of the California Department of Transportation’s comments raised questions regarding queuing on the Islands and the effect of ramp metering, specifically the assumed rate at which the meters would operate. The EIR assumes that ramp metering would be installed and would operate at a rate of 550 vehicles per hour. Some comments have suggested an alternative metering rate would be more appropriate. Under a scenario suggested in one comment, the total mainline bridge volume would be held constant; net traffic off and on the Bay Bridge would be zero (westbound trips from Yerba Buena Island onto the West Span of the bridge would be metered such that they would equal westbound trips from the east span of the bridge onto Yerba Buena Island); and thus, there would be no change to the Bay Bridge Toll Plaza metering rate and associated queues and delays as a result of the Proposed Project.

The purpose of the EIR is to describe a reasonable worst-case operating scenario at the time the Proposed Project is built out. In this context, “worst case” means the scenario that would have the largest impact on queues at the Bay Bridge Toll Plaza.

Mainline bridge capacity is finite and fixed in that the bridge can accommodate a specific number of vehicles travelling westbound during the AM peak hour. Because the Toll Plaza is metered, and meters will also be installed at the westbound on-ramps on Yerba Buena Island, Caltrans can allocate this capacity either entirely to the Toll Plaza (as the comment proposes), or a portion of this capacity can be allocated to the Yerba Buena Island on-ramps. The EIR’s traffic analysis assumed that some capacity (550 trips/hour) would be allocated to the Yerba Buena Island on ramps. (The net impact on bridge capacity would be at most 350 trips/hour, due to the fact that approximately 200 westbound vehicles are expected to exit at Yerba Buena Island.) As noted in Impact TR-6 on EIR pp. IV.E.83-IV.E.84, this approach would also result in incrementally longer queues at the Bay Bridge Toll Plaza. This rate was chosen because it is approximately halfway between the rate that does not exceed the westbound off-ramp flow rate (approximately 200 vehicles per hour) and the maximum rate that Caltrans operates ramp meters throughout the State of California (900 vehicles per hour). The traffic analysis took this approach because it was regarded as a reasonable estimate of how Caltrans would allocate main-line capacity on the bridge. This approach was also taken in order to ensure the EIR disclosed the potential for incrementally longer queues during the a.m. peak hour at the Bay Bridge Toll Plaza.

The EIR acknowledges on p. IV.E.84 that metering rates at the Bay Bridge Toll Plaza and at the Yerba Buena Island on-ramps will ultimately be determined not by the City, but by Caltrans. As noted above, metering rates serve as a means of allocating the fixed vehicle capacity of the Bay Bridge. Caltrans may decide to implement metering rates that differ from the metering rates assumed in the EIR's analysis. In particular, Caltrans may adopt the approach set forth in the comment, or it may allocate a portion of main-line capacity that is lower than 550 trips/hour, or (as the comment states) the allocation may be dynamic and may vary depending on traffic conditions. The purpose of the EIR's analysis was not to anticipate every conceivable operation of the metering rates, or to determine what metering rates ought to be used by Caltrans. Rather, the purpose was to disclose the plausible "worst-case" impact on Bay Bridge Toll Plaza queues.

If the metering rate at the westbound Yerba Buena Island on-ramp were lower than assumed in the EIR, drivers on the Islands would be subject to longer delays and queues than described in the EIR. While this scenario would present a "worst-case" scenario for traffic on the Islands, it could underestimate potential queuing at the Bay Bridge Toll Plaza. The EIR concludes in Impact TR-3, on pp. IV.E.75-IV.E.80, that queues on the westbound on-ramps from the Islands onto the west span of the Bay Bridge represent a significant and unavoidable impact. This impact would occur regardless of the metering rates implemented by Caltrans at the Yerba Buena Island on-ramps. If the rate on the on-ramps were lower than assumed in the EIR, queues would likely increase by a corresponding amount. For example, if the metering rate were reduced by 100 vehicles per hour, the maximum queue would be increased by approximately 100 vehicles, so long as demand volumes in the hour following the peak hour were lower than the metering rate and queues were able to dissipate after the peak hour. In this case, Mitigation Measures M-TR-2, Enhanced Transit Service, and M-TR-25, Transit Only Lane, would be triggered sooner.

A comment also suggests that the analysis described in the EIR assumed some level of coordination between the meters at the Yerba Buena Island and those at the Bay Bridge Toll Plaza, such that rates could be dynamically coordinated, and notes that this level of coordination may not be feasible. However, the analysis does not assume a high degree of communication between the westbound Yerba Buena Island on-ramp metering hardware and the Bay Bridge Toll Plaza metering hardware as suggested in the comment. Rather, the changes in metering rates at the Bay Bridge Toll Plaza were assumed to operate independently, with lower metering rates and a reduction in capacity as a by-product of higher traffic demand on the bridge.

Ramp metering was also assumed on the eastbound on-ramp to the Bay Bridge. Based on the forecasted traffic volumes (presented in Figure IV.E.18: Existing plus Project Bay Bridge Travel Demand (No New Westbound On-Ramps), on EIR p. IV.E.77), the eastbound on-ramp to the Bay Bridge would have a total demand of fewer than 550 vehicles (i.e., 322 vehicles during the weekday AM peak hour, 429 vehicles during the weekday PM peak hour, and 489 vehicles during the Saturday peak hour). If operated similar to the westbound on-ramp (i.e., metered at

550 vehicles per hour), ramp metering lights on the eastbound on-ramp may cause minor queuing on the on-ramp due to short-term fluctuations in demand approaching the ramp; however, the queue and delay experienced by eastbound vehicles is expected to be negligible since the ramp demand volume would be lower than the ramp meter capacity. Alternatively, if operated as suggested by Caltrans, the metering rate for traffic entering the eastbound Bay Bridge would be set at a rate equivalent to the amount of eastbound traffic exiting the Bay Bridge to the Islands. Because the amount of eastbound traffic expected to exit the Bridge to the Islands exceeds the amount of traffic forecasted to enter the eastbound Bay Bridge from the Islands in each of the three peak hours, the ramp metering rate for eastbound traffic would always exceed the demand, similar to the scenario described in the EIR. Therefore, whether operated as assumed in the EIR or as proposed by Caltrans, the metering rate would always exceed the demand. For this reason, detailed analysis of the effects of the ramp meter on the eastbound on-ramp is not required.

Some comments also correctly note that peak hour impacts at the ramp meters on the Islands could be exacerbated by heavier demand preceding the peak hour if that demand exceeded capacity and queues began to form prior to the peak hour. In this case, the Yerba Buena Island on-ramp queues presented in Section 4.2 of the Transportation Impact Study and shown in Figure IV.E.19: Existing plus Project Maximum On-Island Queue, on EIR p. IV.E.79, may not reflect the full extent of queuing. To evaluate this potential, the analysis examined data from other on-ramps along the I-80 corridor, to provide a comparison set of ramp volumes that could be applied to the Yerba Buena Island ramps. Specifically, count data was obtained from the Caltrans' PeMS count database for the on-ramps to I-80 at Powell Street, Ashby Avenue, and University Avenue. The counts on these ramps showed that ramp volumes between 6:00 and 7:00 AM hour were approximately 52 percent lower than the 7:00 to 8:00 AM hour. The highest observed percentage difference was 61 percent, which was observed at Powell Street.

Assuming that the westbound on-ramp on Yerba Buena Island has a pre-peak hour demand volume that is 61 percent of the peak hour volume, the ramp would have a demand volume of approximately 600 vehicles between 6:00 and 7:00 AM under Existing plus Project conditions. If the ramp meter processes 550 vehicles per hour ("vph"), excluding high occupancy vehicles ("HOV"), and approximately 7.5 percent of vehicles use the HOV bypass lane (approximately half of what was assumed to occur during the peak hour), the westbound on-ramp would have a vehicle queue of five vehicles remaining at the beginning of the peak hour. This queue would be negligible and would not substantially affect the results of the ramp analysis in the TIS or EIR. Conclusions presented in Impacts TR-2 through TR-7 and TR-40 through TR-45 would not change. If the metering rate ultimately implemented was lower than assumed in the EIR, it is possible that residual queues would exceed five vehicles and on-island queues would consist of unserved demand from the peak hour as well as residual queuing from unserved demand preceding the peak hour. As a result, as noted on EIR p. IV.E.84, if the ramp meters were

operated with a lower metering rate than assumed in the EIR, queues on the Islands may be longer than reported.

Other comments noted that although HOV's are anticipated to receive a ramp metering bypass lane, they may still be caught in queues in the lanes leading up to the on-ramps, such that simply removing them from the analysis may underestimate the total length of approach queues. However, the ramp queuing and average delays presented in Table IV.E.13: Maximum On-Ramp Queues and Average Delays – Existing plus Project Conditions, on EIR p. IV.E.78, include HOVs unable to reach the HOV bypass ramp. The analysis was conducted using the VISSIM microsimulation software, which simulates the entire network, including the effects of HOVs as a percentage of the total volume approaching the westbound on-ramp. Therefore, the physical constraints of HOVs stuck in queues approaching their bypass lane are accounted for in the analysis of queuing impacts on the Islands. Conversely, the ramp junction analysis presented in Table IV.E.12: Ramp Junction Analysis – Proposed Project, and Project with Mitigation Measure M-TR-2 (Expanded Transit Service), on EIR p. IV.E.76, assumes that all HOVs would reach the Bay Bridge mainline during the peak hour, without being constrained by on-island queues. This presents a conservative analysis of the ramp junction because it may over-estimate the number of vehicles reaching the junction.

The VISSIM microsimulation analysis accounts for typical vehicle spacing and sizes and for the fact that queues at ramp meters may be slowly moving, as suggested in the comment. The vehicle mix used in the analysis included standard passenger vehicles, smaller vehicles, and heavy vehicles, including vans, buses, delivery vehicles, and large trucks.

The VISSIM software was used to estimate maximum queue lengths and ramp meter delays for the westbound on-ramp on Yerba Buena Island so that the physical constraints of the approach roadway network and the somewhat complex and interactive traffic streams referenced in the response to another comment (Subsection 2.7.3.11, Traffic Impact Analysis) could be accurately analyzed. Ramp geometrics, traffic control devices, speeds, and storage lengths for the existing and proposed ramp configurations were based on aerial photography and data from the *Project Study Report (PDS) to Request Programming for Capital Support* (December 2007) for the Yerba Buena Island Ramps Improvement Project that was prepared by Caltrans. Existing traffic volumes were obtained from the ramp and mainline volume counts conducted in May 2008 for the analysis of the Treasure Island / Yerba Buena Island Redevelopment Project. For scenarios that assumed reconstruction of the westbound ramps, the operations of the existing ramps were not useful in calibrating the VISSIM model because the reconstruction of the westbound on-ramp proposed by the Yerba Buena Island Ramps Improvement Project would fundamentally change how the ramps would function, and because there is very little activity on the existing ramps with which to calibrate a model. Instead, the model's default driver behavior calibration statistics, which are based on detailed research described in the model's user manual, were used given the

lack of sufficient similarities between the existing conditions and the scenario analyzed using the model.

For scenarios that did not involve the westbound ramp reconstruction, in which case both westbound on-ramps would remain open to mixed traffic and would remain stop sign controlled, observations were conducted of existing traffic to determine the typical minimum “gap” in traffic that drivers on the on-ramp were willing to use to merge onto the Bay Bridge. This information was coded into the VISSIM model to determine the capacity of the on-ramps, given typical traffic patterns on the Bay Bridge mainline. These observations were conducted prior to the opening of the so-called “S-Curve” temporary bridge structure on the east side of Yerba Buena Island.

The model was run 10 times and the runs were compared to ensure that traffic volumes on the ramp met the expected ramp volumes shown in the EIR. Using the model results, demand volume served, queuing, and time spent in delay were reported in Figure IV.E.17: Existing plus Project Bay Bridge Travel Demand (With New Westbound On-Ramps), and Figure IV.E.18 and in Table IV.E.13: Maximum On-Ramp Queues and Average Delays – Existing plus Project Conditions, on EIR pp. IV.E.73, IV.E.77, and IV.E.78, respectively.

A comment suggested that if substantial queues begin to form on the Islands, it may be advisable to restrict vehicular access from the Islands to the Bay Bridge to HOVs only during peak periods. The roads that would access the property would be public roads that are subject to the Tidelands Trust. Restricting access to these roads to only certain members of the travelling public (i.e. those in high occupancy vehicles) would be a violation of the state vehicle code and the Trust doctrine.<sup>2</sup> Moreover, on a practical level this arrangement was not considered to be a feasible mitigation measure, as it might prohibit emergency travel by some residents. For example, a parent working at home whose child had an emergency somewhere off the Islands that was not accessible by transit during peak periods might not be able to leave the Islands to reach his or her child.

The project sponsor has indicated that as part of the sales brochure for residential units, information related to the transportation program for the Islands would be provided. This would include information on the TITMA, its TDM programs, transit services to San Francisco and the East Bay, on-island shuttles, the congestion pricing program, and use of ramp metering. The transportation program insert would describe the mechanics of the congestion pricing program

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<sup>2</sup> AB981, the legislation that authorizes the TITMA and the congestion pricing states, “Program elements shall not interfere with the provision of public access to public trust lands consistent with the beneficial use of those lands, including, but not limited to, roadway access to serve the public along the western shoreline of Treasure Island.” Program elements, such as limiting road access to only HOVs, and/or alternative fuel vehicles, would interfere with the provision of public access to public trust lands and therefore, would be in violation of the law.

and how the TITMA may change the terms over time, disclose that the ramp metering rates will be selected by Caltrans and may vary, and describe the roles and responsibilities of the various parties involved in providing transit services, TDM programs and congestion control measures on the Islands.

### Bay Bridge Approaches

In addition to comments related to ramp metering and queues on the Islands approaching on-ramps, there were several comments related to the analysis of queuing on approaches to the Bay Bridge. Queues on the westbound approach to the Bay Bridge at the Toll Plaza are identified, and the amount of traffic remaining in these queues approaching the Bay Bridge is quantified, and assumed to be unserved demand, or demand exceeding the capacity of the Bay Bridge.

Similar to the comment regarding residual queues at on-ramps due to over-capacity traffic volumes during the hour preceding the peak hour, a comment suggested that some residual queues exist at the Toll Plaza preceding the peak hour, and therefore, the entire queue should not be considered unserved hourly demand. Existing peak hour demand and associated queuing at the Bay Bridge Toll Plaza was based on the average of maximum queues observed during aerial and floating car surveys conducted over three days in May 2008. These surveys captured conditions at the Bay Bridge Toll Plaza during a typical mid-week period, which, as described in Subsection 2.7.1.1, Traffic Setting – Bay Bridge Demand, did vary from day to day. On at least one of the observation days, residual queues from an incident that occurred prior to the peak period were present and inclusion of the entire queue (rather than the increase) on this day likely results in a conservatively high estimate of unserved demand. This observation was averaged with observations made under more typical conditions in which residual queues were not present. Ultimately, a conservatively high estimate of existing demand for travel on the Bay Bridge does not affect the conclusions described in the EIR – namely that the Proposed Project could increase queues at the Toll Plaza both due to trips traveling to the site from the East Bay and due to a reduction in metering rate at the Toll Plaza to allow trips from the Project Site to enter the westbound Bay Bridge.

#### **2.7.3.10 Traffic Baseline**

##### Comment

The Draft Transportation Plan for Treasure and Yerba Buena Islands (“DTP”), which plan is part of the DEIR states, “[T]otal peak period vehicle trips should be similar to the number of trips generated when Treasure Island was operating as a Naval Base.” There has been no analysis by the DEIR (or elsewhere) that the previous naval traffic was an acceptable burden then or would now be an acceptable burden; such is especially true in light of the fact that no one would seriously argue that traffic on the Bay Bridge has decreased since the closure of the Naval Base. The DEIR’s baseline traffic data should be compared to current conditions and not outdated and

inaccurate data. Historical traffic data should not be considered part of the current environmental setting. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.16]

**Response**

The language quoted in the comment is not from the EIR but from the Draft Transportation Plan, which was prepared by the project sponsors in 2006. The EIR does not rely on the analysis performed for the *2006 Draft Transportation Plan*. As noted on EIR p. IV.E.47, the traffic impact analysis in the EIR compares existing conditions with the Proposed Project to existing conditions without the Proposed Project, and not to conditions when the Naval Station was in operation on the Islands. Existing conditions without the Proposed Project were established via field research as described in the TIS pp. 42 - 44, included as EIR Appendix C. Therefore, the conditions when the Naval Station was in operation are not part of the environmental setting or environmental baseline for the EIR analyses<sup>3</sup>.

The “baseline” or environmental setting against which the impacts of the project are measured normally consists of physical conditions as they exist at the time the lead agency publishes the Notice of Preparation (“NOP”) for a project (CEQA Guidelines, Section 15125(a)). CEQA authorizes agencies to use an alternative baseline where the project at issue consists of a reuse plan for a military base; under this section, the “baseline” may instead consist of conditions as they existed at the time the Federal government made the base closure decision (CEQA Section 21083.8.1). In this case, however, this “alternative baseline” was not used. Rather, baseline conditions were defined as those that existed at the time of the NOP, which was in January 2008. This approach is more conservative than the approach authorized by CEQA Section 21083.8.1.

**2.7.3.11 Traffic Impact Analysis**

**Comment**

9. Using the 550 vph ramp metering rate assumed in the analysis, the ramp meter delays shown in Table 38 do not correspond with our calculation of delays for unserved ramp demands shown in Figures 21, 25, and 30. Please discuss how the unserved ramp demands are calculated. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.9]

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<sup>3</sup> Since publication of the Draft EIR, the California Appellate Court (6<sup>th</sup> District) issued a decision, *Sunnyvale West Neighborhood Association v. City of Sunnyvale Council (2010)*, that, among other things, found that a Proposed Project’s environmental impacts should be evaluated by comparing full buildout of the Proposed Project with existing conditions. The analysis conducted in this EIR is consistent with the findings of that case in that only those changes associated with the Proposed Project have been added to existing conditions to evaluate project impacts. An analysis of the Proposed Project’s contribution to significant future cumulative impacts is presented separately in the EIR.

**Response**

Figure 21 (EIR Figure IV.E.17: Existing plus Project Bay Bridge Travel Demand (With New Westbound On-Ramps), on EIR p. IV.E.73) and Figure 30 of the TIS present unserved demand for the Existing Plus Project and Existing Plus Reduced Development Project, respectively, and assume the reconstruction of the westbound on-ramp on Yerba Buena Island. Since the reconstructed ramps were assumed to be metered at a rate of 550 vph, unserved demand was assumed to be equal to total ramp demand minus demand served at the ramp meter (550 vph) minus HOVs<sup>4</sup> (which would enter the mainline via a bypass lane). In other words, the total number of vehicles that would be permitted to enter the Bay Bridge mainline from the reconstructed westbound on-ramp during the peak hours would be 550 single-occupant vehicles plus all HOVs. This is consistent with the operation of other ramp meters operated by Caltrans, in which a metering rate is set for vehicles with one or two occupants and HOVs with three or more occupants are metered based on demand.

Figure 25 of the TIS presents unserved demand for the Existing plus Project with Mitigation Measure M-TR-2 (described on EIR p. IV.E.74) without the reconstructed westbound on-ramps. Without the reconstructed westbound on-ramp, the existing ramps were assumed to have a capacity to serve 375 vph, based on field observations of the existing on-ramp. Under the scenario where the westbound on-ramps are not reconstructed, both existing westbound on-ramps to the Bay Bridge would be open to mixed-flow traffic. Therefore, the unserved demand in this scenario would be equal to the total westbound on-ramp demand minus 750 vph (or the combined capacity of both westbound on-ramps).

The figures the comment references are illustrative to indicate where demand would be concentrated and where capacity constraints would be located; however, the actual analysis of delays and queues at the westbound on-ramps is based on the VISSIM microsimulation analysis, which accounts for the ability (or lack thereof) of HOVs to bypass the queue. Table C&R.1, below, summarizes the demand volumes, the ramp capacity, and the unserved demand for each scenario evaluated in the EIR.

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<sup>4</sup> For purposes of this analysis, HOV facilities leading from the Islands to the Bay Bridge were assumed to be for HOVs with three or more occupants, consistent with other HOV facilities leading toward the Bay Bridge. Vehicles with two occupants were assumed to not be allowed to use the HOV lane.

**Table C&R.1: Yerba Buena Island Westbound On-Ramp Demand and Capacity**

Scenario	Westbound On-Ramp Demand Volume [AM (PM) Peak Hour]	Reconstructed Westbound On-Ramps		Existing On-Ramps	
		Capacity <sup>1</sup>	Unserviced Demand	Capacity <sup>2</sup>	Unserviced Demand
Existing Plus Project	983 (984)		293 (301)		233 (234)
Existing Plus Reduced Development Project	782 (899)	550 + HOV	118 (227)	750	32 (149)
Existing Plus Project w/ MM-TR2	768 (819)		106 (159)		18 (69)
Existing Plus Reduced Development Project w/ MM-TR2	638 (750)		0 (101)		0 (0)

Notes:

<sup>1</sup> Based on a ramp metering rate of 550 vehicles per hour. As noted in the table and the discussion above, the 550 vehicle-per-hour metering rate applies only to vehicles with one or two occupants. HOVs with three or more occupants would be metered based on demand. Thus, the total number of vehicles that could enter the Bay Bridge mainline from the reconstructed westbound on-ramp is 550 vehicles with one or two occupants per hour plus all HOVs with three or more occupants. The existing westbound on-ramp on the west side of Yerba Buena Island would be converted to a transit and emergency vehicle only on-ramp.

<sup>2</sup> Based on observations of the existing westbound on-ramp on Yerba Buena Island. Existing on-ramps would be unmetered; however, due to the current configuration of the ramps, capacity would be approximately 375 vehicles per hour per ramp. Total capacity represents both existing westbound on-ramps on Yerba Buena Island open to mixed-flow traffic.

Source: Treasure Island and Yerba Buena Island Redevelopment Plan TIS, Fehr & Peers, 2010.

Finally, as a point of clarification, the figures referenced in the comment present total hourly unserved demand. Table 38 of the TIS presents the average travel time and the maximum queue. Vehicles traveling through the maximum queue will have a longer travel time than the average travel time presented in Table 38.

### 2.7.3.12 Trip Distribution

#### Comments

I also could not find, although it probably exists in some appendix, where they would work. I was really curious how many would be working in the East Bay, for example. (*John Elberling, Director, TIDA Board*) [TR.23.2]

And I'm curious to what extent many of the TI residents may, in fact, be working in the East Bay, which is very consequential for the EIR. There is probably an estimate. I just couldn't find it. (*John Elberling, Director, TIDA Board*) [TR.23.3]

I do want to echo Commissioner Elberling's comments about the East Bay, the link to the East Bay and those jobs. I think that had not been adequately addressed in this document (*Jean-Paul Samaha, Director, TIDA Board*) [TR.27.1]

**Response**

The geographic distribution of project-related trips is summarized in Table IV.E.6: Proposed Project Trip Distribution Patterns, on EIR p. IV.E.61. Overall, approximately 20 percent of project-related trips are expected to travel between the Proposed Project and the East Bay, 12 percent would travel between the Proposed Project and the South Bay (including all of San Mateo County), 3 percent would travel between the Proposed Project and the North Bay, and 64 percent would travel between the Proposed Project and the City of San Francisco. However, those percentages are inclusive of all trips to and from the Islands. Some comments specifically requested information regarding the geographic distribution of trips associated with those made by residents of the Proposed Project to and from work. Table C&R-2, below, summarizes the distribution of person-trips (including trips made by auto, bus, and ferry) for work trips generated by the Proposed Project during the weekday AM and PM peak hours. Since substantially fewer trips during the Saturday peak hour are work trips, those trips are not summarized in Table C&R.2.

**Table C&R.2: Geographic Distribution of Project-Generated Residential Work Person-Trips**

<b>Peak Hour Scenario</b>	<b>San Francisco</b>	<b>East Bay</b>	<b>North Bay</b>	<b>South Bay<sup>1</sup></b>
AM Peak Hour	838 (54%)	279 (18%)	47 (3%)	388 (25%)
PM Peak Hour	946 (54%)	315 (18%)	53 (3%)	438 (25%)

Notes:

<sup>1</sup> Includes all of San Mateo County, as well as points south.

Source: Treasure Island and Yerba Buena Island Redevelopment Plan TIS, Fehr & Peers, 2010.

**2.7.3.13 Trip Generation****Comment**

We find the following statement in the DEIR disturbing. “18 Family-sized units are those with two or more bedrooms. While 20 percent of the units is the minimum proposed number of family-sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family-sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one-bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family-sized units.”

We understand the rationale provided later in the document however there is still the fact that a certain dwelling unit may not be occupied by people of the same demographic throughout its lifetime. A young couple could buy a 1-bedroom condo and live there even after having a baby (at least for a little while). They might sell it to some empty nesters, but later it might get sold to another young couple who wind up starting a family there. The assumption that family oriented housing would generate more or less trips just seems too precise given the variables involved.

Given that it is equally likely that with the amenities proposed and in place work force housing, Treasure Island and Yerba Buena Islands could do much more with regard to addressing the City's need for dramatically increasing its stock of family oriented housing. Please provide further evidence that family housing will negatively impact the transit/ traffic issues. (Saul Bloom, Arc Ecology) [28.5]

### **Response**

This comment refers to Footnote 18, on EIR p. II.24 in Chapter II, Project Description. Text on that page of the EIR notes that 20 percent of dwelling units proposed by the Project would be “family-sized.” The footnote defines “family-sized units” as those with two or more bedrooms. The footnote goes on to say that the transportation analysis differentiated the travel behavior characteristics between “family-sized” units and for smaller units. Further, the footnote adds that, to be conservative, the transportation analysis assumed a larger number of “family-sized” units than 20 percent.

The footnote is incorrect. The transportation analysis does not distinguish travel behavior characteristics by the number of bedrooms in a particular unit. Instead, the transportation analysis applies an average trip generation rate for all dwelling units that accounts for the diverse range of occupants (both in terms of number of occupants and their travel characteristics) that may be present in all units, as suggested by the comment. Footnote 18 on EIR p. II.24 is revised as follows:

<sup>18</sup> Family-sized units are those with two or more bedrooms. ~~While 20 percent of the units is the minimum proposed number of family sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family sized units.~~

### **2.7.3.14 Trip Generation – Parking**

#### **Comment**

One problem is that this DEIR, like many others, uses a traditional method of determining transportation mode based on residential origin and attractions to a destination. This method doesn't work for automobile trips, which require a parking place near the residential origin and another parking place near the destination. If either end of the trip does not have parking the auto trip cannot take place. Congestion happens on roadways between areas of more than ample parking. City policy in San Francisco recognized this statement as true, when, over forty years ago, we limited the supply of parking in the central business district to low maximums when every other community was requiring high minimums. We also improved transit as the way to reduce increases in congestion. This truth of how well this worked is demonstrated by an observation: Throughout the Bay Area over 90% of people drive to work in their own car.

However, in downtown San Francisco, where parking is limited and expensive over 50% get to work without their own car. The drivers and non-drivers are neighbors and similar people. The difference is the availability of parking. A deficiency in this EIR, and this project, is that the traditional method of analysis provides no incentive for the developer to consider an alternative with less parking and therefore fewer transportation impacts. The DEIR analysis should be corrected to reflect the availability of parking. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.2]

### **Response**

As noted on EIR p. IV.E.57, the percentage of total trips forecasted to use travel modes other than the private automobile was based on surveys of travel behavior conducted within San Francisco, where parking conditions, at both the origin and destination ends of trips, are constrained in a manner similar to conditions expected on Treasure Island. Therefore, the effect of a constrained parking supply is reflected in the analysis. EIR p. IV.E.138 presents the maximum permitted parking ratios, while EIR p. IV.E.129 presents the proposed residential and non-residential parking supply.

In response to this and other comments, a new project alternative has been included. See Subsection 2.21.2, Reduced Parking Alternative, in Section 2.21, Alternatives, of this Comments and Responses document, for an analysis of a Reduced Parking Alternative added to the EIR.

### **2.7.3.15 Trip Generation – Retail and Sports Facility**

#### **Comments**

- How much traffic would be generated by these regional-serving retail uses? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.63]
- As to the proposed 25-40 acre regional sports complex with baseball diamonds, soccer fields and other sports facilities, how many people/private automobiles will the sports events attract? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.64]

#### **Response**

Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, identifies the total number of person-trips expected to be generated by each land use included in the Proposed Project, with both regional and neighborhood serving uses included under the “Retail” land use. The regional retail uses would generate approximately 103 external vehicle trips in the AM peak hour, 297 external vehicle trips in the PM peak hour, and 311 external vehicle trips during the Saturday midday peak hour. The vehicle trips generated by the regional retail uses represent 6 percent of the net-new project-generated AM peak hour vehicle trips, 12 percent of the PM peak hour vehicle trips, and 11 percent of the Saturday midday peak hour vehicle trips.

Scheduled games at the athletic fields would not begin prior to 6:30 PM on weekday evenings (30 minutes after the evening peak hour). Although there would be little activity at the fields during the evening peak hour, the analysis conservatively assumes that each field would be in use each night, each player would arrive with one spectator, and that up to 50 percent of players and spectators would arrive during the peak hour (at least 30 minutes early).

Table IV.E.4 identifies the total number of person-trips expected to be generated by each land use included in the Proposed Project. As shown in the table, the athletic fields would not generate any trips in the AM peak hour, approximately 700 person-trips in the PM peak hour, and 1,400 person-trips during the Saturday peak hour. Some of these trips would be internal to the Islands, and some of the external trips would use transit. The analysis assumes an average vehicle occupancy of 2.0. The athletic fields would generate about 167 external vehicle trips in the PM peak hour and 325 external vehicle trips in the Saturday midday peak hour. The vehicle trips generated by the athletic fields represent 7 percent of the net-new project-generated PM peak hour vehicle trips, and 11 percent of the Saturday midday peak hour vehicle trips.

#### **2.7.3.16 Cumulative Transit Improvement Assumptions**

##### **Comment**

Another problem with usual method of environmental analysis is considering generally predicted population and land use cumulative impacts but only considering transportation improvements with completed designs, authorization and funding. Bus speeds and ridership should be reanalyzed based on predicted system improvements including: proof-of-payment; low floor buses; congestion pricing and other system changes which will reduce running time. This problem was demonstrated by the Central Subway FEIR which predicted surface transit running times through downtown that will be 50% greater in 2030 than today because of increased congestion, but did not consider transit improvements. This means that automobile drivers will experience about a doubling of their driving time in the downtown because they don't spend time while passengers get on or off the bus or while the bus struggles to get back into a moving traffic lane. San Francisco knows that drivers will find this delay unacceptable and while congestion pricing is only a study, at this time, something will happen to reduce future driving, even if it is not expected. Further, in San Francisco when an EIR predicts increasing transit demand this is not an adverse impact but rather a public service prediction to warn Muni of future needs to allow them to plan for the additional transit capacity required. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.3]

##### **Response**

The purpose of the EIR is to disclose to decision-makers potential impacts associated with the Proposed Project, based on reasonably-foreseeable future conditions. It would be speculative for the analysis presented in the EIR to assume future unfunded and unapproved improvements that would benefit any individual mode, and the resulting analysis may underestimate potential project-related impacts.

The comment states that “in San Francisco when an EIR predicts increasing transit demand this is not an adverse impact but rather a public service prediction to warn Muni of future needs to allow them to plan for the additional transit capacity required.” This statement is incorrect. CEQA allows the lead agency the discretion to determine locally-appropriate thresholds for identifying significant environmental impacts. As noted on EIR p. IV.E.28, the Planning Department’s Initial Study Checklist provides the framework for evaluating a project’s impact under CEQA. This checklist notes that implementation of a project could have a significant impact on transportation if the project were to “conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel.....” The City has established a capacity utilization threshold of 85 percent for transit service. As a result, if the Proposed Project were to result in demand exceeding available capacity, it would be considered a significant impact on transit capacity.

## 2.7.4 TRAVEL DEMAND MANAGEMENT

### 2.7.4.1 Congestion Pricing

#### Comments

Section IV, page IV.E.45 - Would USCG personnel be subject to any “congestion fees” to be imposed by TITMA? Please clarify. Based on previous discussions the USCG believes it will not be subject to these fees and would like the exclusion to be mentioned in the DEIR text. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.15]

Furthermore, as part of implementing the Project, the Treasure Island Transportation Management Act (“**TITMA**”) would administer a variable congestion fee to those accessing the Bay Bridge (at IV. Environmental Setting and Impacts E. Transportation, Page IV.E.45.) In other words, fees would be charged for auto access between the Bay Bridge and TI/YBI during periods of peak congestion. This “congestion pricing” program is designed to discourage residents from making auto trips during peak travel periods and encourage other modes of travel to and from TI/YBI. The amounts and hours that fees would be charged would be controlled by the TITMA. However, individuals can simply circumvent the higher price for this fee by leaving or entering the islands at different time periods. Therefore, the revenue is uncertain as well as its effect on car ownership/traffic. Consequently, the primary purpose of TITMA will be significantly underfunded and/or frustrated to the point of being ineffectual – all of which is a significant impact that should be addressed in the DEIR. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.15]

A. The EIR reveals plans to implement congestion pricing. During both the a.m. and p.m. peak hours, in both the eastbound and westbound directions, residents entering or exiting the islands would be subject to a \$5.00 toll. However, the EIR reveals that visitors are not subject to this fee, nor carpools of at least three people. What is the rationale for not charging visitors a fee as properly priced parking fees for visitors could dramatically reduce congestion? (*Saul Bloom, Arc Ecology*) [28.1]

14) Saturday traffic congestion indicates a need for inclusion of Saturday congestion pricing, and the EIR should analyze and compare Saturday congestion with and without Saturday congestion pricing (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.6]

### **Response**

As currently proposed, only residents of the Islands would be subject to congestion pricing fees. However, the congestion pricing program is intended to be flexible, and over time the TITMA could vary who will be subject to congestion fees and the amount of those fees. TIDA is expected to execute a Memorandum of Understanding (“MOU”) with the Coast Guard prior to implementation of the Proposed Project that would prohibit TITMA from charging Coast Guard employees the congestion fee. Coast Guard traffic was not assumed to be subject to congestion pricing fees in the analysis presented in the EIR. To clarify this point, the following new sentence is added to the paragraph regarding “Congestion Pricing” on EIR p. IV.E.45 (new text is underlined):

Visitors to the Islands, high-occupancy vehicles, and Coast Guard-related vehicles would not be charged a congestion pricing fee.

The steps by which vehicle trip generation forecasts were prepared are summarized on EIR p. IV.E.57. In summary, the first several steps in the process result in forecasts of vehicle trips entering and leaving the Islands during peak periods assuming no congestion pricing. The last step identifies the effects of implementing congestion pricing. If the congestion pricing program is effective, it would reduce the number of vehicle trips that travel onto or off of the Islands during peak periods, incrementally reducing the revenue generated by the pricing program, as suggested in one of the comments. However, the revenue projections included in the Transportation Implementation Plan attached to the DDA are based on the EIR’s trip generation forecasts, and therefore, account for the effects of congestion pricing at reducing peak period automobile travel. As such, the forecast of funding is accurate. TITMA would have the authority to modify the amount charged and the times during which congestion pricing fees apply. It is unlikely that TITMA would administer a pricing program that would result in severe revenue shortfalls for transit and other transportation services, because TITMA would be ultimately responsible for dispersing funds to those services as well.

As currently proposed, visitors to the Islands would not be subject to the same congestion pricing fee for entering or exiting the Bay Bridge that would apply to residents. Instead, visitors that travel to and from the Islands by auto would be subject to other fees, namely parking fees, which could vary by time of day. The effect of varied parking pricing would be similar to the effects of congestion pricing, in that both increase the out-of-pocket costs associated with driving and therefore, influence travel choices. Charging visitor trips both congestion pricing and variable parking fees would not yield extra revenue, as the amount that could be charged for each would

have to be reduced. Similarly, as currently proposed, Saturday travel would not be subject to congestion pricing fees, although TITMA could decide to implement pricing for Saturday conditions in the future.

As indicated in the comment, HOVs would not be subject to the congestion pricing fee. AB 981, the legislation that authorizes TITMA and the congestion pricing states that “HOVs [shall] be permitted to enter and exit Treasure Island without paying the fee.” This legislative requirement cannot be altered by TITMA.

TITMA has been designed to be a flexible and responsive agency, authorized with the discretion and authority to dynamically adjust a variety of transportation programs on the Islands, including administering the congestion fee program, parking pricing, the on-island shuttle, and various other Transportation Demand Management elements. This flexibility would allow TITMA to direct resources into the most effective programs. Specific and binding requirements, either as mitigation measures or as project elements, for a specific amount, time period, or group to charge congestion fees would not allow TITMA to be responsive to changing travel patterns and characteristics, and were therefore, not considered feasible or practical.

#### **2.7.4.2 Parking Demand**

##### **Comment**

B. The EIR estimated parking demand based on the San Francisco Planning Department’s 2002 Transportation Impact Analysis Guidelines for Environmental Review. The parking analysis also considered that different land uses reach their peak parking demand at different times of day. As a result of utilizing these guidelines, a peak demand of 10,162 residential spaces (including residential visitors) and 2,138 nonresidential spaces was identified. This equates to a shortfall of 2,162 residential parking spaces and a surplus of 1,015 nonresidential spaces. Residential visitors could seek parking in on- or off-street nonresidential parking spaces, but an ultimate shortfall of 1,147 parking spaces is anticipated. In other words, the proposed project allows a maximum parking supply of 91 percent of anticipated demand based on parking utilization rates in the City of San Francisco. Because no minimum parking requirements are being established, the shortfall when construction is completed could be greater.

Mandating further reductions of nonresidential parking may not be productive. Residents who are provided with transit alternatives and required to pay each time they exit and enter the islands would be incentivized to use public transit instead of driving. However, visitors to the islands have chosen their mode of travel without knowing whether a space is available to them. If insufficient parking is available when a vehicle arrives on the island, vehicles would have to continue circling the islands’ streets searching for a space, which would increase local traffic congestion. Appropriately priced parking could limit a visitor’s desire to drive on subsequent visits. Please elaborate on the strategy? (Saul Bloom, Arc Ecology) [28.2]

### **Response**

As noted on EIR p. IV.E.136, the City of San Francisco does not consider parking shortfalls to be a significant environmental effect. Further, secondary effects to traffic congestion, noise, air quality, and other environmental resource areas associated with drivers who opt to drive and find themselves circulating around the Islands searching for parking are likely to be offset by other visitors who do not wish to take this risk, and opt to take transit or shift their trip to off-peak times. The EIR considered the secondary impacts of the parking shortfalls in Section IV.F, Noise, and Section IV.G, Air Quality. In addition, the transportation analysis in the EIR took into account the secondary impacts of parking shortfalls. Impact TR-63 on EIR pp. IV.E.140-IV.E.141 states that the parking shortfall on the Islands could result in a shift from auto to transit modes, resulting in an increase in transit travel demand during the peak hours. Impact TR-19 on EIR p. IV.E.95 identified a significant and unavoidable impact for capacity utilization of the Muni line 108-Treasure Island bus line. During the three peak hours of analysis, the total transit demand for the 108-Treasure Island would not be accommodated within the 85 percent capacity utilization standard, and an increase in transit demand due to a mode shift from auto to transit would exacerbate the exceedance of the capacity utilization standard. Therefore, a shift in mode from auto to transit would result in a worsening of the identified significant impact on Muni line 108-Treasure Island. The parking shortfall is not expected to result in additional significant environmental impacts beyond those identified in the EIR in Impact TR-63. Further, if parking deficits do cause substantial frustration to visitors and residents on the Islands, TITMA would have the authority to increase parking fees to better match the high demand, as suggested by the comment. Please also see the response in Subsection 2.7.4.2, Parking Demand, above, for additional information on the project sponsors' proposed approach for pricing of nonresidential parking.

### **2.7.4.3 TDM**

#### **Comments**

In item (3), please advise us of your thought on IV.E.46 Sect #4, the Pre-Paid Transit Passes. You have written in the report "where-by residence and hotel guests would be REQUIRED to purchase transit passes. The pre-paid transit voucher will provide a subsidy to transit operator's ...". Please cite specific legal statute that allows you to force resident and guest to purchase an item that will subsidize a private or public agency. This is not a valid section and the conclusions based on an illegal requirement cannot be allowed to be included in the EIR as is. *(Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation)* [12.7]

Vol. 1, IV.E.46, Transportation: The Transportation Demand Management Plan among other measures describes a Travel Coordinator and a Guaranteed Ride Home Program, both unrealistic mitigation suggestions. Can the DEIR identify other projects of comparable size which have successfully implemented a similar TDM Plan? *(Kathrin Moore, San Francisco Planning Commission)* [20.31]

**Response**

The pre-paid transit vouchers discussed in the EIR are expressly authorized by state legislation, which authorizes the Treasure Island Transportation Management Agency to impose transit voucher fees on residents and users of Treasure Island. Assembly Bill 981, the Treasure Island Transportation Management Act, which was passed by the Legislature and signed by the Governor in 2008, authorizes the formation of a Transportation Management Agency for Treasure Island, and authorizes the Transportation Management Agency to impose and collect transit voucher fees from the residents and other users of Treasure Island (see Section 1967.3(g)). It is anticipated that the pre-paid transit vouchers will be implemented through Covenants, Conditions and Restrictions (“CC&Rs”) that are recorded against residential properties on Treasure Island and Yerba Buena Island. Residents of affordable housing projects would not be required to purchase the pre-paid transit voucher. A likely structure would be for residential property owners to have the cost of the transit voucher included in their homeowner's association dues, and the cost of the transit voucher for renters to be subsidized by the rental property owner. The pre-paid transit voucher requirement is not unlike other conditions of approval commonly imposed on residential projects in California to reduce congestion, requiring property owners to participate and fund a transportation management agency that is charged with area-wide efforts to reduce traffic congestion.

Homeowners Association (“HOA”) dues are often used as a means of financing ongoing maintenance or other activities that address the impacts of a project. State law (Civil Code § 1350 *et seq.*) authorizes such assessments if consistent with the HOA's governing documents. The City has authority to require that the bylaws of an HOA provide financing for specific purposes, provided there is a nexus between the impacts of the project and the uses for which the HOA fees will be used (see *CEQA Guidelines*, Section 15041).

The elements in the TDM Plan, including a transportation coordinator and a guaranteed ride home program, are based on best practices for travel demand management for mixed-use development sites. The Presidio is an example of a site with an agency responsible for implementing a comprehensive TDM program with many similar elements to the Proposed Project's TDM program. The Presidio Trust successfully operates a fare-less shuttle system, including direct point-to-point service to downtown San Francisco, as well as a Guaranteed Ride Home Program, carpool/vanpool matching services, a bicycle rack program, an on-site transit voucher sales office, and also requires individual employers in the Presidio to participate in the park's TDM Program.

With respect to specific elements of the program cited in the comment, the funding of a transportation coordinator is also a relatively common requirement. There are many developments throughout the Bay Area and the United States that have full-time or part-time transportation coordinators, responsible for promoting bicycling, transit use, and carpooling and

administering various programs, such as parking cash-out or commuter checks. Major employment campuses, such as Yahoo!, Google, and Genentech; large institutions, such as Stanford University; and a number of transit-oriented residential developments, such as the Contra Costa Centre, near Walnut Creek, administer robust transportation demand management services and have at least one full-time staff dedicated to administering a TDM Program.

Guaranteed Ride Home programs are equally common throughout the Bay Area and beyond. For example, as noted above, the Presidio administers a pool for employers and employees located in the Presidio through which employees who use transit, walk, or bicycle to work can get reimbursed for a taxi or rental car in the case of an emergency. There is no cost to the employee and the Presidio Trust bears the entire cost of providing this service. The City of San Francisco, Alameda County, and many other jurisdictions in the Bay Area also administer similar programs free of charge to employees and employers.

The overall TDM Program, including the proposals for a TDM Coordinator and a Guaranteed Ride Home program, are based on successful examples of similar services throughout the Bay Area and are considered reasonable and relatively common elements of a successful TDM Program. The comment queries whether these features are appropriate mitigation for traffic impacts. Both the TDM Coordinator and the Guaranteed Ride Home program are features of the Proposed Project that were included in the *2006 Transportation Plan*. Neither feature is proposed as a mitigation measure by the EIR. While the EIR preparers consider these features to be reasonable and common elements of a successful TDM Program that ultimately increase transit use, the methodology used to estimate trips for the EIR conservatively did not assume any additional mode shifting because of these features, with two exceptions. First, the on-site shuttle was assumed in the calculation of travel times. Second, the pre-paid transit vouchers for residents were factored into the cost comparisons used to assess the effectiveness of congestion pricing.

#### **2.7.4.4 Treasure Island Marina**

##### **Comments**

These additional facilities for sailors should be considered as recreational transit and initial funding should be available from congestion pricing. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.10]

This project includes the use of Trust Lands to provide access to Bay waters. This access should be available for those of modest means as well as yacht owners who will rent berths in the TI marina. The EIR should analyze the reduction in driving that will be induced by providing storage facilities, made available at modest fees, for: wind surfing equipment and kayaks; small dinghies on racks and larger dinghies on trailers as well as rentable kayaks. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.8]

### **Response**

Specific amenities, such as kayak storage or other facilities supporting recreational watersports, may be provided as part of the land-side amenities associated with the Marina, or other components of the parks and open space adjacent to the shoreline. However, the provision of such facilities is not expected to substantially affect travel patterns for the Proposed Project, because the proposed usage would be small in relation to the total travel demand associated with the Proposed Project.

#### **2.7.4.5 Travel Mode**

### **Comments**

We are greatly concerned with the proposed regional-serving retail uses (a Regional Shopping Mall) which would only increase the number of discretionary trips to the Islands. This document should break down the transportation of this use, and identify the potential transit use of this visitor sector. Evidence should be given if this expectation or assumption (that they will use transit) is made. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.17]

A project with a thirty percent affordability demographic may mean that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more vehicular trips than estimated by the DEIR - a mitigation by way of a transportation subsidy paid for by the Project should be studied. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.20]

Additionally, since public transportation is voluntary, it is difficult to quantify the amount of reduced traffic; therefore, the aforesaid traffic mitigation analysis is inadequate and fatally flawed. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.22]

In addition, it should be noted that TI/YBI is passed [sic] the toll plaza heading towards San Francisco. Therefore, it is likely commuters would drive instead of taking alternative transportation. Even if alternative transportation is provided, such does guarantee it will be utilized. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.24]

A project with thirty percent affordability may mean that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more trips than estimated - mitigation by way of a transportation subsidy paid for by the project should be studied. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.33]

In addition, the project sponsors should take additional steps to ensure maximum ridership, for example by subsidizing ferry tickets, or further adjusting pricing mechanisms to discourage vehicle trips to and the Project to San Francisco. (*Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District*) [26.3]

Golden Gate Audubon has focuses its comments on impacts to wildlife and natural habitats. However, we are also greatly concerned about the transportation plan as presented in the DEIR and join in the comments provided by the Bay Chapter of the Sierra Club. Increased population on TI-YBI will undoubtedly contribute to additional traffic on the Bay Bridge and to increased air

pollution in the region. The TI-YBI plan does not include adequate measures to reduce dependence on cars (and in fact seems to encourage the use of automobiles as a primary form of transportation) and does little or nothing to offset the impacts that will inevitably arise. (*Mike Lynes Conservation Director, Golden Gate Audubon Society*) [32.30]

### **Response**

The Proposed Project includes a substantial number of physical improvements designed to facilitate high-quality transit and encourage walking and bicycling on the Islands (see EIR pp. IV.E.33-IV.E.45), as well as a robust Transportation Demand Management Plan, which would include pre-paid transit vouchers for each residential unit and hotel room, requirements for an unbundled parking supply, congestion fees for peak hour automobile travel, car-share and bicycle-sharing programs, and other effective strategies to reduce travel by automobiles (see EIR pp. IV.E.45-IV.E.47).

The effect that all of these strategies have at reducing peak hour automobile travel is substantial. Specifically, as discussed on EIR pp. IV.E.55-IV.E.61, the Proposed Project has been designed, both in terms of its physical form and its mix of uses, to maximize the extent to which trips can be made internal to the Islands, with bicycling, transit, and walking as the primary modes. As summarized in Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58, these factors, known as the “4D’s” result in an approximately 40 percent reduction in auto travel compared to traditional development forms (see the response in Subsection 2.7.3.6, Accounting for Density, for additional discussion of the 4Ds).

Further, the Proposed Project would also include a basic amount of new transit service to encourage the use of transit, based on what can be fully funded at this time. As noted on EIR pp. IV.E.33-IV.E.36, the Proposed Project’s transit service would include:

- New ferry service between Treasure Island and the San Francisco Ferry Terminal, operating at 50-minute frequencies
- New AC Transit bus service between Treasure Island and Downtown Oakland, operating at approximately 10-minute frequencies during the peak commute periods, and
- New shuttle-buses circulating throughout the Islands.

Existing bus service between Treasure Island and downtown San Francisco, via the Muni line 108-Treasure Island bus, operating at 15-minute frequencies, would remain. As noted in several locations in the EIR, this basic level of transit service would not be adequate, either in terms of reducing significant automobile impacts or providing adequate transit capacity. Therefore Mitigation Measure M-TR-2 calls for increasing frequencies on the 108-Treasure Island bus line, providing a new bus line between Treasure Island and another location in San Francisco (likely the Civic Center), and increasing frequencies on the ferry from every 50 minutes to every 15 minutes. Dialogue with SFMTA and with WETA has thus far indicated that Mitigation

Measure M-TR-2 is reasonable and likely to be funded and implemented. Nevertheless, implementation of Mitigation Measure M-TR-2 cannot be guaranteed, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, and because providing the more frequent ferry service would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port of San Francisco, the Board of Supervisors, and WETA. However, with implementation of Mitigation Measure M-TR-2, approximately 40 percent of PM peak hour travel to and from the Proposed Project would be made by transit. The combined effect of the project's physical design, its mix of land uses, and the robust transit service plan called for in Mitigation Measure M-TR-2 would be a reduction in peak hour automobile travel of approximately 60 percent, compared to traditional development patterns. Therefore, the combination of project components and mitigation measures identified in the EIR would result in a substantial decrease in the severity of impacts associated with automobile travel, although, as noted in several locations in the EIR, some impacts would remain significant and unavoidable.

Several comments suggest that, since it is difficult to predict transit ridership, the forecasts in the EIR are invalid, and that the EIR therefore, underestimates vehicle trip generation. It is unclear from these comments why any error in transit ridership forecasting would necessarily mean that ridership was overestimated and not underestimated. The transit ridership forecasts were developed by examining behavior of San Francisco residents who live in similar neighborhoods with similar access to similar levels of transit service as expected to be offered by the Proposed Project. These forecasts are discussed in more detail in pp. 73-74 of the Transportation Impact Study, included in EIR Appendix C. CEQA does not require that forecasts be exact, but rather, that they be based on the best available information. Although there is some uncertainty inherent in travel demand forecasting, it is equally likely that transit ridership could be either higher or lower than predicted, and, as a result, vehicle trip generation could be either higher or lower than forecasted in the EIR. The City continues to regard the travel demand forecasting approach used in the EIR as reasonable.

Both ferry and the East Bay bus service would be subsidized by TITMA, with revenues collected from parking pricing, congestion pricing, and the pre-paid transit vouchers for residential units. Some comments suggest that since the Proposed Project includes a substantial affordable housing component, a higher portion of residents would likely not be able to afford to ride ferry transit, and would instead choose to drive, compared to the forecasts in the EIR. However, a resident who chooses not to travel by ferry due to its cost would not likely choose driving as a preferable option, as the cost of owning and operating a car is typically substantially higher than taking transit, particularly when, in the case of the Proposed Project, the cost of driving would also include a congestion fee.

Although the ferry service would be subsidized such that its price would be more competitive with bus service than most ferry service in the Bay Area, it is expected to remain slightly more expensive than the bus. With implementation of Mitigation Measure M-TR-2 (on average for the three peak hours analyzed in the EIR), for transit riders traveling between San Francisco and Treasure Island, approximately 55 percent would choose bus as a travel mode and 45 percent would choose ferry service. As shown in Table IV.E.17: Transit Ridership and Capacity Utilization – Existing plus Project and Existing plus Project with Mitigation Measure M-TR-2, on EIR p. IV.E.96, even if more transit riders opted to ride the bus (and fewer rode the ferry) than predicted, bus capacity would still be expected to be adequate to handle increased ridership and no new significant impacts would occur.

One comment noted that since the Proposed Project is west of the Bay Bridge Toll Plaza, more people would opt to drive than predicted in the EIR. It is unclear from the comment how the project's location with respect to the Toll Plaza would affect travel demand, particularly since the mode split forecasts were derived from travel behavior surveys conducted in San Francisco, which is also west of the Toll Plaza. In addition, while trips between Treasure Island and San Francisco would not have to pay the toll at the toll plaza, the Proposed Project would implement congestion pricing during peak hours, which would act as a price signal to reduce vehicular trips. The extent to which some trips would be affected by congestion pricing, tolls or queues at the toll plaza was incorporated into the forecasts as part of the analysis of the effects of congestion pricing at the Islands. In the Transportation Impact Study included in EIR Appendix C, p. 77 provides more discussion of this topic.

The retail uses proposed as part of the project would include both local-serving and regional retail. For more discussion on why regional retail uses are included in the Proposed Project, please see the response to comments in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description. Although some regional retail uses would be included, the characterization of the project as including a “regional shopping mall” is inaccurate. The Proposed Project would include 85,000 square feet of regional-serving retail uses. Regional shopping malls typically contain between 400,000 and 800,000 square feet situated on 40 or more acres.<sup>5</sup>

Trip generation rates in the EIR include trips associated with the Proposed Project's retail component. The regional retail would generate trips by both auto and transit, as shown in Table C&R.3, below. The transit mode share forecasts are based on surveys conducted of both work-trips and non-work trips for trips from similar sites in San Francisco with similar access to similar levels of transit as the Proposed Project, as discussed on pp. 73-74 of the project's Transportation Impact Study.

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<sup>5</sup> Appraisal Institute, CoStar and the International Council of Shopping Centers, April 2009.

**Table C&R.3: Regional Retail Trip Generation**

Mode	Proposed Project			Proposed Project with Mitigation Measure M-TR-2: Expanded Transit Service		
	AM	PM	Sat	AM	PM	Sat
	Auto Person-Trips	206	594	622	178	505
Transit Person-Trips	105	330	342	133	419	416
Vehicle Trips <sup>1</sup>	103	297	311	89	253	275

Note:

<sup>1</sup> An average vehicle occupancy of 2 persons per vehicle for retail trips was used in the analysis. Therefore, the number of vehicle trips generated is one-half the number of person-trips by auto.

Source: Fehr & Peers, 2010

## 2.7.5 TRAFFIC

### 2.7.5.1 Traffic Circulation

#### Comments

Historically that having all “your eggs in one basket” has never been a good idea and making the current west-side westbound ramp into a transit & emergency vehicle lane will create severe overcrowding on Treasure Island Road and Hillcrest as there would be only one single westbound entrance for general traffic on the east side of the island where the bridge connects to the island tunnel fixture. That area has always been significantly crowded with slower traffic as vehicles prepare to enter the tunnel. Study of the traffic flow prior to the current bridge configuration showed this speed decrease and resulting congestion as mostly a psychological event as there were no significant increases in accidents in the tunnel, people just are generally claustrophobic and hesitate when entering enclosed spaces. With that in mind, you are proposing that all the general traffic be made to proceed around the island on a small two way it will share with traffic coming from the eastbound off ramp from San Francisco & the west-bound off ramp from Oakland. The traffic flow study needs to be done [as] part of a realistic view of how vehicles move and how this “one ramp fits all” can be even proposed. (*Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation*) [12.1]

Now let’s look at Figure IV.E.13 and the questionable decision to use the bridge underpass as the sole route to the westbound onramp for the entire island. Requiring all traffic to go through such a bottle-neck is inherently dangerous. The underpass can be subject to closure from many things that are readily foreseeable. The lanes are close together and there is no room for emergency vehicles on the side. Trucks coming off the eastbound top-deck may be too tall for the underpass and damage or in a worst case instance destroy the outer segment weakening the decking. A accident in the tunnel east or west bound would not allow traffic to exit and re-enter the freeway in a thoughtful and timely manner as they would have to come back around the island and the use the west-side Emergency /Transit only lane. Most motorists would not know if they would be allowed to use it and emergency responders would have other more pressing issue to take care of...the gridlocked traffic would lead to critical delays that have negatively impact emergency operations. (*Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation*) [12.5]

**Response**

As described on EIR p. IV.E.7, the Yerba Buena Island Ramps Improvement Project (the “Ramps Project”) is a separate study underway by the San Francisco County Transportation Authority (“SFCTA”) to evaluate the potential reconfiguration of the ramps, and is not part of the Proposed Project. Under the Ramps Project, the westbound on-ramp on the east side of Yerba Buena Island would be completely reconstructed to provide greater acceleration distance. The ramp would also be outfitted with ramp metering traffic signals to meter the flow of traffic onto the westbound Bay Bridge from the Islands. The reconfigured ramp would alleviate the constraints imposed by the existing on-ramp configuration described in the comment.

As indicated on Figure IV.E.3: Proposed Access Ramps with Existing Roadways, on EIR p. IV.E.6, access to the westbound on-ramp would be reconfigured and would be provided from Macalla Road, and would not require the use of the bridge underpass as the sole route to the on-ramp. The construction associated with the ongoing Bay Bridge East Span Project and the Ramps Project would meet Caltrans standards for design, and would accommodate trucks accessing the Islands. Caltrans and the California Highway Patrol deploy appropriate emergency response personnel to facilitate traffic flow in the event of incidents on State highway facilities, and implementation of the Ramps Project would facilitate access to and from westbound Bay Bridge. Implementation of the Proposed Project would not affect the ability of CHP and Caltrans, or other emergency service providers, to respond to incidents.

Implementation or replacement of the westbound on- and off-ramps as part of the Ramps Project, if undertaken, would be a separate project from both the Bay Bridge East Span project currently under construction and the Proposed Project. If the Ramps Project were not to go forward, both of the two existing westbound on-ramps would remain in use for the general public. Because the implementation of the Ramps Project is not certain, the traffic impact analysis was conducted for future conditions without and with the Ramps Project. Traffic impact analysis results are presented on EIR pp. IV.E.71-IV.E.83 and IV.E.118-IV.E.121.

**2.7.5.2 Unavoidable Impacts**

**Comment**

Notwithstanding these alternatives and obvious analysis failures, the DEIR improperly concludes that the majority of the Traffic Impacts are “unavoidable,” which obviously is a false conclusion. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.23]

**Response**

Under CEQA, the term “unavoidable” means an impact that would remain significant even after application of all feasible mitigation. The methodology used to analyze the potential traffic impacts associated with the Proposed Project and alternatives is presented on EIR pp. IV.E.47-

IV.E.52. Each impact determination was based on the significance criteria presented on pp. IV.E.28 and IV.E.29. Significant traffic impacts were determined to be “unavoidable,” as defined by CEQA, if the mitigation measure(s) included the EIR would not reduce the identified impact of the Proposed Project to a less than significant level or if no feasible mitigation measure was available to reduce the impacts. Implementation of Mitigation Measure M-TR-2, Expanded Transit Service, would reduce vehicle trip generation and improve operating conditions at locations where the Proposed Project would result in significant impacts, but in some of these locations the improvements gained from M-TR-2 were not sufficient to reduce impacts to a less-than-significant level, as defined in the significance criteria. At these locations, therefore, the EIR correctly concludes that the Proposed Project impacts would remain significant and unavoidable.

## **2.7.6 TRANSIT**

### **2.7.6.1 General**

#### **2.7.6.1.1 Transit Capacity**

##### **Comment**

The fully funded base transit scenario includes one ferry making round trips to the Ferry Building requiring 50 minutes for a roundtrip, 15-minute headways on Muni-108 during both peak hours (40-foot [ft] buses), and a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses). In this scenario, total transit capacity is 1,415 passengers per hour. The expanded transit scenario includes three ferries making roundtrips to the Ferry Building with 15 minute headways, 7-minute headways on Muni-108 in the a.m. peak hour, 5-minute headways on Muni-108 in the p.m. peak hour (with larger, 60 ft buses), a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses), and a new bus line with 12-minute headways to Civic Center San Francisco during both peak hours (40 ft buses). In this scenario, total transit capacity is 4,241 passengers in the a.m. peak hour and 4,563 passengers in the p.m. peak hour. Travel demand off the island is estimated at 5,376 in the a.m. peak hour and 7,559 in the p.m. peak hour. In the absence of private automobiles, travel demand could be accommodated in the a.m. peak hour with the expanded transit scenario with the addition of two ferries for a total of five ferries and 10-minute headways. Travel demand in the p.m. peak hour would require five ferries with 10-minute headways, 5-minute headways on Muni-108 with 60 ft buses, 5-minute headways to downtown Oakland with 60 ft buses, and 5-minute headways to Civic Center San Francisco with 60 ft buses. Please identify how the project will address and mitigate this discrepancy. (Saul Bloom, Arc Ecology) [28.4]

##### **Response**

The comment summarizes both the fully-funded base transit scenario included as part of the Proposed Project and the expanded transit scenario proposed as part of Mitigation Measure M-TR-2. The comment correctly summarizes the transit capacity for both scenarios; however, it should be clarified that the capacities cited are total capacity onto and off of the Islands (regardless of destination) and the capacities are one-way hourly capacities. The comment also

cites project-generated travel demand, in terms of total person-trips, onto and off of the Islands during the AM and PM peak hours. However, the numbers cited are for project-related trips only, and do not account for existing uses expected to remain on the Islands, such as the Job Corps and Coast Guard facilities. Consequently, at buildout of the Proposed Project, the total number of person-trips traveling onto and off of the Islands would be greater than the numbers cited in the comment. Further, the demand numbers cited in the comment are total person-trip generation, not one-way or peak direction demand, which does not present an accurate comparison of travel demand to the transit capacity numbers cited. Despite these clarifications, the thesis presented in the comment, that peak hour transit capacity could physically be provided at levels adequate to accommodate all person-trips generated onto and off of the Islands, likely remains true.

By making this point, the comment appears to be suggesting that the Proposed Project should provide sufficient transit service to accommodate all desired travel in the peak hours via transit, and to require use of that transit. The comment does not propose a mechanism for restricting residents and visitors from using private automobiles. The response to comments in Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, discusses why it would be infeasible for the Proposed Project to ban gasoline powered vehicles and only permit transit and nonpolluting vehicles to be used on the Island. For similar reasons, prohibiting the use of all automobiles on the Island is not considered feasible.

Restricting access to and from the Islands to transit-only would make multiple land uses infeasible, and therefore, the land use program and associated travel demand would be substantially different from that presented in the EIR on Table IV.E.5: Person-Trip Generation by Mode, on p. IV.E.60. Since revenues from congestion pricing and visitor parking are proposed to be used to fund transit operations, by not allowing the use of private automobiles, neither the development program nor the transit service would be supportable, and therefore, the service proposals identified in the comment would not be appropriate or fundable. Other funding mechanisms would need to be identified to provide the transit service, which may affect the services provided.

The Proposed Project is not required, nor is it proposing, to accommodate all travel demand generated by the proposed uses by transit. The Proposed Project is instead proposing to provide a package of transit and transportation improvements. These improvements alone were analyzed by the EIR and found to be insufficient to accommodate all transit trips. The EIR finds that, with implementation of the expanded transit service under Mitigation Measure M-TR-2, the amount of transit is sufficient to accommodate the estimated number of transit trips. That level of transit service was considered to be uncertain, however, because of the inability to commit future funding for the expanded Muni bus service and because it requires expansion of the ferry docking facilities in San Francisco that are currently under review but have not been approved.

2.7.6.1.2 Transit Travel Time

**Comment**

Eliminating ferry service eliminates the one mode of transit that is not dependent on the bridge. The proposal to increase bus service is great in concept, but is not studied for its feasibility in light of the increased congestion. How long will it take to travel to and from the island by bus at peak, near peak and off peak times? What impact will that have on the reliability and use of the service? (*Jennifer Clary, President, San Francisco Tomorrow*) [38.9]

**Response**

As indicated on EIR p. VII.48, the No Ferry Service Alternative was considered in response to comments on the NOP and to evaluate if and to what extent development of fewer residential units on Treasure Island would avoid or substantially lessen traffic and traffic-related air quality and noise impacts, as well as air quality impacts related to ferry operations. This alternative was also considered to evaluate to what extent it would avoid or lessen impacts on scenic views, noise, and historic resources.

Eliminating ferry service would reduce transit capacity between the Islands and San Francisco, but the capacity would be made up by the expanded bus service described in Mitigation Measure M-TR-2. With the expanded bus service, the No Ferry Service Alternative would result in a slightly higher overall transit mode share compared to the Proposed Project with the base transit service.

As indicated on EIR p. VII.57, the No Ferry Service Alternative was analyzed with and without the Ramps Project. Under conditions without and with the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island would impact Muni line 108-Treasure Island and AC Transit bus operations. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) (p. IV.E.100), the impact on Muni line 108-Treasure Island operations under conditions without and with the Ramps Project would be reduced to a less-than-significant level. Implementation of Mitigation Measure M-TR-24 under either circumstance would improve operations for AC Transit buses destined to the eastbound on-ramp. However, since this improvement would extend only to the westbound on-ramp on the west side of Yerba Buena Island, and since sufficient right-of-way is not available to extend a transit-only lane beyond the westbound on-ramp, AC Transit vehicles would continue to experience congestion between the diverge point for the westbound on-ramp and the eastbound on-ramp. Therefore, similar to the Proposed Project, either with or without the Ramps Project, the impact to AC Transit operations would remain significant and unavoidable.

The second paragraph on EIR p. VII.57 is revised as follows (deletions are shown in ~~strikethrough~~ and new text is underlined):

Similar to the Proposed Project, under conditions without and with the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island would impact Muni line 108-Treasure Island and AC Transit bus operations. ~~Under conditions with the Ramps Project, queues would impact AC Transit bus operations; however, queues would not significantly impact Muni line 108-Treasure Island bus operations.~~ With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) identified in Section IV.E, Transportation, for the Proposed Project (p. IV.E.100), the impact on Muni line 108-Treasure Island operations under conditions without the Ramps Project would be reduced to a less-than-significant level.

The comment queries what the travel time would be by bus on and off of Treasure Island. The comment does not provide a specific bus route or locations on or off of Treasure Island for which travel times should be identified; however, given the nature of the overall comment regarding the competitiveness of bus versus ferries, the comment is assumed to refer to bus service between the Treasure Island Transit Hub and the Transbay Terminal in downtown San Francisco on Muni line 108-Treasure Island. The amount of traffic on the section of the Bay Bridge between the Islands and downtown San Francisco is, and will continue to be, constrained by the eastbound approach and the Toll Plaza in the East Bay. Further, with implementation of Mitigation Measure M-TR-24, congestion on the approaches to the Bay Bridge from the Islands would not affect travel times for the 108-Treasure Island. Therefore, travel times are not expected to change substantially in the future, even in the context of increased demand for travel on the bridge. According to SFMTA service planners, travel times between Treasure Island and downtown San Francisco on Muni line 108-Treasure Island are expected to be 8 minutes in the AM peak hour and 9 minutes in the PM peak period.

Under the No Ferry Service Alternative, it is not anticipated that bus travel times would be greater than with the Proposed Project for any of the bus routes proposed. Under both Proposed Project and No Ferry Service Alternative conditions, with implementation of M-TR-24, buses would have exclusive travel lanes approaching the Bay Bridge between Treasure Island and the westernmost westbound on-ramp. Operations on the Bay Bridge would be similar to existing conditions, as the bridge generally operates at capacity in the peak direction of traffic flow during the peak periods. The expanded bus service included in Mitigation Measure M-TR-2, and assumed for the No Ferry Service Alternative, took into account the travel times that would be experienced by AC Transit and Muni buses in order to maintain the proposed headways. In some instances, additional buses would need to be provided in order to maintain the proposed headways; allowances for increased congestion are typically included in overall transit planning by the various transit operators.

### 2.7.6.2 San Francisco Muni

#### 2.7.6.2.1 Transit Funding

##### Comments

1. As stated on page 23 of the TIS, the Treasure Island Transportation Management Agency (TITMA) will oversee the collection of revenue from parking, transit passes and congestion pricing, and the disbursement of funds to transit operators. Would these funds go toward improving and maintaining the Muni Route 108 service? Due to annual fluctuation of the San Francisco Municipal Transportation Agency (SFMTA) budget and numerous competing priorities for General Fund revenues, the TITMA should contribute directly to SFMTA to ensure that the headways for Route 108 are maintained or improved. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.11]
  
- 13) The Sierra Club's major comment is that a DEIR on a project of this magnitude should include an alternative with minimum transportation impacts. We are concerned that the project will be allowed to proceed and create profits on the island while causing delays to Muni and AC transit while both services are suffering with operating costs exceeding their available funding. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.1]

##### Response

TITMA, as the agency that would be responsible for managing revenue from congestion pricing and parking, would disburse funds to AC Transit and WETA to cover operating costs not paid for via farebox receipts. The Proposed Project also includes funding for transit operating subsidies for the TITMA, for the interim period when congestion pricing, parking revenues and transit vouchers are insufficient to cover the shortfall.

Funds for SFMTA to operate the Muni line 108-Treasure Island bus route, and expansion of Muni bus service proposed as part of Mitigation Measure M-TR-2, would come from the San Francisco General Fund. The City prepared a Fiscal Impact Analysis for the Proposed Project that indicates that General Fund revenues generated from the Proposed Project through property taxes, sales taxes, hotel taxes, and other sources would provide sufficient General Fund revenues for the Muni line 108-Treasure Island bus route both under the Proposed Project and the Enhanced Transit

Service under Mitigation M-TR-2.<sup>6</sup> Ongoing economic feasibility studies related to revenue projections and discussions between TIDA and SFMTA regarding funding and service levels will be documented as part of the final record supporting the decision-maker's actions on the Proposed Project. See also the responses in Subsection 2.7.2.3, Funding Mechanisms, and Subsection 2.7.15.3, Funding, for additional discussion of funding for proposed transit facilities.

Under the base transit scenario, Muni line 108-Treasure Island is assumed to operate on its existing headways. Planning Department staff has reviewed the Muni line 108-Treasure Island headways for the last several years (2007 to present). Despite the annual SFMTA budget fluctuations and declarations of fiscal emergency, the Muni line 108-Treasure Island has maintained headways of 15 minutes or less during the AM and PM peak periods over the course of the last three years. As such, it was reasonable to assume existing service levels for the purposes of the EIR analysis.

The comments also suggest some concern that funds for Muni line 108-Treasure Island service would be uncertain in the future due to budgeting priorities. Based on the trip generation forecasts for the Treasure Island project with the baseline transit service (e.g., with existing headways on the Muni line 108-Treasure Island maintained), ridership on the Muni line 108-Treasure Island would increase between 100 percent and 400 percent, depending on peak hour and direction. Although SFMTA would maintain control over Muni line 108-Treasure Island operations, so long as General Fund revenues generated by the Proposed Project, and annually appropriated by the Board of Supervisors to Muni, are sufficient to cover the increased cost of service, it is unlikely that SFMTA would reduce service or eliminate a high ridership line such as the one that the Muni line 108-Treasure Island is projected to be. However, as indicated in Impact TR-19 on EIR p. IV.E.95 in the EIR, because full funding for the expanded transit service has not yet been identified and the sustenance of such service cannot be guaranteed, its implementation remains uncertain and was therefore, not assumed in the transit analysis. Accordingly, Proposed Project impacts to transit capacity on the 108-Treasure Island have been determined to be significant and unavoidable.

The Proposed Project's development program, transportation network, and TDM Plan were designed to accommodate all travel modes, while advancing the City's Transit First policy. The

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<sup>6</sup> Update to Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island, Updated Exhibit R, Financing Plan and Transaction Structure, Exhibit 14, Fiscal Impact Analysis, April 2010, included in Legislation Submitted to the Board of Supervisors supporting Redevelopment of Former Naval Station Treasure island, April 6, 2010, found at [www.sftreasureisland.org/index.aspx?page=26](http://www.sftreasureisland.org/index.aspx?page=26) (hereinafter "2010 Term Sheet update"). Accessed January 9, 2011. Alex Galovich, Wilson Meany Sullivan, "Proposed Transit Operating Funding for the TI/YBI Redevelopment Project," memorandum of December 8, 2010. Copies of these documents are available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

unique location of the Proposed Project and the use of congestion pricing and parking fees, along with other funding mechanisms, for funding transit improvements, required careful consideration of the mix and density of land uses in order to develop a viable and thriving community on the Islands. Due to the scale of the proposal and nature of congested urban areas, the travel demand generated by the proposed development would be expected to result in some transportation impacts. The EIR includes transportation mitigation measures to enhance and further encourage the use of transit by residents and visitors to the Islands, and physical improvements to minimize impacts of on-island congestion.

#### 2.7.6.2.2 Transit Impacts – Effects on Headways

##### **Comment**

In addition, in the DEIR, numerous downtown intersections in San Francisco experience ‘significant and unavoidable’ impacts. Please discuss how SFMTA plans to maintain the proposed seven minute bus headways between the Transbay Terminal and Treasure Island if there are significant delays within San Francisco and on-ramps onto I-80 and the SFOBB. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.15]

##### **Response**

The Muni line 108-Treasure Island would operate as a point-to-point bus line between the Treasure Island Transit Hub and the Transbay Terminal in Downtown San Francisco. Within Downtown San Francisco, Muni line 108-Treasure Island currently operates on transit-only ramps and transit-only lanes as it approaches and departs from the Transbay Terminal, and is not subject to congestion on Downtown streets. Since Muni line 108-Treasure Island would continue to operate within transit-only ramps and transit-only lanes as it approaches and departs the Transbay Terminal, it would not experience delays associated with increased traffic congestion on Downtown streets in the future.

#### 2.7.6.2.3 Transit Mitigation – Headways

##### **Comment**

3. The DEIR states that Mitigation Measure M-TR-2 will reduce the headways for Muni Route 108 from 15 minutes to as low as seven minutes in the AM peak and as low as five minutes in the PM peak. By implementing M-TR-2, an additional four to eight buses would be added to the westbound on-ramp. Due to the projected congestion on the Treasure Island westbound on-ramp to the SFOBB and the SFOBB itself, will an additional four to eight buses be sufficient to maintain lower headways? Since transit schedule reliability is critical to attracting transit riders, please discuss how to mitigate the potential affects on transit headways. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.14]

**Response**

Congestion on the approaches to the Bay Bridge from the Islands would increase travel times for transit, which would increase the number of vehicles required to maintain the anticipated headways. However, implementation of Mitigation Measure M-TR-24, described on EIR p. IV.E.100, would construct a transit-only lane between First Street on Treasure Island and the existing west-side westbound Bay Bridge on-ramp such that Muni vehicles would have a continuous transit-only route from the ferry terminal/transit hub on Treasure Island to the existing west-side westbound Bay Bridge on-ramp. Under the scenario where the YBI Ramps Improvement Project is implemented, the west-side westbound Bay Bridge on-ramp would be restricted to transit and emergency vehicle use only, further extending the transit-only route to the Bay Bridge mainline. As discussed in the EIR, implementation of Mitigation Measure M-TR-24 would reduce the impact on Muni operations caused by vehicle queues on Treasure Island Road to a less-than-significant level. Under these mitigated conditions, travel times for buses destined to San Francisco would be relatively similar to today. Based on this, SFMTA and the project sponsor have agreed that Muni would require a total of six buses on Muni line 108-Treasure Island to maintain proposed headways (an increase of two vehicles over existing conditions) and four new buses on the new route. TIDA and TICD have consulted with SFMTA on the design of the intermodal transit facilities for Treasure Island;<sup>7</sup> a proposed bus layover location is identified on Figure IV.E.9: Proposed Transit Circulation, on EIR p. IV.E.34.

Since the proposed transit-only lane would extend only as far as the west side westbound on-ramp to the Bay Bridge, AC Transit vehicles destined for the East Bay would experience some congestion during peak periods between that on-ramp and the eastbound on-ramp (see Impacts TR-25 and TR-26 on EIR pp IV.E.101-IV.E.102). The analysis conducted by AC Transit to determine the number of vehicles required to operate proposed service (which informed the costs accounted for by the project sponsor in their estimates of the operating costs for TITMA-funded services) did include additional travel time due to this congestion and no additional vehicles beyond those already assumed and accounted for would be required for proposed AC Transit service.

As a result, additional transit vehicles beyond those identified in the analysis would not be required to maintain headways since the effects of congestion on transit travel times would be reduced.

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<sup>7</sup> See, for example, Jack Sylvan, Mayor's Office of Economic & Workforce Development, letter to Nathaniel P. Ford, Sr., Executive Director, San Francisco Municipal Transportation Agency, June 9, 2009. A copy of this letter is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

### 2.7.6.3 AC Transit

#### 2.7.6.3.1 Transit Circulation – Bay Bridge

##### Comment

##### **Bay Bridge Congestion Study**

As the process goes forward, it is important that all relevant agencies coordinate their efforts. In order to make the best use of their new facility the Transbay Joint Powers Authority (along with the San Francisco County Transportation Authority) is currently conducting a study of projected Bay Bridge congestion. This study, now in draft, makes a preliminary recommendation for a “contraflow” westbound transit lane on the lower deck of the Bay Bridge. The Treasure Island EIR should review and incorporate (as needed) the findings of the Bay Bridge Congestion Study, particularly the proposal for the contra-flow lane. (*Cory LaVigne, Director of Service Development and Planning, AC Transit*) [23.1]

##### Response

The Bay Bridge Corridor Congestion Study (draft study dated October 2010) assessed the future operating conditions for vehicular travel across the Bay Bridge from Oakland into San Francisco during the morning commute hours, with particular focus on impacts on transit travel times. The effort included development of a traffic micro-simulation model for a 24-mile study area, including the Bay Bridge and its approaches, and development and analysis of future year 2035 conditions. In response to projections of increased congestion levels and increased transit travel times, a preliminary set of potential improvements were identified that would warrant additional study. These include increased toll plaza metering rates, physical improvements such as an I-580 High Occupancy Vehicle (“HOV”) lane, additional westbound HOV facilities, and a westbound contraflow lane on the lower level of the Bay Bridge. The results of the study indicated that additional investigation of improvements to the Bay Bridge Corridor is warranted. Since significant additional study is needed to determine the feasibility and design of a potential contraflow lane and other options to improve transit are also under study, consideration of a facility contraflow lane would be speculative at this time and is not appropriate for the CEQA analysis of the Proposed Project.

The Bay Bridge Corridor Congestion Study was intended to be the first step in a more detailed study of potential Bay Bridge corridor improvements. It should be noted that the Bay Area Toll Authority (“BATA”) has recently selected a consultant to conduct the San Francisco Bay Crossing Study Update, to look at long-term options for traffic relief in the Bay Area. Both of these studies involve longer term improvements, and would include the Proposed Project as part of the planning and analysis effort.

The Proposed Project includes the formation of a transportation management agency, TITMA, that would be responsible for coordinating the Proposed Project’s transit and transportation activities both on-Island and within the regional context. Should large changes in the regional

transportation network materialize, such as a contraflow lane on the Bay Bridge, the TITMA would be responsible for coordinating the use of such a lane by Island transportation providers.

#### 2.7.6.3.2 Transit Funding

##### Comments

###### Transit Funding

The EIR assumes that AC Transit will operate the robust transit service from Downtown Oakland to Treasure Island that is contemplated in the 2006 Treasure Island Transportation Plan (a document which should be specifically incorporated by reference into the EIR). AC Transit's ability to provide this service is completely based on the ability of the development project to provide an adequate and sustainable source of funds for transit operations. This should be noted in the EIR. The specific cost estimates in the 2006 Plan are now obsolete, and will need to be updated to costs at the time service is initiated (with ongoing inflation adjustments). If it is not possible to fully fund this transit, then levels of service would have to be reduced, either in frequency and/or in hours of operation (span of service). We would be happy to work with the newly formed Treasure Island Transportation Management Agency (TITMA) to analyze various potential funding sources. (*Cory LaVigne, Director of Service Development and Planning, AC Transit*) [23.2]

###### Roadway Assumptions

AC Transit's ability to provide service rests on certain roadway assumptions as well as funding assumptions. It is assumed that Hillcrest Road will not suffer Impact TR-25 (p. IV.E.101), backups due to the Ramps Project not being implemented. It is also assumed that the development project will not cause congestion on the Bridge mainline. We are particularly concerned because the Bay Bridge Congestion Study has made a preliminary finding that without mitigation congestion in the area of the Toll Plaza will block bus access to HOV lanes by 2035.

If either Hillcrest Rd. or the Bay Bridge mainline experience delays, then bus service quality will degrade, and operating time and costs would increase. That would in turn require additional funding to maintain the every ten minutes level of service planned in the Treasure Island Transportation Plan. Alternatively, appreciably increased travel times with no additional resources would result in levels of service to be reduced. (*Cory LaVigne, Director of Service Development and Planning, AC Transit*) [23.3]

##### Response

The Proposed Project would provide operating funding for the proposed AC Transit service between the Islands and Downtown Oakland. It is anticipated that TIDA and AC Transit would enter into a Memorandum of Understanding, followed by a service contract or other arrangement, which would document that the sources of project-generated funding would be sufficient to cover AC Transit's cost of providing the level of service proposed as part of the Project. The MOU would include provisions to maintain headways to account for the effects of congestion on Hillcrest Road and the extent to which congestion blocks access to HOV/bus-only lanes at the Toll Plaza on AC Transit travel times under conditions without the Ramps Project, and funding requirements to maintain headways in the future.

The 2006 *Treasure Island Transportation Plan* is referenced in the EIR, but not specifically incorporated by reference because the Plan has been refined since it was published in 2006, and would be replaced by the Transportation Implementation Plan to be adopted by TIDA as part of the final project approvals.

#### 2.7.6.3.3 Transit Impacts

##### **Comment**

6. In the DEIR, Impact TR-27 states that AC Transit will experience significant and unavoidable impacts after implementing Mitigation Measures M-TR-2 and M-TR-24. Although AC Transit buses can use the Transit/Emergency Vehicle-only lane proposed for westbound transit, AC Transit buses would need to merge back into the mixed-flow lane towards the eastbound on-ramp. Due to the size and significant queuing on Treasure Island Road, buses merging could potentially block both travel lanes and delay Muni buses accessing the westbound on-ramp. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.18]

##### **Response**

The comment correctly notes that if Mitigation Measure M-TR-24 were implemented, AC Transit buses would use the Transit/Emergency Vehicle-only lane between Treasure Island and the west-side westbound Bay Bridge on-ramp before merging back into mixed-flow traffic to reach the eastbound on-ramp on the east side of Yerba Buena Island. Based on proposed transit headways for these service operators, the potential that Muni and AC Transit vehicles arrive at the location where AC Transit buses need to merge back into the mixed-flow lane, resulting in a conflict between buses, would occur at most four times during the peak hour under the Proposed Project and at most six times under conditions with implementation of Mitigation Measure M-TR-2. Delay incurred by Muni because of this conflict is expected to be minor and would not impact transit operations such that additional vehicles would be needed to meet described transit levels of service. As described in Mitigation Measure M-TR-24, the construction of the transit-only lane would reduce the impact to Muni to less-than-significant and would improve conditions for AC Transit, but impacts to AC Transit due to congestion on Hillcrest Road would remain significant and unavoidable.

#### **2.7.6.4 Golden Gate Transit**

##### 2.7.6.4.1 Congestion on Bay Bridge

##### **Comment**

- Impacts TR-6, TR-7, TR-44, and TR-45 indicate that significant and unavoidable queuing will occur on freeway approaches to the Bay Bridge, at the Bay Bridge Toll Plaza (TR-6 and TR-44) and on San Francisco city streets (TR-7 and TR-45). It is unclear if the queuing impacts will affect bus operations to the Bay Bridge. Although GGT does not operate in

revenue service across this bridge, it is used by GGT buses operating in non-revenue service between the District's main bus garage in San Rafael and San Francisco. Excess congestion on the approaches to the Bay Bridge, especially in the vicinity of the entrance to the bus lane at the Toll Plaza, can adversely impact GGT operations and ultimately increase operating costs. (*Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District*) [9.2]

### **Response**

The Proposed Project would not substantially affect the PM peak period Golden Gate Transit non-revenue service on the westbound Bay Bridge. Under Existing plus Project conditions, the Proposed Project would result in a significant impact on queues at the Bay Bridge toll plaza during the weekday AM peak hour (Impact TR-6), and not during the PM peak hour when Golden Gate Transit buses are traveling from San Rafael to downtown San Francisco.<sup>8</sup> Under 2030 Cumulative conditions, toll plaza operations would experience increased congestion during both the weekday AM and PM peak hours, and the Proposed Project would contribute to significant cumulative queuing impacts at the Bay Bridge toll plaza. However, during the PM peak period, the increased queues would not extend upstream into the I-80/I-580/I-880 distribution structure, which is the location where queues spilling back from the toll plaza block the bus lane, and therefore, the entrance to the bus lane at the toll plaza would not be affected during the future PM peak hour conditions.

As indicated in Impact TR-32 on EIR pp. IV.E.107-IV.E.108, and Impact TR-62 on EIR p. IV.E.136, the Proposed Project's impact on Golden Gate Transit due to increased traffic congestion in downtown San Francisco would be less than significant. At intersections where project-generated vehicle trips would result in significant impacts, Golden Gate Transit buses operate within transit-only lanes or in lanes that are not subject to the queued conditions associated with traffic destined to the Bay Bridge.

#### **2.7.6.4.2 Impacts on Golden Gate Transit**

### **Comment**

- Impacts TR-32 (existing conditions plus project) and TR-62 (cumulative conditions plus project) indicate that the proposed project will have a less-than-significant impact on GGT operations even though buses travel through intersections that will see degradation in traffic operations. The District agrees with this assessment because GGT buses operate in lanes that appear to be mostly unaffected by project-generated traffic.

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<sup>8</sup> Golden Gate Transit primarily runs non-revenue service across the Bay Bridge in the westbound direction only on weekdays between 12:15 and 7:15 PM, although based on needs could run non-revenue service across the bridge outside of these hours and on weekends. (Telephone conversation between David Davenport, GGBHTD and Luba Wyznyckyj, LCW Consulting on 1/4/11)

- Impact TR-36 indicates that the proposed project will have a less-than-significant impact to pedestrian access to the Ferry Building. Golden Gate Ferry operates two ferry lines originating at this location, and it is the District appreciates that the impact remains less than significant if ferry service to Treasure Island is operated at 15- or 50-minute headways. (*Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District*) [9.3]

### **Response**

The District's concurrence with the EIR impact determination for Impact TR-32 and TR-62 is acknowledged. As indicated, Proposed Project impacts on Golden Gate Transit due to increased traffic congestion in downtown San Francisco would be less than significant.

As indicated in Impact TR-36, the pedestrian travel demand in the vicinity of the Ferry Building that would be associated with the new ferry service to and from Treasure Island would not result in overcrowding of public crosswalks, and would not impede existing Golden Gate Ferry operations at the Ferry Building.

### **2.7.6.5 Ferry**

#### **2.7.6.5.1 Ferry Service – East Bay**

### **Comment**

Moreover, as noted above, it is difficult to conceive as to why ferry service is not extended to the East Bay cities. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.14]

### **Response**

As described on EIR p. IV.E.35, the Proposed Project would include new bus transit operating between the Island and downtown Oakland, which would be operated by AC Transit. The service is assumed to stop in two Oakland locations, at 20<sup>th</sup> and Broadway and 14<sup>th</sup> and Broadway. Both locations are near major East Bay employment centers and have direct connections to BART and other AC Transit bus lines. Service would be provided at approximately 10-minute headways during the peak hours, and less frequent service during off-peak hours. The proposed bus service would accommodate the projected number of transit trips destined to the East Bay, would deliver the transit riders to a more centrally located destination than would new ferry service, and would have fewer environmental impacts with respect to air quality and noise than ferry service (refer to EIR Section IV.F, Noise, Impact NO-4 on pp. IV.F.23-IV.F.26, and EIR Section IV.G, Air Quality, Impact AQ-6 on pp. IV.G.42-IV.G.47, where noise and diesel particulate emissions from ferry operations are discussed). Mitigation requiring additional ferry service to the East Bay was therefore, not considered necessary. Please see Subsection 2.7.6.3.2, Transit Funding, regarding funding for East Bay bus service.

Should WETA decide at some point in the future to implement ferry service between Treasure Island and the East Bay, the Proposed Project would not preclude the provision of such new ferry service.

#### 2.7.6.5.2 Ferry Size

##### **Comment**

A 699 passenger vessel will be one of the largest ferries operating on the Bay. Has the City already verified the availability of this size boat and an operator to provide the service? Is there available capacity at the Port of San Francisco to accommodate the larger ferry? (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.13]

##### **Response**

The Proposed Project would initially provide funding for the lease of one ferry to operate between Treasure Island and the Ferry Building in downtown San Francisco. The leased ferry could range in size from 299 to 699 passengers, depending on actual ferry ridership. By full buildout, the Proposed Project anticipates having one 699 passenger ferry operating at 50-minute headways under the base transit scenario.<sup>9</sup>

The existing facilities at the San Francisco Ferry Building would be able to accommodate the service anticipated to be provided under the base transit scenario. Ferry service included as part of Mitigation Measure M-TR-2, Expanded Transit Service, would be accommodated within the existing and proposed berthing facilities at the Ferry Building. WETA and its consultants have recently initiated conceptual design and will undertake the necessary environmental review for the expansion of berthing facilities at the Ferry Building. Note that because implementation of the expanded berthing facilities will require future discretionary approvals by WETA, the Port and the Board of Supervisors, as well as an identified funding source, the base analysis in the EIR assumes that the Expanded Transit Service would not be in place, as further described in the response in Subsection 2.7.15.3, Funding, below.

#### 2.7.6.5.3 Ferry Vessel

##### **Comment**

The ferries should provide areas for bikes where they will be protected from salt spray, How many more people will bring their bikes on the ferries if they know that their bikes and accessories will not be sprayed with salt water. (*Ruth Gravanis*) [31.14]

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<sup>9</sup> The EIR analysis conservatively assumes that this vessel can accommodate 699 passengers; however, the capacity of the vessel is highly dependent on the seat and amenity configuration, and as a result, the vessels could be reconfigured to increase capacity up to 899 passengers, if needed.

**Response**

The ferry would include a protected area for bicycle storage. While the design of the ferry is not currently known, TITMA would work with WETA to ensure that appropriate provisions would be made for bicyclists. Existing ferry vessels that provide outdoor bicycle storage for bicycles are generally well-used by bicycle riders. Statistics are not available regarding the additional number of persons that may bring a bicycle on the ferry if the bicycles were protected from salt water spray.

2.7.6.5.4 Travel Mode – Ferry Demand

**Comment**

2. On page 73 of the TIS, it indicates that the ferry will have a capacity of 699 passengers. In Table 26 (page 89), the DEIR projects 817 PM peak hour ferry trips under the Base Transit Scenario. With ferries operating at 50 minute headways, will there be enough capacity to accommodate all these trips? (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.12]

**Response**

The comment correctly notes that the Proposed Project would generate approximately 817 PM peak hour ferry trips, irrespective of direction. Table 43 on p. 163 of the TIS and Table IV.E.16: Existing and Existing plus Project Transit Ridership and Capacity Utilization, on p. IV.E.94 of the EIR present ferry ridership by peak hour and direction. As shown, the ferry would have a maximum one-way load of 479 passengers in the eastbound direction during the PM peak hour. This would result in a PM peak hour utilization of 57 percent, and there would be capacity to accommodate the demand.

In the case of either scheduled or unscheduled ferry maintenance, the project sponsors expect to execute a Memorandum of Understanding (“MOU”) with the Water Emergency Transit Authority (“WETA”) to ensure that service is uninterrupted. Specifically, and among other things, the MOU is expected to include a statement of intent to allow the use of spare vessels that WETA currently uses for purposes of continuing fleet operations during vessel maintenance to also be used for the proposed Treasure Island ferry route, as needed.

2.7.6.5.5 Ferry Terminal

**Comment**

And our campaign to correct the location of the Ferry Building -- the Ferry Terminal at the site, help lead to its current location. So we’ve been involved in this for some time. (*Saul Bloom, Arc Ecology*) [TR.16.1]

**Response**

The input provided by Arc Ecology as part of the planning process on the location of the Ferry Terminal on Treasure Island is noted.

**2.7.6.6 Shuttle Service**

2.7.6.6.1 On-Island Shuttle

**Comments**

An enhanced shuttle system [II.39] should provide for all visitor/tourist and recreational uses – including teams arriving from off-island by transit; tourist and museum visitors, as well as island residents. (*Ron Miguel, President, San Francisco Planning Commission*) [7.5]

For instance, the Project’s proposed public transportation system does not adequately serve and/or account for intra-island transportation, including where visitors would like to travel (e.g. the northern shoreline, to the wetlands or historical admiral mansions); more study needs to be done concerning on-island transportation. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.13]

**Response**

As indicated on EIR p. IV.E.36, Job Corps commuters and visitors would also be able to use the proposed on-island shuttle system. The shuttle system would be provided without fares and would be available for all visitors and residents of the Islands, including tourists, visitors, museum visitors, teams using sports fields and Islands residents.

As described on EIR p. IV.E.36 and illustrated on Figure IV.E.9: Proposed Transportation Circulation Plan, on p. IV.E.34, the fare-free on-island shuttle system would consist of three separate lines: two serving the neighborhoods on Treasure Island (including the Job Corps), and a third serving Yerba Buena Island. (Note: Figure IV.E.9 has been corrected in response to comments noting inconsistencies between Figure II.9: Proposed Shuttle Routes, on EIR p. II.40, and Figure IV.E.9; please see Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, of this Comments and Responses document, for description of revisions and clarification to shuttle routes.) Each of the three shuttle lines would provide continuous service from early morning to late evening. The fare-free shuttles would stop at the Transit Hub on Treasure Island, facilitating transfers to ferry and outbound Transbay bus service. On weekends,, the on-island shuttles could extend their routes to provide access to parks and open spaces on both Treasure Island and Yerba Buena Island, including the northern shoreline park and wetlands that would be part of the Great Park, and the Senior Officer’s Quarters Historic District on Yerba Buena Island. Please refer to Figure IV.J.1: Proposed Open Space, on p. IV.J.15, for location of existing and proposed parks and open spaces.

In addition to the above, the TDM Program for the Project would require that operators of special events coordinate with TITMA regarding transportation to and from the special event.

Arrangements for special events would vary depending on the size, type, and time of day of the event, but could include adding more shuttles or providing shuttle service to a special location for the event.

Since publication of the Draft EIR, the City of San Francisco was selected to host the 34<sup>th</sup> America's Cup yacht race. Current plans call for races to be held in the summers of 2012 and 2013 in San Francisco Bay. Race-related facilities are currently proposed at several waterfront sites on mainland San Francisco; however, there are no plans to construct race-related facilities or uses on Treasure Island or Yerba Buena Island. Facilities proposed to be constructed for America's Cup-related uses will undergo separate environmental review, which will consider the individual effects of those facilities as well as their cumulative effects combined with other anticipated development in the area, including the Proposed Project.

#### 2.7.6.6.2 Funding

##### Comment

The developer-provided shuttle will be useful for residents and visitors who cannot or desire not to walk long distances. However the history of developer-provided transit is that it doesn't last very long. The EIR should show future new guaranteed funding sources from the project and a method to determine funding needs for Muni when the shuttle service is discontinued; or show how the shuttle will go on in perpetuity. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.5]

##### Response

CEQA does not require a project sponsor to demonstrate how the shuttle service would be funded in perpetuity. The on-island shuttle service would be included as part of the Proposed Project, and is anticipated to be a permanent service to support the ferry and off-island bus services. While the project sponsors would purchase shuttles for use on the Islands, the on-Island shuttle service is not expected to be provided by the project sponsors; rather, the Board of Supervisors would create or designate a new transportation agency, the TITMA, which would collect revenues and arrange for transit service, including the shuttle service that would serve the Proposed Project. Provision of the on-island shuttle system would be included as part of the *Transportation Implementation Plan* a part of the *Disposition and Development Agreement* between TIDA and TICD.

In San Francisco, a number of institutions and larger developments that provide shuttle service to connect with transit and other destinations have maintained their shuttle service for many years (e.g., Mission Bay shuttle, University of California San Francisco shuttle, California Pacific Medical Center shuttle, Presidio shuttle).

## 2.7.7 BICYCLES

### 2.7.7.1 Bicycle Access – Macalla Road

#### Comments

In item (2), I want to address the EIR consideration of turning Macalla road into a one-way leading from the Hillcrest Road/I-80 underpass to Treasure Island Road. This was being done to facilitate bicyclist coming off the east bridge span. This idea again put all the traffic flow “eggs in one basket” as the only way to the bridge (east or west bound onramps) is on Treasure Island road to Hillcrest Road. Having only one way off an island with upwards of 6500 units and hotels is just nuts. Add to that the incline on Macalla road coming down to Treasure Island road is too dangerous. The EIR study does not have a single authority on bicycle safety cited on this study. The danger in allowing bicyclist to come down Macalla at full speed is evident in figure IV.E.14, there is simply no way bicyclist can stop or turn at speeds of over 30 mph. Which is the minimum speed a bicyclist will reach if they fail to realize there is a sudden stop or their b[r]akes fail, which is a very real issue as bicycle brakes lose stopping power as they heat since the rubber composite becomes soft. There also needs to be a rethink of the design of figure IV.E.15 - No one who has seen that design feels it is in anyway safe or even rational. Please look at making the bicycle lane follow the hill. This design will get people injured or killed. *(Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation)* [12.6]

5. As stated in the DEIR, Mitigation Measure M-TR-24 would create a Transit Only Lane between First Street on Treasure Island and the Transit/Emergency vehicle-only westbound SFOBB on-ramp by eliminating the proposed southbound bicycle lane on Treasure Island Road and a segment of Hillcrest Road. Although bicyclists will still have access to the bicycle path on the new east span of the SFOBB by the bicycle lanes proposed on Macalla Road, eliminating the southbound bicycle lane will result in a significant disconnect to the proposed multi-use path on the west span of the SFOBB between Treasure Island and the rest of San Francisco. On page 17 of the TIS, the report states the Department and the Bay Area Toll Authority are currently considering alternatives for the proposed path. The proposed redevelopment project should proactively plan for connectivity between Treasure Island and San Francisco. Eliminating the southbound bicycle lane would severely limit future options to provide bicycle access to the proposed multi-use path. *(Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation)* [16.17]

Regarding bicycle and pedestrian access on Yerba Buena Island (YBI) Figures II.12 and IV.E.10 show the proposed conceptual bicycle and pedestrian plans. While we are aware of existing site constraints, as mentioned in the Transportation section of this letter, we are concerned about the safety, usability, and lack of a separated, Class One trail on YBI. Visiting bicyclists and pedestrians coming from the east span of the Bay Bridge will likely be a mix of advanced and novice riders both youth and adult. Without a Class I trail, the novice riders would likely interfere with the advanced riders going down hill and up hill on Macalla Road. The FEIR should address providing a Class I trail, in both directions on Macalla Road, including curb separation and guardrails along the outside edge of Macalla Road, which could allow for bicycles to safely use the four-foot-wide shoulder. *(Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission)* [17.17]

In addition, we are concerned over Mitigation Measure M-TR-24, which could allow for the removal of the proposed bicycle lane on Treasure Island Road if bicycle access interferes with bus access off the island. Without this proposed bicycle access, a bicycle would be forced to use the steep incline up Macalla Road. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.18]

Thank you for the opportunity to comment on the above referenced DEIR. As described in detail below, the Bay Trail project has serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the San Francisco-Oakland Bay Bridge to the Islands. As stated on several previous occasions, a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge must be included in the project description.

The underlying mission of the Bay Trail is a Class I, multi-use pathway along the shoreline. While there are times it is not feasible to accommodate a Class I facility due to existing conflicting land uses (San Francisco International Airport, Port of Oakland, etc.), the development of Treasure and Yerba Buena Islands represents an unprecedented opportunity to build not only ‘gold-standard’ Bay Trail, but a green transportation infrastructure that can become a model for cities worldwide.

The new eastern span of the San Francisco-Oakland Bay Bridge will feature a multi-use path connecting Oakland to Yerba Buena Island. Treasure Island will feature a stunning multi-use shoreline path around its perimeter. Both of these facilities are proposed to become part of the region-wide Bay Trail system, and will be a welcome addition. While many progressive statements are made encouraging environmentally sound transportation choices and a true “transit first” approach on the Islands, unfortunately, the current plans as depicted in the DEIR fail to deliver for bicycles and pedestrians on several important fronts. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.1a]

...while we understand that the exact alignment of the offramps from the new eastern span of the Bay Bridge are not finalized at this time—a factor that may impact the final alignment of a trail in this area—we believe that denoting even a draft alignment for the trail on YBI will encourage the myriad planners, engineers, landscape architects, and regulatory agencies who are involved to think of the trail as an important part of this exciting redevelopment opportunity (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.1b]

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 18,640 residents and 2,930 employees of the proposed new hotels, restaurants, entertainment and other uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's "Better Streets" Plan, the Bay Trail Plan, BCDC's Public Access Design Guidelines, or the Transportation Objectives Shared by TIDA and TICD.

The Macalla Road cross section shown in Figure IV.E.13 shows a 32' ROW with an 11' vehicle lane. In order to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island—a Class I facility or its functional equivalent is needed on both sides of the road. Given the steepness of this route, design within bike/pedestrian facilities must be carefully planned as many cyclists—young and old—will surely be walking the steepest pitches.

During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the above referenced Class I facilities will be incorporated on Macalla Road. The Bay Trail Project is confident that the TI/YBI design team can find an innovative solution to the challenging terrain presented by YBI, and we are open to any solution that provides a safe and enjoyable connection between the Bay Bridge and Treasure Island. However, it is important to note that from our perspective, a singular Class I path in the uphill direction and a bike lane in the downhill direction are *baseline starting points* from which to begin designing this facility. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.6]

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. Please provide detailed design information and drawings of a proposed solution in the FEIR. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.7]

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.8]

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge. Once this facility is in place, the TI and YBI developments will be able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.9]

There are serious problems with the proposed ped/bike connection (p. IV.E.38) to the planned new path on the East Span of the bridge. Please provide an analysis of realistic ways to get people between TI and the bridge. Consider the needs and abilities of families with children. Consider

shuttles with racks for multiple bicycles. Consider a significant widening of Macalla Road to accommodate a Class I bike path, Please also do a comparative analysis of the impacts on the bike/ ped connection of retaining or removing eucalyptus trees in the area, both with regard to safety and maintenance needs. (*Ruth Gravanis*) [31.16]

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's "Better Streets" Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD. (*Tom Radulovich, Livable City*) [36.6]

The Macalla Road cross section shown in Figure IV.E.13 shows a 32' R.O.W. with an 11' vehicle lane. Retaining a 5' bike lane in the downhill direction leaves 21' in which to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21' ROW for the bike/pedestrian facility must be carefully planned as many cyclists—young and old—will surely be walking the steepest pitches.

During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road. (*Tom Radulovich, Livable City*) [36.7]

#### Treasure Island Road

Page IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a "...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they mus[t] share the roadway at this location (see Figure IV.E.15)."

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a "bicycle circulation improvement". The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. (*Tom Radulovich, Livable City*) [36.8b]

Mitigation Measure M-TR-24

“The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road”.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands. (*Tom Radulovich, Livable City*) [36.10]

It is a commonsense and reasonably-anticipated phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve, a very significant impact to bicycle circulation.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco’s “Better Streets” Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD.

The Macalla Road cross-section shown in DEIR Figure IV.E.13 shows a 32’ right-of-way with an 11’ vehicle lane. Retaining a 5’1 bike lane in the downhill direction leaves 21’ in which to construct a world class bicycle/ pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect – the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21’ ROW for the bike/pedestrian facility must be carefully planned, as many cyclists – young and old – will surely be walking the steepest pitches. During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.4]

EIR p. IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a “...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they must share the roadway at this location (see Figure IV.E.15).”

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.6]

See comments above in “2. Analyzed alternatives conflict with Bay Trail Plan and policies”. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.7]

**5. Mitigation Measure M-TR-24 introduces new significant impacts:** The DEIR states:

The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Mitigation Measure M-TR-24 should be struck from the DEIR as it will have a significant impact on bicycle circulation on the Islands. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.9]

As others have commented and we agree, there are serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the East Span to both Yerba Buena Island and to Treasure Island. We completely support the proposal for a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge. (*Dave Campbell, Program Director, East Bay Bicycle Coalition*) [43.1]

It is estimated that more bicyclists will use a new bikeway on the Bay Bridge than currently use the bikeway on the Golden Gate Bridge, which sees 250 pedestrians/hour and 250 bicyclists/hour during weekday commutes. This estimate is not unexpected since both the City of San Francisco and the City of Oakland rank in the top 15 nationally as the cities with the highest numbers of bicyclists. The Bay Bridge is the only road between these two bike-centric cities.

Please re-evaluate your plans and the environmental documents for the Yerba Buena Island Redevelopment Project to include safe and inviting bikeways on the Bay Bridge, its connections to the Islands and on the Islands, themselves. (*Dave Campbell, Program Director, East Bay Bicycle Coalition*) [43.2]

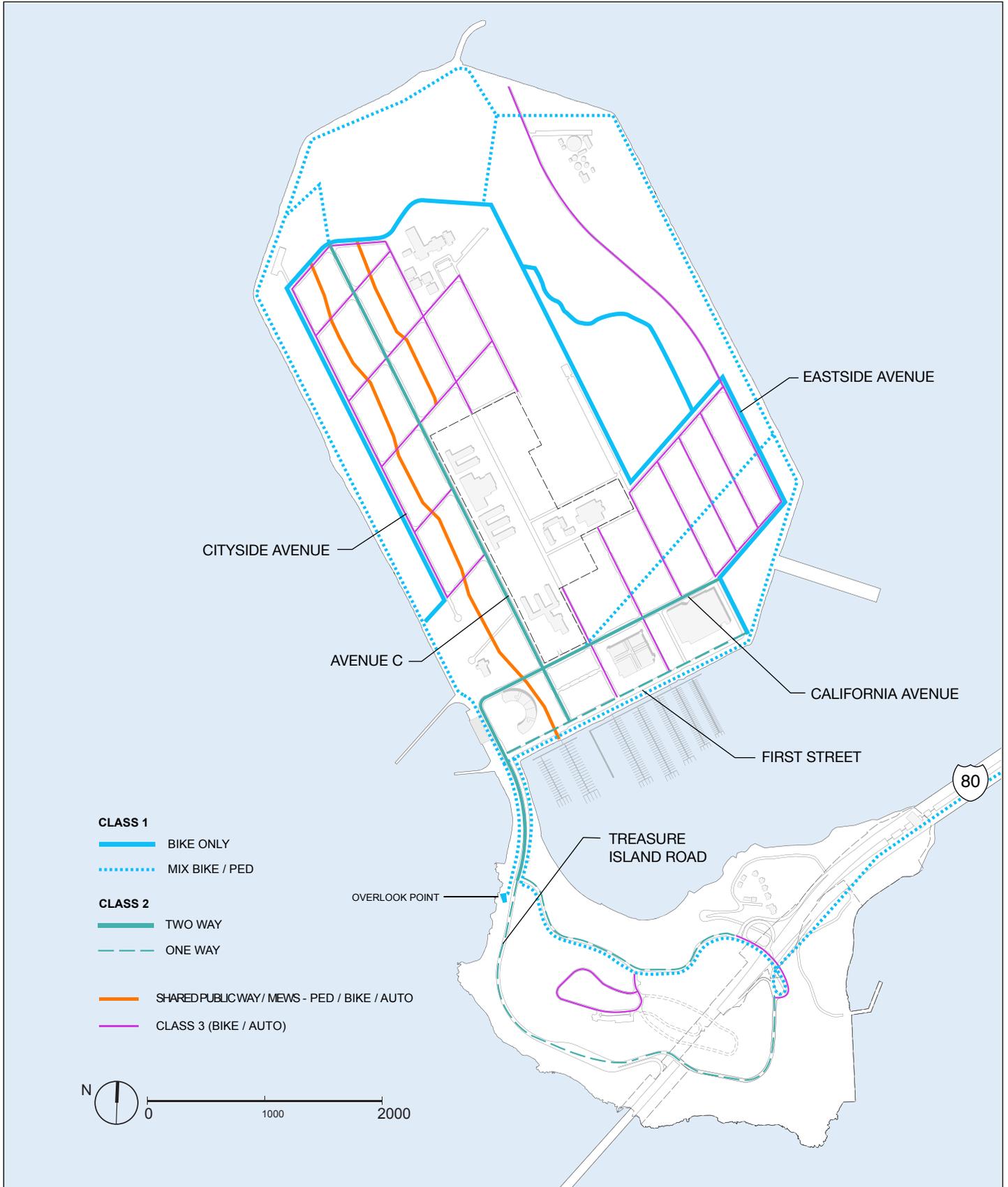
**Response**

EIR pp. IV.E.36-IV.E.45 describe the bicycle circulation improvements proposed for Treasure Island and Yerba Buena Island. The bicycle facilities proposed on Macalla Road met basic design standards and, as a result, the EIR concluded in Impact TR-33 on pp. IV.E.108 and IV.E.109 that impacts would be less than significant. However, in response to comments that raised concerns regarding the bicycle and pedestrian facilities on Macalla Road, the project sponsors have revised the proposed design of Macalla Road to widen the roadway to expand the bicycle facilities.

Figure II.12: Proposed Bicycle Routes, in EIR Chapter II, Project Description, p. II.46, and Figure IV.E.11: Proposed Bicycle Circulation Plan, p. IV.E.38, are revised to reflect changes to the bicycle route network on Macalla Road and Treasure Island Road to provide additional Class I facilities and a scenic overlook on Treasure Island Road. The revised figures are presented on the following two pages, and the changes to pedestrian and bicycle facilities are described in detail here.

The Proposed Project would reconfigure Macalla Road into a one-way road, allowing vehicular traffic in the northbound, or downhill, direction only (i.e., from the Bay Bridge toward Treasure Island) because two-way travel could not be accommodated with the addition of bicycle and pedestrian facilities. As a result, the only vehicular access for non-emergency vehicles from Treasure Island to the Bay Bridge would be from Treasure Island Road. The primary vehicular capacity constraint for traffic leaving the Islands is the on-ramps to the Bay Bridge, either with or without the separate Ramps Project to reconfigure the westbound ramps on the east side of Yerba Buena Island. This is discussed in Impacts TR-3 through TR-5 on EIR pp. IV.E.75-IV.E.83, which identify the extent to which queuing occurs on roadways approaching the Bay Bridge due to the limited capacity at the on-ramps. The capacity of the on-ramps would not be affected by the proposed reconfiguration of Macalla Road; therefore, traffic congestion would not be exacerbated by converting Macalla Road to one-way. Similarly, providing two-way travel on Macalla Road, as suggested by a comment, would not increase the capacity of the on-ramps.

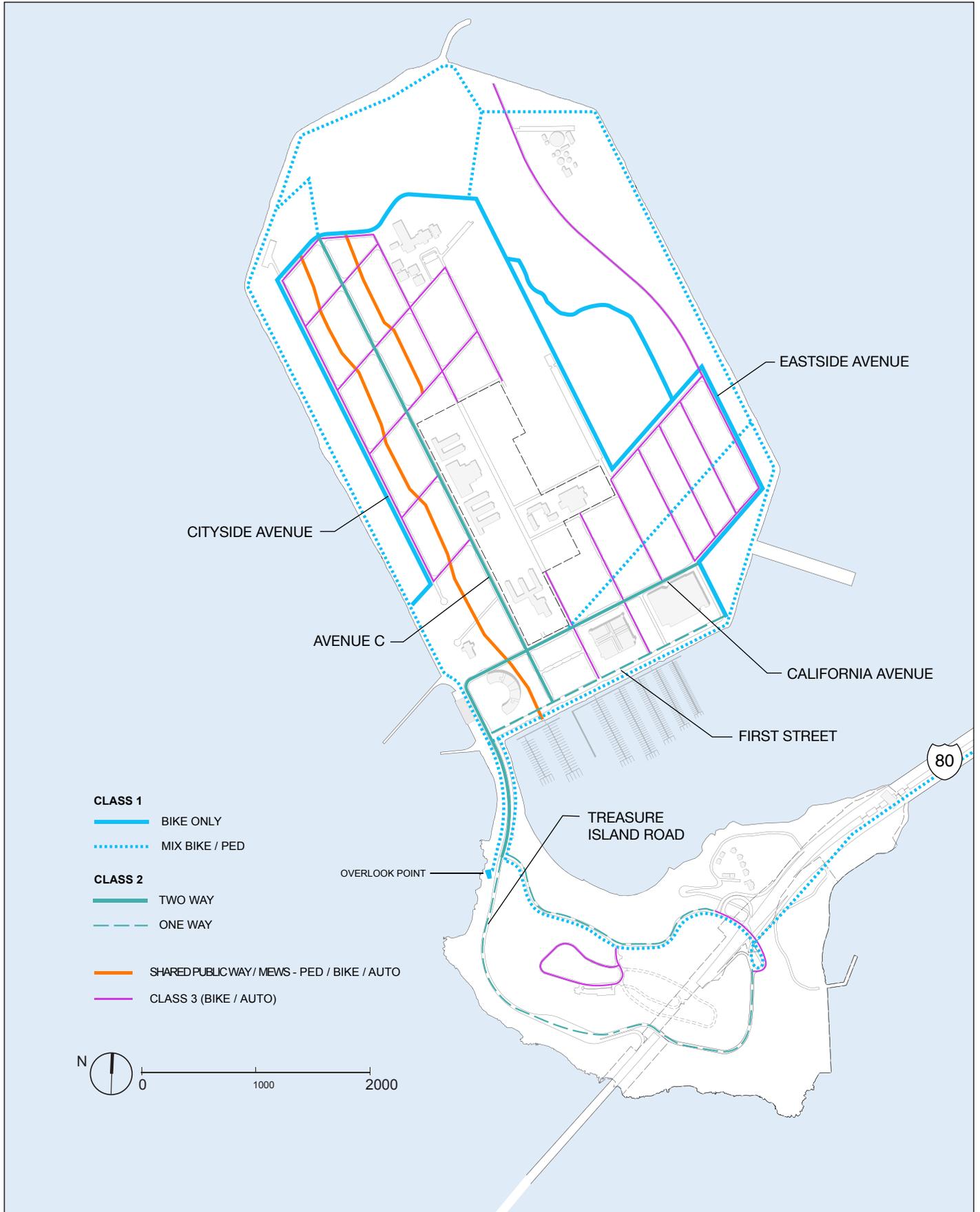
In response to concerns regarding the safety of the proposed bicycle treatments on Macalla Road, including design treatments at intersections and the roadway's grade, the EIR concluded that the proposed facilities met standard design guidelines and constituted an adequate provision of bicycle facilities, such that the Proposed Project's impacts on bicycle circulation would be less than significant (see EIR Impact TR-33). However, in light of this and several other comments regarding bicycle circulation on Yerba Buena Island, and in particular, connections between the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge and Yerba Buena Island and Treasure Island, the project sponsors reviewed the available right-of-way and revised the planned improvements to Macalla Road. The revised proposal includes (from south



SOURCE: Perkins+Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE II.12: PROPOSED BICYCLE ROUTES**



SOURCE: Perkins + Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.11: PROPOSED BICYCLE CIRCULATION PLAN**

to north) a 16-foot, two-way Class I mixed-use pedestrian and bicycle path, an 11-foot vehicular travel lane, a 2- to 3-foot buffer, and a 6- to 7-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction would use the Class I facility, which would follow the existing, relatively steep contours of Macalla Road, but would provide a greater separation from vehicular traffic than the Class II facility previously proposed, as it would be elevated from the roadway and separated by a curb and gutter. The 16-foot facility would stretch from the intersection of Treasure Island Road/Macalla Road to North Gate Road/Macalla Road. At the Treasure Island Road/Macalla Road intersection, users would be able to connect to proposed 10-foot Class I mixed-use bicycle and pedestrian paths on either side of Treasure Island Road between Macalla Road and Treasure Island, where users could connect to the proposed bicycle and pedestrian network on Treasure Island. Beyond the North Gate Road/Macalla Road intersection, users would be able to continue toward the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge using either a 12-foot Class I bicycle path or a 6.5-foot pedestrian path. Ultimately, these facilities provide continuous Class I facilities between the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge and Treasure Island. Figure IV.E.13: Proposed Macalla Road at Bay Bridge Westbound On-Ramp Intersection Configuration, on EIR p. IV.E.41, is revised to illustrate these changes on Macalla Road. Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration, on EIR p. IV.E.42, is revised to present the changes to the intersection to accommodate the 16-foot wide, two-way shared pedestrian/bicycle path, as well as a new 10-foot wide shared pedestrian/bicycle path on the west side of Treasure Island Road (discussed further below in the response in Subsection 2.7.7.2, Bicycle Access – View Area). A scenic overlook would be provided at the terminus of this Class I path on Treasure Island Road; beyond that point, there would be no pedestrian facilities and the bicycle facilities on Treasure Island Road would be limited to the one-way Class II path originally proposed and discussed on EIR pp. IV.E.32 and IV.E.38-IV.E.39. Figure IV.E.15: Proposed Treasure Island Road at Bay Bridge Westbound On-Ramp (West Side) Intersection Configuration, on EIR p. IV.E.44, is revised to correct the width of the bicycle lane from 4 feet to 6 feet. Revised Figures IV.E.13, IV.E.14, and IV.E.15 are shown on the next three pages.

Text in EIR Chapter II, Project Description, and EIR Section IV.E, Transportation, is revised to account for these revisions to the Proposed Project.

The second sentence in the first full paragraph on p. II.48 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

Class I mixed bicycle and pedestrian paths are proposed around the perimeter of Treasure Island, connecting to Class I bicycle-only bicycle paths in the open space areas. A Class I mixed-use, two-way bicycle/pedestrian path along the south side of Macalla Road



SOURCE: AECOM, 2009

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(REVISED) FIGURE IV.E.13: PROPOSED MACALLA ROAD AT BAY BRIDGE WESTBOUND ON-RAMP INTERSECTION CONFIGURATION



SOURCE: AECOM, 2009

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.14: PROPOSED TREASURE ISLAND ROAD AT MACALLA ROAD INTERSECTION CONFIGURATION**



SOURCE: AECOM, 2009

BICYCLE LANE  
XXX  
XXX SIGNS THAT WOULD BE POSTED

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.15: PROPOSED TREASURE ISLAND ROAD AT BAY BRIDGE WESTBOUND ON-RAMP (WEST SIDE) INTERSECTION CONFIGURATION**

would ~~also~~ connect to the east span of the Bay Bridge on Yerba Buena Island. A Class II bicycle lane also would be provided on the north side of Macalla Road for cyclists heading downhill (with traffic) from the Bay Bridge.

A new sentence is added at the end of the first full paragraph on p. II.48:

A Class I mixed-use, two-way bicycle/pedestrian path would be provided west of and parallel to Treasure Island Road south of the causeway, leading to a scenic overlook to be provided about 500 feet south of the intersection with Macalla Road.

The first paragraph under the bulleted paragraph “Major Arterials” on p. IV.E.32 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

- On Treasure Island Road, a bicycle lane would be provided in the south and east-bound directions only (i.e., from Treasure Island towards the Bay Bridge only), with the exception that a Class II bicycle lane would be provided for a short segment in the northbound direction from Macalla Road to Treasure Island, connecting the proposed bicycle lane in the downhill direction on Macalla Road with Treasure Island. A short section on Treasure Island Road near the existing Bay Bridge westbound on-ramp would have a 14-foot wide travel lane and a Class III bicycle route instead of a Class II bicycle lane.<sup>10</sup> There would be ~~sidewalks~~ 10-foot Class I shared bicycle/pedestrian facilities provided on both sides of Treasure Island Road between Treasure Island and Macalla Road. In addition, the 10-foot Class I shared bicycle/pedestrian facility proposed on the west side of Treasure Island Road would extend from the Transit Hub on Treasure Island to the proposed lookout point south of the Macalla Road intersection. Otherwise, ~~No~~ sidewalks would be provided on the section of Treasure Island Road between Macalla Road and the Bay Bridge.

There is no change to footnote 10, cited in this text change.

The last dashed paragraph on p. IV.E.32, which continues at the top of p. IV.E.33, is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

- Macalla Road would be reconfigured to provide (from south to north) a 16-foot two-way Class I shared bicycle/pedestrian path, an 11-foot travel lane allowing one-way vehicular traffic only, from the Bay Bridge northwesterly towards Treasure Island Road, a 2- to 3-foot buffer, and a 5- to 9-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction could use the Class I facility. Pedestrians traveling in either direction could use the Class I facility on the south side of Macalla Road. This street would provide one 11-foot wide travel lane, a five-foot Class II bicycle lane on the right hand side, and a 6-foot wide contra-flow bicycle lane on the left hand side. A 5-foot wide sidewalk would also be provided on the left hand side.

The second full paragraph on EIR p. IV.E.39 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

In addition, a ~~contra-flow~~ 16-foot two-way, shared Class II bicycle/pedestrian path lane would be provided on Macalla Road. The Macalla Road bicycle ~~lane-path~~ would provide

a shorter, yet steeper, alternative route from Treasure Island to the Bay Bridge. A 10-foot two-way shared Class I bicycle/pedestrian path would also be constructed on the west side of Treasure Island Road between Treasure Island and the new lookout point just south of the Macalla Road intersection, as well as on the east side of Treasure Island Road between Treasure Island and Macalla Road. Other streets on Yerba Buena Island would allow shared bicycle/auto use, but no exclusive bicycle right-of-way would be provided.

The last two sentences in the second bulleted paragraph on EIR p. IV.E.39 are revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

~~On the north side of this intersection, the shared path would continue on the south side of Macalla Road to its terminus at Treasure Island Road. end, and bicyclists destined for Treasure Island would need to cross Macalla Road at a new crosswalk. North of this crossing, Macalla Road would provide one travel lane northbound (toward Treasure Island) and would have a Class II bicycle lane in each direction, one being a contra flow lane.~~

The text in the first bulleted paragraph at the top of EIR p. IV.E.43 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

**Treasure Island Road at Macalla Road** – The proposed bicycle treatments at this intersection are shown on Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration. Bicyclists using Treasure Island Road to access the Class I two-way shared bike/pedestrian path~~contra flow bicycle lane~~ on Macalla Road from Treasure Island would need to turn left across the opposing direction of traffic on Treasure Island Road to access Macalla Road. The Proposed Project would provide a new five-foot wide bicycle-only left-turn lane from Treasure Island Road to Macalla Road adjacent to an 112-foot wide travel lane on Treasure Island Road and separated from oncoming traffic by an 45-foot median. The bicycle-only turn lane and ~~wide~~ median would facilitate the left turn maneuver, and provide a clear and safe route to access Macalla Road from Treasure Island Road

The second and third bulleted items on the bottom of EIR p. IV.E.43 are revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

- Macalla Road ~~contra flow~~ Class II downhill bicycle lane at intersecting cross-streets; and
- Treasure Island Road/Macalla Road intersection.
  - Bicycle-only left-turn lane from Treasure Island Road to the ~~contra flow~~ Class I bicycle lane path on Macalla Road; and
  - Bicycle-only section of median on Treasure Island Road at Macalla Road.

The second bulleted item on the bottom of EIR p. IV.E.100 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

- Elimination of the proposed southbound Class II bicycle lane on Treasure Island Road and a small portion of Hillcrest Road south of the intersection with Macalla

Road. The Class I facility on Treasure Island Road connecting Treasure Island and the proposed new lookout point, just south of the Macalla Road intersection, would remain. Bicyclists who use the Class I path to the lookout point and continue on Treasure Island Road toward Hillcrest Road would have to share the lane with traffic, similar to other roadways where bicycle lanes are not provided. Bicyclists would still be able to use Class I bicycle paths and Class II bicycle lanes proposed on Macalla Road to connect between the Islands and the bicycle path on the new east span of the Bay Bridge.

The second paragraph in Impact TR-33 on EIR p. IV.E.108 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

On Yerba Buena Island, a one-way Class II bicycle lane would be provided on Treasure Island Road and Hillcrest Road, which would continue as a loop around South Gate Road and Macalla Road, back to Treasure Island Road. ~~Although Macalla Road is one-way northbound for vehicles, a contra-flow Class II bicycle lane~~two-way Class I shared bicycle/pedestrian facility would also be provided from Treasure Island Road to South Gate Road, continuing on South Gate Road to its intersection with Hillcrest Road, and the Class I path connecting to the new Bay Bridge eastern span path, although portions of this facility near the bridge and ramps connections are proposed to be constructed separately by the Ramps Project and the Bay Bridge eastern span replacement project, separated from traffic by a two-foot buffer with painted chevrons. As a result, Macalla Road would provide a Class II bicycle lanes path in each direction connecting Treasure Island Road and the Bay Bridge for bicycle traffic in each direction, as well as a Class II bicycle lane specifically for bicycle traffic traveling in the downhill direction from the Bay Bridge toward Treasure Island.

The last paragraph on p. IV.E.108, and continuing on to p. IV.E.109, is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

There would be one primary bicycle route from the Bay Bridge to Treasure Island, on Macalla Road, either via the Class I or Class II facilities provided on that roadway. There would be two primary routes from Treasure Island to the Bay Bridge. The Class I facility on Macalla Road would be the most direct (although steeper) route to the Bay Bridge from Treasure Island. Bicyclists who opt for a longer, but less steep route from Treasure Island to the Bay Bridge would use the one-way Class II bicycle lane on Treasure Island Road and Hillcrest Road. At the intersection of Hillcrest Road and South Gate Road, bicyclists would be able to enter the Bay Bridge bicycle/pedestrian path providing access to the East Bay. Bicyclists traveling on Macalla Road to access the Bay Bridge bicycle path would use the Class II bicycle lanes path on Macalla Road, and South Gate Road between Treasure Island and the Bay Bridge westbound eastbound ramps intersection at Hillcrest Road and South Gate Road, where the Class I facility would intersect the Bay Bridge eastern span facility. ~~Between that intersection and the Bay Bridge bicycle path, which begins at the intersection of Hillcrest Road and South Gate Road, bicycles and pedestrians would use a 10-foot shared pathway on the west side of the street, which would continue along South Gate Road and loop around onto the bridge.~~

The third sentence in the first full paragraph on EIR p. IV.E.109 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

At Macalla Road and the Bay Bridge westbound ramps, treatments would include a Class II bicycle-only lanes in each the downhill direction between the Bay Bridge westbound ramps and Treasure Island Road.

The first full sentence of the first partial paragraph on p. IV.E.110 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

Cyclists would continue to have a ~~Class II contra-flow~~ facility connecting Treasure Island and the Bay Bridge, via Treasure Island Road (eastern side) and Macalla Road.

A new sentence is added at the end of the first paragraph on p. IV.E.112 (deleted text is shown in ~~strike through~~, new text is underlined):

On Yerba Buena Island, sidewalks would be built on public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way along roadways. In addition to sidewalks, several trails through the open spaces and development areas would be constructed on Yerba Buena Island. A new Class I shared bicycle/pedestrian facility would also be constructed on Macalla Road and South Gate Road providing pedestrian connections between Treasure Island and the Bay Bridge eastern span bicycle/pedestrian facility.

The proposed Class I bicycle/pedestrian path on Macalla Road would involve some widening of Macalla Road, requiring the removal of eucalyptus and other non-native plants. The draft *Habitat Management Plan for Yerba Buena Island* (“HMP”) includes provisions for removing and thinning stands of non-native trees, specifically eucalyptus trees, in Section V, Best Management Practices, Subsection G, Non-native Tree Removal.<sup>10</sup> There is also a section in the draft HMP on surveying for hazardous trees (see Section V, Best Management Practices, Subsection F, Hazard Tree Assessment), particularly large eucalyptus trees, because they are prone to structural deficiencies.<sup>11</sup> High human use areas such as pedestrian and bicycle facilities on Yerba Buena Island would be one of the areas focused on in performing surveys for hazardous trees. Therefore, bicycle and pedestrian facilities would be taken into account as part of the overall management plan. Removal strategies and hazards issues would be balanced with habitat issues, such as surveys for active bird nests. The notable California buckeye tree on the south side of Macalla Road near its intersection with Treasure Island Road would be retained.

The revised configuration for Macalla Road would allow a two-way Class I path between Treasure Island and the East Span of the Bay Bridge. Comments also ask how the Proposed Project would connect to the proposed West Span Bicycle / Pedestrian Mixed Use (“BPM”) Path currently under study by BATA and Caltrans. The scope for the West Span BPM Path Project

<sup>10</sup> *Draft Habitat Management Plan*, pp. 50-53

<sup>11</sup> *Draft Habitat Management Plan*, p. 49.

Study Report (“PSR”) includes looking at how to design the path on the west span of the Bay Bridge, and exploring how that path would connect both to the East Span path currently under construction and to the facilities on Treasure Island. While the details of how the two projects would connect cannot be determined until a design for the West Span BPM Path is selected, the Proposed Project would not preclude Class I connections to that path. Bicyclists and pedestrians could connect indirectly, by using the Class I facilities that connect to the Class I path on the new eastern span and from there connect to a new path on the west span; alternatively, the Class I path and scenic overlook provided along Treasure Island Road as part of the Proposed Project in response to comments would terminate at the point that the West Span BPM Path project is considering adding separate bridge structures to connect to the West Span of the Bay Bridge. Under either circumstance, there would be continuous Class I facilities from Treasure Island to the West Span BPM Path. None of the alternatives currently under study as part of the West Span BPM Path PSR relies on the southern portion of Treasure Island Road to make connections to the West Span BPM Path.

In response to comments that suggested that the grade of Macalla Road is unsafe for cyclists traveling downhill, and that cyclists may travel too fast, the grade and connections provided on Macalla Road were considered in developing the Proposed Project improvements. Because Macalla Road provides the most direct route between the Bay Bridge and Treasure Island, it is likely to be more heavily used than alternate routes, such as Hillcrest Road and Treasure Island Road for downhill travel. Therefore, the Proposed Project has focused safety improvements on Macalla Road to improve conditions for cyclists that would likely use this road whether improvements are made or not. As part of Proposed Project improvements on Macalla Road, warning signs would be posted for hills and steep grades, including California Manual on Uniform Traffic Control Devices sign 2C.48 “Watch Downhill Speed.” These signs would warn drivers and bicyclists of steep grades.

The EIR concludes that implementing Mitigation Measure M-TR-24 (a transit-only lane on Treasure Island Road, which would remove the proposed Class II bicycle lane on Treasure Island Road) would not cause significant secondary impacts to bicycle circulation. The mitigation measure was deemed necessary by the EIR preparers because, under certain conditions vehicle queues on the Bay Bridge on-ramp approaches would extend along Treasure Island Road, potentially blocking bus circulation from Treasure Island toward the Bay Bridge, resulting in delays to bus service. As indicated on EIR p. IV.E.100, Mitigation Measure M-TR-24 would be implemented if and only if the extent of actual vehicle queues were to impact buses accessing the Bay Bridge. The implementation of a transit-only lane would be triggered if impacts in the form of delay to bus service equal to or greater than the prevailing headway are observed over the course of six months at least 50 percent of the time during the AM, PM, or Saturday peak periods. If queues do not cause these delays to bus service, Mitigation Measure M-TR-24 would not be implemented. The SFMTA will determine whether and at what point to require implementation

of Mitigation Measure M-TR-24. Conditions on Treasure Island Road will be monitored as established in the Mitigation Monitoring and Reporting Program and as summarized above. Installation of the associated improvements could be done in a relatively short period following action, perhaps within a month or two, as the improvements would involve only changes to the roadway striping and no construction other than minor reconfiguration of the median on Treasure Island Road north of Macalla Road would be required.

The second paragraph on EIR p. IV.E.100 is revised as follows to clarify that SFMTA is the implementing agency of Mitigation Measure M-TR-24 (new text is underlined):

Implementation of Mitigation Measure M-TR-24 would only be triggered if the extent of actual vehicle queuing impacts the proposed Muni line 108 Treasure Island on Treasure Island Road and creates delays for Muni buses accessing the westbound transit-only on-ramp. As such, throughout the life of the project, the TITMA, in consultation with SFMTA and using SFMTA's methodology, shall monitor the length and duration of potential queues on Treasure Island Road and the associated delays to Muni service. If the queues between First Street and the westbound on-ramp on the west side of Yerba Buena Island result in an operational delay to Muni service equal to or greater than the prevailing headway during the AM, PM or Saturday peak periods, SFMTA, in consultation with TITMA, shall implement a southbound transit-only lane between First Street on Treasure Island and the transit and emergency vehicle-only westbound Bay Bridge on-ramp. The implementation of a transit-only lane would be triggered if impacts are observed over the course of six months at least 50 percent of the time during the AM, PM, or Saturday peak periods.

Although under these certain circumstances the proposed Mitigation Measure M-TR-24 would eliminate the Class II facility on Treasure Island Road and use the right-of-way to accommodate a transit-only lane, as noted above bicyclists destined for San Francisco could potentially access the proposed West Span BPM path through a variety of means, depending on the final design selected for that project. None of the Proposed Project transportation network improvements preclude future construction of the proposed West Span BPM as a separate project, nor would the facilities being provided by the Proposed Project preclude connections being made to those facilities under consideration in the West Span BPM PSR.

As noted in the discussion of Impact TR-33 on EIR pp. IV.E.109-IV.E.110, the implementation of Mitigation Measure M-TR-24 would create a less desirable option for cyclists traveling uphill, as they would have to use a steeper roadway. However, the Planning Department, in consultation with SFMTA, determined that this would not be considered a significant impact because bicycle facilities on Macalla Road would be substantially upgraded compared to existing baseline conditions, with a two-way Class I facility and a separate northbound Class II facility. In addition, for cyclists who do not wish to cycle up either Macalla Road or Treasure Island Road, the on-island shuttle fleet would be outfitted with bicycle racks, such that users could secure their bicycle onto the shuttle, and then remove it at the top of the hill to join the Bay Bridge East Span bicycle path, and, if completed, the west span bicycle path.

Even without implementation of Mitigation Measure M-TR-24, a number of comments suggested that the bicycle treatment on Treasure Island Road, particularly where it crosses the westbound on-ramp to the Bay Bridge on the west side of Yerba Buena Island, would present a challenge for cyclists. Generally, good design practices call for designing on-ramp terminals to intersect roadways at right angles, similar to a standard intersection. As a result, vehicles entering the on-ramp do so at slower speeds, and drivers and cyclists, alike, are presented with a more familiar roadway configuration to navigate. However, in the case of the westbound Bay Bridge on-ramp on the west side of Yerba Buena Island, the existing roadway configuration is constructed as a “free-right” diverge, whereby autos can enter the on-ramp at full speed. This interchange is constructed as part of a bridge structure and substantial physical design improvements, such as re-aligning the on-ramp to be more perpendicular to Treasure Island Road would involve completely reconstructing the viaduct structure and the on-ramp connection to the Bay Bridge, which would be prohibitively expensive.

Some of the bicycle/automobile conflicts may be reduced if a Class I facility were to be provided along Treasure Island Road, past its currently-proposed terminus at the new lookout point. However, the roadway width is not sufficient in several locations to provide a Class I facility on Treasure Island Road without substantial widening. Providing a Class I bicycle facility on the east (uphill) side of Treasure Island Road would also not satisfy many of the concerns raised by the commenters. First, it would be difficult to connect a Class I facility on the east side of the road to the proposed West Span Bike Path; the connection would require a structure to go either over or under the roadway to get to the bridge, and it would be difficult to have the space to do that at a reasonable grade given that the Class I path would be immediately adjacent to the hill. In addition, a Class I facility would also need to cross over Hillcrest Road at some point to avoid conflicts with traffic exiting from the eastbound off-ramp, and to get to the correct side of the road for the new East Span bicycle-pedestrian path. Finally, even if the physical challenges to constructing a Class I facility on this portion of Treasure Island Road were overcome, Mitigation Measure M-TR-24 would still require the removal of this facility.

Although there is not physically room for a Class I or II facility for a short section of Treasure Island road near the on-ramp to the Bay Bridge, the Proposed Project includes a substantial amount of visual cues for both drivers and cyclists, alerting them to the junction. Cues and warning devices would include colored pavement treatments, warning signs, and frequent in-pavement stencils. This configuration was developed in consultation with SFMTA, the San Francisco Bicycle Coalition, and others, and was identified as the best available treatment given the constraints at that location. Although the treatments do not provide continuous Class I or Class II facilities through the segment, they do substantially increase the visibility of cyclists and represent a substantial improvement over the existing condition of Treasure Island Road. Finally, with implementation of the Ramps Project, the westbound on-ramp to the Bay Bridge from

Treasure Island Road would be limited to transit vehicles only, meaning that conflicts with cyclists would be less frequent than if the ramp were open to mixed traffic.

#### **2.7.7.2 Bicycle Access – View Area**

##### **Comments**

A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future. (*Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail*) [25.10]

The Bay Trail Project's comment letter for the *Design for Development Document* recommended a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the Highway 80 west onramp from Treasure Island Road, suggesting that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multiuse paths to this location from both sides of the Island. (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.2]

The Bay Trail Project's comment letter regarding the Design for Development Document suggested a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the 80 west onramp from Treasure Island Road. We suggested that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multi-use paths to this location from both sides of the Island. (*Tom Radulovich, Livable City*) [36.4]

##### **Response**

In response to comments requesting to include a scenic overlook from Treasure Island Road, near the on-ramp to westbound I-80, both as an amenity and as a means to secure right of way for potential future connection to the separate proposal for a new bicycle and pedestrian path on the western span of the Bay Bridge, the project sponsors conducted additional engineering analyses. An overlook cannot be constructed at the requested location because Treasure Island Road is on a structure, and there is no land on which to locate an overlook. Also, even if an overlook were possible in this location, access would be limited to Class II bicycle lanes, as there is not room to include a Class I facility, as requested in some comments.

However, the project sponsors have identified an alternative location for a scenic overlook, on Treasure Island Road, approximately 500 feet south of the Macalla Road intersection, as shown in revised Figure IV.E.11: Proposed Bicycle Circulation Plan, presented in the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, above. The Project is also proposing to include a two-way Class I bicycle facility between the new overlook and Treasure Island. Although the scenic overlook and Class I bicycle connections to Treasure Island are anticipated to

provide a substantial amenity to visitors and residents of Treasure Island, these amenities are not required as mitigation measures to mitigate significant project-related impacts.

The newly-proposed Class I facilities on the northern portion of Treasure Island Road on Yerba Buena Island, and along Macalla Road would preserve right-of-way for a Class I facility between Treasure Island and the Bay Bridge. See the responses in Subsection 2.7.7.1, Bicycle Access – Macalla Road, for additional discussion of bicycle access to the Bay Bridge.

### **2.7.7.3 Bicycle Access – West Span**

#### **Comment**

Connections to Future Path on the West Span

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge.

Once this facility is in place, the TI and YBI developments will be able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands. A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future. (*Tom Radulovich, Livable City*) [36.11]

#### **Response**

The Proposed Project does not preclude future construction of a bicycle path on the West Span and a connection to Treasure Island and Yerba Buena Island. Also see the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, regarding Proposed Project improvements on Yerba Buena Island. A connection to a bicycle path on the West Span could be provided in various ways.

### **2.7.7.4 Bicycle Safety**

#### **Comments**

Section IV, page IV.E.104 - “At the intersection of Hillcrest Road at South Gate Road, bicycle treatments would allow for an uncontrolled crossing of South Gate Road for bicyclists destined to the Bay Bridge bicycle path.” – The USCG has concerns with this proposal in light of USCG personnel turning right from Southgate onto the eastbound on-ramp. Signage should be provided to both drivers on Southgate and to cyclists on Hillcrest to proceed with caution through this intersection. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.18]

In addition, the FEIR should address incorporating signals along Treasure Island Road at the Bay Bridge Westbound On-Ramp Intersection, as shown on Figure IV.E.15, which could create a

safer bicycle access lane across the on-ramp. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.19]

### **Response**

Figure IV.E.12: Proposed Hillcrest Road at South Gate Road Intersection Configuration, on EIR p. IV.E.40 presents the Proposed Project treatments at the intersection of Hillcrest Road and South Gate Road. The approach to Hillcrest Road from Southgate Road would be controlled with “STOP” signs, and bicycles on Hillcrest Road would be traveling in marked bicycle lanes. Coast Guard motorists turning right from Southgate Road to the eastbound on-ramp to the Bay Bridge would be required to stop before proceeding onto the Bay Bridge. This situation would be similar to other side-street stop-controlled intersections with striped Class II bicycle lanes, and therefore, the EIR’s conclusion that this intersection would not constitute a significant impact to bicycle circulation and safety remains valid. Figure IV.E.12 is revised to include the Coast Guard Quarters 9 Driveway, as well as to illustrate the changes to the South Gate Road paths that are currently under construction by Caltrans as part of the Bay Bridge East Span Project to provide a separated 6.5-foot-wide pedestrian path and a 12-foot-wide bicycle path. The revised figure is shown on the following page. See the response in Subsection 2.7.11.1, Circulation Impacts, regarding additional improvements at this intersection to accommodate Coast Guard vehicles.

Regarding the suggestion to install a traffic signal at the intersection of Treasure Island Road and the westbound on-ramp to the Bay Bridge on the west side of Yerba Buena Island to improve bicycle safety, it would be unusual to provide a signal at a location where a single traffic stream diverges into two streams. The *California Manual on Uniform Traffic Control Devices*, California Department of Transportation, 2010, contains several criteria for determining whether new signals are warranted. Specifically, pp. 4C-7 and 4C-8 describe the warrants for installing a signal to facilitate bicycle travel. The criteria include three warrants: volume, collision, and geometric. To meet the criteria for installing a signal, either the volume and collision warrants must be met or the volume and geometric warrants must be met. Since there is very little bicycle activity at the site under existing conditions, and since it is impossible to predict future collisions, it is speculative to predict whether warrant would be met. The geometric criteria state that a signal is appropriate only when a separate bicycle/multi use path intersects a roadway or to facilitate a bicycle movement that is not permitted for a motor vehicle. In this case, although there would be a Class II/Class III facility along Treasure Island Road, it would not be a separated facility intersecting a roadway. Further, since vehicles are also allowed on Treasure Island Road, it would not facilitate a movement that is not permitted for a motor vehicle. Thus, the geometric warrant would not be met, and the overall bicycle signal warrant would not justify installation of a new bicycle signal at this location.

Also see the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, above, for additional discussion of bicycle safety and Proposed Project improvements.



SOURCE: AECOM, 2009

**TREASURE ISLAND AND TERDA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.12: PROPOSED HILLCREST ROAD AT SOUTH GATE ROAD INTERSECTION CONFIGURATION**

## 2.7.8 PEDESTRIANS

### 2.7.8.1 Pedestrian Circulation

#### Comment

**3. Transportation analysis fails to recognize significant impacts to pedestrian and bicycle circulation:** The DEIR's discussion of Pedestrian Circulation Improvements within Section IV E: Transportation, states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed." (*Andy Thornley, Program Director, San Francisco Bicycle Coalition*) [41.5]

Under "Pedestrian Circulation Improvements" (p. IV.E.36) the document states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed." It is difficult to evaluate this approach when the diagram on E.37 fails to show the streets and erases the contour lines in the housing areas.

Please rethink the "Secondary Pedestrian Route" that appears to traverse the rip-rap along the causeway to bring people down onto Clipper Cove Beach and along a sensitive habitat area. Please analyze the impacts on native plants and animals that would result from the construction and use of such a route. (*Ruth Gravanis*) [31.17]

Under "Pedestrian Circulation Improvements", the document states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed." (*Tom Radulovich, Livable City*) [36.8a]

#### Response

The pedestrian impact assessment is presented in Impact TR-35 on EIR pp. IV.E.111-IV.E.113. On Treasure Island, where the majority of new development would occur, sidewalks would be constructed on all streets, except on the pedestrian priority shared public ways, where pedestrians would have use of the full right-of-way. Intersections would include crosswalks and a number of corner bulbouts to shorten pedestrian crossing distances and improve pedestrian visibility. On Yerba Buena Island, sidewalks would be built on public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way. In addition to sidewalks, several paths through the open spaces and development areas would be constructed on Yerba Buena Island. In addition, as indicated on EIR p. II.39, Yerba Buena Island would also have privately owned streets that would provide access to the main residential areas.

While the proposed sidewalk and pedestrian path system on Yerba Buena Island would be less direct than on Treasure Island due to the topography of the Island, it would nonetheless provide

adequate pedestrian connections to all uses on the island. Since the new pedestrian trips generated by the Proposed Project would not result in substantial overcrowding on the proposed pedestrian facilities, or result in hazardous conditions, the Proposed Project's impacts on pedestrians was determined to be less than significant.

Figure IV.E.10: Conceptual Yerba Buena Island Pedestrian Circulation Plan, on EIR p. IV.E.37, is revised, and is presented on the following page. The revisions include removing a pedestrian path along Clipper Cove Beach, provision of a pedestrian connection to a new lookout point on Treasure Island Road, just south of Macalla Road, and refinements to interior paths. Changes to interior trails were made to more accurately reflect the alignment of existing trails that would be available after redevelopment. These include, for example, the trail from near the top of Macalla Road (just north of the Bay Bridge) that leads down toward the "Great Whites," and removal from the figure of a fire road that previously extended through the Coast Guard property, which is outside the control of the project sponsors. Changes were also made in the development areas (including both residential areas and on the hilltop park) to show a greater level of detail on conceptual circulation. In addition, the Bay Trail designation was removed from the west span of the Bay Bridge, as this trail does not currently exist and is not currently planned (feasibility is still under study). The removal of the pedestrian path along Clipper Cove Beach responds to concerns raised in a comment regarding potential impacts on native plants and animals if a pedestrian path were to be constructed along the Cove.

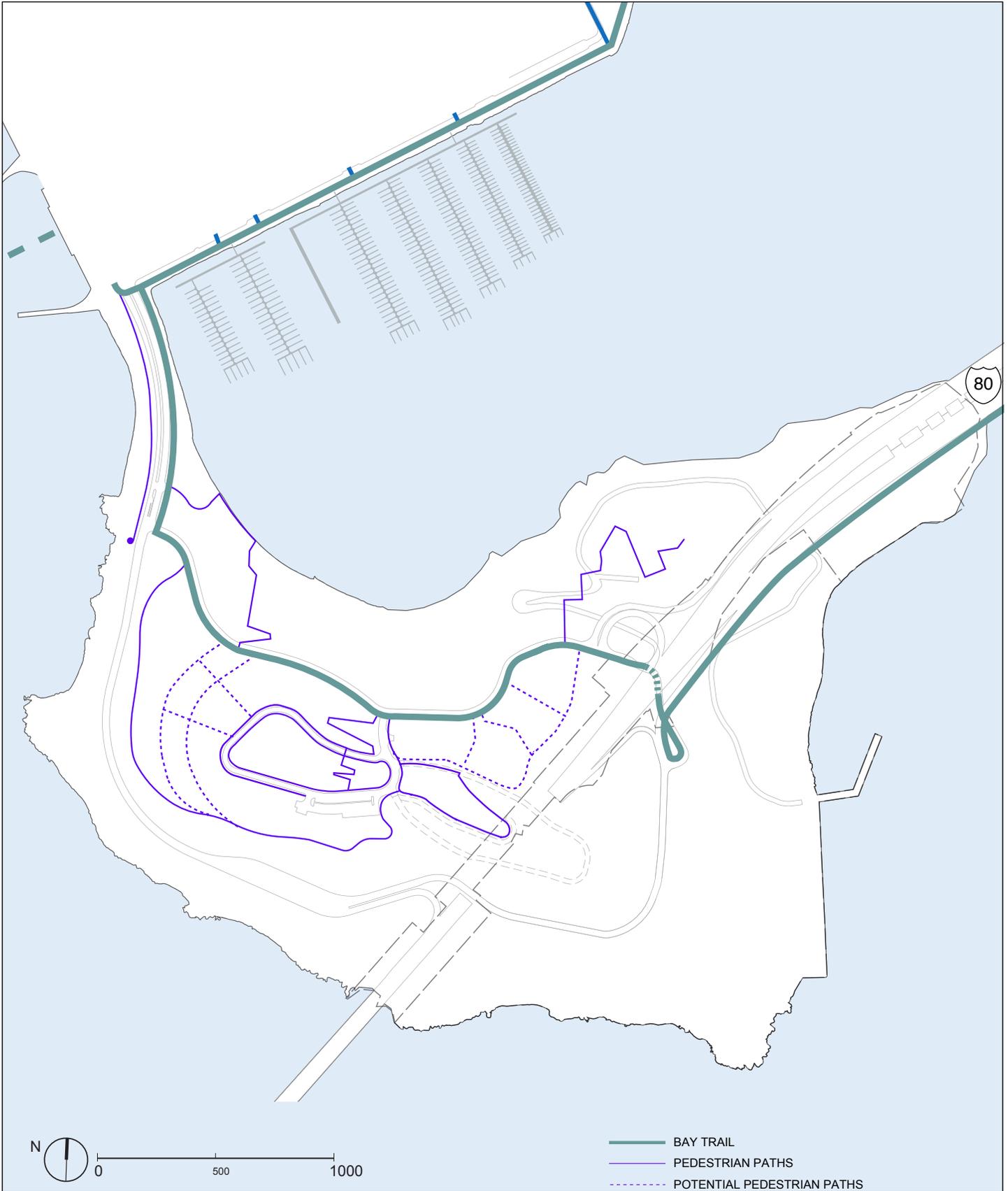
The first paragraph on EIR p. IV.E.112 is revised as follows to add mention of the new pedestrian connection to the new overlook viewing area (deleted text is shown in ~~strike through~~, new text is underlined):

On Yerba Buena Island, sidewalks would be built on most public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right of way along roadways and a pedestrian path would be constructed as part of a two-way, mixed-use bike/pedestrian facility along Treasure Island Road to a scenic overlook about 500 feet south of the intersection with Macalla Road. In addition to sidewalks, several trails through the open spaces and development areas would be constructed on Yerba Buena Island.

### 2.7.8.2 Walking Times

#### Comment

The Walking Times map (page II.47) is inaccurate for YBI. People take longer to walk uphill (and up stairs), and since most of us can't walk on water it will take longer to get from the transit hub to the east housing area on YBI than to a site that is the same distance away (as the crow flies) on TI. Please revise the walking times diagram to make it realistic. It is necessary to have this information to be sure that YBI residents and visitors are equitably served. (*Ruth Gravanis*) [31.13]



SOURCE: Perkins+Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.E.10: CONCEPTUAL YERBA BUENA ISLAND PEDESTRIAN CIRCULATION PLAN**

**Response**

Figure II.13: Walking Times to Transit Hub, in EIR Chapter II, Project Description, on p. II.47, is revised to more clearly show walking time radii on Treasure Island and Yerba Buena Island, and is presented on the next page. Although some residents and visitors to Yerba Buena Island would walk to/from the transit hub, the majority would most likely take the Islands shuttle instead. As indicated on EIR p. II.45, residents of Yerba Buena Island would be within a 5-minute walk of a shuttle stop. The modifications to Figure II.13 do not affect the pedestrian impact analysis discussion presented in Impact TR-35 on EIR pp. IV.E.111-IV.E.113; the Proposed Project's impacts on pedestrians would remain less than significant.

**2.7.9 GOODS MOVEMENT**

**2.7.9.1 Trucks – Bay Bridge**

**Comment**

In Table 49, page 207 of the TIS, the proposed project would generate 583 daily truck trips (approximately 24 per hour). The I-80 eastbound and westbound off-ramps for Treasure Island and YBI are designed with small radius curves. As a result, there is a potential for serious operational and safety issues on the mainline as a result of the queuing caused by vehicles waiting to exit behind larger vehicles negotiating these small radius curves at slow speeds. As the owner and operator of State highway facilities, the Department is obligated to ensure public safety on all highways under its jurisdiction, and monitors factors such as accident rates, traffic and truck volumes, speed and level of service. Please include proposed improvements and mitigation measures to address these potential safety issues. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.20]

**Response**

As indicated by the comment, the I-80 eastbound and westbound off-ramps for Treasure Island and Yerba Buena Island have small radius curves, which require slower travel speeds for vehicles, and especially trucks, exiting the bridge (see discussion on EIR p. IV.E.74). The small radius curves are an existing condition, and these ramps have been continuously used by trucks accessing the Islands since their construction. Due to the tight radius, warning signs indicating a tight turn and 15 mph speeds are posted at the approach to the eastbound off-ramp on the west side of Yerba Buena Island. According to Caltrans, California legal size trucks are no longer than 65-feet, and the existing westbound off-ramp on the west side of Yerba Buena Island can accommodate a 65-foot truck. However, the Surface Transportation Assistance Act of 1982 (STAA) allows larger trucks to operate on routes that are part of the National Network, which includes I-80 and the Bay Bridge. Due to the tight radius, STAA trucks longer than 65 feet cannot be accommodated on the existing westbound off-ramp on the west side of Yerba Buena Island. In response, the following item has been added as an item required as part of M-TR-1: Construction Traffic Management Plan (new text is underlined):



SOURCE: Perkins + Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE II.13: WALKING TIMES TO TRANSIT HUB**

- Require contractors to notify vendors that STAA trucks larger than 65 feet exiting from the eastbound direction of the Bay Bridge may only use the off-ramp on the east side of Yerba Buena Island.

Reconstruction of the eastbound off-ramp on the west side of YBI would require major construction on the Bay Bridge, Yerba Buena Island, and Treasure Island Road. As indicated on EIR p. IV.E.74, improvements to this ramp were evaluated in the “Project Study Report on I-80 in the City and County of San Francisco at Yerba Buena Island from Post Mile 7.6 to Post Mile 9.1” (December 2007) prepared by Caltrans and the SFCTA and were found to be infeasible.

As indicated on EIR p. IV.E.7, the proposed Yerba Buena Island Ramps Improvement Project currently underway by SFCTA is evaluating potential reconfiguration of two of the westbound on- and off-ramps on the east side of the Bay Bridge tunnel. The westbound off-ramp on the east side of Yerba Buena Island, which is currently a tight left-handed exit, would be removed and replaced with a new right-hand exit that distributes exiting traffic onto Macalla Road, just west of the proposed reconstructed westbound on-ramp. If the Ramps Project is implemented, the improved geometry and increased length of the ramp would improve conditions for trucks exiting I-80 westbound. If the Ramps Project is not implemented, exiting trucks would continue to need to reduce travel speeds on the off-ramp. The EIR analyzes the project both with and without the Ramps Project, and operating conditions on the ramps are presented in the EIR on Table IV.E.12: Ramp Junction Analysis – Proposed Project, and Project with Mitigation Measure M-TR-2 (Expanded Transit Service), on p. IV.E.76. The Proposed Project would not affect the ability to construct the ramp improvement project. No additional feasible ramp improvements have been identified.

## **2.7.10 PARKING**

### **2.7.10.1 Parking – Open Space Users**

#### **Comment**

The DEIR states that the residential and non-residential parking demand associated with the Project would be for 21,233 vehicles and that 18,917 spaces would be provided as a part of the Project resulting in about 2,300 fewer spaces than what is actually needed. The DEIR does not identify parking areas or spaces dedicated to users of the public access areas at the project site. Because the demand for off-street parking would likely be high, the FEIR should clarify whether parking for shoreline public access areas would be provided, how parking restrictions would be enforced to assure parking availability for shoreline users and, if no designated parking is proposed, where users of these areas would be expected to park. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.15]

**Response**

The comment is correct to note that the EIR analysis finds that the Proposed Project would supply less parking than would be demanded. The numbers cited in the comment, however, are

- incorrect. As stated on EIR p. IV.E.139, the Proposed Project would supply 10,675 parking
- spaces, but there would be demand for 12,300, generating a shortfall of 1,745 spaces. The Project Description, on EIR pp. II.50-II.51 describes the amount of parking proposed for individual uses. However, most parking on the Islands is expected to be publically available and shared among uses. Users of public recreational and open space who choose to drive to the Islands would use on-street parking and public parking garages or lots, similar to other visitors to the Islands. On-street parking located adjacent to major open space areas would likely be further away from other uses such as retail and residential units, and therefore would likely be more available to visitors of the shoreline public access areas. Further, since all on-street parking would be subject to parking fees, it is unlikely that residents would use on-street parking for long term use.

**2.7.10.2 Parking Ratios**

**Comments**

I strongly support the basic concept of the Treasure Island Redevelopment Plan: creating a relatively high-density mixed-use community that has the critical mass necessary to support neighborhood services and high-quality transit. The Plan's provision for 1:1 residential parking, however, weakens the Plan's strategy for minimizing automobile use and is inconsistent with the approach the City has taken in other recently adopted neighborhood plans. (See, e.g., the Market & Octavia Better Neighborhoods Plan, the Eastern Neighborhoods plans, and downtown residential parking limits.) (*Christopher Pederson*) [5.2]

At page IV.E.139, the DEIR states that providing less than 1:1 parking would affect the project's livability, financeability, and marketability and would make the project economically infeasible. It goes on to point out that parking fees would pay a substantial portion of the funding for transit facilities and other aspects of the TDM Plan. It concludes by asserting that with "no" offstreet parking, the transit service, the TDM Plan, and the project as a whole would be infeasible.

There are multiple problems with these statements. First, they suggest that residential parking fees would help pay for transit service and other TDM programs. Page VII.76, however, states that only commercial parking fees would fund transit service and the TDM Plan. If the statement on page VII.76 is accurate, then the statement on page IV.E.139 should be corrected. In addition, if residential parking fees will not fund transit services, then a reduction in residential parking supply would not have a direct effect on transit funding.

Second, according to the DEIR, 30 percent of the housing units will be below market rate. The DEIR fails to explain how reducing residential parking for affordable units would harm their marketability or the financial viability of the project. To the contrary, by reducing construction expenses, reducing parking supply for affordable units would make those units less of a financial drag on the overall project. (*Christopher Pederson*) [5.4]

Fourth, given that the City has in recent years approved residential parking maximums of less than 1:1, it is surprising to see the statement in the DEIR that the City concluded than anything

less than 1:1 residential parking would render the project entirely infeasible. Given the recent plans where the City reached very different conclusions, the EIR should at a minimum explain this seeming inconsistency. (*Christopher Pederson*) [5.6]

The provision of 1:1 residential parking is completely in opposition to San Francisco's currently approved areas plans (Market-Octavia, etc.), and no reasoning is supplied. Nor is there logical explanation for 1,035 spaces of on-street parking being projected [II.50]. These provisions are totally unsupported in view of the stated *Walking and Biking Objectives* [II.45]. No explanation for the stated amount of hotel parking – 400 spaces for 500 hotel rooms is given – the amount is ludicrous and totally unsupported. (*Ron Miguel, President, San Francisco Planning Commission*) [7.4]

The TDM measures noted under *Encouraging Use of Transit & Other Modes, and Discouraging Automobile Use* [II.51] are useful, however they must be applied to a much lower parking allowance following the principles articulated by the *Transportation Demand Management Plan* [IV.E.45-47], i.e. "...designed to reduce use of single-occupant vehicles and to increase the use of rideshare, transit, bicycle, and walk modes for trips to and from, as well as within the Proposed Project." A maximum ratio of .5:1 residential parking; wide sidewalks in all areas; bike lanes with the possibility of bike-share; car-share; and enhanced shuttle service would be far more in keeping with the stated objectives. Analysis must proceed directly from Objectives! (*Ron Miguel, President, San Francisco Planning Commission*) [7.6]

The way to reduce the vehicle miles traveled that are generated by the development is to **reduce the availability of parking** on the islands. Merely increasing the cost of parking is not sufficient. As SPUR wisely points out in its October 2004 report, *Parking and Livability in Downtown San Francisco; Policies to reduce congestion*:

The more parking you build, the more cars you attract and the worse congestion gets. (*Ruth Gravanis*) [31.2]

### **Response**

The proposed maximum parking supply rates are summarized in Table IV.E.22: Permitted Parking Ratios and Maximum Off-Street Car Parking Spaces, on EIR p. IV.E.138, and in Table 2 on p. 21 of the Transportation Impact Study, included as EIR Appendix C. The parking supply ratios used for major land uses in the Proposed Project, such as residential, office/commercial, and hotel are consistent with the San Francisco Planning Code requirements for projects in many neighborhoods in San Francisco,<sup>12</sup> with the exception that the rates proposed for Treasure Island are island-wide maximum rates, and the rates required in the Planning Code are minimum rates for individual uses and do not account for surpluses that may exist from adjacent on-street and off-street public or private parking facilities. Additionally, the maximum rate proposed for retail uses on Treasure Island is approximately one-half the default minimum rate required by the

<sup>12</sup> A number of more recent area plans in San Francisco have adopted parking maximums for individual buildings at ratios lower than one space per dwelling unit for residential uses.

Planning Code for miscellaneous retail uses,<sup>13</sup> although some specific types of retail uses within specific districts of the City have different parking requirements. Therefore, the parking rates proposed would be more restrictive than those required by the City's Planning Code.

The first paragraph on EIR p. IV.E.139 has been revised as follows to clarify that only parking fees for non-residential uses would be used to fund transit improvements and the TDM Plan (new text is underlined):

“...Some centralized off-street parking is proposed as part of the Project and is likely to be built even if individual buildings do not provide parking.[footnote omitted] Market analysis conducted for TICD indicated that providing less than one parking space per residential unit could affect the financeability of the development program, the marketability of the homes, and livability of the Islands, and make the project economically infeasible. In addition, parking fees for non-residential uses would be a substantial portion of the funding supporting transit facilities and other features of the Proposed Project's TDM Plan. With no off-street commercial parking, there would not be sufficient funds to support the entire TDM Plan and transit services, and the Proposed Project would be infeasible.”

There have been several studies on the relationship between parking supply and weekday peak hour automobile trip generation. Many of those studies have found only weak statistical relationships between parking supply and peak hour automobile trip generation. However, in response to a number of comments that suggested that the Proposed Project's parking supply would be too high, a new project alternative has been included in the EIR. See the response in Subsection 2.21.2, Reduced Parking Alternative, for more information.

## **2.7.11 COAST GUARD OPERATIONS**

### **2.7.11.1 Circulation Impacts**

#### **Comments**

Section IV, page IV.E.31 - Figure IV.E.8 does not classify nor improve Northgate Rd in the Proposed Street System, yet its function needs to be reflected and studied as a “major artery” in the TIR definition as it provides sole USCG access to TI and the SFOBB for majority of our operations. Because our access is not improved, this DEIR should document how the project will impact USCG existing access.

Section IV, page IV.E.39 - Southgate Rd at Hillcrest Rd bicycle enhancement detail states flow through uncontrolled Hillcrest Southgate intersection and direct entry onto the SFOBB bike landing area. An opening into the bike landing area at north side of this intersection was requested but eliminated due to safety concerns. The project as designed has significant impact to USCG QTRS 9 driveway access as it will remove the existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. Thus safe use of the driveway can no

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<sup>13</sup> Planning Code requirement for miscellaneous retail uses is 2 spaces per 1,000 square feet of use up to 20,000 square feet, plus 4 spaces for each 1,000 square feet of area in excess of 20,000 square feet.

longer be assured as cyclists make in essence a blind turn into traffic movements in/out of the driveway. USCG personnel may collide with cyclists.

Section IV, page IV.E.40 - This relates to the comment above. On Figure IV.E.12 please address the impacts of the Southgate & Hillcrest Rd configuration to CG QTRS 9 driveway access without mitigation. As shown, either this or the ramp project will remove existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. We have noted through previous discussions that possible acceptable mitigation measures include:

- A traffic control trigger activated by exiting driveway vehicles.
- A relocation of the driveway.
- New stop signs and signage to alert drivers on Southgate to the presence of the bike path in the intersection and cyclists to the driveway when making the right turn.

We hope to minimize cyclist and traffic conflicts at the intersection and at the driveway. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.14]

Section IV, page IV.E.81 - Thank you for this thorough discussion of ramp traffic impacts at the Hillcrest/Southgate intersection. While the USCG will experience a shorter ramp queueing distance as personnel will not be required to circle the Island to access the eastbound on-ramps, there are still impacts. These should be elevated to an actual “**TR**” impact section in the document – such as **Impact TR-5** while the remaining impacts are renumbered. Access to the eastbound on-ramps and westbound off-ramps are of vital importance as USCG requires access to its units in the East Bay.

While most have impacts been addressed, there are residual concerns about those in the Hillcrest queue allowing USCG vehicles to make a right hand turn from Southgate onto the ramps. Also we have concerns about truck access to Macalla Road down to the CG facilities as at least twice a week deliveries are made to Sector San Francisco Buildings on the east side of VBI. Many USCG vehicles do not have sirens or signals. The USCG would recommend that ongoing monitoring of the intersection by USCG and SFMTA be included as a recommendation to ensure that dialogue commences early and often regarding traffic impacts to USCG operations. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.16]

### **Response**

North Gate Road, which primarily provides access to the Coast Guard and to the Senior Officer’s Quarters Historic District uses, would be classified within the hierarchy of streets as a “local street.” It would not be considered a “major arterial,” as it is not a through road, and does not connect with collector streets.<sup>14</sup> With implementation of the Proposed Project, the function of North Gate Road would not change, and it is not anticipated that there would be a substantial increase in the number of vehicles on North Gate Road. As such, Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31, does not warrant

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<sup>14</sup> The *San Francisco General Plan* defines Major Arterials as crosstown routes whose primary purpose is to link districts within the city and to distribute traffic from and to the freeways; these are routes generally of citywide significance; of varying capacity depending on the travel demand for the specific direction and adjacent land uses. Local Streets are defined as streets intended for access to abutting residential and other land uses, rather than for through traffic; generally of lowest capacity.

changes. Access to the Coast Guard operations would not change from existing conditions, although as indicated on EIR p. IV.E.81, queues on the Islands and associated delay may affect the U.S. Coast Guard operations around Yerba Buena Island and their access to the Bay Bridge.

Additional engineering assessments were conducted by the project sponsors to determine options to better accommodate access to and from the Coast Guard Quarters 9 driveway, which is located off of South Gate Road about 20 feet east of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramp, as well as the right turns from South Gate Road onto the I-80 eastbound ramps. Three options to improve access from the driveway were assessed: closure of the driveway and construction of a new access road that would connect with the existing driveway on Hillcrest Road; signalization of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramps as the Quarters 9 driveway as an additional leg of the signalized intersection; left turn restrictions out of the Quarters 9 driveway.<sup>15</sup> The most appropriate option to accommodate the Coast Guard access driveway and the need for monitoring of intersection operations would need to be determined as part of the Bay Bridge East Span Project; the project sponsors would coordinate their activities in this area with Caltrans, the Ramps Project, and the Coast Guard. Signage to alert drivers on South Gate Road of the presence of the bicycle lane on Hillcrest Road and/or to alert cyclists to the presence of the driveway on South Gate Road would be provided as part of the bicycle lane improvements.

Option 1: New Access Road

A new access road and driveway on Hillcrest Road to the Coast Guard Quarters 9 facility would increase travel time for vehicles destined for, or travelling from, the Bay Bridge. Vehicles that would previously exit the Quarters 9 driveway onto South Gate Road would now travel along a newly constructed north-south access road connecting to Hillcrest Road. The access road would be approximately 0.15 mile long and would likely be located on the eastern edge of the Coast Guard property. Given the length of the Coast Guard property, the entire route would be approximately 0.30 mile. The additional travel time would be approximately one minute.

Option 2: Intersection Signalization

Signalization of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramps would require Caltrans traffic operations approval for a traffic signal at this intersection. Issues related to signalization of this intersection include the non-standard geometry, and the potential for queuing on the freeway mainline (eastbound off-ramp). Detailed design and assessment of potential

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<sup>15</sup> AECOM, October 8, 2009, Yerba Buena Island – United States Coast Guard Quarters 9 Driveway Access Memorandum. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

signalization should be conducted by Caltrans in coordination with the project sponsors, the Ramps Project, and the Coast Guard.

Inclusion of the Quarters 9 driveway as an additional leg of the intersection would result in a non-standard, 4-legged intersection configuration. A separate signal phase would need to be provided for vehicles exiting the driveway. A phase would also be provided for vehicles approaching the intersection from South Gate Road. Due to low volumes on the Quarters 9 driveway and southbound South Gate Road approaching the intersection, the installation of an actuated signal is recommended to ensure that these phases are only called when required. In addition, queue detection is recommended to prevent queues developing at the off-ramp.

The majority of green time would be given to traffic movements from the Hillcrest Road approach and Bay Bridge eastbound off-ramp, which would maximize the efficiency of the high volume Hillcrest Road approach and prevent queues at the off-ramp approach to the intersection from spilling upstream onto the Bay Bridge mainline. Installation of a loop detector would ensure that a green light would be called should a queue affecting the mainline operation begin to develop.

#### Option 3: Left Turns Prohibited

Prohibiting left turns out of the Quarters 9 driveway would result in an increase in travel time and distance for Coast Guard vehicles destined for the Bay Bridge eastbound on-ramp. The return route to the Coast Guard facility along South Gate Road would increase travel distance by approximately 0.18 mile, less than one minute of additional travel time. The increase in travel distance under this alternative would be considered minimal, and less than the forecast 0.30-mile additional travel distance that would be required under Option 1, a new access road.

Vehicles that wish to travel westbound on the Bay Bridge or to proceed to the Coast Guard's main facility on Yerba Buena Island would have no increase in travel time or distance. These vehicles would turn right out of the driveway, as they do under existing conditions. Vehicles that would previously exit the Quarters 9 driveway by turning left onto South Gate Road and immediately right onto the eastbound on-ramp would be required to turn right onto South Gate Road, continue under the new span of the Bay Bridge, and complete a U-turn maneuver at the intersection of Macalla Road / South Gate Road. Analysis indicates that the all-way stop controlled intersection as currently configured would be large enough for passenger vehicles to safely complete this turning maneuver. However, single unit trucks and heavy vehicle traffic would be required to travel around the island along Macalla Road and Hillcrest Road to access the eastbound onramp.

### 2.7.11.2 Coast Guard Access

#### Comment

Section IV, page IV.E.81 - The sentence: “Coast Guard vehicles are equipped with lights and sirens, and during emergency conditions, would be able to bypass queued vehicles.” is factually incorrect. The assumption that all USCG vehicles are equipped with lights and sirens is incorrect and reliance on this strategy to mitigate traffic impacts is invalid and not acceptable to the USCG.

The longest potential queue the Coast Guard vehicles would have to face would be about one-tenth of a mile, based on the distance between access points on the main YBI circulation route and the Bay Bridge. The TIS did not quantify any CG facility trip generators in its data, nor study all potential CG delays and queues. The primary USCG access concerns are the Macalla/Southgate/Northgate road intersection which was not studied. USCG trip generators **MUST** be included in the assessment of transportation impacts. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.17]

#### Response

The discussion on EIR p. IV.E.81 does not assume that all Coast Guard vehicles are equipped with lights and sirens. The discussion discloses that Coast Guard vehicles would be subject to additional delay due to queues on Hillcrest Road. The duration of travel within queued conditions and added delays would depend on the day of week, time of day, and conditions on the Bay Bridge. Based on existing driveway locations, Coast Guard vehicles would be within queued conditions for a distance of between 50 and 550 feet from the eastbound on-ramp (likely less than two minutes of delay), compared with a maximum queue of about 1.2 miles (6,340 feet) on Hillcrest Road. While some Coast Guard vehicles may wait in a short queue, emergency vehicles are equipped with lights and sirens, and would be able to bypass the queues during an emergency.

Since the Coast Guard facility is an existing use that is anticipated to remain, its trip generation is included as part of existing conditions, and is therefore, included as part of the assessment of transportation impacts.

The intersection of North Gate Road/South Gate Road/Macalla Road is anticipated to be all-way stop controlled. This means that Coast Guard traffic exiting from North Gate Road onto either South Gate Road or Macalla Road during times when queues are present would be able to enter the stream of traffic relatively easily, since cross-traffic would be required to stop and yield right-of-way to traffic from North Gate Road. The forecasted cumulative conditions peak hour traffic volumes at this intersection are not expected to be large enough to meet peak hour signal installation warrants, as defined in the Manual on Uniform Traffic Control Devices (MUTCD), primarily due to the low projected volumes on North Gate Road.

### 2.7.11.3 Coast Guard Operations

#### Comment

Once the project is completed, the USCG believes the increase in traffic volumes and the proposed congestion pricing described in the DEIR may continue to impinge on USCG access to our facilities. Traffic may restrict the ability of our personnel to enter facilities and congestion pricing will place a cost on access to USCG facilities. It seems the traffic study did not explicitly consider USCG operations in its evaluation, or study USCG operations in depth. The full impacts to the USCG from the project cannot be clearly discerned or mitigated. The project liaison proposed for project construction should therefore be maintained after project completion to ensure that no access to USCG facilities is compromised. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.3]

#### Response

While the transportation analysis presented in EIR Section IV.E, Transportation, did not discuss the Coast Guard operations in depth, the travel demand associated with Coast Guard operations is included as part of the impact assessment. As indicated in the Transportation section, implementation of the Proposed Project would increase traffic volumes on roadways on Yerba Buena Island destined to and from the Bay Bridge, and result in increased congestion, that would affect Coast Guard vehicles. The Coast Guard would not be subject to congestion pricing fees.

During and after completion of construction, TIDA would maintain a project liaison with the Coast Guard. See the response in Subsection 2.7.12.1, Coast Guard Operations, immediately below, regarding liaison between Coast Guard and TIDA during construction activities.

Footnote 4 in Table IV.E.5: Person Trip Generation by Mode, on EIR p. IV.E.60, is revised as follows (new text is underlined):

- <sup>4</sup> Based on counts of peak hour vehicle traffic on the Islands and assumes that the existing trip generation of the Job Corps center on Treasure Island and at the Coast Guard Station and Sector Facility on Yerba Buena Island would remain the same.

### 2.7.12 CONSTRUCTION

#### 2.7.12.1 Coast Guard Operations

#### Comment

Personnel and equipment assigned to support USCG operations based at YBI also require unfettered, uninterrupted (24/7/365) access to and egress from USCG facilities on YBI. The increase in traffic volumes, construction equipment, and changes of traffic patterns during construction could negatively impact the USCG's mission response posture. Based on the USCG's experience in accommodating the construction of the San Francisco Oakland Bay Bridge Eastern Span Replacement Project, the USCG strongly advocates that the City designate a liaison

with whom the USCG can work to ensure that access to USCG facilities is not compromised during construction. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.2]

**Response**

Mitigation Measure M-TR-1: Construction Traffic Management Plan, described on EIR pp. IV.E.69-IV.E.71, requires consultation with Island users, including the Job Corps and the Coast Guard. TIDA staff would serve as liaison with the Coast Guard during construction. TIDA anticipates entering into a Memorandum of Understanding with the Coast Guard to, among other things, establish construction rules and to formalize the communication channels between the two parties.

**2.7.12.2 Truck Routing**

**Comment**

2. Where will the construction truck routes be located on the island? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.2]

**Response**

The Proposed Project would largely reconfigure existing streets on Treasure Island, as illustrated on Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31. While specific truck routes on the new street system have not been identified, it is anticipated that trucks would use the major and secondary arterials to access construction sites. Mitigation Measure M-TR-1, Construction Traffic Management Plan, includes provisions for developing traffic management strategies and route strategies for minimizing impacts of construction activities. It is anticipated that the construction routes would be developed in consultation with the Job Corps.

**2.7.12.3 Pedestrian Hazards**

**Comment**

3. Will the proposed/anticipated locations of the truck routes result in potential pedestrian hazards? If so, how is the developer proposing to deal with the hazards? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.3]

**Response**

Construction-related transportation impacts are discussed in Impact TR-1 on EIR pp. IV.E.67-IV.E.71. As indicated on EIR p. IV.E.69, the Proposed Project would involve construction of a new street system, which would require temporary closure of traffic and parking lanes and

sidewalks on the Islands. These closures could last the entire duration of construction of particular phases, and it is possible that more than one area could be closed simultaneously. As disclosed in the EIR on p. IV.E.69, these closures may involve temporary disruptions to the routes and stops for the Muni line 108-Treasure Island, the new AC Transit bus line, and the new Islands shuttle service, resulting in the need for rerouting. Changes to transit lines would be coordinated and approved, as appropriate, by SFMTA, AC Transit, and TITMA.

Closure of one or more travel lanes is not expected to cause severe congestion on the Islands because existing traffic volumes on the Islands are relatively low and would continue to be low during early development phases. However, the closures may necessitate temporary changes in bicycle and pedestrian circulation during construction. The construction contractors would be required to meet San Francisco's Regulations for Working in San Francisco Streets (the "Blue Book"), including those regarding sidewalk and lane closures. Mitigation Measure M-TR-1, Construction Traffic Management Plan, would ensure that temporary accommodations for pedestrians and bicyclists would be maintained to minimize these potential disruptions, and therefore, the impact on pedestrians and bicyclists from construction of the Proposed Project would be less than significant.

#### **2.7.12.4 Traffic Management**

##### **Comment**

4. As an affected agency, Job Corps would like an opportunity to review and comment on the Construction Traffic Management Plan. (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.4a]

##### **Response**

Mitigation Measure M-TR-1: Construction Traffic Management Plan, described on EIR pp. IV.E.69-IV.E.71, requires consultation with Island users, including the Job Corps and the Coast Guard. TIDA anticipates entering into a Memorandum of Understanding with the Job Corps to establish construction rules and to formalize the communication channels between the two parties. The Job Corps would have an opportunity to review and comment on the Construction Traffic Management Plan.

#### **2.7.12.5 Construction Vehicle Trips**

##### **Comment**

1. Truck traffic, with noise and pollution, to fill in the island is not discussed. Does truck traffic projections include trucks needed to add fill as well as those for building construction? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.1]

**Response**

Construction-related transportation impacts are discussed in Impact TR-1 on EIR pp. IV.E.67-IV.E.71. Table IV.E.10: Proposed Project Construction Traffic, on EIR p. IV.E.68, provides the number of truck trips and barge trips associated with equipment and materials deliveries and disposal trips. The estimates of materials needed include delivery of fill, as well as for materials for infrastructure and building construction.

**2.7.13 REGULATORY FRAMEWORK**

**Comment**

Regulatory Framework

This section (page IV.E.25) appears to be incomplete. Consider adding AB 32, AB 981, the Bay Trail legislation, etc. (*Ruth Gravanis*) [31.21]

**Response**

AB 32, the Global Warming Solutions Act, is discussed in EIR Section IV.H, Greenhouse Gas Emissions, on p. IV.H.12. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020 by enforcing a statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs the California Air Resource Board to develop and implement regulations to reduce statewide GHG from stationary sources. While the Air Resources Board is developing new emissions controls for automobiles and encouraging use of zero-emissions vehicles to help reduce statewide GHG, these regulations would affect the manufacture of new vehicles and would not directly affect vehicular travel or travel modes. Therefore, AB 32 does not need to be included in EIR Section IV.E, Transportation.

AB 981, enacted in 2008, authorized the San Francisco Board of Supervisors to designate a board or agency to act as the transportation management agency for Treasure Island and Yerba Buena Island. The Treasure Island Transportation Management Agency (“TITMA”) is the name of the agency designated in AB 981. AB 981 also establishes the authority for the Board of Supervisors and the San Francisco County Transportation Authority to adopt a congestion pricing program for Treasure Island and Yerba Buena Island. The statute authorizes TITMA to recommend a fee structure for congestion pricing to City decision makers, and to establish parking fees, fines and other parking-related revenues, among other actions. The authority and duties of TITMA are described on EIR pp. IV.E.45-IV.E.46 and throughout relevant discussions and analyses in Section IV.E, Transportation, as well as on pp. II.51 and II.84 in Chapter 3, Project Description. Please also see the response in Subsection 2.7.4.3, TDM, above, for information on the project sponsors’ proposed TDM Plan for the Islands. The congestion pricing program is included in the analysis of trip generation and travel mode in the transportation analysis, and is discussed on EIR pp. IV.E.45 and IV.E.58-IV.E.60 and in EIR Chapter II, Project Description, on p. II.51. The legislation authorizing the City to establish the congestion pricing program and TITMA is not a

typical “regulation” that provides some of the foundation for analysis of impacts, and therefore, was not discussed in the Regulatory Framework subsection of the Transportation section. However, since AB 981 authorizes the creation of TITMA, information regarding this legislation is added to the EIR.

The Bay Trail Plan is included in EIR Chapter III, Plans and Policies, on p. III.12, and in EIR Section IV.J, Recreation, on p. IV.J.16. The text under the heading “Federal, State, and Regional” in the Regulatory Framework subsection on EIR p. IV.E.25 is revised and new text is added, as follows (deleted text is shown in ~~strike through~~, new text is underlined):

**Federal, State, Regional**

There are no Federal, ~~State, or regional~~ transportation regulations applicable to the Proposed Project.

**State**

Treasure Island Transportation Management Act

AB 981, enacted in 2008, authorized the San Francisco Board of Supervisors to designate a board or agency to act as the transportation management agency for Treasure Island and Yerba Buena Island. The Treasure Island Transportation Management Agency (“TITMA”) is the name of the agency designated in AB 981. AB 981 also authorizes the Board of Supervisors and the San Francisco County Transportation Authority, by a two-thirds majority of each body, to adopt a congestion pricing program for Treasure Island and Yerba Buena Island and to set an initial congestion pricing fee structure based on recommendation by TITMA. AB 981 also authorizes TITMA, among other things, to establish parking fees, fines, and other parking-related revenues, to establish a transit pass fee structure and program, and to adopt amendments to the congestion pricing fee structure.

**Regional**

San Francisco Bay Trail Plan

Refer to Chapter III, Plans and Policies, for a description of the San Francisco Bay Plan and its application to the Proposed Project. The following information about the San Francisco Bay Plan is related to the Transportation analysis.

The 2005 Gap Analysis Study, prepared by ABAG for the entire Bay Trail area, attempted to identify the remaining gaps in the Bay Trail system; classify the gaps by phase, county, and benefit ranking; develop cost estimates for individual gap completion; identify strategies and actions to overcome gaps; and present an overall cost and timeframe for completion of the Bay Trail system. In the vicinity of the Project site, the 2005 Gap Analysis Study proposes to connect existing Bay Trail segments in downtown San Francisco with the trail on the eastern span of the Bay Bridge. The proposed trail would then connect to the existing trails in Oakland.

As indicated on EIR p. IV.J.16, an approximately 3.0-mile-long multi-use path would be developed around the perimeter of Treasure Island, consisting of a 30-foot-wide, 4,522-foot-long

segment within the proposed Cityside Waterfront Park and a 40-foot-wide, 2,210-foot-long segment within the Clipper Cove Promenade. This perimeter path is planned to be an extension of the San Francisco Bay Trail; however, it has not been designated as such at the time this EIR was published. See also the discussion of the Class I and II bicycle facilities proposed on Macalla Road in the response to Subsection 2.7.7.1, Bicycle Access – Macalla Road, above.

#### **2.7.14 EMERGENCY ACCESS**

##### **Comment**

There is no reason to change the current configuration on the west-side top-deck onramp. Including a timed transit lane would meet all the requirements as emergency vehicles will have plenty of opportunity to enter the westbound traffic. Currently few emergency vehicles enter the bridge *from* Ti/YBI to affect emergency services or transports as CHP and Caltrans operate constantly on the bridge and dispatch vehicles for either the Oakland meter-station or the San Francisco CHP station on 8<sup>th</sup>/Howard. SFPD do not operate in significant numbers to impact this need a reconfiguration on the west-side, westbound top-deck on-ramp. (*Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation*) [12.4]

##### **Response**

As indicated on EIR p. IV.E.7, the proposed Yerba Buena Ramps Improvement Project (“Ramps Project”) currently underway by SFCTA is evaluating potential reconfiguration of two of the westbound (upper deck) on- and off-ramps on the east side of the Bay Bridge tunnel. If the Ramps Project is implemented, the westbound on-ramp on the west side of Yerba Buena Island would not be modified geometrically; however, it would be restricted to transit and emergency vehicle use only, providing exclusive access for transit and emergency vehicles departing the Islands destined for the San Francisco mainland. Thus, the comment is correct in stating that the westbound on-ramp on the west side would provide opportunities for emergency vehicles to access the Bay Bridge. The Ramps Project is not part of the Proposed Project.

The proposed reconfiguration of the east side ramps by SFCTA is not simply to accommodate emergency vehicles, but to upgrade the substandard ramp design and acceleration and deceleration distance for vehicles accessing and exiting the Bay Bridge. The SFCTA considered closing the west side westbound on-ramp completely as part of the Ramps Project, but, after consultations with SFMTA, determined it would be preferable to keep it open for limited use for services such as transit and emergency services that would benefit from the travel time savings associated with the ramp, and whose professional drivers would be comfortable despite the existing ramp’s substandard design. With the reconfiguration of the westbound on-ramp on the east side of Yerba Buena Island, the westbound on-ramp on the west side of Yerba Buena Island would be used for Muni and emergency vehicles. As appropriate, emergency vehicles would also use the reconfigured westbound on-ramp on the east side of Yerba Buena Island, and would benefit from the improved geometrics.

## 2.7.15 MITIGATION MEASURES

### 2.7.15.1 Mitigation Measures

#### Comments

Of equal or more significance is the Project's traffic impact(s) and the DEIR's flawed conclusion that such is "unavoidable." In fact, the various Mitigation Impacts TR1 through TR63 as addressed by Mitigation Measures M-TR-2 and M-TR-24, are fatally flawed because of their vague and speculative/incomplete nature, including but not limited to a failure to consider/examine direct access to BART, an overdependence on an expensive, limited, bi-directional (only between TI/YBI and SF) ferry service, and an illogical reliance on a fundamentally inadequate congestion management "fee." Indeed, it is incredible that there can be sixty three identified Traffic Impacts, but only some basic, oversimplified Mitigation Measures proposed in M-TR-2 and M-TR-24. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.12]

The first one is on transportation. It appears that out of all the topics and all the impact being analyzed, I think the area of transportation really suffers the most impact. Out of the 60-some impacts stated in the report, over 35 or up to 38 are considered significant and unavoidable. (*Claudine Cheng, Director, TIDA Board*) [TR.22.1]

And the mitigation measure suggested -- the one mitigation measure that was suggested for this significant and unavoidable impact, or 38 of them, happens to be to expand transit service, MTR-2.

And the report also stated that funding for extended transit service are not identified and secured, and therefore, its implementation must be considered uncertain at this time. I think we all understand that, given the budget of the City and the budget of Muni. It's understandable.

But I wish, because of the totality of the impact, and so many of them, I just wish that planning staff would consider adding more information, as far as alternatives as to how we can or possibilities of how we can -- the transit service can be extended. Will it be a function of the soon to be newly created Treasure Island Transportation Management Agency, which is supposed to be appointed by the board of supervisors? Will it be one of the responsibilities of the transportation management agency to oversee and guide us in the future in developing policies, mitigation measures, and how we can afford it.

Maybe we can also consider giving some options, so that we, as well as members of the public, can look into, can understand what other possibilities, because the impacts are quite immense. And I would really like to see some alternatives being suggested or options into how these mitigation measures can be funded. (*Claudine Cheng, Director, TIDA Board*) [TR.22.2]

#### Response

As indicated by the comments, EIR Section IV.E, Transportation, includes only three mitigation measures for 63 project impacts, although 19 of the 63 transportation impacts were identified as less-than-significant impacts, and two were identified as less than significant with implementation of mitigation measures. Further, for CEQA purposes, several impacts were identified separately as impacts of the Proposed Project with the current ramp configuration and impacts with the

reconfigured westbound ramps on the east side of Yerba Buena Island, and impacts identified under Existing plus Project conditions are also identified as impacts under 2030 Cumulative conditions. Identifying the same or similar impacts separately, depending on the condition of the ramp configuration, serves to exaggerate the number of impacts due to the Proposed Project, particularly when the same mitigation measure would reduce impacts under both circumstances. As such, the Proposed Project would result in 20 significant and unavoidable transportation impacts, which is not surprising given the magnitude of the Proposed Project.

One reason that there are relatively few mitigation measures to reduce the Project's significant impacts due to automobile traffic generation is that several potential measures, such as congestion pricing, paid parking, and pre-paid transit vouchers, have been incorporated into the Proposed Project, as described in the EIR on pp. IV.E.45-IV.E.47. Further, Mitigation Measure M-TR-2, Expanded Transit Service, serves as an effective measure at reducing a number of significant impacts identified in the EIR. Implementation of Mitigation Measure M-TR-2 cannot be guaranteed, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, and because providing the more frequent ferry service would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA. Please refer to the response in Subsection 2.7.2.3, Funding Mechanisms, above, regarding funding of the Proposed Project improvements and improvements included in Mitigation Measure M-TR-2.

Finally, additional measures that involve physical modifications to existing roadways to improve capacity for specific modes are generally not feasible given the physical constraints of the roadways on Yerba Buena Island and the Bay Bridge.

The Proposed Project would not preclude future connections between a new BART tunnel and Treasure Island or Yerba Buena Island, should BART determine that a new tunnel in the vicinity of the Islands is feasible. See also the response in Subsection 2.7.3.5, Future Regional Improvements, above.

Chapter VII, Alternatives, identifies alternatives to the Proposed Project and discusses the environmental effects associated with them. The alternatives analyzed in the EIR have been developed to focus on those that are capable of avoiding or substantially lessening one or more of the significant impacts identified for the Proposed Project. Under the Reduced Development Alternative and No Ferry Service Alternative presented in Chapter VII, the transportation impacts would be similar to those identified for the Proposed Project, although overall trip generation would be less, as would the overall degree of significant transportation impacts. Under the Reduced Parking Alternative presented in Chapter VII, there is weak evidence suggesting that if parking supplies were reduced, trip generation might be reduced to a level similar to the Reduced Development Alternative. If the reduction in vehicular trips were to materialize, the Reduced

Parking Alternative would have similar transportation impacts to those identified for the Reduced Development Alternative, and therefore, similar to those of the Proposed Project, although, as noted above, the overall degree of significant transportation impacts would be less than the Proposed Project.

#### 2.7.15.2 Fees

##### Comment

The proposed project would generate numerous significant and unavoidable transportation impacts but only three mitigation measures were proposed to reduce the number of vehicle trips on the SFOBB. Since only the 'base transit' is fully funded, the Department cannot assume the 'expanded transit' will be in place after project completion. In the DEIR, under the "Proposed project – base transit" scenario, the project would generate 1,613 AM, 2,462 PM, and 2,861 Saturday vehicle trips. As a result, the proposed project will have significant impacts to the already congested State highway system.

Per California Environmental Quality Act (CEQA) law precedence, the City has a legal duty to require mitigation of all the significant impacts identified. In the case of *City of Marina et. al. v. Board of Trustees of the California State University* (2006) 39 Cal 4<sup>th</sup> 341. The California Supreme Court determined that,

“CEQA requires a public agency to mitigate or avoid its projects’ significant effects not just on the agency’s own property but “*on the environment*” (Pub. Resources Code, Section 21002.1, subd. (b)), with “environment” defined for these purposes as “the physical conditions which exist *within the area which will be affected by a proposed project*” (id., Section 21060.5). Thus, if the [Board of Trustees of the California State University] cannot adequately mitigate or avoid [California State University Monterey Bay]’s off-campus environmental effects by performing acts on campus (as by reducing sufficiently the use of automobiles or the volume of sewage), then to pay a third party such as [Fort Ord Reuse Authority] to perform the necessary acts off campus may well represent a feasible alternative. A payment made under these circumstances can properly be described neither as compulsory nor, for that reason, as an assessment.” (City of Marina at p.704)

In April 2010, the Department identified three projects which have the potential to reduce trips on the SFOBB and its approaches. Since then, the Department has refined these cost estimates as referenced below.

- i. Traffic Operation System (TOS) projects in San Francisco and Alameda Counties for ramp meters and fiber optics installation – Estimated cost \$25.9 million
- ii. Projects near Toll Plaza approach in Alameda County for TOS and fiber optics installation – Estimated cost \$13.1 million
- iii. Proposed Multi-use bicycle and pedestrian path on the west span of the SFOBB – Estimated cost – \$500 million

These TOS projects will improve operations on the State highway system by improving response time to incidents and providing more reliable travel times for all users of the system. Any operational improvements to the approaches to the SFOBB have the potential to add capacity that would mitigate the impacts of the proposed redevelopment project. The proposed multi-use path

on the west span of the SFOBB has the potential to reduce vehicle trips by providing an attractive alternative to driving. The Department strongly urges the City and County of San Francisco to contribute fair-share fees to these projects that would improve the efficiency of the transportation system and reduce delays while maintaining reliability on the major approaches to the SFOBB. *(Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation)* [16.21]

### **Response**

Impacts TR-2 through TR-7 and TR-40 through TR-45 in the EIR identified the significant and unavoidable impacts associated with project-generated vehicle trips on the Bay Bridge approaches in the East Bay, San Francisco and on the Bay Bridge ramps. As indicated on EIR p. IV.E.74, as a means to reduce vehicular travel to and from the Islands, additional transit capacity shall be provided as part of Mitigation Measure M-TR-2, Expanded Transit Service. While the specific improvements within the baseline conditions and as part of Mitigation Measure M-TR-2 have been discussed between the City, project sponsors, SFMTA, AC Transit and WETA, certain elements of the transit improvements are uncertain. Accordingly, Impacts TR-2 through TR-7 and TR-40 through TR-45 remain significant and unavoidable.

As noted on EIR p. IV.E.45, the majority of the trips on and off the Islands would be subject to a congestion pricing fee and ramp metering. These two measures would more directly affect the travel mode choice and use of vehicles for access to and from the Islands than traffic operations systems (“TOS”) projects in San Francisco and Alameda Counties.

As discussed elsewhere (see Subsection 2.7.3.9 – Traffic Analysis Assumptions), the selection of the metering rate is within the control of Caltrans. The metering rate assumed in this analysis was a conservative one, in that it was relatively high, and assumed relatively more traffic could exit Yerba Buena Island onto the Bay Bridge. The selection of the congestion pricing rate would be within the control of the TITMA, the SFCTA and the San Francisco Board of Supervisors.

The comment correctly notes that the result of the EIR’s analysis is that, even after application of Mitigation Measure M-TR-2, there remain significant and unavoidable impacts associated with project-generated vehicle trips on the Bay Bridge approaches in the East Bay, San Francisco and on the Bay Bridge ramps. The comment, therefore, proposes that the Project make a “fair share” contribution to three transportation improvement projects currently under study. The three projects identified in the comment may be beneficial to the overall transportation system in the region. It is possible that these regional benefits would improve congestion on the Bay Bridge. However, the magnitude of such a regional benefit has not been determined and it is not known whether these projects are feasible, or whether these projects represent a cost-effective means of helping alleviate regional congestion.

If the Proposed Project were to make a fair-share contribution towards these projects, it is not known whether these projects would ultimately prove to be feasible, or whether Caltrans would be able to secure the balance of funding necessary to move forward with these projects. The current status of the three proposed regional improvements is summarized as follows:

- i: TOS projects in San Francisco and Alameda Counties for ramp meters and fiber optics installation: These include various projects that are proposed to be included as State Highway Operations and Protection Program projects. A Project Study Report has been prepared for these projects; however funding sources have not been identified.
- ii: Projects near Toll Plaza approach in Alameda County for TOS and fiber optics installation: These include various projects that are proposed to be included as State Highway Operations and Protection Program projects. A Project Study Report has been prepared for these projects; however, funding sources have not been identified.
- iii: Proposed Multi-use bicycle and pedestrian path on the west span of the Bay Bridge: In 2009 the Bay Area Toll Authority initiated preparation of the ongoing Project Study Report (Project Development Support) [PSR(PDS)] for the Bay Bridge West Span Bike Path. Upon completion of the PSR(PDS), sponsor agencies will seek approval to move into the Project Approval/Environmental Documentation phase. Funding for this project has not been identified.

As this summary indicates, Caltrans has not approved these three projects, nor has it adopted a program to secure funds for their construction. Until a program is adopted that identifies the funding sources necessary to construct these improvements, it would be speculative to assume they would be constructed. In particular, under CEQA, it is inappropriate to rely upon fair-share funding to mitigate the cumulative traffic impacts of a project, where no mechanism has been established to actually obtain funding for or implement the identified improvement. For this reason, the proposal to require the project to provide fair-share funding for these regional improvements is considered speculative and infeasible.

Based on available information, the three projects identified in the comment would not be as effective in reducing the number of vehicle-trips generated by the Proposed Project as Mitigation Measure M-TR-2, and would not be considered to represent feasible alternative mitigation. As suggested in the comment, provision of Traffic Operations Systems projects in San Francisco and Alameda counties would improve operations on Bay Bridge and on its approaches by improving response times to incidents and providing more reliable travel time information. However, neither of these proposals would add capacity, and therefore, neither of them would mitigate the cumulative impacts of the Proposed Project. Therefore, Mitigation Measure M-TR-2 is deemed by the EIR preparers to be more appropriate.

As noted in the comment, the proposed multi-use path on the west span would accommodate pedestrians and bicyclists traveling to and from the Islands. A multi-use bicycle and pedestrian path on the west span of the Bay Bridge could potentially divert some travelers who would

otherwise use their vehicles to travel across the bridge. It is not known, however, how many travelers would use their bikes instead of cars. As a result, it is not anticipated that the proposed multi-use path would have a substantial effect on peak hour mode choice or reduce traffic impacts to less-than-significant levels.

In sum, the three projects identified in the comment would be less effective than the provision of additional transit service in reducing travel demand by vehicles. The Proposed Project would include substantial investment in transportation infrastructure with regional benefit, including roadways, bicycle and pedestrian facilities, and transit services. In addition, the Proposed Project would contribute financially to the Ramps Project planning and engineering studies in the amount of over \$10 million. While the Ramps Project would not add capacity to either the ramps themselves or the mainline, the Ramps Project would improve the safety and operations of the mainline, and therefore, have a direct benefit to the regional system.

In conclusion, the contribution of fair share fees to the three projects identified in the comment would not represent a feasible alternate mitigation measure to Mitigation Measure TR-2, as suggested in the comment.

### **2.7.15.3 Funding**

#### **Comment**

4. The expanded transit scenario for Mitigation Measure M-TR-2 has not yet been funded but is considered as a mitigation measure for transportation impacts. Please discuss how these transit improvements will be funded and explain development phasing in relation to expanded transit services. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.16]

#### **Response**

As described on EIR p. IV.E.74, Mitigation Measure M-TR-2, Enhanced Transit Service, would increase the frequency of Muni line 108-Treasure Island, create an additional Muni bus route between Treasure Island and another employment center in San Francisco (e.g., Civic Center), and increase frequency of ferry service between the Island and Downtown San Francisco.

The specific transit improvements contemplated under Mitigation Measure M-TR-2 are uncertain. The City prepared a Fiscal Impact Analysis for the Proposed Project that indicates that General Fund revenues generated from the Proposed Project through property taxes, sales taxes, hotel taxes, and other sources would greatly exceed the incremental cost of providing the increase in Muni service under Mitigation Measure M-TR-2<sup>16</sup>. Please refer to responses in Subsection 2.7.2.3, Funding Mechanisms, above, for information related to funding of project improvements.

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<sup>16</sup> The Fiscal Impact Analysis is Exhibit 14 in the 2010 Term Sheet Update, cited above in footnote 3.

However, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, the service was not assumed to be in place.

The provision of ferry service under Mitigation Measure M-TR-2 is uncertain because providing the decreased headways would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA.

Given the uncertainty of these transit improvements, the Expanded Transit Service was not assumed to be in place. As a result, the transit impacts associated with not implementing this level of transit would be significant and unavoidable. Although the EIR makes the assumption that the Expanded Transit Service is not in place, the specific improvements included in Mitigation Measure M-TR-2 have been discussed between the City, project sponsors, and SFMTA (for San Francisco bus service), AC Transit (for Oakland bus service), and WETA (for ferry service). An Interagency Cooperation Agreement would be entered into between TIDA and the City. SFMTA would be a party to the Interagency Cooperation Agreement, which would be subject to approval by the SFMTA Board. By entering into the Interagency Cooperation Agreement, SFMTA would confirm its concurrence with the Transportation Implementation Plan and the SFMTA's service. A Memorandum of Understanding describing the expectations of the project sponsors, AC Transit and WETA is anticipated to be attached to the Transportation Implementation Plan that is part of the Project's Disposition and Development Agreement. The Transportation Implementation Plan would define how TITMA, the agency responsible for managing funding for transportation improvements for the Islands, would operate. TITMA would be responsible for developing, in conjunction with TIDA, SFMTA, WETA, and AC Transit, a phasing plan to determine when specific transit improvements would occur. TITMA would also be responsible for administering the proposed congestion pricing program, and for coordinating their transit and other TDM efforts with Caltrans' metering of the Yerba Buena Island Bay Bridge on-ramps. As indicated in the EIR, because full funding for the expanded transit service has not yet been identified, and because expansion of the San Francisco berthing facilities relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA implementation of M-TR-2 remains uncertain and was therefore, not assumed in the transit analysis. Accordingly, Proposed Project impacts to transit capacity would be considered significant and unavoidable.

#### **2.7.15.4 Additional Mitigation Measures**

##### **Comment**

- Why isn't the following Mitigation Measure recommended in the DEIR: "If it is determined that traffic from the Redevelopment Area is constraining the capacity of the SFOBB, either more aggressive transit improvements must be implemented or additional development should be

delayed until such improvements are implemented.” Please explain why this is not a Mitigation Measure. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.69]

**Response**

The extent to which the Proposed Project constrains capacity on the Bay Bridge is largely a function of the metering rate selected for on-ramps. As discussed in the response in Subsection 2.7.3.9, Traffic Analysis Assumptions, the analysis is based on a metering rate that the City believes presents a reasonable worst-case scenario for purposes of identifying impacts on the Bay Bridge. Thus, even if the Proposed Project generated more vehicle traffic than projected in the EIR, the effect on the Bay Bridge would be the same because additional vehicles could not get through the ramp meters. Thus, such a mitigation measure is not necessary as a means to lessen the project’s impact on the Bay Bridge or its approaches. Aggressive transit improvements, such as increased frequencies on Muni line 108-Treasure Island, additional ferry service, and a new bus route to San Francisco, are included as part of Mitigation Measure M-TR-2.

**2.7.15.5 Mitigation Monitoring and Reporting**

**Comment**

Public Resources Code Section 21081.7, requires that, after a Lead Agency approves a project, Agency must submit transportation information generated from the reporting or monitoring program that the Lead Agency adopted at the time of approval. Please see the Department’s “*Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation*” at the following website for more information:  
[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa.html](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html)

The Mitigation Monitoring Submittal Guidelines discuss the scope, purpose and legal requirements for mitigation monitoring reporting and submittal, specify the generic content for reports, and explain procedures for timing, certification and submittal of reports. Please complete and sign a Certification Checklist form for each approved development project that includes transportation related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed.

The City needs to consider measuring mitigation effectiveness and periodically evaluate transit utilization rate, headway reliability and quality of service to ensure transit is the most attractive mode of travel. (*Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation*) [16.22]

**Response**

A Mitigation Monitoring and Reporting Program will be prepared for the Proposed Project based on the impacts and mitigation measures identified in the EIR. The Planning Department will follow the Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to Caltrans.

## 2.8 NOISE

### 2.8.1 CONSTRUCTION NOISE

#### Comment

The noise impacts are not adequately addressed or studied in the DEIR, as there appears to be no analysis at all of potential noise level increases as measured from locations along the NE Embarcadero and on Telegraph Hill. Based on the experience of our members, we know that when music events are held on TI, the noise levels reaching Telegraph Hill are significant. Thus, it is certain that the impacts of noise pollution from construction and other activities proposed on TI/YBI could cause significant noise and light pollution impacts at locations on the mainland. Construction noise over a 30-year period would definitely significantly impact the residents and visitors to these and other mainland locations. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.74]

#### Response

A significant and unavoidable noise impact from project construction is identified in the EIR in Section IV.F, Noise, p. IV.F.14. The proposed ferry quay would be the closest project element to The Embarcadero, at a distance of 1.7 miles. Telegraph Hill is further inland. The noisiest construction activity would be pile driving, which generates noise levels of about 101 dBA at a distance of 50 feet. At a distance of 1.7 miles (8,976 feet) pile driving noise would be attenuated to 56 dBA. Consequently, while the greatest construction noise would likely be audible to receptors along The Embarcadero during quieter periods, it would generally be below the noise levels generated by motor vehicle traffic along The Embarcadero, which the San Francisco Department of Public Health has modeled to be 75 dBA or greater.<sup>1</sup> Therefore, while construction noise would be significant and unavoidable at some on-island receptor locations, impacts along The Embarcadero and at Telegraph Hill, which is further away, would be below ambient values and less than significant. The EIR uses the following significance threshold for temporary increases in noise levels, such as noise from construction activities, on p. IV.F.12: “Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.” Construction-related noise impacts from the Proposed Project along The Embarcadero and on Telegraph Hill would be less than significant.

### 2.8.2 OPERATIONAL NOISE

#### Comment

- In addition to noise generated by construction activities over a 30-year period, what other noise generating activities are proposed? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.75]

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<sup>1</sup> <http://www.sfdph.org/dph/files/EHSdocs/ehsPublstdocs/Noise/TransitNoiseMap.pdf>

**Response**

As discussed in EIR Section IV.F, Noise, on p. IV.F.20, operation of the Proposed Project would increase noise levels along existing and proposed roadways due to increased vehicle traffic in the area of Treasure Island where the streets lead to the Treasure Island Causeway and all traffic would concentrate. Impact NO-4, on EIR p. IV.F.23, addresses noise generated by ferry vessels at and approaching the proposed Ferry Terminal. No other substantial noise-generating activities are proposed.

EIR Chapter II, Project Description, p. II.79, states that construction and buildout would occur over an approximately 15- to 20-year period, although market forces could affect the actual timing. Therefore, the statement in the comment that construction activities would occur for a 30-year period is not correct.

**2.8.3 NOISE LEVELS ON MAINLAND**

**Comment**

- Quantify the noise levels and light pollution increases that would be caused from the proposed Sports Complex.
- Please analyze all potential noise level increases to locations along the NE Embarcadero and on Telegraph Hill. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.76]

**Response**

The proposed Sports Park is described in EIR Chapter II, Project Description, on EIR p. II.31. The Sports Park would be a regional recreational park of up to 40 acres with a variety of athletic fields and associated facilities. The facilities may include courts and fields for baseball (including batting cages), softball, soccer, rugby, lacrosse, and volleyball, as well as associated services such as a concessionaire, parking, and restroom facilities. These community sports fields are anticipated to generate 1,376 peak hour weekend vehicle trip ends. Noise from land uses such as these would be from vehicle trip generation and participant and crowd noise during games and practices. Noise increases from vehicle trips generations are addressed in EIR Section IV.F, Noise, in Impact NO-3, on p. IV.F.20, and quantified in Table IV.F.6: Modeled Project Traffic L<sub>dn</sub> Noise Levels, on p. IV.F.23. The table includes traffic generation from all project components inclusive of the sports fields.

Noise generated by participants and crowds attending these sporting events would be similar to those at most community sports fields. An analysis of noise generated from a mix of soccer and softball games indicated that average noise levels during games are approximately 60 dBA at a

distance of 100 feet from the field.<sup>2</sup> An analysis of noise generated by spectators at two soccer fields with maximum attendance for a tournament indicated that if all attendees were shouting at the same time, the noise level at 155 feet would be about 75 dBA.<sup>3</sup> The proposed Sports Park would be located on the eastern side of Treasure Island, on the far side of the Island from receptors on Telegraph Hill. Noise from the Sports Park would also be shielded by proposed buildings to the west of the sports fields. These noise levels would be attenuated to well below existing ambient levels on The Embarcadero and Telegraph Hill, both at a distance of 1.7 miles or more.

See the response in Subsection 2.4.4, Nighttime Views and Glare, in Section 2.4, Aesthetics, of this Comments and Responses document, for a discussion of changes in nighttime lighting as a result of the Proposed Project.

An analysis of construction-related noise impacts to receptors along The Embarcadero and Telegraph Hill is addressed in the response in Section 2.8.1, Construction Noise, above.

Noise increases from traffic generated by the Proposed Project would have significant impacts at on-island roadway segments; these roadways are located 1.7 miles away from The Embarcadero and further away from Telegraph Hill. However, noise increases along these roadways would not be audible at a distance of 1.7 miles. The *Transportation Impact Study* for the Proposed Project examined the intersection of Harrison Street and The Embarcadero, and indicates a Proposed Project contribution of 25 peak hour vehicles to The Embarcadero, which has an existing volume of 1,937 vehicles. The addition of 25 peak hour vehicles to the existing traffic volumes on The Embarcadero would result in a non-quantifiable increase in roadway noise (less than 0.1 dBA) based on the Traffic Noise Model of the Federal Highway Administration.

Noise increases from the Ferry Terminal on Treasure Island would be generated at a distance of 1.7 miles away from The Embarcadero. A study of noise from ferry terminals in the state of Washington yielded anecdotal daytime hourly equivalent sound level ( $L_{eq}$ ) values of 55 to 60 dBA at residential locations varying from 500 to 2,500 feet from terminal operations. Attenuation of terminal noise to a distance of 8,976 feet results in hourly noise levels of 44 dBA, well below the existing ambient traffic-related noise levels along the northeastern Embarcadero roadway, which exceed 75 dBA.

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<sup>2</sup> J.C. Brennan and Associates, 2005, Environmental Noise Analysis, Walker Park and Quail Hollow Elementary School, September 7, 2005.

<sup>3</sup> City of Piedmont, Moraga Canyon Sports Fields Project Draft EIR, June 2010, pp. 287-288. A copy of this material is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

Noise would also increase at the existing Ferry Building terminal on the mainland as a result of increased ferry operations to and from Treasure Island. As ferries already access the Ferry Building terminal in the existing conditions, the single additional ferry docking event would not result in a change in the maximum noise levels or sound exposure noise level. The change in the noise environment would result from the increase in the number of daily maneuvering and docking events, which would potentially increase the 24-hour based day-night sound level in the area of the Ferry Building. The nearest mainland sensitive receptor to the Ferry Building terminal would be residential condominiums on Drumm Street and Washington Street, approximately 1,300 feet to the west.

The Ferry Building terminal currently experiences 64 ferry dockings per day between the hours of 6:20 a.m. and 11:00 p.m. The Proposed Project would increase these daily visits to 79 dockings per day, while the Expanded Transit Service would increase ferry dockings to 109 daily events with operations occurring between 5:00 a.m. and 9:00 p.m. The Federal Transit Administration transit noise impact model was adjusted to predict noise increases from increased ferry docking events. Using the upper end of maximum noise levels at 100 meters for ferries at cruising speed, the Proposed Project would increase existing noise levels 100 meters from the ferry terminal from 63 dBA, Ldn to 64 dBA, Ldn. The Expanded Transit Service would increase existing noise levels 100 meters from the ferry terminal from 63 dBA, Ldn to 66 dBA, Ldn. Attenuating this noise level out to the distance of the nearest receptor results in a Ferry Building terminal noise contribution of 52 dBA, Ldn for the Proposed Project and 54 dBA, Ldn for the Expanded Transit Service. These contributions would not affect existing noise levels at mainland residential uses in the area, which are dominated by vehicle traffic on The Embarcadero that generates noise levels in excess of 75 dBA, Ldn. Therefore, the additional ferry vessel activity resulting from the Proposed Project would not cause a significant noise effect at sensitive receptors located on the mainland.<sup>4</sup>

#### **2.8.4 TRAFFIC NOISE AT COAST GUARD FACILITIES**

##### **Comment**

Section IV, page IV.F.21 - Impact NO-3 recognizes noise impacts to the USCG from traffic. Is increased insulation of USCG residential structures, or other interior sound dampening viable to mitigate these impacts? Is there going to be long term monitoring of noise impacts to CG property?

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<sup>4</sup> This conclusion is similar to the conclusion reached in the *Water Emergency Transit Authority Final Program EIR*, in Impact NOI-2 on pp. 3.11-12-3.11-14 of that EIR, cited in Section IV.F, Noise, on pp. IV.F.25 and IV.F.26 of the *Treasure Island / Yerba Buena Island Redevelopment Project EIR*.

Section IV, page IV.F.31 - Impact NO-8 should mention the cumulative sound impacts on USCG residential properties along Hillcrest Road. (*P. M. McMillin, Captain, U. S. Coast Guard*)  
[10.19]

**Response**

EIR Section IV.F, Noise, states on p. IV.F.21 that Coast Guard residences would experience increased noise levels. Existing Coast Guard residential dwellings are located south of and adjacent to the Bay Bridge and over 1,000 feet from the roadways analyzed in Table IV.F.6: Modeled Project Traffic  $L_{dn}$  Noise Levels, on p. IV.F.23. Noise from existing traffic on the Bay Bridge was monitored on Yerba Buena Island to be 66 dBA,  $L_{dn}$ , as presented on EIR p. IV.F.6. Noise modeling presented on EIR p. IV.F.23 indicates that future noise levels along the Avenue of the Palms would be 70 dBA,  $L_{dn}$  at a distance of 50 feet from the roadway center. A majority of the southbound traffic on the Avenue of the Palms would continue on to Treasure Island Road on Yerba Buena Island, leading to the Bay Bridge ramps. At a distance of 1,000 feet these noise levels on Avenue of the Palms and Treasure Island Road would be attenuated to well below the monitored ambient noise levels on Yerba Buena Island. Consequently, while roadside noise levels along the roadway would increase by as much as 9 dBA along Avenue of the Palms, noise levels would not increase at Coast Guard residences on Hillcrest Road, because of the dominating contribution of existing vehicle traffic on the Bay Bridge, and would not be a significant noise impact requiring mitigation.

To further examine the potential impacts at Coast Guard residences on Hillcrest Road, a noise modeling analysis was conducted to assess the potential noise increase resulting from the increase in vehicle volumes on the eastbound ramps to and from the Bay Bridge. It is estimated that the roadway center of the eastbound ramps is as close as 200 feet from the Hillcrest Road residences, taking into account elevation changes. While roadside noise levels would increase by 7.1 dBA (from 52.7 dBA to 59.8 dBA) from increased eastbound on- and off-ramp traffic with the Proposed Project, the full impact of this increase would not be realized by local receptors because of the existing contribution of traffic noise from the Bay Bridge (66 dBA). Addition of the existing (66 dBA) noise level and the estimated future noise level from eastbound ramps with the Proposed Project (59.8 dBA) results in an increase of 0.9 dBA. This would be a less-than-significant noise impact to residences on Hillcrest Road from the Proposed Project. This impact would be reduced in the Expanded Transit Service and the Reduced Development Alternatives because ramp volumes would be reduced compared to the Proposed Project.

Based on this information, the EIR was very conservative in stating that traffic noise would increase substantially and result in a significant noise impact at Coast Guard residences. Accordingly, the text has been adjusted to reflect this updated analysis. The references to impacts to residents on the Coast Guard property in the third and fourth full paragraphs on EIR p. IV.F.21

are deleted and other revisions to these paragraphs are made, as shown below (deletions are shown as ~~strike-through~~ and new text is underlined):

Although these significant traffic noise level increases would not expose existing or future residents to noise levels in excess of compatibility standards (discussed in Impact NO-6), they would affect future residential receptors in the Cityside District, the Island Center District, and the Yerba Buena Island District, particularly, future residents of early phases ~~that~~ who would not have been exposed to the full extent of the operational noise environment prior to full buildout. The traffic noise level increases would also affect students at the Job Corps campus and Life Learning Academy, ~~and residents on the Coast Guard property~~ who would have been exposed to the pre-operational noise environment. Therefore, permanent increases in ambient noise levels are considered to be potentially significant due to noise created by project-generated traffic.

Measures available to address significant traffic noise increases in the Job Corps campus, ~~and Life Learning Academy, and Coast Guard~~ areas or the future residential areas are limited. For example, the construction of continuous noise barriers at curbside along the entire length of the identified roadways would not be feasible because such a barrier would block vehicle access to properties and conflict with the aesthetic character of the neighborhoods. All proposed new dwelling units would be multi-family structures. Multi-family structures and hotels proposed as part of the Project would be required to design interior dwelling spaces to achieve an interior noise standard of 45 dBA as required by Title 24. Noise-reducing building techniques to attain these standards could include use of increased insulation and installation of building materials and windows with a high sound transmission class. Consequently, this impact would primarily result in a significant noise increase to exterior areas only (e.g., balconies, and public gathering areas).

The following text is added to EIR p. IV.F.21 as a new second paragraph, to provide a discussion of traffic noise impacts at the Coast Guard residences (new text is underlined):

To examine the potential impacts from traffic noise increases to Yerba Buena Island receptors near eastbound Bay Bridge on- and off-ramps, a noise modeling analysis was conducted. It is estimated that the roadway center of the eastbound ramps is as close as 200 feet from the Hillcrest Road residences, taking into account elevation changes. While roadside noise levels would increase by 7.1 dBA (from 52.7 dBA to 59.8 dBA) from increased eastbound on- and off-ramp traffic with the Proposed Project, the full impact of this increase would not be realized by local receptors because of the existing contribution of traffic noise from the Bay Bridge (66 dBA). Addition of the existing (66 dBA) noise level plus the future noise level from the eastbound ramps with the Proposed Project (59.8 dBA) results in an increase of 0.9 dBA. This is considered a less-than-significant noise impact on residences on Hillcrest Road. This impact would be reduced in the Expanded Transit Service and the Reduced Development Alternatives because ramp volumes would be reduced compared to the Proposed Project.

Hillcrest Road is located over 1,000 feet from the roadways impacted by cumulative traffic noise presented on EIR p. IV.F.30. Noise from existing traffic on the Bay Bridge was monitored on Yerba Buena Island to be 66 dBA, Ldn, as presented on EIR p. IV.F.6. Noise modeling presented on EIR p. IV.F.30 indicates that future noise levels along Avenue of the Palms, within 50 feet of

the roadway, would be 71 dBA, Ldn. At 1,000 feet, the TNM model of the Federal Highway Administration indicates that roadway noise would be reduced to 50 dBA. Consequently, while roadside noise levels along the roadway would increase by as much as 9 dBA, there would be no quantifiable noise increase at Coast Guard residences on Hillcrest Drive, particularly given the presence of intervening topography. Consequently, Coast Guard residential properties on Hillcrest Road would not experience cumulative traffic noise impacts and were not included in Impact NO-8 of the EIR.

### **2.8.5 CONSTRUCTION HOURS AND NOISE MITIGATION PLAN**

#### **Comment**

5. Will the Treasure Island Job Corps Center have an opportunity to review the General Contractor's proposed hours of operation and noise mitigation plan, particularly for deep dynamic compaction and pile driving activities? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.4b]

#### **Response**

As stated in the response in Subsection 2.1.6, Hours of Construction, in Section 2.1, Project Description, of this Comments and Responses document, construction hours must comply with the San Francisco Noise Ordinance, described in EIR Section IV.F, Noise, on pp. IV.F.11-IV.F.12. This ordinance restricts construction activities to the hours between 7:00 a.m. and 8:00 p.m. unless the Director of Public Works of the Director of the Department of Building Inspection has granted a special permit for construction activities outside of these hours.

A copy of the construction contractor's noise mitigation plan would be made available to the Job Corps, with an opportunity to review and comment on it. The Treasure Island Development Authority ("TIDA") would take these comments into account when approving the final noise mitigation plan. TIDA anticipates that a Memorandum of Agreement would be entered into with the Job Corps, establishing construction rules and channels of communication during construction to minimize the impacts of construction-related noise on the Job Corps campus.

## 2.9 AIR QUALITY

### 2.9.1 CONSTRUCTION

#### Comment

Air Quality Levels: The proposed Environmental Impact Report clearly and distinctly states that the projects construction will violate new Bay Area [Air] Quality Management District thresholds for air pollution, with particulate matter smaller than 2.5. Microns. Further clarification as to why this will occur is needed and alternatives presented. Impact AQ-4 page S-29 (*Jorge Garcia*) [4.4]

7. Dormitories at Treasure Island Job Corps Center are identified in the Air Quality report as “sensitive receptors.” Diesel Particulate Matter concentrations/health risks were estimated for residents living in the northwestern part of the island but not the southern part where a significant portion of the construction will occur. Can TIDA complete additional studies to include potential impacts on Job Corps residents and staff? Incremental cancer risk for Phase 2 for residents is right at the threshold for “significant and unavoidable.” (*Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.5]

While staff supports the above referenced attributes that will serve to reduce air pollutants from this Project, staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with Project construction and operation emissions. The San Francisco Bay Area region is currently in non-attainment for state and federal ozone standards and fine particulate matter (PM<sub>2.5</sub>) standards, and for state PM<sub>10</sub> standards. The emissions associated with this Project need to be mitigated to the maximum extent feasible to ensure the Project does not adversely affect the region’s ability to attain health-based ambient air quality standards.

#### Air Quality Mitigation Measure-2

The DEIR states that Air Quality Mitigation Measure-2 (M-AQ-2) requires the project sponsor to commit to converting all construction diesel equipment to EPA Tier 3 engine standards or better, or utilize diesel oxidation catalysts, diesel particulate filters or similar technology *to the extent feasible* at the start of construction, and utilize EPA Tier 4 engine standards for 50 percent of the fleet at the start of construction, increasing to 75 percent by 2015, and 100 percent by 2020, *to the extent feasible*.

District staff recommends “to the extent feasible” be stricken from this clause and M-AQ-2 changed to state that the all construction diesel equipment utilized *shall be* as clean as Tier 3 engine standards, and that Tier 4 engine standards *shall be* 100 percent utilized by 2018. In addition, staff also recommends that diesel generators for construction activity be prohibited as a condition of Project approval.

M-AQ-2 also states that *to the extent feasible*, year 2007 or newer model year haul trucks shall be utilized. District staff recommends that “to the extent feasible” be stricken from this clause, and that the City require use of year 2010 or newer model year haul trucks. (*Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District*) [26.1]

**Response**

**PM-2.5 Emissions**

Impact AQ-4, in EIR Section IV.G, Air Quality, pp. IV.G.36-IV.G.37, and, as pointed out in one comment, also in the EIR Summary Chapter on pp. S.28-S.29, addresses construction-related PM2.5 impacts. Concentrations of PM2.5 would be generated by earth movement, off-road construction equipment, on-road haul trucks, and tug boats that would transport the barges used during construction. PM2.5 would also be generated by airborne fugitive dust made from excavation and other material handling processes.

Mitigation Measure M-AQ-4, on EIR pp. IV.G.37-IV.G.38, identifies all 13 measures suggested by the Bay Area Air Quality Management District (“BAAQMD”) to reduce particulate matter emissions during construction activities. These measures are in addition to Mitigation Measure M-AQ-1, on EIR pp. IV.G.26-IV.G.27, which identifies eight measures to reduce fugitive dust impacts.

Mitigation Measure M-AQ-2, on EIR pp. IV.G.29-IV.G.30, would implement accelerated use of low-emission off-road construction equipment, principally to reduce significant ROG and NOx emissions. It would also reduce PM2.5 exhaust emissions. This measure is revised, as shown in this response under the heading “Mitigation,” below. Given these revisions, an estimate can be reliably made regarding the potential reduction of PM2.5 that could not previously be assumed. Specifically, if 50 percent of the construction equipment used in project development were to operate on Tier 4 engines, as now required by the revised measure, exhaust-related PM2.5 construction emissions would be reduced by approximately 48 percent over what was assumed in Impact AQ-4. Further, if the remaining equipment were to operate on Tier 3 engines, as required by the revised measure, then exhaust-related PM2.5 construction emissions would be reduced by approximately 78 percent over what was assumed in Impact AQ-4. These reductions address only exhaust-related particulate emissions.

Even if all mitigation components relative to fugitive dust PM2.5 were implemented, it remains unlikely that the mitigation would be able to achieve a 65 percent reduction in PM2.5 emissions and resultant concentrations from fugitive (non-exhaust) PM2.5 sources. This is primarily because the most effective mitigation measures, on-site watering and erosion control programs, were already assumed to be implemented and a 75 percent reduction already considered in the PM2.5 dispersion analysis. Therefore, PM2.5 emissions reductions to the level necessary to reduce emissions from these sources to a level below the BAAQMD’s 0.3-microgram-per-cubic-meter significance threshold, as stated on EIR p. IV.G.38, would likely not be achieved. Based on this analysis, even with the implementation of all feasible (BAAQMD-identified) mitigation measures, PM2.5 concentrations would remain a significant and unavoidable impact. This determination considers all feasible mitigation measures and would be a temporary impact for

receptors on Treasure Island who live or work nearest to the construction activities. It is important to note that under BAAQMD guidance this new threshold and its associated impact do not apply to projects for which the Notice of Preparation was published and circulated prior to January 1, 2011. At the December 15, 2010, Board Meeting, the BAAQMD Board of Directors revised the effective date for the risk and hazards thresholds for new receptors from January 1, 2011, to May 1, 2011.<sup>1</sup> However, to provide decision-makers and the public with a conservative analysis, it is identified in the EIR as a significant and unavoidable impact.

All of the Alternatives addressed in Chapter VII of the EIR would result in less overall development on the Islands. With the exception of the No Project Alternative, these Alternatives would primarily reduce the duration of potential construction-related PM2.5 exposure impacts. However, since the same equipment would generally be operated in the same proximities to adjacent sensitive receptors (e.g., an occupied Phase 2 residence adjacent to a Phase 3 construction area), the magnitude of localized PM2.5 concentrations in a given year of peak construction activity would be similar to those of the Proposed Project.

#### Construction Impacts

The Job Corps dormitories would be located adjacent to Phase 2 construction activities as well as residences constructed and potentially occupied during Phase 2. As such, the construction-related diesel particulate matter (“DPM”) impacts described on EIR p. IV.G.34 for occupied Phase 2 residences (Cityside District) would also apply to Job Corps dormitories with some notable differences.

As stated on EIR p. IV.G.34, impacts to Phase 2 occupants during Phase 2 construction could be a cancer risk of greater than 16.8 in one million and would be significant, depending on their location relative to the predominant wind direction. However, this risk estimate includes an age sensitivity factor of 1.7 that increases this risk to account for exposure to children from birth to 16 years of age.<sup>2</sup> Children are not occupants of the Job Corps dormitories. Consequently, the increased cancer risk for adults at the dormitories would be 9.9 in one million (16.8 divided by 1.7). This estimated risk also assumes exposure over the duration of the subsequent 12-year construction period. The average length of time individual Job Corp dormitory occupants reside at the facility is approximately 1.25 years, and the maximum length of time is two years, except

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<sup>1</sup> See the Bay Area Air Quality Management District web site at [www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx](http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx), and at [www.baaqmd.gov/~media/Files/Planning\\_and\\_research/CEQA/Adopted\\_Thresholds\\_Table\\_December\\_2010.ashx](http://www.baaqmd.gov/~media/Files/Planning_and_research/CEQA/Adopted_Thresholds_Table_December_2010.ashx). accessed February 2, 2011.

<sup>2</sup> BAAQMD, *Recommended Methods for Screening and Modeling Local Risks and Hazards Version 1.0*, May, 2010 p. 80. Available online at <[http://www.baaqmd.gov/~media/Files/Planning\\_and\\_Research/CEQA/BAAQMD\\_CEQA\\_Modeling\\_Approach\\_May\\_2010.ashx](http://www.baaqmd.gov/~media/Files/Planning_and_Research/CEQA/BAAQMD_CEQA_Modeling_Approach_May_2010.ashx)> Accessed December 2, 2010.

for students who continue on to Advanced Training through the college program.<sup>3</sup> Therefore, it is unlikely that individual Job Corps dormitory occupants would live at the facility for the full 12-year subsequent construction period. Therefore, Job Corps dormitory occupants would be exposed to less-than-significant construction-related DPM impacts.

### Mitigation

Measure M-AQ-1, on EIR pp. IV.G.26-IV.G.27; Mitigation Measure M-AQ-2, on EIR pp. IV.G.29-IV.G.30; Mitigation Measure M-AQ-3, on EIR p. IV.G.36; and Mitigation Measure M-AQ-4, on EIR pp. IV.G.37-IV.G.38, identify feasible mitigation measures for reducing the severity of construction-related impacts resulting from the Proposed Project. Mitigation Measure M-AQ-5, on EIR p. IV.G.42, identifies feasible mitigation measures for reducing the severity of operational-related impacts resulting from the Proposed Project.

Mitigation Measures M-AQ-2, on EIR pp. IV.G.29-IV.G.30, and M-AQ-3 on p. IV.G.36 are revised as indicated below (deletions are shown in ~~strike through~~ and new text is underlined). These changes have been made in accordance with recommendations in the BAAQMD comment letter. The text changes do not alter the findings of significance for Impacts AQ-2 or AQ-3, either prior to or after mitigation.

#### Mitigation Measure M-AQ-2: Construction Exhaust Emissions

TIDA shall require project sponsors to implement combustion emission reduction measures, during construction activities, including the following measures:

- The contractor shall keep all off-road equipment well-tuned and regularly serviced to minimize exhaust emissions, and shall establish a regular and frequent check-up and service/maintenance program for equipment.
- Off-road diesel equipment operators shall be required to shut down their engines rather than idle for more than five minutes, unless such idling is necessary for proper operation of the equipment.<sup>39</sup> Clear signage shall be provided for construction workers at all access points.

TIDA shall require that, ~~to the extent feasible,~~ project sponsors also engage in early implementation of the following combustion emission reduction measures, during construction activities:

- ~~To the extent feasible,~~ the project shall utilize EPA Tier 3 engine standards or better at the start of construction for all off-road equipment, or utilize Retrofit Emission Control Devices which consist of diesel oxidation catalysts, diesel particulate filters or similar retrofit equipment control technology verified by the California Air Resources Board (“CARB”)

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<sup>3</sup> Email correspondence between Alexandra Galovich, Wilson Meany Sullivan; Michael Tymoff, Mayor’s Office of Workforce and Economic Development; and Wilhelmina Parker, Jobs Corps. Forwarded to Turnstone Consulting on November 18, 2010.

(<http://www.arb.ca.gov/diesel/verdev/verdev.htm>), to the extent that EPA Tier 3 equipment or similar retrofit equipment control technology is commercially available.

- ~~To the extent feasible,~~ the project applicant shall utilize EPA Tier 4 engine standards or better for 50 percent of the fleet at construction initiation, increasing to 75 percent by 2015, and 100 percent by ~~2020~~2018, to the extent that EPA Tier 4 equipment is commercially available.
- ~~To the extent feasible,~~ the project applicant shall utilize ~~2010~~2007 or newer model-year haul trucks, to the extent that they are commercially available.
- Diesel-powered generators for construction activity shall be prohibited as a condition of construction contracts for each Major Phase, unless TIDA has made a finding in writing in connection with the Major Phase that there are no other commercially available alternatives to providing localized power.

There is no change to footnote 39 on EIR p. IV.G.29, cited in the above text.

#### Mitigation Measure M-AQ-3

At the submission of any Major Phase application, TIDA shall require that an Air Quality consultant review the proposed development in that Major Phase along with existing uses and uses approved in prior Major Phases to determine whether the actual project phasing deviates materially from the representative phasing plan. If the Air Quality consultant determines the possible impact of the actual phasing could result in a significant impact on any group of receptors, then TIDA shall require that the applicant implement in connection with that Major Phase best management practices to the extent that TIDA determines feasible to reduce construction emissions in accordance with Mitigation Measures M-AQ-1, M-AQ-2, and M-AQ-4. TIDA shall also determine whether Tier 3 or Tier 4 engines, non-diesel powered generators, or year 2010 or newer haul trucks are commercially available for that phase and, if so, require the use of such engines or haul trucks.

### **2.9.2 FERRY EMISSIONS**

#### Comments

3. Throughout the DEIR, there is reference to diesel ferries. With our constant goal of this becoming a *sustainable* and *green* development, we feel and recommend very strongly that all parties involved explore alternate types of ferries that do not rely solely on diesel fuel and that all parties strongly consider and include wind and/or solar-powered ferries. These alternate ferry types are currently under development and should be ready for use by the time the Island redevelopment is underway. (For more information on alternative power, please reference the August 19, 2010, article in the New York Times, titled Beyond Fossil Fuels: *Finding New Ways to Fill the Tank*, by Matthew L. Wald, which I have attached to my email.) (*Treasure Island/Yerba Buena Island Citizens' Advisory Board*) [8.3]

Vol. 1, IV.G.42, Air Quality: Why is the DEIR assuming ferries operated by diesel fuel? An alternative energy fueled ferry alternative needs to be studied, with minimum or zero impact on air quality. (*Kathrin Moore, San Francisco Planning Commission*) [20.34]

Air Quality Mitigation Measure-5

Mitigation Measure AQ-5 (M-AQ-5) requires all ferries providing service between Treasure Island and San Francisco to be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions.

District staff recommends that the EIR state that all ferries that serve Treasure Island meet the most stringent California Air Resources Board regulations for new vessels. (*Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District*) [26.2]

**Response**

Mitigation Measure M-AQ-5, on EIR p. IV.G.42, is revised as indicated below to address compliance of proposed ferries with State emissions regulations. Commercial harbor craft regulations recently adopted by the California Air Resources Board<sup>4</sup> require new diesel engines on ferries to meet either the Tier 2 or Tier 3 EPA engine standard applicable at the time the vessel is registered. The regulations also require that in-use diesel engines on ferries be brought into compliance with Tier 2 or Tier 3 engine standards according to a schedule based on the age of the engine. Therefore, this updated mitigation measure would also apply if the project sponsors were to initially lease one or more ferries at initiation of ferry service. These text changes do not alter the findings of significance for Impact AQ-5, either prior to or after mitigation.

Mitigation Measure M-AQ-5: Ferry Particulate Emissions

All ferries providing service between Treasure Island and San Francisco shall meet applicable California Air Resources Board regulations. Additionally, all ferries shall be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions. If diesel particulate filters are operated at the proper temperatures, they are reported to achieve up to 90 percent reduction in particulate emissions. However, because the Water Emergency Transit Authority would operate the ferry service, implementation of this measure is outside the jurisdiction of the City and is not assured.

The Proposed Project already includes substantial Transportation Demand Measures. Public transit improvements and further measures to reduce motor vehicle emissions, which alone would be significant, are not available. ROG emissions would result primarily from use of consumer products and architectural coating applications by future residents (non-construction) which could not feasibly be mitigated. Consequently, regional emissions of ROG, NO<sub>x</sub> and PM<sub>10</sub> would be significant and unavoidable under the applicable 1999 BAAQMD Guideline thresholds. Additionally, emissions of PM<sub>2.5</sub> would be significant and unavoidable under the 2010 BAAQMD thresholds.

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<sup>4</sup> California Air Resources Board, Compliance Guideline for the Commercial Harbor Craft Regulation, January 2009, available online at <<http://www.arb.ca.gov/ports/marinevess/documents/chccomplianceguideline.pdf>> , accessed October 20, 2010.

### Diesel Ferry Assumption

The air quality and greenhouse gas analysis in the EIR assumed that ferries would be diesel powered for two reasons. First, diesel-powered ferries are the type of ferry vessels that are predominantly available, particularly if a leased vessel is used early in the development program. Alternative power systems for ferries are still in development. The Water Emergency Transportation Authority (“WETA”, formerly WTA) prepared a working paper in 2002 examining alternative propulsion and fueling technologies.<sup>5</sup> This study examined not only the emissions reductions but also included a cost/benefit analysis of different ferry population systems and fuels. This study examined a variety of options, including non-diesel fuels such as liquefied natural gas, liquefied petroleum gas, methanol, ethanol, and hydrogen. WETA used information from this study to select its current diesel hybrid ferry as the ferry type best suited to be pursued in the development of a prototype for ferry service in the San Francisco Bay Area. Concerns cited for non-diesel fueled ferries ranged from hazard risks of fuel storage, to fuel density and storage limitations that reduce passenger capacity.

While WETA has developed three prototype ferries that are 85 percent cleaner than Tier 3 marine vessel engines, these prototype craft only have space to accommodate 199 passengers,<sup>6</sup> which is insufficient to serve the Proposed Project’s ferry demand. The transportation analysis for the EIR assumed a ferry capacity of 699 passengers. The Proposed Project under the base transit scenario would generate approximately 1.2 ferry trips per hour.

Secondly, WETA’s prototype ferries operate on a blend of ultra-low sulfur diesel and biodiesel. Until this technology becomes further developed to feasibly power the size of ferry needed for the Proposed Project, as a conservative analysis, all ferries were assumed to be diesel powered. Engineers for the project sponsors provided specifications for diesel-powered ferries from which emissions were calculated. If the analysis in the EIR were to rely on an unproven technology or technology not readily available, it could be argued that the emissions calculations and their associated impacts were underreported by the use of unrealistic assumptions. Nothing in the Proposed Project would preclude use of cleaner ferry technologies should their use become feasible for the Proposed Project in the future.

### **2.9.3 IMPACTS AT COAST GUARD FACILITIES**

#### **Comment**

Section IV, page IV.G.31 - Although the USCG properties are not in the Study Area, air quality impacts have been mentioned earlier in the Air Quality section of the DEIR – due to increased

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<sup>5</sup> Available at [http://www.watertransit.org/files/pubs/techPubPresentations/JJMA\\_NewTech\\_altfuels.pdf](http://www.watertransit.org/files/pubs/techPubPresentations/JJMA_NewTech_altfuels.pdf), accessed February 2, 2011.

<sup>6</sup> <http://www.watertransit.org/files/ferryfactsheet.pdf>, accessed October 22, 2010.

traffic on Hillcrest. Are the USCG residences covered in the Yerba Buena Island Receptors listed on this page? (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.20]

**Response**

Residences on Yerba Buena Island were considered in the analysis of construction-related health risk exposure impacts as a receptor entitled “Yerba Buena Island East.” Please refer to the first six pages of EIR Appendix E for figures identifying the location of maximally exposed individual receptors (“MEIR”) on the east side of Yerba Buena Island during each phase of construction. Although these receptors were not specific to Coast Guard residences, they are located on the east side of the Island and representative of potential impacts at Coast Guard residences.

Existing Coast Guard residences located on the east side of Yerba Buena Island would be exposed to elevated DPM concentrations during all construction phases. Maximum incremental cancer risk in this neighborhood would be 16 in one million accounting for an age sensitivity factor for exposure of unborn children through 15 years of age. Adult exposure risk would be 9.5 in one million. These risks would be reduced by over 50 percent by implementation of Mitigation Measure M-AQ-2 as revised in the response in Subsection 2.9.1, Construction, above.

**2.9.4 TRANSPORTATION AIR QUALITY IMPACTS**

**Comment**

... and just the lack of study of the pollution from the cars being forced to wait on Treasure Island Road & Hillcrest Road for the bridge onramps must render this section insufficient for review and will need to be re-done. (*Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation*) [12.3]

**Response**

The Air Quality analysis of the EIR addresses localized operational air quality impacts in Impact AQ-6, pp. IV.G.42-IV.G.49. Air quality modeling of fine particulate matter (PM2.5) concentrations and health risks from diesel particulate matter included bus and passenger vehicle sources on both Treasure Island Road and Hillcrest Road as predicted in the *Transportation Impact Study*. These sources are indicated as purple circles on pp. 15 and 16 of EIR Appendix E, *Air Quality Health Risk Assessment*.

Carbon monoxide concentrations were not modeled along these ramp/roadway segments because roadway volumes for these segments were not as substantial as those for the intersections presented in Table IV.G.6: Estimated Future CO Concentrations at Selected Intersections, on EIR p. IV.G.44. To validate the non-inclusion of the Treasure Island westbound ramp from the carbon monoxide analysis in the EIR, a modeling run was performed for the ramp using the Caline 4 program with year 2030 emission factors for a speed of 5 miles per hour and the peak

hour predicted volume of 1,285 vehicles under existing and worst-case meteorology. The results of the modeling run indicate that no existing receptors would experience an increase in carbon monoxide concentrations. This result is expected because of the predicted improvements in the vehicle fleet as well as fuels<sup>7</sup> and because of the distance of receptors.

## 2.9.5 AIR QUALITY MITIGATION MEASURES

### Comments

8. Would construction of a solid fence around the center add a measure of safety as well as help mitigate the air quality impacts on the center? Would the redevelopment be willing to construct such a permanent structure around the campus? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.6]

In addition to the specific measures above, the City could establish an offsite mitigation program that project sponsor(s) could pay into if on-site construction and/or operation emission reductions cannot lower emissions to the less-than-significant level. (*Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District*) [26.4]

### Response

Localized air quality impacts at the Job Corps campus would occur during Phase 2 construction activities adjacent to the Job Corps site (see the response in Section 2.9.1, Construction, above). These impacts are the result of localized concentrations of DPM and fine particulate matter (PM<sub>2.5</sub>). DPM would be emitted through the exhaust pipes of diesel-powered construction equipment which are typically elevated at a height of eight feet or more; the emissions rise upward because of temperature gradients between the engine chamber and the atmosphere. Consequently, completely surrounding construction areas with a solid fence would not be an effective mitigation tool to curtail localized concentrations of these airborne pollutants. Guidance recently adopted by the BAAQMD includes measures designed to address air pollutant emissions during construction. The measures recommended by the BAAQMD include the requirement to install windbreaks (e.g., trees, fences) on the windward side of actively disturbed areas of construction. This measure has been incorporated into Mitigation Measure M-AQ-4, on EIR pp. IV.G.37-IV.G.38.

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<sup>7</sup> California Air Resources Board, *ARB Almanac 2009*, Chapter 3, pp. 3-16 and 3-17, available online at <<http://www.arb.ca.gov/aqd/almanac/almanac09/pdf/chap309.pdf>>, accessed December 2, 2010.

### Off-Site Mitigation

The BAAQMD has developed a document entitled *Guidance for Lead Agencies to Develop an Off-site Mitigation Program*,<sup>8</sup> which states:

...in performing their review of the project application, the lead agency would determine if the project would result in any air quality impacts above the Air District's thresholds of significance. If any emissions from the project are above the Air District's thresholds of significance, the lead agency would determine the feasibility of applying an offsite mitigation measure to reduce the projects' impacts below the significance level. If determined to be feasible, the lead agency would include the offsite mitigation measure within the environmental document.

As noted in this guidance, it is at the discretion of the lead agency to determine the feasibility of an off-site mitigation measure.

Construction-related emissions would need to offset NOx emissions by 520 pounds per day in 2013 and lesser amounts for years between 2011 and 2018, when use of Tier 4 construction equipment would reduce emission to less-than-significant levels (see EIR p. IV.G.30). To offset operational emissions, off-site emissions of 403 pounds per day of NOx, 561 pounds per day of ROG, 446 pounds per day of PM10, and 43 pounds per day of PM2.5 would need to be eliminated. The BAAQMD has not published specific cost per ton for pollutant mitigation. The Sacramento Metropolitan Air Quality Management District ("SMAQMD"), however, currently uses an emission reduction cost of \$16,000 per annual ton of emissions<sup>9</sup> based on the State's Carl Moyer Incentive program. Using the 561 pounds per day of ROG needed to reduce ROG impacts to a less-than-significant level, the Proposed Project would need to mitigate 102.4 tons of ROG annually. This would require an estimated annual financial commitment of approximately \$1.64 million, assuming a fee program were established that is comparable to the program adopted by SMAQMD. It is likely that the mitigating mechanism would not reduce all pollutants equally and that additional mitigation off-sets would be required to reduce potential residual PM10 and/or NOx impacts, at unknown additional cost. For example, if the mitigating mechanism were to install or replace vapor recovery equipment at an off-site location to reduce ROG emissions from fuels transfer, this reduction would not result in a reduction of NOx emissions and additional offsets would be required to reduce NOx emissions to a less-than-significant level.

The City has not established an off-site air quality mitigation program for any development project, nor has a project funding source been identified that could afford the estimated annual

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<sup>8</sup> [http://www.baaqmd.gov/~media/Files/Planning and Research/CEQA/baaqmd\\_offsite\\_guidance\\_5\\_3\\_10.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/baaqmd_offsite_guidance_5_3_10.ashx), accessed October 22, 2010.

<sup>9</sup> <http://www.airquality.org/ceqa/OperationalMitigationProtocol.pdf>, accessed October 22, 2010.

funding commitment without significantly reducing the ability to fund other public benefits (e.g., affordable housing, transportation, community facilities, and open space) that are key project objectives. The BAAQMD also has not established such a program. There is no guarantee that a program would be successful in reducing emissions of criteria pollutants to less-than-significant levels. Based on the absence of such an adopted program, and the analysis provided above, an off-site mitigation measure is not considered a feasible mitigation measure.

## 2.9.6 CUMULATIVE IMPACTS

### Comment

The increase in air pollution (primarily from cars) and water pollution (from construction and storm water discharge) are downplayed in the DEIR and not adequately considered in the cumulative impacts analysis. We ask that these sections be revised and released for additional review and comment by the public. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.31]

### Response

The Air Quality analysis of the EIR addresses operational air quality impacts in Impact AQ-5, pp. IV.G.38-IV.G.42. Table IV.G.5: Estimated Daily Emissions for the Proposed Project, on EIR p. IV.G.41, presents the air pollutant emissions associated with the Proposed Project including those generated by motor vehicles. These operational air quality impacts are identified in the EIR as significant and unavoidable.

Cumulative air quality impacts are addressed in Impact AQ-9 on EIR pp. IV.G.52 and IV.G.55-IV.G.58. Cumulative impacts related to operational regional air pollutant emissions are identified in the EIR as a significant and unavoidable cumulative impact.

With regard to the Proposed Project's contribution to increased air pollution from vehicles, the Proposed Project consists of high-density, compact residential and commercial development located within walking distance of a Transit Hub. These are intended to maximize walking, bicycling, and use of public transportation, and to minimize the use and impacts of private automobiles.

As discussed in the EIR in Chapter II, Project Description, pp. II.35-II.39 and p. II.51, and Section IV.E, Transportation, pp. IV.E.33-IV.E.47, the Proposed Project includes numerous elements that would reduce motor vehicle trips compared to a similar project without trip reduction elements. Specifically, the air quality impact analysis considers both the Proposed Project's base transit scenario and Expanded Transit Service, which is the Proposed Project with implementation of Mitigation Measure M-TR-2, as discussed in EIR Section IV.E, Transportation. The Proposed Project with the Enhanced Transit Service, in addition to the Reduced Development Alternative, is presented in the EIR as a potential method of reducing

identified operational regional air quality impacts to the degree feasible. Recirculation is not required if new information clarifies, amplifies or makes insignificant modifications to an adequate EIR. In this instance, significant new information has not become available with respect to cumulative air quality impacts that would require recirculation for additional public comment.

See the response in Subsection 2.17.5, Cumulative Impacts, in Section 2.17, Hydrology and Water Quality, of this Comments and Responses document, for a discussion of potential cumulative water quality impacts.

## 2.10 GREENHOUSE GAS EMISSIONS

### 2.10.1 BASELINE ASSUMPTIONS

#### Comment

Another potential traffic impact not adequately analyzed is the contribution of such impact to greenhouse gases and the degradation of air quality. The DEIR applies BAAQMD's second, optional quantitative efficiency threshold of 4.6 MT of CO<sub>2</sub>e per service population per year to the Project. Both the Project and the Project with Expanded Transit Service are analyzed quantitatively (H. Greenhouse Gas Emissions, page IV.H.27). Moreover, the Waste Management Act of 1989 requires local governments to reduce solid waste by fifty percent. There is an inadequate, cross-analysis correlation between the traffic impact sections and the greenhouse gas/air quality sections.

In particular, the analysis of greenhouse contributions falsely assumes that they are reduced because certain (vague) programs and the Project's design will reduce solid waste and transportation contributions to greenhouse gas generation. Indeed, there is no demonstrative science in the DEIR that quintupling the population of TI/YBI would produce a "less than significant" impact on greenhouse gas creation. In addition to the aforesaid items, the DEIR analysis should include a worse-case, greenhouse gas scenario in order to determine the Project's full impacts because solid waste and transportation are fickle habits subject to change by the consumer. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.27]

#### Response

The analysis of greenhouse gas ("GHG") impacts in the EIR uses the guidance and thresholds developed by the Bay Area Air Quality Management District ("BAAQMD"), the local air quality regulatory agency with jurisdiction over the project site. As discussed in EIR Section IV.H, Greenhouse Gas Emissions, p. IV.H.26, a qualitative analysis would require that the lead agency have a qualified GHG Reduction Strategy. While the City and County of San Francisco does have a *Climate Action Plan* and numerous related policies and ordinances that address emissions reductions (see EIR pp. IV.H.19-IV.H.24), at the time the Draft EIR was published it had not formally received acknowledgement from the BAAQMD that its efforts represented a "qualified" GHG Reduction Strategy. Consequently, it was necessary to perform a quantitative analysis of GHG impacts for the Draft EIR. Since publication of the Draft EIR, the City of San Francisco has received acknowledgement from the BAAQMD that its *Climate Action Plan* meets the conditions of a qualified GHG Reduction Strategy.<sup>1</sup> The EIR continues to rely on the project-specific quantitative analysis presented in Section IV.H.

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<sup>1</sup> Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District, letter to Bill Wycko, Environmental Review Officer, October 28, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

The City also proactively seeks to reduce its GHG emissions through implementation of various programs. For example, the City's zero waste program commits to a goal of diverting 75 percent of its waste from landfills by 2010, with the ultimate goal of zero waste by 2020. The Proposed Project would be required to comply with the waste recycling and composting requirements in the City ordinances. The City's Residential Water Conservation Ordinance, as amended in 2009, establishes minimum water conservation standards for new and existing residential buildings. The Commercial and Residential Water Conservation Ordinances are expected to save 4 million gallons per day by 2017, equating to 1,900 metric tons of CO<sub>2</sub>e ("CO<sub>2</sub> [carbon dioxide] equivalents") by 2017.

Under BAAQMD guidance, the selection of the efficiency-based GHG significance threshold is at the discretion of the lead agency and was selected because it is appropriate for larger-scale mixed-use projects that encourage high-density development such as the Proposed Project. The BAAQMD developed this efficiency standard to represent the emissions below which the State and region can accommodate future growth and still meet the requirements and goals of AB32.

With regard to the correlation between the transportation analysis and the air quality and GHG analyses, the number of daily vehicle trips assumed for both air quality and GHG calculations was provided by the transportation consultant from information used to develop the *Transportation Impact Study* for the EIR. These values were then input into the URBEMIS2007 model to calculate mobile GHG emissions. Additionally, daily bus trip estimates were also provided by the transportation consultant and are consistent with the transportation analysis in the EIR. The GHG emissions assume only the base levels of transit are in place, and do not assume reductions associated with implementation of additional transit service through Mitigation Measure M-TR-2, in EIR Section IV.E, Transportation, pp. IV.E.74-IV.E.75.

Regarding solid waste use, as stated on EIR p. IV.H.40, the BAAQMD GHG model ("BGM") was used to calculate GHG emissions from the increase in solid waste generation resulting from the Proposed Project. BGM uses waste disposal rates for the various land uses from values compiled by CalRecycle (formerly the California Integrated Waste Management Board). These rates are likely overestimates since they are based on 1999 data that do not account for the recent increases in percentages of waste that have been diverted from landfills pursuant to AB939, or further diversions that are expected to occur in the future. For example, the City currently diverts 77 percent of its solid waste.<sup>2</sup> Predicted waste generation rates were not adjusted to reflect any project-specific elements or the aggressive waste diversion strategies of San Francisco, and therefore represent a worst case analysis.

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<sup>2</sup> City of San Francisco, Department of the Environment Website [http://www.sfenvironment.org/our\\_programs/programs/overview.html?ssi=3](http://www.sfenvironment.org/our_programs/programs/overview.html?ssi=3), ZeroWaste, accessed December 30, 2010.

### **2.10.2 GEOTECHNICAL STABILIZATION EMISSIONS**

#### **Comment**

Although the DEIR seeks to analyze the effect and possible consequences of a large part of the Project being a man-made/artificial island with poor fill and compaction by proposing mitigation and improvement measures to rectify this inherent problem, including without limitation the possibility of liquefaction resulting in massive structural failures of the Project's improvements, it does not address the environmental impact on the surrounding tidal waters and the generation of greenhouse gases necessary to effectuate such measure's improvements. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.9]

#### **Response**

Construction-related GHG emissions are discussed in EIR Section IV.H, Greenhouse Gas Emissions, on p. IV.H.35. The BAAQMD has not adopted a threshold for construction-related GHG emissions and does not require construction-related emissions to be included in the Project inventory for comparison to its adopted operational GHG threshold. Nevertheless, the EIR includes emission estimates for equipment used to conduct soil stabilization measures as well as truck and barge trips to export and import soil and stabilization materials. Total construction-related GHG emissions were then amortized over the Proposed Project lifetime and included in the total Project-related emissions that were compared to the significance thresholds of the BAAQMD. By including construction emissions in the Proposed Project inventory, Project-related emissions of GHG presented in the EIR represent a conservative estimate of the Proposed Project contribution to the global burden of GHG emissions.

### **2.10.3 GREENHOUSE GAS ANALYSIS DATA AND ASSUMPTIONS**

#### **Comment**

Moreover, based on the accepted current understanding of global warming, green house gases and the economic effects (not to mentioned the distorting demographic effects on the surrounding cities/communities) caused by increased traffic, the proposed mitigation measures and alternatives fail miserably to address those issues. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.17]

#### **Response**

Mitigation measures in EIR Section IV.E, Transportation, are identified to mitigate potential transportation impacts. The transportation measures are not needed to address emissions of greenhouse gases that may affect climate change because, as discussed in EIR Section IV.H, Greenhouse Gas Emissions, the Proposed Project and the Proposed Project with Expanded Transit Service would have less-than-significant impacts with regard to GHG emissions and climate change.

**Comment**

3) SERIOUS INADEQUACIES IN ADDRESSING GREENHOUSE GAS EMISSIONS

The Treasure Island and Yerba Buena Island Redevelopment Plan DEIR makes fundamentally false and deeply flawed assumptions about the severity of greenhouse gas emission impacts and relies on reports and data that are far too old, in establishing those assumptions.

Section IV.H. begins its first paragraph with statements including the following:

“While worldwide contributions of GHGs are expected to have widespread consequences, it is not possible to link particular changes to the environment of California to GHGs emitted from a particular source or location. Thus, when considering a project’s contribution to impacts from climate change, it is possible to examine the quantity of GHGs that would be emitted either directly from project sources or indirectly from other sources, such as production of electricity. However, that quantity cannot be tied to a particular adverse effect on the environment of California associated with climate change.”

This statement is completely false. It is now well established science that global greenhouse gas emissions are accelerating, and are currently so high, that the Earth’s atmosphere already contains sufficient excess parts per million (PPM) of CO<sub>2</sub> to create adverse climate impacts (along with connected adverse social, agricultural and economic impacts) in every state on the planet. No state is, or will be, unaffected. This is especially true when it is recognized that since some impacts of climate change, no matter where they are happening on the Earth, will be sufficiently powerful to negatively impact the global economy, and food production and distribution systems, that it is impossible for California to completely avoid such impacts.

This can be said with certainty, because recent peer reviewed science has clearly established that the planetary atmospheric CO<sub>2</sub> load is causing and will continue to cause adverse impacts unless that load is brought -down- from its current level at around 392 PPM, to be stabilized at or below 350 PPM. Because of this fundamental reality, -all- net increases in greenhouse gas emissions (GHGs) will have adverse impacts on California. This is particularly clear in the case of sea level rise which obviously does not recognize state boundaries in its impacts, and which is even clearly recognized as an immediate problem to the Treasure Island and Yerba Buena Island Redevelopment Plan itself.

This science on CO<sub>2</sub> PPM load is most clearly established by Hansen, et al. 2008, in ‘Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?’ a 20 page document which can be easily read at <http://arxiv.org/ftp/arxiv/papers/0804/0804.1126.pdf>

This report is also further verified, shown to be accurate, and amplified in its importance, through the even more current reporting and data in the previously mentioned ‘Copenhagen Diagnosis’, which again can be read at <http://www.copenhagendiagnosis.org/download/default.html>

To understand its full, very serious, and immediate implications, the 64 page ‘Copenhagen Diagnosis’ should be read in its entirety. Particularly important in this report is the section ‘Abrupt Change And Tipping Points’ which can be found on pages 40-42 of the report. (Note that page 40 of the report itself, begins at page 42 of the full PDF document found at the link noted above.)

Since it cannot be determined at precisely which point CO<sub>2</sub> overload in the atmosphere will result in triggering the serious tipping points noted in both of these reports, only a project which results in actually -reducing- greenhouse gas emissions can be claimed to have ‘less than significant impacts’.

Therefore the DEIR's claims on pages IV.H.44. and IV.H.45 that project greenhouse gas emissions will be 'Less than Significant' are clearly and dangerously false.

Consequently, the entire DEIR section IV.H. 'Greenhouse Gas Emissions' must be extensively and dramatically revised to properly reflect the realities established in these reports.

Furthermore the entire DEIR, as well as the Treasure Island and Yerba Buena Island Redevelopment Plan itself must be extensively and dramatically revised so that they will set forward clear mandates by which the project will begin achieving quantifiable net -reductions- in greenhouse gas emissions by at least 2050 (and beginning to achieve such reductions by 2030 or even earlier is far more prudent and should be an aggressive goal of the project). (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.6]

### **Response**

The introductory sentences in EIR Section IV.H, Greenhouse Gas Emissions, on p. IV.H.1 do not deny the existence of a causal link between GHG emissions and climate change nor the fact that carbon dioxide concentrations have been rapidly increasing over the past several decades. The intent of this introductory passage is to advise the reader that no specific quantity or rate of GHG emissions (e.g., x metric tons per year) from a particular source has been demonstrated to directly represent a cumulatively considerable climate change impact or a measureable increase in ambient global carbon dioxide concentrations, or a specific environmental effect, such as sea level rise.

Significance determinations made in Section IV.H, Greenhouse Gas Emissions, of the EIR, specifically those on pp. IV.H.44-IV.H.45, are based on the guidance and thresholds developed by the BAAQMD, the local air quality regulatory agency with jurisdiction over the project area. These thresholds, as well as the methodologies used to determine project-related GHG inventories, are based on guidance adopted by the BAAQMD in June 2010,<sup>3</sup> approximately one month prior to publication of the Draft EIR, and therefore are quite recent. No revisions in the thresholds are necessary.

The BAAQMD has adopted a quantitative significance threshold of 4.6 metric tons per service population per year to assess GHG impacts.<sup>4</sup> This quantitative threshold was based on the goals and programs of Assembly Bill 32 ("AB 32") and the *Climate Change Scoping Plan* that address climate change in California, not on the resulting changes in climate or carbon dioxide concentrations.<sup>5</sup> The basic goals of AB 32 are to reduce GHG emissions throughout California to

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<sup>3</sup> BAAQMD, *CEQA Air Quality Guidelines*, June 2010, available at [http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines\\_June%202010.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_June%202010.ashx)

<sup>4</sup> BAAQMD, *California Environmental Quality Act Guidelines Update, Proposed Thresholds of Significance*, May 3, 2010, pp. 14-23.

<sup>5</sup> BAAQMD, *California Environmental Quality Act Guidelines Update, Proposed Thresholds of Significance*, May 3, 2010, pp. 14-23.

1990 levels by the year 2020 (see EIR p. IV.H.12); AB 32 is discussed in more detail later in this response.

In California, AB 32 requires the California Air Resources Board (“CARB”) to adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state reduces GHG emissions enough to meet the cap. AB 32 also includes guidance on instituting emissions reductions in an economically efficient manner, along with conditions to ensure that businesses and consumers are not unfairly affected by the reductions. Using these criteria, to reduce statewide GHG emissions to 1990 levels by 2020 would represent an approximate 25 to 30 percent reduction in current emissions levels. As stated earlier, the BAAQMD has adopted a quantitative significance threshold of 4.6 metric tons per service population per year to assess GHG impacts. This quantitative threshold was developed based on consistency with AB 32 and the goals and programs of the *Climate Change Scoping Plan*, which were developed to address climate change in California. The Proposed Project emissions would be consistent with the targets of AB 32, as discussed on EIR p. IV.H.45, and would not be required to achieve more aggressive targets to demonstrate a less-than-significant GHG impact.

EIR pp. IV.H.2-IV.H.9 provide background information on GHG emissions and climate change based on data sources ranging primarily from 2006 through 2010.

The potential use of a net zero threshold is addressed in the California Air Pollution Control Officers Association (“CAPCOA”) document *CEQA and Climate Change*.<sup>6</sup> CAPCOA identifies the net zero threshold as one of eight significance thresholds that might be potentially adopted by an air quality district or lead agency. Two BAAQMD staff were among the principal authors that participated in the development of the CAPCOA document. The BAAQMD chose not to adopt a net zero threshold, choosing instead to adopt a threshold of significance based on AB 32 goals; this was applied in Section IV.H of the EIR.

Based on the discussion above and the content of the GHG section of the EIR, the analysis of GHG impacts contained in the EIR supports a less-than-significant finding with regard to GHG emissions, as it is based upon the most recent applicable thresholds and methodologies published by the regulatory agency with jurisdiction over the project site.

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<sup>6</sup> California Air Pollution Control Officers Association, *CEQA and Climate Change*, 2008, pp. 27-30. Available at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>

**Comment**

2) Establishing that all open space, wildlife habitat, gardening and farming areas in the project area must be carefully designed to achieve aggressive and rapid soil building which will progressively and permanently sequester large amounts carbon from the atmosphere. The actual methods by which such soil carbon sequestration can be achieved are extensive and too numerous to specify in these remarks, however a web search for the combined terms ‘permaculture’ and ‘carbon farming’ will produce a plethora of examples by which to model a successful plan. A similar search for the term “keyline agriculture” will produce similar results which detail one of the most promising methods for such success. The ‘Land Use’, ‘Transportation’, ‘Greenhouse Gas Emissions’, ‘Recreation’, ‘Biological Resources’, ‘Hydrology and Water Quality’, and ‘Agricultural Resources’ sections of the DEIR must each be revised to mandate such changes in the Treasure Island and Yerba Buena Island Redevelopment Plan, so that the project will be able to effectively achieve the establishment of ‘Less than Significant’ impacts on greenhouse gas emissions. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.8]

**Response**

EIR Section IV.H, Greenhouse Gas Emissions, addresses carbon sequestration resulting from proposed landscaping changes that would occur with the Proposed Project. Specifically, EIR pp. IV.H.34-IV.H.35 contain a subsection that discusses the predicted sequestration of 22 metric tons (“MT”) per year of CO<sub>2</sub>e, which considers relocation of 100 trees on Treasure Island, removal of all of the remaining 1,677 existing trees on all of Treasure Island and the developed areas of Yerba Buena Island, and the planting of 6,000 new trees, as proposed as part of the Project. Additionally, this section of the EIR takes into account that proposed athletic fields would also sequester carbon and concludes that there would be a net GHG benefit even after consideration of lawn maintenance activities. Athletic fields are predicted to sequester 34 MT per year of CO<sub>2</sub>e. Total vegetation sequestration from trees and grass would total 56 MT of CO<sub>2</sub> annually. Other landscape plantings (shrubs, etc.) would also sequester carbon, but would result in only a marginal increase relative to existing plantings.

EIR Section IV.H identified less-than-significant impacts related to greenhouse gas emission and climate change. Consequently, additional measures to sequester carbon in open space and farming management techniques are not required, although plants that are particularly successful at sequestration may be selected as part of the development of landscaping for the open spaces and other areas of the Islands.

**Comment**

I’m not positive in my mind that that linkage has been properly explored or considered, SB375, all of the other environmental acts, as far as cutting down on greenhouse gas emissions. Everything else involved in that area of the environment I know has been looked at, but I think they will become, at least in my mind, more serious when we get to this 15 or 20 or longer build-out of the project itself. (*Ron Miguel, San Francisco Planning Commission*) [TR.25.2]

**Response**

As discussed in EIR Section IV.H, Greenhouse Gas Emissions, on EIR p. IV.H.13, SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (“MPOs”) to adopt a Sustainable Communities Strategy or alternative planning strategy that will prescribe land use allocation in the MPO’s regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks for 2020 and 2035. Since publication of the Draft EIR, CARB formally adopted targets on September 23, 2010. For the San Francisco Bay Area, the targets are a 7 percent reduction from passenger vehicles compared to 2005 levels by 2020 and 15 percent by 2035. The MPOs must now begin the process of developing Sustainable Communities Strategies that meet the targets set out by CARB, or if it is not possible for MPOs to meet the targets, the MPOs must prepare an Alternative Planning Strategy that shows how the target could be met. The process initiated by SB 375 is one that will continue to develop over the next several years and will be implemented by planning agencies in conjunction with CARB.

The regional housing needs assessment prepared pursuant to SB 375 is expected to redirect growth to already urbanized areas in the region. Therefore, SB 375, through its Sustainable Communities Strategy, will likely require the City of San Francisco to provide a larger share of new housing in the region. Concentrating growth in urban areas will reduce vehicle miles travelled in the region and the associated GHG emissions.

EIR Section IV.H addresses the impacts of the Proposed Project relative to its generation of GHG emissions and its consistency with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. The significance criteria used to assess these impacts are those adopted by the BAAQMD in June 2010. The supporting document the BAAQMD prepared to justify the development of these thresholds states:<sup>7</sup>

GHG CEQA significance thresholds recommended herein are intended to serve as interim levels during the implementation of the AB 32 Scoping Plan and SB 375, which will occur over time. Until AB 32 has been fully implemented in terms of adopted regulations, incentives, and programs and until SB 375 required plans have been fully adopted, or the California Air Resources Board (ARB) adopts a recommended threshold, the BAAQMD recommends that local agencies in the Bay Area apply the GHG thresholds recommended herein.

The analysis of GHG impacts in the EIR applied BAAQMD significance thresholds, which were developed as interim assessment levels until plans to be developed under SB 375 are fully

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<sup>7</sup> BAAQMD, CEQA Guidelines Update, Proposed Thresholds of Significance, May 3, 2010, p. 9. available at: [http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Proposed\\_Thresholds\\_Report\\_%20May\\_3\\_2010\\_Final.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Proposed_Thresholds_Report_%20May_3_2010_Final.ashx), accessed October 27, 2010.

adopted. Therefore, the analysis contained in the EIR, which also incorporates vehicle miles travelled within the region and transit assumptions of the Proposed Project, addresses the linkage between density, transportation and SB 375 to the degree feasible at the present time.

#### **2.10.4 ENERGY AND GREENHOUSE GASES – IMPACTS OF STORMWATER AND WASTEWATER DISCHARGE**

##### **Comment**

In the case of Treasure Island, we assume that levees will protect infrastructure that lies below sea level; in that case, however, the discharge of effluent will be more difficult and energy intensive; this is a near-term impact that must be analyzed in this document, particularly in terms of its energy use and GHG emissions.

*Recommendation; include increased GHG emissions due to sea level rise in GHG calculations (Jennifer Clary, President, San Francisco Tomorrow) [38.38]*

##### **Response**

The GHG analysis in the EIR addressed operational GHG emission impacts in Impact GHG-1, in EIR Section IV.H, Greenhouse Gas Emissions, on EIR pp. IV.H.44-IV.H.45. Table IV.H.3: Emissions of GHGs from the Proposed Project, on EIR p. IV.H.36, presents the GHG emissions associated with the Proposed Project, including those generated by increased electricity demand which account for approximately 1.5 percent of total project GHG emissions.

The improvements included in the Proposed Project for flood protection and to accommodate sea level rise do not rely on levees, as explained in the responses in Subsection 2.17.1, Sea Level Rise, in Section 2.17, Hydrology and Water Quality, of this Comments and Responses document. The perimeter berm around Treasure Island would be raised where necessary to prevent significant wave overtopping, and the ground level of the development portion of Treasure Island for buildings and infrastructure would be raised to accommodate up to 36 inches of sea level rise (see also EIR Section IV.O, Hydrology and Water Quality, pp. IV.O.29-V.O.35).

As stated on EIR p. IV.H.38, the Proposed Project's electrical GHG emissions were calculated based on energy demand estimates contained in the 2009 Treasure Island Development Energy Study.<sup>8</sup> This study contains the results of an analysis undertaken to estimate building and site energy use for the Treasure Island/Yerba Buena Development Program. The analysis also defines profiles for this energy use, identifying how much energy is used annually.

Specifically, pp. 18 and 19 of the Energy Study account for infrastructure energy from potable water pump stations, sanitary sewer pump stations, and storm water pump stations. Stormwater pumping energy estimates are conservative in that they assume constant pump operation (8,760

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<sup>8</sup> ARUP, *TICD Treasure Island Development Energy Study*, Final, December 2009. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

hours per year), whereas they would more typically be operating only during periods of high tides when gravity drainage would not be adequate. With future potential sea level rise, the durations when pumps would operate would increase, but pumps would still not be under constant operation. Because of this conservative assumption, the potential additional energy demand that may be required for operation of effluent outfalls if they are affected by sea level rise is accounted for in the analysis of GHG emissions in the EIR.

## 2.11 WIND AND SHADOW

### 2.11.1 WIND IMPACTS

#### Comment

10. The wind studies indicate that the only location on the island where there will be an increase in winds exceeding prescribed comfort levels will be at the southeast corner of Education Building 367. An exterior stairwell and parking lot are located here. Would there be a wind tunnel effect in the exterior corridor of Building 367 from 45 mph winds? What measures will be taken to protect staff and students who park in the lot? This area is a busy pedestrian area on the campus; what measures will be taken to protect staff and students as they walk to and from the building? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.8]

#### Response

The comment states that there would be an increase in winds that exceed prescribed comfort levels at the southeast corner of Education Building 367 on the Job Corps campus and asks what measures will be taken to protect pedestrians in this area. Pedestrian comfort was assessed as part of a wind tunnel test conducted for this EIR. As shown in Table IV.I.1: Wind Speeds Exceeded 10 Percent of the Time – Existing and Proposed Project, in EIR Section IV.I, Wind and Shadow, on p. IV.I.38, and as discussed in the third bullet point on p. IV.I.50, equivalent wind speeds at the southeast corner of Education Building 367 on the Job Corps campus (Test Point No. 12) currently exceed the pedestrian comfort criterion of 11 mph and would continue to do so after implementation of the Proposed Project. Equivalent wind speeds at Test Point No. 12 would increase from 16 mph to 19 mph. At 10 other locations on the Job Corps campus (Test Points No. 8, 9, 10, 11, 13, 14, 15, 16, 17, and 28), equivalent wind speeds would decrease. Overall, the wind conditions on the Job Corps campus would improve with implementation of the Proposed Project.

The wind tunnel test conducted for this EIR also assessed the potential for hazardous winds. As shown in Table IV.I.2: Wind Hazards – Existing and Proposed Project, on EIR p. IV.I.43, and as discussed in the third bullet point on EIR p. IV.I.47, existing wind speeds on the Job Corps campus are already high at 34 mph and would remain high with implementation of the Proposed Project. Equivalent wind speeds at Test Point No. 12 (the southeast corner of Building 367, at 5th Street and Avenue C) would increase from 34 mph to 45 mph. The exterior corridor of Building 367 and the adjacent parking lot would continue to be very windy. At this location, the wind hazard criterion of 34 mph would be exceeded for a total of 15 hours per year, so there would not be a constant or continuous wind tunnel effect. As discussed in the third bullet point on EIR p. IV.I.50, while implementation of the Proposed Project would create a new wind hazard at Test Point No. 12, it would eliminate 10 existing wind hazards at Test Points No. 8, 9, 10, 11, 13, 14,

15, 16, 17, and 28. Thus, as a whole, hazardous wind conditions on the Job Corps campus would improve.

As required by Mitigation Measure M-WS-3, on EIR pp. IV.I.51-IV.I.52, wind speeds on Treasure Island would be monitored by a qualified wind consultant throughout the 15- to 20-year construction period, and areas where potentially hazardous winds are likely to occur would be identified. Potentially hazardous winds are those exceeding an equivalent wind speed of 26 mph for more than a single full hour per year. As the Proposed Project is built out, the project sponsors would be required to implement measures designed to minimize pedestrian exposure to hazardous winds in these areas. The measures could include placing weighted warning signs in appropriate locations, identifying alternate pedestrian or bicycle routes, and installing landscaping or semi-permanent windscreens to provide shelter from the wind.

While Mitigation Measure M-WS-3 would apply during the construction period, Mitigation Measure M-WS-4, on EIR pp. IV.I.56-IV.I.60, would require ongoing review and mitigation of hazardous wind impacts during the building design and review process. Prior to design approval of each building, a qualified wind consultant will review and compare the exposure, massing, and orientation of the proposed building to the model that was tested in the wind tunnel. If the qualified wind consultant concludes that the proposed building would not create a new wind hazard or contribute to a wind hazard that was identified in the wind tunnel test conducted for this EIR, then no further review would be required. If the qualified wind consultant concludes that the proposed building could create a new wind hazard or contribute to a wind hazard that was identified in the wind tunnel, then one of two options would be implemented. The consultant could propose changes in building design, building orientation, or measures such as the addition of street furniture (bus stop shelters, vending kiosks) or landscaping if such measures would prevent the proposed building from creating a new wind hazard or contributing to a preexisting wind hazard. In the event that such measures would not prevent the proposed building from creating a new wind hazard or contributing to a preexisting wind hazard, the consultant could determine that additional wind tunnel testing would be required. Following a wind tunnel test, the consultant could propose design changes or the addition of street furniture or landscaping if such measures would prevent the proposed building from creating a new wind hazard or contributing to a wind hazard.

Thus, Mitigation Measures M-WS-3 and M-WS-4 would provide for detailed wind analysis at the engineering design level and for site-specific mitigation during construction and operation of the Proposed Project. These measures would apply to project buildings that have the potential to contribute to the preexisting wind hazard at Building 367. Where necessary and feasible, implementation of Mitigation Measures M-WS-3 and M-WS-4 would result in mitigation actions that could include changing building designs or orientations, installing permanent or semi-permanent windscreens to provide shelter from the wind, installing or modifying landscaping to

provide shelter from the wind, and/or identifying alternate pedestrian or bicycle routes. Such engineering analysis cannot be performed at this time. Rather, such analysis must be performed at the time specific building designs that may affect the existing wind conditions at Building 367 are proposed, since the resulting wind hazard is in part a function of the specific design of proposed buildings.

As discussed on EIR pp. IV.I.50-IV.I.60, it is possible that not all wind hazards would be eliminated even with implementation of Mitigation Measures M-WS-3 and M-WS-4. For this reason, the EIR states that the Proposed Project's wind impacts would be potentially significant and unavoidable.

### 2.11.2 SHADOW IMPACTS

#### Comment

According to the DEIR, shadows from the Proposed Project would impact the existing open spaces and recreation areas in the Job Corps campus, a federally owned property. It also concludes that shadows from the Proposed Project would impact 16 of the 19 parks and open spaces proposed as a part of the project, as well the proposed 7 individual neighborhood parks (to be called collectively the Cityside Neighborhood Park). The DEIR then goes through the approximately 27 total areas of parks and open spaces one by one and concludes that shadows on any individual park or open space would not be significant.

#### **Please respond to each the following questions/comments:**

- Even though the DEIR concludes that the shadows cast by the Proposed Project on the open space and recreational areas, including those within the federal Jobs Corps area, would not be *individually* significant, how can the DEIR conclude that shadows from the Proposed Project on all but 3 of the approximately 27 parks/open space areas on TI and YBI, when considered *cumulatively*, would not be a significant impact?
- The Proposed Project would create a brand new island suburb. The DEIR states that the existing buildings do not cast shadows on the existing parks and open spaces. Please explain why the proposed new buildings cannot be located and designed so that they will not cast shadow on substantially all of the parks and open spaces on TI? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.73]

#### Response

The comment does not address the adequacy or accuracy of the EIR but asks why the proposed buildings cannot be located and designed to avoid casting shadows on the parks and open spaces. In the Northern Hemisphere, building shadows generally fall to the west in the morning, to the north in the middle of the day, and to the east in the late afternoon and early evening. The proposed buildings would have to be located primarily on the northern and eastern portions of Treasure Island, with the parks and open spaces located primarily on the southern and western portions of Treasure Island, to avoid casting shadows on the parks and open spaces. According to the project sponsors, the proposed buildings are located on the southern and western portions of

the island for the following reasons: In order to form a cohesive community, the proposed buildings are centered around the existing historic buildings on the southern portion of the island that would be retained and reused as part of the Proposed Project. The southern portion of the island is naturally higher than the northern portion, which makes it less susceptible to the potential impacts of sea level rise. In addition, the southern and western portions of the island rest on the original sand shoal/dense rock layer that was later covered with fill to create Treasure Island. The sand shoal/dense rock layer is the most suitable location for seismic stabilization and the construction of the proposed buildings (see Figure 1.3.c: Best Soil Capacity, on p. 14 of the draft *Treasure Island and Yerba Buena Island Design for Development*, and Figure 2-1: Preconstruction Conditions, in Appendix C-1: Geotechnical Conceptual Design Report Treasure Island, of the *Treasure Island Infrastructure Plan*).

The comment questions how the EIR can conclude that the Proposed Project would not have a significant shadow impact even though it would cast shadow on 24 of 27 parks and open spaces when considered collectively. The significance criteria discussed in EIR Section IV.I, Wind and Shadow, on EIR p. IV.I.3 relate to shadows that would affect, in an adverse manner, the use of any park or open space under the jurisdiction of the Recreation and Park Commission, or shadows that would substantially affect the usability of other existing publicly accessible open space or outdoor recreation facilities or other public areas. As noted on EIR p. IV.I.3, the Proposed Project would not create any shadow impacts on parks or open space under the jurisdiction of the Recreation and Park Commission. Furthermore, the Proposed Project involves the creation of a new network of open spaces and recreation facilities. Limited areas of existing publicly accessible open spaces in their present condition would remain with implementation of the Proposed Project (Job Corps campus, school open space, portions of Yerba Buena Island), and the EIR, on p. IV.I.19, finds that the Proposed Project's shadow impacts would not substantially affect their usability.

Typically, shadow analyses focus on new building shadows on existing parks and open spaces. In the case of the Proposed Project, the buildings, parks, and open spaces have been designed together as part of a master-planned community (see Section T.11, Public Open Space Framework, on p. 61, of the March 5, 2010 draft *Treasure Island and Yerba Buena Island Design for Development*). For informational purposes, the EIR analyzes the Proposed Project's shadow impacts on the proposed parks and open spaces to determine how their usability would be affected.

The significance criteria do not use a number or a percentage of parks that are shadowed in order to determine the significance of a project's shadow impacts; they focus on the usability of parks and open spaces. Analyzing the Proposed Project's shadow impacts on all of the parks and open spaces in a collective manner would not provide meaningful information. The various types of proposed parks and open spaces to be developed would be used for different activities, so

shadows would affect the usability of the various parks in different ways. For example, the usability of the Sports Park would be affected by shadows in a different manner than shadows on the wetlands. As discussed on EIR pp. IV.I.23-IV.I.24, parks and open spaces with similar types of activities are grouped together and analyzed collectively. Based on the relevant significance criterion discussed on EIR p. IV.I.3, and as discussed on EIR pp. IV.I.5-IV.I.25, the Proposed Project would not substantially affect the usability of publicly accessible open space, outdoor recreation facilities, or other public areas.

## 2.12 RECREATION

### 2.12.1 PUBLIC OPEN SPACE

#### Comments

In no section of the DEIR do you find mention of Public Open Space and/or its environmental impact, positive or negative.

While we understand that the substantial downturn in the housing market complicates the City's and the project applicant's ability to provide improved access during the initial stages of construction, we believe that the DEIR should specifically describe incremental access and phasing of Public Open Space and Facilities. (*William Robberson, President, San Francisco Boardsailing Association*) [27.2]

- 3) Why does the DEIR not provide specific project scope for Public Open Space and/or its environmental impact, positive or negative? (*William Robberson, President, San Francisco Boardsailing Association*) [27.5]

#### Response

Public open space and potential environment effects of public open space are discussed in a number of places in the EIR. The public open space on Treasure Island and Yerba Buena Island proposed for use by residents of San Francisco and the region is discussed under the project sponsors' objectives in EIR Chapter II, Project Description. As stated on EIR pp. II.5-II.6, the Proposed Project is intended to "provide a comprehensive new regional waterfront system of parks and public open spaces that is programmed with a variety of uses, including recreational, passive open space, arts, cultural, and educational uses, and that establishes the Development Plan Area as a regional destination; provide a high-quality public realm, including a pedestrian and bicycle-friendly environment with high design standards for public open spaces, parks, and streetscape elements; and create an organizational structure that provides for high-quality development, operations and maintenance of parks and open space." Proposed open space is also discussed on EIR pp. II.22-II.24 and pp. II.29-II.31. The 300 acres of open space included in the Proposed Project are described and analyzed in EIR Section IV.J, Recreation, on pp. IV.J.12-IV.J.16, with more detail provided in Table IV.J.1: Proposed Parks and Open Space, on pp. IV.J.13-IV.J.14, for each of the proposed parks and open spaces identified on Figure IV.J.1: Proposed Open Space, on p. IV.J.15.

Although management and operation of these Treasure Island Development Authority (TIDA)-owned recreational resources would not be under the jurisdiction of the San Francisco Recreation and Park Department (see EIR pp. IV.J.3 and IV.J.16), the development of 300 acres of recreational areas and open space would be a notable public benefit, as it would augment the recreational facilities and open space currently available in San Francisco and assist in meeting the City's identified shortfall of athletic fields (see pp. IV.J.8 and IV.J.19).

Information about existing recreational resources on the Islands and potential open space impacts of the Proposed Project is provided in EIR Section IV.J, Recreation. As discussed on EIR pp. IV.J.11-IV.J.26, the Proposed Project would result in less-than-significant impacts on the physical appearance or structural integrity of existing recreational resources, as well as on access to these resources, both during the construction phases and after buildout when the facilities planned in the Proposed Project are fully operational.

The phasing of the 20-year project is described in EIR Chapter II, Project Description, on pp. II.79-II.82. Important recreation and open space facilities expected to be developed in each phase include the following:

- **Phase 1:** Development of the backbone infrastructure; initiation of the bicycle and pedestrian network; and construction of the Ferry Terminal with the Waterfront Plaza.
- **Phase 2:** Development of the southern portion of Cityside Waterfront Park; construction of the Clipper Cove Promenade along the southern edge of Treasure Island and the Sailing Center improvements; and renovation or reconstruction and reopening of Treasure Island school, including 8 acres of open space (in addition to the 300 acres included in the Proposed Project).
- **Phase 3:** Development of the linear park (Eastside Commons) and portions of Eastern Shoreline Park; renovation of Building 1 open space (Building 1 Plaza and Marina Plaza); development of the regional sports complex on Treasure Island; and development of the stormwater wetlands on Treasure Island.
- **Phase 4:** Development of the remaining open space, including development of the remaining portion of the Cityside Waterfront Park; development of the Great Park on Treasure Island (Northern Shoreline Park, and the Wilds); development of the Cultural Park and museum; development of the Urban Agricultural Park; and development of Pier 1 facilities on Treasure Island; and development of the Senior Officers' Quarters Historic District and landscaping improvements on Yerba Buena Island.

As noted on EIR p.II.79, actual project phasing could vary in response to market conditions and other factors. However, the Schedule of Performance attached to the proposed Disposition and Development Agreement for the Proposed Project would require public open space amenities to become available commensurate with development. This would ensure that even if the phasing changes, the public benefits associated with the Proposed Project, including open space and recreation, would be delivered throughout the Proposed Project's buildout.

As residential units are developed, and neighborhood districts are built on the Islands, these units would have full access to recreation and open spaces completed during preceding phases and the spaces built during concurrent phases as they are completed.

Construction-related impacts associated with the development of the 300 acres of recreational areas and open space would be less than significant. The proposed project's temporary construction impacts on traffic, noise, air quality, and hazards are evaluated in EIR Section IV.E,

Transportation, on pp. IV.E.67-IV.E.71; in EIR Section IV.F, Noise, on pp. IV.F.14-IV.F.20; in EIR Section IV.G, Air Quality, on pp. IV.G.24-IV.G.38; and in EIR Section IV.P, Hazards and Hazardous Materials, on pp. IV.P.39-IV.P.46, respectively. Also, in each topic section, a management plan, regulatory requirements, or mitigation measures have been identified to minimize the potential impacts, i.e., construction traffic management plan, construction noise and vibration reduction/muffling measures, standard dust control and enhanced combustion emission reduction measures, air quality consultation at each major phase of construction, and soil and groundwater management plans. As part of the last phase of construction, the northern portion of Treasure Island where the majority of the existing residential units are located would be deconstructed and the area would be redeveloped with the Northern Shoreline Park, and the Wilds.

### 2.12.2 ACCESS

#### Comments

Section IV, page IV.J.8 - *Bay Plan Map No. 4 Policy 23* that encourages “redevelopment of the portion of Yerba Buena Island south of the San Francisco-Oakland Bay Bridge (“Bay Bridge”) for recreational use when it is no longer owned or controlled by the U.S. Coast Guard,” is mentioned. To be clear the USCG does not have any current or long-term plan to vacate its interests in this area of YBI. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.21]

In addition, mandates of the McAtteer- Petris Act provide “maximum feasible public access consistent with the project” to apply to all and interim stages of construction as well. Presently, windsurfers, fishermen, walkers, and kayaks use the levee road and launch from the Island. We think that those users should be able to have improved use of the existing facilities, which can be accomplished without any construction, but merely by reopening the parking lot adjacent to the launching ramp. Such options should also be address[ed] in the DEIR. (*William Robberson, President, San Francisco Boardsailing Association*) [27.3]

- 4) Why does the DEIR not specifically describe “maximum feasible public access consistent with the project” to apply to all and interim stages of construction, including incremental access and phasing of all Public Open Space and Facilities during project development?

In closing, the DEIR does not include the specific depiction of public access that had been agreed upon in earlier versions of the plan. While that detail is included in the *D4D*, plans and graphics should be part of the Final EIR. The Final EIR should make it clear that part of the long term plan for the 300 acres of parkland is the specific provision for continued and improved access to the water. (*William Robberson, President, San Francisco Boardsailing Association*) [27.6]

#### Response

A discussion of the existing recreational resources on the Islands, a listing of the applicable regulatory controls, and an impact analysis of the Proposed Project on recreational areas and public open space are provided in the EIR in Section IV.J, Recreation. Potential conflicts with applicable statutes, plans, and policies related to environmental issues are identified in EIR

Chapter III, Plans and Policies, including the McAteer-Petris Act and the *San Francisco Bay Plan* (“*Bay Plan*”).

The portion of Yerba Buena Island under the jurisdiction of the United States Coast Guard (“USCG”) is outside the Project Area. The *Bay Plan* Map No. 4, Policy 23 is correctly cited on EIR p. III.10, and the USCG’s future plans to remain on Yerba Buena Island are noted. The EIR does not assume that any open space or recreational uses would be developed on USCG property.

The McAteer-Petris Act identifies water-oriented recreation and public assembly as water-oriented land uses along the Bay shoreline that are essential to the public welfare of the Bay Area. It further states that the *San Francisco Bay Plan* finds that existing public access to the shoreline and waters of the San Francisco Bay is inadequate and that maximum feasible public access, consistent with a proposed project, should be provided. The Act does not specifically include a requirement to provide public access to water-oriented recreation and public assembly through all interim stages of construction. Although access to the northern shoreline for recreational purposes has been restricted at various times during the Navy’s remediation activities, both the Navy and TIDA have worked with interested parties to provide interim access that is not in conflict with the Navy’s remediation activities, and that does not result in disturbances to existing residential tenants. The existing arrangement for interim access to the boardsailing and boat launch facility at the north end of Treasure Island allows for parking in the residential area and pedestrian access to the boat launch area via the green space between residential buildings. This interim access to recreational uses of the Bay would be maintained during project construction if it is feasible to do so. To clarify this issue in the EIR, the following text is added after the fifth sentence of the first full paragraph on p. II.9 of Chapter II, Project Description (new text is underlined):

Although the Navy has temporarily restricted access to portions of the northern shoreline for remediation activities, interim access to the perimeter pedestrian path and the boat launch is allowed for launching recreational watercraft, e.g. boardsailing and kayaks.

Additionally, Mitigation Measure TR-1, Construction Management Plan, is revised to address interim access to recreational uses. Please see the response in Subsection 2.12.1, Public Open Space, above, for this text change.

The McAteer-Petris Act is discussed on EIR pp. III.9-III.11. The proposed recreation and public access features of the Proposed Project were reviewed against the Act and the policies in the *Bay Plan* prepared by BCDC pursuant to the Act, and no inconsistencies were found. This finding is based on the fact that the Proposed Project would provide continuous public open space along the shoreline and water access via a perimeter pathway on Treasure Island. The perimeter path on Treasure Island would be designed to satisfy the design requirements for the Bay Trail (see EIR Section IV.J, Recreation, p. IV.J.16). This perimeter pathway would link the future Cityside

Waterfront Park, Northern Shoreline Park, Eastern Shoreline Park and Pier 1, and Clipper Cove Promenade. A mixed-use Class I path along the causeway would connect the open spaces on Yerba Buena Island with those on Treasure Island and would also provide controlled public access down to Clipper Cove Beach. The Proposed Project also includes a circulation system that would allow residents, on-site employees, and visitors to access all parts of the Islands' recreational network via the pedestrian and bicycle networks and public transit. The Proposed Project also includes a fare-free on-island shuttle with stops at major open space destinations, with possible extended routes to more distant open space destinations such as the Wilds and the Senior Officers' Quarters Historic District on both islands on weekends. Parking areas such as the one proposed at the Northern Shoreline Park would be provided at strategic locations to support activities such as kayaking, canoeing, sailboarding, sculling, rowing, or car-top sailing.

The existing recreational access point for boardsailing and other water-oriented recreation is an existing boat ramp at the north end of Treasure Island adjacent to the existing residential area (see EIR p. IV.J.4). Access to the recreational access point and nearby parking as well as the pedestrian pathway along the northern shoreline has been limited by the Navy and TIDA due to remediation activities in the area. This site is currently accessed under a special interim arrangement with the Navy and TIDA. Recreationalists are able to park along North Point Drive or Bayside Drive in the residential complex on the north end of the Treasure Island to access the perimeter pathway, preferably in front of unoccupied residential buildings to minimize disruption to existing tenants.

To help ensure that access to recreation and open space uses would be provided during construction phases, Mitigation Measure M-TR-1, Construction Traffic Management Plan, is revised. The following text is added to the first sentence of the last paragraph on EIR p. IV.E.69, continuing on p. IV.E.70 (new text is underlined):

The Plan shall disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation on the Islands is maintained to the extent possible, with particular focus on ensuring pedestrian, transit, and bicycle connectivity and access to the Bay and to recreational uses to the extent feasible.

In recognition of the *Bay Plan's* stated objective of reserving high-priority water-oriented land uses, development of the proposed Northern Shoreline Park would include improvements to the existing recreational access point for boardsailing and other small craft and an area for parking and loading (see also the response in Subsection 2.1.4.1, Recreation and Open Space, in Section 2.1, Project Description, of this Comments and Responses document). Additional detail for the Northern Shoreline Park and for each of the proposed park locations is provided in Table IV.J.1: Proposed Parks and Open Space, on EIR pp. IV.J.13-IV.J.14. The location of each of the proposed parks and open spaces is shown on Figure IV.J.1: Proposed Open Space, on EIR p. IV.J.15.

The proposed recreational access point for boardsailing and other water-oriented recreation is described in EIR Chapter II, Project Description, on pp. II.29-II.31, where it is stated that watercraft launch sites, including one at the existing boat launch location, would be among the amenities that would be improved or developed for the Northern Shoreline Park. The construction phasing and the accommodations made for the existing users and residents of Treasure Island and Yerba Buena Island are discussed in detail on EIR pp. II.79-II.82. Development activities at the existing boat launch site at the north end of Treasure Island would occur near the end of the 20-year construction period as part of the fourth phase. In the interim, access to the existing access point would be managed as part of the Construction Traffic Management Plan identified as Mitigation Measure M-TR-1, and would likely be limited by traffic lane closures that would necessitate rerouting (see EIR pp. IV.E.69-IV.E.71). See also information provided in the response in Subsection 2.2.4, BCDC Regulations, in Section 2.2, Plans and Policies, of this Comments and Responses document.

### **2.12.3 SAILING CENTER**

#### **Comment**

Vol. 2, IV.J.4, Recreation: Why is the Treasure Island Sailing Center not listed under TI Rec Facilities? As a non-profit, volunteer-operated multi-use community sailing center, TISC offers sailing and boating safety to under-privileged adults and youth in the region. 1200 + inner-city youths, referred by Glide Memorial, Boys & Girls Club and inner-city agencies partake in the program *each* year. Why does the EIR fail to evaluate project impact on this social services resource? How is this Community Sailing Center impacted during construction, where is relocated? Please explain why the 2006 EIR for Transfer & Reuse of TI clearly identifies TISC and identifies its continued use in future reuse? Why does the current EIR fail to mention that it exists and also fails to identify its continued use in the future? (see attachment)

Vol. 2, IV.J.8, Recreation: In keeping with SF Bay Plan Recreation Policies IV.1 and IV.3 why does the EIR fail to evaluate diverse and accessible water-oriented recreational facilities, such as marinas, launch ramps, beaches and fishing piers? Why is the existing Clipper Cove Marina (100+ slips) not evaluated as an integral part of the recreational facilities? What are development impacts on this widely-popular marina which is a regional resource? (*Kathrin Moore, San Francisco Planning Commission*) [20.36]

#### **Response**

The analysis of recreational resources is focused on new facilities in the Proposed Project. The Clipper Cove Marina is an existing facility, and its expansion is not part of the Proposed Project. Expansion of the Marina was analyzed in the 2005 Final EIR, as explained in EIR Chapter II, Project Description, on pp. II.9-II.10. The expansion of the Marina is considered in cumulative analyses where appropriate (e.g., transportation – see Note 2 in Table IV.E.4: Person-Trip Generation by Land Use, in EIR Section IV.E, Transportation, p. IV.E.58), but is not part of the recreational facilities proposed to be developed as part of the Proposed Project. Landside

facilities for the Marina, including parking, restrooms, and laundry facilities, are part of the Proposed Project and are described on pp. II.10, II.16, and II.18 (in Table II.1: Proposed Development Plan). Improvements for the Clipper Cove Marina edge would occur during the second phase of construction (see EIR p. II.81). These landside facilities are included in the proposed land uses analyzed in the EIR.

The Treasure Island Sailing Center is also an existing facility; the Proposed Project includes replacement of the landside and waterside facilities for the Sailing Center. The EIR anticipates that about 15,000 sq. ft. of landside facilities would be constructed at the Sailing Center on a developable pad to be provided by Treasure Island Community Development, LLC, under the Disposition and Development Agreement with TIDA; landside facilities would include classrooms, restrooms, and other support facilities. Waterside improvements for the Sailing Center would include a new pier on pilings to accommodate two vessel launch and retrieval cranes, entry landings and gangways, and floating docks. Access to the existing recreational facilities at Clipper Cove Marina would be maintained to the extent feasible throughout the duration of the construction activities; however, public access could be restricted due to traffic lane closures and rerouting that would be developed as part of the Construction Traffic Management Plan (see Mitigation Measure M-TR-1, on EIR pp. IV.E.69-IV.E.71 and the revision to this measure in the response in Section 2.12.2, above).

The impacts of constructing these facilities are analyzed in appropriate sections of EIR Chapter IV, Environmental Setting and Impacts (see the response in Subsection 2.1.5, Bay Fill, in Section 2.1, Project Description, of this Comments and Responses document). Impacts of construction on existing facilities on the Islands, including the Marina and Sailing Center, are addressed in each of the topics analyzed in EIR Chapter IV, Environmental Setting and Impacts.

#### **2.12.4 USERS**

##### **Comment**

The FEIR should clarify whether the area dedicated for parks and open space takes into account the demands of visitors besides residents and employees, e.g., those using the bicycle and pedestrian trails, hotel guests, and retail customers, as well as visitors to the open spaces. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.12]

##### **Response**

As identified in EIR Chapter II, Project Description, on p. II.4, one of the project objectives is to improve access to and from the Islands to maximize the opportunities for City and Bay Area residents to use the projected 300 acres of TIDA-owned recreational areas and public open spaces. The Islands are expected to be a future destination for recreational, retail, commercial, and cultural activities. Activities such as the Treasure Island Music Festival, which draws visitors

from throughout the Bay Area, are expected to continue. Additionally, the travel demand analysis shows that the Sports Park and other parks and open spaces would be expected to generate approximately 995 trips by off-island users during the Saturday peak and approximately 355 during the typical weekday PM peak.<sup>1</sup> Thus, the Islands are expected to generate visitors from the City and the Bay Area region. The EIR analysis does not break down recreation and open space users by their residential location; however, as discussed in EIR Section IV.J, Recreation, on EIR pp. IV.J.5-IV.J.6, a parkland-to-population ratio, based on daytime population, is used to measure whether the land set aside for recreational areas and public open space is sufficient to meet the Project demand for recreational resources. This ratio would typically account for a daytime population consisting of future residents of the Islands who remain there during the workday and future employees who would travel from other parts of the City or Bay Area to work on the Islands. The analysis of parks-to-population ratio in this EIR does not estimate how many new residents would work off the Islands and not use the open space during the day or the number of employees who would travel to the Islands for work and could use the open space during the day. Instead, this ratio assumes that all residents who live on the Islands would also work on the Islands, which, based on commute patterns, is not likely. In other words, the proportion of Island residents who would commute to other parts of the City and/or Bay Area for work is the proxy for potential visitors who would come to the Islands during the daytime from other parts of the City and/or Bay Area. Thus, the analysis provides a conservative assessment of the total number of daytime users who could potentially use the proposed parks and open space. As stated on EIR p. IV.J.19, the daytime parks and open space-to-population ratio would be about 14 acres per 1,000 employees and residents, which is 75 percent higher than the current Citywide ratio of about 8 acres of parks and open space per 1,000 residents. Therefore, the Proposed Project would accommodate additional demand from visitors, retail customers, tourists, hotel guests, bicyclists, and pedestrians who come from outside the City.

The demand generated for recreation and open space on the Islands by residents in other parts of the City, as well as reasonably foreseeable park and public open space likely to be constructed in other developing areas in the City, are considered in the evaluation of the cumulative impacts on recreational resources (see EIR pp. IV.J.26-IV.J.27).

Pursuant to CEQA and to the *CEQA Guidelines*, the EIR's analysis of impacts on recreational resources is focused on Project-related impacts, e.g., population growth that could lead to the physical deterioration or degradation of existing recreational resources and whether the construction of the proposed new recreational resources would have physical effects on the environment. A variety of types of recreational resources are proposed that would attract regionwide users, e.g., the Sports Park and the Great Park on Treasure Island and the Senior

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<sup>1</sup> Fehr & Peers, *Treasure Island and Yerba Buena Island Redevelopment Plan Transportation Impact Study*, July 7, 2010, Table 18- Net Person-Trip Generation by Land Use, p. 72. A copy of the *Transportation Impact Study* is included as EIR Appendix C.

Officers' Quarters Historic District and Hilltop Park on Yerba Buena Island, and that would serve on-Island demand from residents and employees, e.g., publicly accessible neighborhood-serving parks. As described on EIR pp. IV.J.18-IV.J.19 and p. IV.J.27, the provision of 300 acres of recreational space and public open space is expected to be sufficient to meet the demand generated by the residents and employees on the Islands and would also benefit residents from other parts of the City and the region by augmenting the amount of available recreational areas and open space.

### **2.12.5 IMPACTS**

#### **2.12.5.1 Impacts on Yerba Buena Island and Clipper Cove Beach**

##### **Comment**

At the first DRB review of this project, the Board raised a concern regarding the potential impact on the 0.5-acre beach adjacent to Clipper Cove on YBI. Section IV.J Impact RE-2 states that there will be a less than significant impact on existing recreational facilities on the whole. However, an additional 18,640 residences, plus employee and visitors, may have a significant impact on the 0.5-acre beach and surrounding areas, including access and parking to the beach. The FEIR should address specific impacts to the 0.5-acre beach, as well as any improvements in the area to create safe access to and from the beach. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.13]

##### **Response**

The projected increase in the daytime population (employees and residents) on the Islands, identified in EIR Section IV.J, Recreation, on pp. IV.J.19 under Impact RE-2, would result in increased use of recreational areas and open spaces on the Islands including the Clipper Cove Beach Park. Improvements to Clipper Cove Beach Park would be minimal and subject to the *Yerba Buena Island Habitat Management Plan*, which is aimed at preservation, restoration, and continued stewardship of the ecological resources on Yerba Buena Island (see EIR Chapter II, Project Description, pp. II.31-II.32). The draft *Design for Development* indicates that a parking lot would be located southeast of the Clipper Cove Beach Park and a shoreline trail would link the Beach Park to the Hilltop Park and to Treasure Island.

As discussed on EIR pp. IV.J.5-IV.J.6, a parkland-to-population ratio is used to assess whether the land set aside for recreational areas and public open space would be sufficient to meet demand. The population figure in this ratio is the daytime population, which consists of residents and employees (and assumes that all residents work on the Islands, which is not likely and thus presents a conservative assessment). As noted on EIR p. IV.J.6, the Recreation and Open Space Element of the *General Plan* recognizes that geographic limits make it difficult to achieve the National Parks and Recreation Association's parkland-to-population standard of 10 acres per 1,000 persons within the City limits. The existing and future parkland-to-population ratios on the Islands are identified on EIR pp. IV.J.5 and IV.J.19, respectively. The future ratio (upon

completion of the Proposed Project in 2030) of parkland to population is expected to be about 14 acres of parkland for each 1,000 persons. The future parkland-to-population ratio would exceed the existing and recommended Citywide parkland-to-population ratio (8 acres per 1,000 persons [see EIR p. IV.J.5]). Therefore, as the EIR concludes, the Proposed Project would not result in a significant impact due to overuse of or deterioration of open space. Water-oriented recreation areas are included in the Proposed Project in addition to the small beach along the south edge of Clipper Cove. The Proposed Project includes improvements such as parking areas and a warming hut near the existing boat launch facility at the north end of Treasure Island, and a second water-oriented recreation area at the northwest corner of that island. These new or improved water recreation areas would help to reduce the burden on the Yerba Buena Island beach.

As described on EIR pp. IV.J.26-IV.J.27, when the proposed 300 acres of recreational areas and open space become available and are included with existing and future City, State, and Federal recreational areas and open space, the existing and future residents of San Francisco and the Bay Area (including those on the Islands) would be expected to have an increased amount and increased diversity of recreational resources available for use. Nonetheless, the recreational activities of future residents and employees would be distributed among the diverse City-serving, district-serving, neighborhood-serving, or sub-neighborhood-serving recreational opportunities that would be available, e.g., trail hiking in the Wilds or along the perimeter of Treasure Island, safe access points along the Northern Shoreline Park for water-related recreation, athletic fields, playgrounds for active recreation, and open spaces for passive recreation. Thus, as discussed on EIR pp. IV.J.17 and IV.J.27, there would be sufficient acreage of recreational areas and open spaces on the Islands, in the City, and in the region to accommodate demand, including the demand for use of the Clipper Cove Beach Park. As a result, the deterioration and degradation of recreational resources such as the 0.5-acre Clipper Cove Beach Park would not be expected to occur. TIDA as Trustee has statutory obligations to protect Trust lands and would actively manage Clipper Cove Beach to minimize impacts through education, stewardship programs, and controlled access (e.g. signage and wildlife fencing) in certain areas as appropriate to protect sensitive areas. TIDA would also be responsible for ensuring that the beach is managed in a manner that is consistent with the proposed *Yerba Buena Island Habitat Management Plan* (see EIR Chapter II, Project Description, pp. II.31-II.32).

In terms of safe access and parking for residents and employees of the Islands, the formation of the Treasure Island Transportation Management Agency and the implementation of transportation demand management measures as the primary means to encourage transit and other modes, discourage automobile use, and manage parking on the Islands are discussed in EIR Chapter II, Project Description, on p. II.5, and in EIR Section IV.E, Transportation, on p. IV.E.45. Improved bicycle, pedestrian, and transit access would be developed to ensure that residents and on-site

employees, as well as City and regionwide residents, have improved accessibility to all the Islands' destinations, including recreational areas and open spaces.

### **2.12.6 FUTURE ATHLETIC FIELD OPERATORS**

#### **Comment**

And it is from that perspective that I speak from the 40 acres of athletic sports fields. Our organization have and represent thousands of kids in San Francisco and the Bay Area, through our own organization, the Boys and Girl Club, Rhythm and Moves, CYO, YMCA, et cetera. I want -- the kids in San Francisco are literally crying out for quality playing fields.

Two years ago our own organization was at a crossroads. We were on the verge of dying. So we took an enormous leap of faith and developed 15 acres of derelict land that was a blight on the island of Treasure Island, and converted it into 15 acres of pristine athletic fields at zero cost to the City of San Francisco, where it was an estimated cost to our own organization of \$5 million. These fields have been an enormous benefit to the kids of San Francisco and the Bay Area, and indeed the disadvantaged kids of the island.

In collaboration with TIDI and the City of San Francisco, we also built a 10,000-square-foot playing structure for the kids on the island. The fields have been the site for several local regional international tournaments, which has resulted in millions of dollars of revenue to the City of San Francisco. (*Patrick Huniacke, GAA Athletic Association*) [TR.14.2]

#### **Response**

The existing recreational resources on Treasure Island, including the regular and youth rugby fields recently developed by San Francisco Gaelic Athletic Association, are identified in EIR Section IV.J, Recreation, on EIR p. IV.J.4. The proposed regional sports complex of 25 to 40 acres, identified in Table IV.J.1: Proposed Parks and Open Space, on EIR p. IV.J.13 and discussed on EIR p. IV.J.17, would provide tournament-level facilities to replace and expand upon the existing fields. Additionally, the provision of these facilities, including soccer pitches, baseball diamonds, and other athletic fields, would assist the City in meeting the existing unmet demand for 35 additional soccer fields and 30 additional sports and athletic fields identified in the *Recreation Assessment* report prepared by the Recreation and Park Department. The majority of the existing recreational resources on Treasure Island would be affected during the latter stages of construction (see the response in Subsection 2.12.1, Public Open Space, above). To the extent feasible, TIDA will continue to work with existing recreational users to provide access and maintain operations of these facilities during buildout of the Proposed Project. TIDA will also work with existing recreational users to identify potential opportunities for them to participate in the development, programming, and operations of the proposed recreational program contemplated by the Proposed Project. This comment does not address the adequacy or accuracy of the EIR; therefore, no further response is required.

### 2.12.7 RECREATIONAL USES

#### Comment

And I certainly want to put an emphasis on recreational uses, which we are sadly lacking in acreage for. (*Michael Antonini, Planning Commission*) [TR.19.2]

#### Response

As described in EIR Section IV.J, Recreation, on pp. IV.J.26-IV.J.27, the diverse array of TIDA-owned recreational areas and public open space that would occupy approximately 300 acres of Treasure Island and Yerba Buena Island would help to address the shortage of sufficient recreational space in the City. The comment does not address the adequacy or accuracy of the EIR; therefore, no further response is required.

## 2.13 UTILITIES AND SERVICE SYSTEMS

### 2.13.1 WASTEWATER

#### Comments

Furthermore, although the DEIR/Project proposes two methods to treat wastewater, only conceptual plans have been developed. The impacts of different wastewater treatment should be defined so that proven mitigation measures can be properly evaluated. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.30]

**Wastewater treatment.** The preferred alternative for wastewater treatment proposes a traditional wastewater treatment plant which would treat most of the effluent to secondary standards, then disinfect and discharge into San Francisco Bay. However, this level of treatment may not be sufficient to meet reasonably foreseeable regulatory requirements. In particular, the new plant will need to comply with new mercury discharge requirements; mercury is not removed by secondary treatment. In addition, the Bay Area Regional Water Quality Control Board is considering expanding its nutrient limits in San Francisco Bay. This document needs to analyze reasonably foreseeable regulatory actions. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.33]

With respect to the Waste Water Proposal Discussion, as you may know, the Regional Water Quality Board will permit a new facility. (*Nick S. Rossi, representing Ken Masters*) [TR.5.5]

#### Response

The different wastewater treatment methods under consideration are sufficiently defined for analysis of their potential impacts. The EIR analyzes whether the proposed wastewater collection and treatment systems would have environmental impacts (see Section IV.K, Utilities and Service Systems, pp. IV.K.5-IV.K.14). Because the wastewater treatment technologies under consideration would meet water quality standards, the EIR concludes that no significant water quality impacts would occur. The different wastewater treatment methods under consideration are all regarded as proven technologies. The EIR also addresses other types of impacts, such as construction impacts, and, when necessary, identifies mitigation measures.

As explained on EIR p. IV.K.5, the applicable thresholds of significance for the wastewater treatment facilities are as follows:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Regarding the first significance criterion, the EIR explains in several locations that the Proposed Project would meet applicable regulatory requirements. As stated on EIR p. IV.K.5, “The proposed wastewater treatment plant would be required to meet regulatory standards as embodied in the provisions of the new NPDES [National Pollutant Discharge Elimination System] permit issued by the RWQCB [Regional Water Quality Control Board] in 2010 (see ‘Existing Wastewater Treatment,’ p. IV.K.2) or an updated permit if required.” In Section IV.O, Hydrology and Water Quality, the EIR states on p. IV.O.28, “The existing NPDES permit, discussed on p. IV.O.9, would be updated when the treatment plant is upgraded or replaced.” Page IV.O.43 states, “The SFPUC [San Francisco Public Utilities Commission] would be required to comply with relevant laws and approvals required for the new or upgraded treatment plant.” Page IV.K.5 states, “The proposed wastewater treatment plant would be required to meet the provisions of the new NPDES permit issued by the RWQCB in 2010 (see ‘Existing Wastewater Treatment,’ p. IV.K.2) or an updated permit if required.” Pages IV.K.6-IV.K.7 explain how the types of treatment processes under consideration have been demonstrated in practice to meet the current NPDES permit requirements. Pages IV.K.7-V.K.14 provide the remainder of the impact analysis of the proposed wastewater treatment and collection facilities.

Regarding the second significance criterion, the Proposed Project would “require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.” Construction-related impacts are analyzed in different parts of the EIR; see Impact UT-1 on EIR pp. IV.K.12-IV.K.13 and the cross-references there to other EIR sections. In addition, EIR pp. IV.K.19-IV.K.20 provide the impact analysis for the proposed recycled water treatment system.

Regarding the third significance criterion, the existing wastewater system would be upgraded or replaced to serve Proposed Project needs; therefore, adequate capacity would be provided (see EIR p. IV.K.7).

One comment requests information on future regulations that may limit mercury and nutrient discharge. Determining future permit requirements would generally be considered speculative, and analysis of the Proposed Project’s compliance with future laws, regulations, and permitting requirements is not required under CEQA. Nevertheless, for informational purposes, the information below discusses regulatory trends and issues currently under consideration by regulatory agencies, and discusses how possible future permit requirements could be met, if adopted. This information does not change the EIR’s conclusion that the proposed wastewater treatment plant would meet RWQCB’s wastewater treatment requirements and would therefore not have a significant impact.

### Mercury

Regarding discharges of mercury, the RWQCB undertook a substantial effort to define a Total Maximum Daily Load (“TMDL”) plan for mercury for the San Francisco Bay (see pp. IV.O.14-

IV.O.15).<sup>1</sup> The RWQCB adopted a single permit regulating mercury discharges from all municipal and industrial wastewater treatment plants, as mentioned on p. IV.O.11. This Mercury TMDL permit specifies three limits that apply to the Treasure Island wastewater treatment plant: (1) an annual mass limit of 0.026 kilogram per year (“kg/yr”); (2) an average monthly effluent limit of 0.066 microgram/liter (“µg/L”); and (3) an average weekly effluent limit of 0.072 µg/L.<sup>2</sup>

The permit does not require mercury load reductions of the Treasure Island wastewater treatment plant. The NPDES permit for the Treasure Island wastewater treatment plant references the mercury permit.<sup>3</sup> As set forth in a technical memorandum prepared by Brown and Caldwell, for the existing discharge rate of 1.3 million gallons per day (“mgd”), the mass limit of 0.026 kg/yr corresponds to an average mercury concentration of 0.014 µg/L.<sup>4</sup>

Research regarding existing wastewater treatment plants during development of the mercury TMDL shows that many secondary treatment plants attain an effluent quality of 0.014 µg/L mercury.<sup>5</sup> Under current operations, the Treasure Island plant discharges 0.0046 kg/yr.<sup>6</sup> Based on Brown and Caldwell’s analysis, assuming that Treasure Island plant’s flow rate triples or quadruples (from the existing flow of 0.35–0.5 mgd, to an estimated future flow of about 1.3 mgd estimated dry-weather flow), the annual mass limit would still be attained, as long as the level of treatment were equivalent to, or better than, current plant performance.<sup>7</sup>

The mercury TMDL permit also includes some programmatic requirements, such as monitoring and reporting, source reduction,<sup>8</sup> and risk communication.<sup>9</sup> San Francisco already has a mercury

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<sup>1</sup> See also, RWQCB, “San Francisco Bay Mercury TMDL” web page, available [http://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/TMDLs/sfbaymercurytml.shtml](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaymercurytml.shtml), accessed November 2, 2010.

<sup>2</sup> RWQCB, Order No. R2-2007-0077, NPDES No. CA0038849, “Waste Discharge Requirements for Municipal and Industrial Wastewater Discharges of Mercury to San Francisco Bay,” November 1, 2007, Table 6, “Municipal -- Individual Mercury Effluent Limitations,” p. 13 (and see footnote (3) on p. 14). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

<sup>3</sup> RWQCB, Order No. R2-2010-0001, NPDES Permit No. CA0110116 (for Treasure Island wastewater treatment plant and its collection systems), issued Jan. 20, 2010 (“NPDES Permit for Existing Treasure Island Wastewater Treatment Plant”), Attachment F, part III.D (p. F-11) and part IV.C.3.d (p. F-19, footnote d to Table F-11).

<sup>4</sup> Brown and Caldwell, Technical Memorandum, “Potential Future Regulatory Scenarios at the Treasure Island Wastewater Treatment Plant,” from Khalil Abusaba, to Khey Loke, May 28, 2010 (“Brown and Caldwell Future Regulatory Scenarios Memo”), p. 4.

<sup>5</sup> Brown and Caldwell Future Regulatory Scenarios Memo, p. 4.

<sup>6</sup> Brown and Caldwell Future Regulatory Scenarios Memo, p. 4 (citing a Bay Area Clean Water Agencies’ annual mercury report).

<sup>7</sup> Brown and Caldwell Future Regulatory Scenarios Memo, p. 4.

<sup>8</sup> RWQCB, Order No. R2-2007-0077, NPDES No. CA0038849, p. 19 (source reduction of amalgam from dental offices).

<sup>9</sup> RWQCB, Order No. R2-2007-0077, NPDES No. CA0038849, p. 20 (public education and risk communication to those who fish in the Bay).

reduction program for amalgam from dental offices.<sup>10</sup> The SFPUC would continue to participate in regional programs as required by the mercury TMDL permit.<sup>11</sup>

Nutrients, Including Ammonia

Effluent containing nutrients, such as nitrogen and phosphorous, contribute to nutrient overloading in receiving waters. In general, nutrient-related water quality problems in Bay Area waters (not necessarily in the San Francisco Bay), include:<sup>12</sup>

- Eutrophication (i.e., excessive algae growth), especially in streams, which depletes oxygen growth and smothers bottom habitat;
- Elevated ammonia concentrations, which can be acutely toxic to aquatic life (especially salmonids); and
- Nitrate, which can be toxic to fish and amphibian eggs and juveniles.

Most of the RWQCB's regulatory attention in recent years appears to have been on nutrient problems in streams or smaller water bodies. Regarding San Francisco Bay, recently an association of 27 public water agencies, along with other interested parties, has encouraged the Sacramento Regional County Sanitation District to upgrade its treatment plant in order to reduce the amount of ammonia discharged.<sup>13</sup> Ammonia is alleged to contribute to ill effects in Suisun Bay (which is connected to San Francisco Bay).

Table IV.O.2: NPDES Permit Effluent Limitations, 2010–2015, on EIR p. IV.O.10, shows the existing effluent limitations for ammonia in the current NPDES permit. An attachment to the permit notes that ammonia effluent limits are calculated based on a receiving water dilution of 102:1.<sup>14</sup> Based on analysis by Brown and Caldwell, the effluent limit is currently about three times higher than the concentration of ammonia in the flows that enter the plant for treatment, and the Treasure Island wastewater treatment plant would not have to remove ammonia to meet this limit.

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<sup>10</sup> See EIR p. IV.O.21 (discussing San Francisco's Dental Mercury Reduction Program).

<sup>11</sup> Potential methylmercury generation in the proposed wetland is discussed in Section IV.M, Biological Resources, on pp. IV.M.57 and IV.M.61-IV.M.63.

<sup>12</sup> RWQCB-San Francisco Bay Region, Staff Summary Report (Peter Krottje), "Nutrient TMDLs in the San Francisco Bay Region -- Status Report, item 13, for meeting date June 18, 2003, available at [http://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/TMDLs/sonomacrknutrients/scnutrientssr0603.pdf](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sonomacrknutrients/scnutrientssr0603.pdf), accessed Nov. 1, 2010.

<sup>13</sup> State Water Contractors, "Statewide Interests Urge Sacramento Regional County Sanitation District to Upgrade Sewage Plant and Be Part of Delta Solution" (press release), Oct. 20, 2010, available at <http://www.swc.org/uploadfiles/swc.sacregional.10.20.10.pdf>, accessed Nov. 1, 2010.

<sup>14</sup> NPDES Permit for Existing Treasure Island Wastewater Treatment Plant, Attachment F, p. F-12, item A.3.

Further, the RWQCB has begun implementing effluent limits for ammonia, whereas previously only receiving water limits were applied.<sup>15</sup> Should future regulations require ammonia removal, nitrification tanks could be installed.<sup>16</sup> At the present time, while there is concern about ammonia, regulatory standards have not yet been tightened. However, should ammonia standards be tightened, the techniques mentioned above could be employed to meet them.

#### **2.13.1.1 Wastewater Biosolids**

##### **Comment**

There is no discussion of the disposal and handling of biosolids produced during wastewater treatment. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.34]

##### **Response**

EIR Section IV.K, Utilities and Service Systems, describes the existing handling and disposal of biosolids from the Treasure Island wastewater treatment plant. EIR p. IV.K.2 discusses primary clarification, in which solids are settled out and floating matter is skimmed off. (Secondary treatment results in additional solids.) The solids resulting from primary and secondary treatment are processed by anaerobic digestion. The solids are dewatered by centrifuge and then trucked to the land application site in Solano County used by the City and County of San Francisco to dispose of much of its wastewater treatment solids.

Currently, the SFPUC is planning to modify the existing treatment plant's handling of biosolids by implementing a proposed new lime stabilization treatment process. Therefore, the following text updates the EIR's description of the existing process in the Setting. The following text is added after the third paragraph (which discusses solids processing) on EIR p. IV.K.2 under the heading, "Existing Wastewater Treatment" (new text is underlined):

By about May 2011, the SFPUC plans to replace the anaerobic digestion process for solids with a stabilization process using lime (i.e., calcium carbonate).<sup>5</sup> The lime will be added as a slurry (i.e., lime and water mixture). Typically, lime is added to untreated biosolids to raise the pH to 12 or higher, with the dosage dependent on type and concentration. The lime stops or reduces the microbial reactions that can lead to odor production. Lime can also inactivate pathogens, and may be less expensive than traditional anaerobic digestion. The lime slurry will discharge into and out of a double-walled, high-density, polyethylene, chemical tank with a capacity of approximately 5,000 gallons. Transport off site would be by truck, similar to existing solids transport off the Islands.

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<sup>15</sup> Brown and Caldwell, Future Regulatory Scenarios Memo, p. 7.

<sup>16</sup> *Ibid.*

The new footnote for this text change, to be added at the bottom of p. IV.K.2, is shown below, and subsequent footnotes in this section will be renumbered accordingly:

<sup>5</sup> Email between Michael Marten, SFPUC, and Michael Tymoff, Mayor's Office of Economic and Workforce Development, forwarded to Turnstone Consulting on November 30, 2010.

The EIR does describe the proposed handling and disposal of biosolids on pp. II.59-II.60 in Chapter II, Project Description, as well as in the Utilities section on p. IV.K.10.

### **2.13.1.2 Wastewater Services for Federal Facilities on the Islands**

#### **Comments**

13. Additional discharge to sewer system will occur during construction – any problems with system backups now? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.10]

Section IV, page IV.K.9 – The USCG wastewater is currently processed by the existing facility on Treasure Island. The USCG's wastewater processing needs should be discussed as they are for the Job Corps on this page. If we are included on the eastern side of YBI, please make this state so in the text. The USCG will work with the project to provide the information necessary for system design. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.22]

#### **Response**

According to the SFPUC, there were nine reported sewer backups at Treasure Island during 2009, all caused by tree root intrusions.<sup>17</sup> Because tree root intrusions are a common problem with sewer systems, there is nothing unusual about the sewer backups reported at Treasure Island.

EIR Section IV.K, Utilities and Service Systems, p. IV.K.1, discusses *existing* wastewater flows from the Coast Guard: “The eastern side of the island, including the Coast Guard Station and Sector Facility, has a gravity sewer system that drains to a pump station under the Bay Bridge at the eastern tip of Yerba Buena Island. The pump station sends the flow through a 6-inch-diameter, submarine force main to the southern shore of Treasure Island.” The following new sentences are added at the end of the second full paragraph on p. IV.K.9, regarding the *proposed* wastewater system (new text is underlined):

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<sup>17</sup> Email communication, Samuel Larano, SFPUC, to Alexandra Galovich, Wilson Meany Sullivan, forwarded to Turnstone Consulting on October 29, 2010, p. 4. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

Utility service to the Coast Guard Station and Sector Facility would be maintained throughout buildout of the Proposed Project. Certain modifications to the piping connecting to the proposed replacement pump station could be necessary. Details would be worked out during the design process.

The Coast Guard's wastewater flows were included in the total wastewater flows.

### **2.13.1.3 Wastewater Wetlands**

#### **Comments**

- C. We support a combination of Wastewater Wetlands Variants D1 and D2 as these two uses are not mutually exclusive, would provide additional treatment capacity while enriching the wetlands access and experience for residents, students and potential visitors. (*Saul Bloom, Arc Ecology*) [28.10]

The review of the two wetlands treatment variants finds that the aesthetic and recreation impact would be similar to the proposed project. This is not correct. Treatment wetlands are almost universally considered an aesthetic and recreational benefit to the communities in which they're located - see <http://water.epa.gov/type/wetlands/constructed/index.cfm> for examples. Additionally, the provision of tertiary treatment prior to discharge into San Francisco Bay is a net water quality benefit. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.35]

#### **Response**

The opinion expressed in the comment, that treatment wetlands are almost universally considered an aesthetic and recreation benefit, is noted. The focus of an EIR is to assess a project's significant environmental impacts, which are defined as substantial *adverse* impacts.

Support for incorporating both Wastewater Wetlands Variants D1 and D2 in the Proposed Project is noted. EIR Chapter VI, Project Variants, discusses these two variants, beginning on p. VI.38, and notes that they are mutually exclusive.

As explained in EIR Chapter II, Project Description, on p. II.59, the two Wastewater Wetlands Variants are distinct from the 10- to 15-acre wetland proposed to treat stormwater before discharge to the Bay. EIR Chapter V, Variants, p. VI.39, describes the Wastewater Wetlands Variants. Variant D1 would be constructed on about 5 acres of land adjacent to the proposed wastewater treatment plant in the northeast corner of Treasure Island, whereas Variant D2 would occupy about 2 to 4 acres of land in the same location. Variant D1 would treat the portion of effluent to be recycled, whereas Variant D2 would treat the portion of the effluent not destined for recycling.

While it may be theoretically possible to install all of the features of both variants, more land area would have to be set aside to accommodate both wetlands, altering the proposed land use program (in addition to the third, stormwater treatment wetlands). What the EIR means by

“mutually exclusive” is that if a wastewater treatment wetland were to be built, one or the other of the Wastewater Wetlands Variants would be built, but not both.

The EIR discusses the aesthetic and recreation impacts of the Wastewater Wetlands Variants D1 and D2 on pp. VI.40-VI.41, and, on p. VI.41, states:

Under Wastewater Wetlands Variant D1 about 5 acres of the planned 300 acres of open space would be removed from public accessibility...Wastewater Wetlands Variant D2 would allow public access to the wetland. There would be opportunities to view the wetland and the wildlife using the wetland.

The EIR discusses the water quality impacts of the Wastewater Wetlands Variants D1 and D2 on p. VI.42, and states:

For Variant D1, where the wetlands would support treatment of recycled wastewater, the effluent from the wetlands would eventually be piped back into the Proposed Project’s recycled water system. This recycled water would be required to meet the same Federal, State, and local standards for recycled water quality as compared to the Proposed Project. Therefore, no water quality degradation would occur.

Under Variant D2, the wetland areas would be used to support wastewater treatment, prior to discharge of the treated wastewater into San Francisco Bay using the wastewater treatment plant discharge facilities. The proposed wetlands would support the wastewater treatment process. Effluent quality of the wastewater treatment plant discharge into the Bay would be required to meet applicable Waste Discharge Requirements under the plant’s NPDES permit. The Waste Discharge Requirements would not be altered as a result of installation of the proposed wetlands. Therefore, the proposed wetlands would not result in reduced water quality, as compared to the Proposed Project.

The EIR adequately discusses the aesthetic, recreation, and water quality impacts of the Wastewater Wetlands Variants D1 and D2.

### **2.13.2 STORMWATER**

#### **Comment**

11. Job Corps is going to get runoff from neighboring properties with the addition of fill. How will this runoff be drained off Job Corps property?
12. Stormwater pumping systems and modifications to the stormwater drainage system are proposed for the Job Corps property. Will the construction, operations, and future maintenance of these systems be the responsibility of the developer? (*Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.9]

## **Responses**

For context, as described in EIR Section IV.N, Geology and Soils, on pp. IV.N.21-IV.N.22, the proposed geotechnical improvements for Treasure Island include making a stable platform by densifying the underlying loose sand fill and consolidating the compressible Young Bay Mud. The EIR states, “A variety of techniques are available for densification of the sand fill, including deep dynamic compaction, and vibro-compaction. Surcharging or preloading can be used to consolidate the Young Bay Mud.” Because the geotechnical stabilization would result in a lowering of the current ground surface, new fill would be added to raise the ground surface. Raising the overall grade of the developed areas would help protect against flooding and sea-level rise. The existing Job Corps site is not included in the stabilization program; therefore, the ground around the Job Corps site would be raised higher than Job Corps site (see Figure IV.N.2: Areas of Proposed Geotechnical Improvements, EIR p. IV.N.26).

The comment expresses concern about stormwater runoff from the higher, adjacent areas flowing onto the Job Corps site. During construction, as explained under Impact GE-1 on EIR pp. IV.N.23-IV.N.24, stormwater runoff would be managed under a Storm Water Pollution Prevention Plan (“SWPPP”), which is required by law. As discussed in Section IV.O, Hydrology and Water Quality, a SWPPP includes specific construction-related Best Management Practices (“BMPs”) to prevent soil erosion and loss of topsoil.

After construction, stormwater runoff in areas surrounding the Job Corps site would be managed by the new stormwater collection system. EIR Section IV.K, Utilities and Service Systems, pp. IV.K.27-IV.K.38, describes the proposed stormwater collection and treatment system. See Figure II.17: Proposed Stormwater Collection System, in EIR Chapter II, Project Description, p. II.63, which shows the preliminary pipeline sizing and approximate locations of the pump station and outfalls. The Proposed Project includes consideration of managing stormwater flow around, and generated on, the Job Corps site, as described on pp. IV.K.28-IV.K.29:

The Proposed Project is designed so as not to cause overland storm drainage onto the Job Corps site from the areas to be developed. Overland storm drainage release from the Jobs Corps campus and buildings would be maintained through the use of pump stations. The existing Job Corps pump station may need to be modified or relocated. Drainage from the Job Corps campus and buildings would be maintained during construction and permanently thereafter. Certain modifications to the storm drain system would be necessary at the perimeter of the Job Corps site. Details would be worked out during the design process.

The proposed stormwater collection system improvements on the perimeter of the Job Corps site would be constructed by the project sponsors and operated and maintained by the SFPUC. If the existing Job Corps pump station needs to be modified or relocated to accommodate the Proposed Project, the project sponsors would undertake the construction.

After the transfer of the Project Area from the Navy to the Treasure Island Development Authority (“TIDA”), the stormwater collection facilities on the Job Corps campus would remain in Federal ownership. Thus the U.S. Department of Labor would own any piping and the pump station on the Job Corps campus and would be responsible for maintenance. The Department of Labor may choose to enter into a maintenance arrangement with TIDA or the SFPUC.

### 2.13.3 WATER SUPPLY

#### 2.13.3.1 Emergency Water Supply

##### Comment

4. On page IV.K.52, first paragraph, the first sentence should be deleted; service from EBMUD should not be considered a redundant water source which provides a back-up water source. As stated above, EBMUD currently provides emergency water supply to TI/YBI through a special agreement with the Navy. EBMUD does not guarantee that it can provide a 1,800 gpm supply as stated in the same paragraph. (*William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District*) [6.5]

##### Response

The EIR discusses the East Bay Municipal Utility District’s (“EBMUD”) emergency water supply pipeline to the Islands in several locations. To clarify that this supply is for emergency use, text on EIR p. IV.K.47 and IV.K.51-IV.K.52 is modified, as described below (deleted text is shown in ~~strikeout~~ and new text is underlined).

The second paragraph on EIR p. IV.K.47 is revised as follows:

Treasure Island and Yerba Buena Island have two sources of water. The primary supply is provided by the SFPUC’s water distribution system in San Francisco. An emergency ~~back-up~~ supply ~~for emergency use~~ is provided by EBMUD.

The first and fifth sentences in the fourth paragraph on EIR p. IV.K.47 are revised to read as follows (the first five sentences are provided here for context):

The ~~back-up~~ emergency water supply is provided by EBMUD through a 12-inch-diameter, ductile iron, main pipeline connected to an EBMUD water meter at Beach Street in ~~Emeryville~~Oakland. From the water meter, the 12-inch main is owned and maintained by the Navy. The main delivers water to a pump station located below the eastern end of the existing Bay Bridge in Oakland. Water is then pumped through a 12-inch-diameter steel pipe attached to the east span of the Bay Bridge. This water supply charges the fire hydrants on the Bridge and is connected to the existing water tanks on Yerba Buena Island for an emergency ~~back-up~~ supply.

The first sentence in the last partial paragraph on EIR p. IV.K.47 is revised as follows:

As described above, SFPUC ~~and EBMUD~~ furnishes potable water to existing water tanks on Yerba Buena Island.

The last three sentences in the last paragraph on EIR p. IV.K.51 and the first two sentences in the first paragraph on EIR p. IV.K.52 are revised as follows:

~~The back-up~~ An emergency water supply to Treasure Island / Yerba Buena Island would be provided by a new 12-inch-diameter pipeline on the new east span of the Bay Bridge, connected to a new SFPUC pump station near the eastern base of the Bridge. The new system would be capable of delivering up to 1,800 gpm of potable water ~~to~~ from the EBMUD connection point on Beach Street in Oakland. The water would be chloraminated by EBMUD prior to delivery, as with the existing ~~back-up~~ emergency supply.

The ~~redundant~~ water source from EBMUD provides ~~a back-up~~ an emergency water source to the Project Area. If ~~either~~ the SFPUC ~~or EBMUD~~ system were to be taken off-line for maintenance, power interruptions, or damage due to an earthquake, ~~the other source~~ EBMUD would ~~continue to be capable of supplying~~ 1,800 gpm to meet peak demands for the Proposed Development Project on an emergency basis.

### 2.13.3.2 Water Supply Assessment

#### Comments

5. On page 283 of the Appendix I of the Acrobat document, Final Water Supply Assessment, 7.1.1 Existing Water Supply, second paragraph, first line, “back up supply” should be changed to ***emergency supply*** as is correctly used later in the same paragraph. (*William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District*) [6.7]
6. On page 283 of the Appendix I of the Acrobat document, Final Water Supply Assessment, 7.1.1 Existing Water Supply, second paragraph, sixth sentence states “There is currently an agreement in place between EBMUD and the Navy that limits the average annual flow to 61 gallons per minute to maintain water quality in the line on the bridge.” This statement is not correct and should be deleted. The agreement between EBMUD and the Navy includes an estimated annual consumption for the purposes of providing a water supply for emergency purposes. Historically, the amount of flow used by the Navy to maintain water quality in the pipeline is significantly lower than the 61 gallons per minute. (*William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District*) [6.8]

Footnote 97 is not relevant and should be deleted as EBMUD is not the water purveyor for this project:

~~<sup>97</sup> EBMUD currently provides 220 mgd of water to approximately 1.3 million people as well as industrial, commercial, and institutional customers in its 331 square mile service area. The existing and proposed water demand for the Redevelopment Plan Project Area~~

*is small in relation to EBMUD's total delivery.” (William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District) [6.6]*

### **Response**

The comments refer to the Water Supply Assessment, which is Appendix I to the EIR. The Water Supply Assessment is a formal legal document approved by the SFPUC and cannot be amended by this EIR. The text on EIR p. IV.K.47 and pp. IV.K.51-IV.K.52 is corrected to change “back up supply” to “emergency supply,” as shown in the Response in Subsection 2.13.3.1, Emergency Water Supply, above. EIR p. IV.K.47 states that the actual annual average flow is about 35 gallons per minute, not 61. The text in EIR Chapter II, Project Description, is also revised to identify the “emergency” water supply (see the response in Subsection 2.1.10, Emergency Water Supply, in Section 2.1, Project Description, of this Comments and Responses document).

Footnote 97 on p. IV.K.52 is revised as follows (deleted text is shown in ~~strikeout~~ and new text is underlined):

<sup>97</sup> EBMUD currently provides 220 mgd of water to approximately 1.3 million people as well as industrial, commercial, and institutional customers in its 331-square-mile service area. ~~The existing and proposed water demand for the Redevelopment Plan Project Area is small in relation to EBMUD’s total delivery. EBMUD is not the water supply purveyor for the Proposed Project.~~ EBMUD is not the water supply purveyor for the Proposed Project.

### **2.13.3.3 Water Demand**

#### **Comments**

Additionally, the discussion of utilities does not appear to consider USCG demands for water, electricity, and telecommunication services that reflect our actual YBI operations. Future USCG demands for these services cannot be accurately estimated based on current use patterns reflected in the DEIR. As the USCG continues to modernize and improve its equipment and operations, the utilities requirements at this site may significantly change. As the utility improvements mentioned in the DEIR are constructed, the USCG should be consulted to ensure that USCG tie-ins to the utility systems continue to provide uninterrupted and adequate service to support USCG operations on YBI. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.4]

Section IV, page IV.K.47 – Please make reference to the fact that the USCG and Job Corps obtain their water from the SFPUC in the discussion of the current water conveyance and distribution system.

Section IV, page IV.K.52 – Please include a paragraph similar to the one provided for the Job Corps site concerning water service for the USCG. While our site is technically outside the project area, the system supplying our site is within the project area.

Section IV, page IV.K.57 – On table IV.K.3 the USCG water demands were provided by SFPUC (via the water supply report, Appendix I, page 4-3). However does this figure consider future USCG facility operations on YBI? The USCG must maintain several vessels and runs a buoy

maintenance facilities whose water needs are reflected in current SFPUC billings. However, the USCG should verify this figure and can provide an estimate of future water use based on planned operations and planned water conservation measures. A footnote in an appendix referencing a person working at the SFPUC is probably insufficient means by which to project USCG water demand. We can work with the City and developers to more accurately determine USCG water demands. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.23]

### **Response**

The U.S. Coast Guard's existing water use is accounted for in the EIR's analysis of water demand. See, for example, the discussion in EIR Section IV.K, Utilities and Service Systems, under the heading "Project Water Demand" on pp. IV.K.56-IV.K.57, where the Coast Guard is specifically mentioned. The Coast Guard is not specifically mentioned in the water supply Setting discussion, although its existing use is accounted for. Therefore, the following text is added to EIR p. IV.K.52 as a new third paragraph (new text is underlined):

Water service to the Coast Guard Station and Sector Facility would be maintained throughout the buildout of the Proposed Project. Certain modifications to the piping for connections of the water pipes would be necessary. Details would be worked out during the design process. TIDA and the Coast Guard have agreed that they would enter into a Memorandum of Understanding (MOU). The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that modifications for increased utility demand can be coordinated. Among other things, the MOU would also address construction coordination to ensure uninterrupted utility delivery and service.

Regarding future Coast Guard water demand, the Coast Guard currently has no specific details for its future expansion or modernization plans.<sup>18</sup> The Coast Guard typically uses a 2 percent annual growth factor for planning its water demand; however, its new or renovated facilities would be designed for improved water efficiency. In addition, the Coast Guard requires its new projects to meet certain Leadership in Energy and Environmental Design ("LEED") goals. Therefore, it is possible that even with 2 percent annual growth, the Coast Guard's water demand would not increase. It is too speculative at this time to estimate a future increase in water demand for the Coast Guard. The analysis of water demand in the EIR and the Water Supply Assessment are sufficiently conservative to account for this background growth and future potential increases.

In response to the Coast Guard's comments on the Project Description chapter and the Utilities and Services section, the third paragraph on EIR p. IV.K.47 is revised as follows (note that a few additional technical edits are included) (deleted text is shown in ~~strikeout~~ and new text is underlined):

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<sup>18</sup> Based on information received at a meeting between TIDA, Treasure Island Community Development, LLC, and U.S. Coast Guard representatives, held on October 29, 2010.

Water from the SFPUC system is delivered to Treasure Island / Yerba Buena Island through a 10-inch-diameter steel pipe attached to the west span of the Bay Bridge. Water is pumped across the bridge by a pumping station located on Spear Street in San Francisco. The station contains four pumps, each rated at 900 gallons per minute (“gpm”). The station can run a maximum of two pumps at a time for a maximum output of 1,800 gpm. The SFPUC chloraminates this water prior to transmission; additional treatment on Treasure Island is not required. A standby ~~booster~~chlorine station is available for emergencies where the pipeline touches down on Yerba Buena Island. The SFPUC provides water for the Job Corps campus and the Coast Guard Station and Sector Facility.

See Subsection 2.1.10, Emergency Water Supply, in Section 2.1, Project Description, of this Comments and Responses document, for related edits to the text in EIR Chapter II, Project Description.

For a response to the U.S. Coast Guard’s current and potential electric and telecommunications demand, see Subsection 2.13.6, Electricity, Natural Gas, and Telecommunications Infrastructure, below.

#### **2.13.3.4 Firefighting Water Supply Infrastructure**

##### **Comment**

15. Will the replacement of the fire hydrant system affect Job Corps? Will the new piping be extended to fire hydrants on Job Corps property? Will the hydrants located on the Job Corps property be modernized by the developer? . . . (*Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.12]

##### **Response**

The Proposed Project does not include replacement of fire hydrants or associated piping on Job Corps property. Within the Development Plan Area, the Proposed Project would include two types of hydrants: those connected with the domestic water system, which would constitute the primary fire-fighting water supply, and those connected with the recycled water system, which would be a supplemental water supply. The domestic water supply piping would be extended to the property line of the Job Corps campus and connect with the existing Job Corps piping. Modernizing the hydrants located on Job Corps property is not part of the Proposed Project. The piping and hydrants for the supplemental, recycled water, fire-fighting system would be on the Development Plan Area only, and would not extend into the Job Corps campus.

After the transfer of the Project Area from the Navy to TIDA, the U.S. Department of Labor would own the pipes and hydrants on the Job Corps campus. The Department would be responsible for maintaining its own system and may choose to enter into a maintenance arrangement with TIDA or the SFPUC.

The EIR also considers two variants that would modify the fire-fighting water supply system. Under Variant C1, the domestic water system on Treasure Island would be expanded to include additional storage and pumping facilities that would charge the domestic supply fire hydrants. The Job Corps campus might receive some benefit from this proposal, since the additional storage and pumping facilities on Treasure Island would be connected to the domestic water lines that would ultimately connect to the existing pipes and hydrants on the Job Corps campus. Under Variant C2, a saltwater system would be used in place of the recycled water system. As under the Proposed Project for the recycled water system, the piping and hydrants for the saltwater fire-fighting system would be on the Development Plan Area only, and would not extend into the Job Corps campus.

#### **2.13.4 RECYCLED WATER**

##### **Comment**

The Draft EIR does not consider the feasibility of supplying recycled water to TI/YBI from the East Bay. As a feature of the new Bay Bridge east span reconstruction project, Cal Trans installed a 6-inch recycled water line on the bridge for potential future supply. This pipeline, along with the proximity of the East Bayshore Recycled Water Project at EBMUD's Main Wastewater Treatment Plant may provide an opportunity to supply recycled water to the proposed project should institutional arrangements be made between EBMUD, SFPUC, and TI/YBI. EBMUD recommends that the City of San Francisco and Treasure Island Development Agency require developers of new or redevelopment projects within TI/YBI to coordinate and consult with EBMUD regarding the feasibility of providing recycled water for appropriate non-potable purposes such as landscape irrigation, commercial applications, industrial processes, and other applications as identified in the Draft EIR. (*William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District*) [6.9]

##### **Response**

EBMUD's offer of a potential recycled water supply to Treasure Island is noted. The project sponsors have included in the Proposed Project the production of recycled water on Treasure Island using a portion of the wastewater effluent. Therefore, at this time there does not appear to be a need for recycled water from other sources. As such, the EIR does not analyze the feasibility or potential environmental impacts of obtaining recycled water from off-island sources.

### 2.13.5 SOLID WASTE

#### Comment

17. Has a decision been made if the Automated Waste Collection System will be constructed? If it will be built, will it still be located in the vicinity of the planned urban agricultural park? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.15]

#### Response

As of the time of completion of this Comments and Responses document, no decision has been made by the project sponsors regarding whether or not to implement the Automated Waste Collection System Variant, described in EIR Chapter VI, Project Variants, pp. VI.43-VI.50. As stated on p. VI.43, "This system would be constructed as part of the subsurface infrastructure on Treasure Island and buildings would connect to this system as they were built. The system would terminate in a central waste handling facility, likely to be located in the vicinity of the new Police/Fire station or the Urban Agricultural Park on the edge of the Island Center on Treasure Island..." In other words, the solid waste collection "pipes" would extend under the developed portions of Treasure Island, and the location of the central waste handling facility has not yet been determined. One possible location for the central facility is the Urban Agricultural Park on the edge of the Island Center district.

#### Comment

However, there has not been a proper discussion of the waste reduction, as required under the Waste Management Act of 1989. And that plays right into the greenhouse discussion, and we would like to have a further study of how the greenhouse gasses are going to be studied with respect to the waste reduction. (*Nick S. Rossi, representing Ken Masters*) [TR.5.6]

#### Response

EIR Section IV.K, Utilities and Services, discusses the California Integrated Waste Management Act of 1989, the Solid Waste Disposal Measurement Act of 2007, and how the City and County of San Francisco has already met and in some cases exceeded the waste reduction requirements of both laws on pp. IV.K.63-IV.K.64 (see also the discussion on pp. IV.K.67-IV.K.68 about the City's aggressive approach to waste diversion). The Proposed Project would be required to implement the City's waste reduction and diversion ordinances. EIR Section IV.H, Greenhouse Gas Emissions, p. IV.H.40, explains how the greenhouse gas estimates related to solid waste in landfills were calculated. This discussion on that page notes that the EIR analysis is conservative: "These are likely overestimates since they do not account for the recent increases in waste percentages that would be diverted from a landfill." Thus, the EIR includes the requested analysis.

## 2. 13.6 ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS INFRASTRUCTURE

### 2. 13.6.1 U.S. Coast Guard Infrastructure

#### Comments

Section IV, page IV.K.71 – The USCG obtains its power via the submarine cable from Oakland. The text should mention the USCG tie-in point into this system in the “Distribution on the Islands” text on this page. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.24]

Section IV, page IV.K.72 – There is no mention of tie-in points to the natural gas and telecommunications infrastructure by the USCG. The USCG obtains these utilities via the same connections to the mainland so that any improvements will impact the USCG. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.25]

Section IV, page IV.K.78 – Utility service to the job corps is addressed at the top of this page. A similar discussion on electrical distribution to the USCG should be provided as we rely on the system up to our property line. Additionally the USCG can assist the developer as the project is completed by providing more accurate estimates of USCG energy demands as we continue to modernize our vessels. As such, current electrical demands by the USCG cannot be assumed to remain at their current levels. Thus we can assist in developing [*text of comment appears incomplete*]. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.26]

Section IV, page IV.K.80 – In the discussion of telecommunications no mention is made of the USCG. As the USCG continues to update its telecommunication and computer systems additional capacity may be required. We are in the process on constructing a new harbor command center and wonder if it has been considered by this DEIR. As we obtain our telecommunication services through the same supply lines from the mainland as the project does, we should be assured that all improvements up to the USCG property line and tie-in points can accommodate USCG needs. (*P. M. McMillin, Captain, U. S. Coast Guard*) [10.27]

#### Response

As requested in the comment, several changes are made to EIR Section IV.K, Utilities and Service Systems (new text is underlined).

The fifth paragraph on EIR p. IV.K.71 is expanded as follows:

The submarine cable from Treasure Island to Yerba Buena Island terminates at the Yerba Buena Island Main Substation. From here, power is distributed to Yerba Buena Island via a combination of poles and underground facilities. The Coast Guard Station and Sector Facility obtains its electrical power from a tie-in to the power delivered to Yerba Buena Island by this submarine cable.

Subsequent to the Coast Guard’s comment letter, the Coast Guard clarified that it does not currently have natural gas service on Yerba Buena Island. Therefore, there is no existing tie-in to the Coast Guard Station and Sector Facility.

The following sentence is added after the fifth full paragraph on p. IV.K.79, at the end of the discussion in the subsection entitled “Proposed Natural Gas Infrastructure”:

The Coast Guard does not currently have natural gas service, so the Proposed Project would not need to maintain service during construction. The Proposed Project would continue to provide natural gas service to Yerba Buena Island to serve the new development. If in the future, the U.S. Coast Guard wishes to add natural gas service for the Coast Guard facilities on Yerba Buena Island, the service could tie in to the supply lines on Yerba Buena Island.

The following sentence is added to the last full paragraph on p. IV.K.72:

The Coast Guard Station and Sector Facility obtains its wired (land-based) telecommunications services from the same connections to the mainland.

The second heading on p. IV.K.76 is changed as follows:

*Distribution System on Treasure Island and Yerba Buena Island*

The following new text is inserted as new third and fourth paragraphs at the top of p. IV.K.78, above the heading “Electricity Supply”:

Electrical service to the property line of the Coast Guard Station and Sector Facility would be maintained during buildout of the Proposed Project. Certain modifications to the connections may be necessary. Details would be worked out during the design process.

TIDA and the Coast Guard have agreed that they would enter into a construction coordination Memorandum of Understanding (MOU).<sup>147</sup> The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that utility-demand modifications can be coordinated. Regarding future electrical demand, the Coast Guard has no details for its future expansion or modernization plans at this time. Modernization plans may be more energy intensive, since new technology often requires more power than older equipment. However, because no modernization projects are currently defined, it is too speculative to estimate a future increase in electricity use for the Coast Guard.

The new footnote for this text change, to be added at the bottom of p. IV.K.78, is shown below, and subsequent footnotes in this section will be renumbered accordingly:

<sup>147</sup> This information is based on the results of a meeting between TIDA, TICD, and U.S. Coast Guard representatives held on October 29, 2010.

The following is inserted after the first partial paragraph on p. IV.K.80, above the heading “Project Impacts”:

The Coast Guard Station and Sector Facility is updating its telecommunications and computer systems. Land-based telecommunications services to the property line of the Coast Guard Station and Sector Facility would be maintained during buildout of the Proposed Project. Certain modifications to the connections may be necessary. Details would be worked out during the design process. As discussed above on p. IV.K.78, TIDA and the Coast Guard have agreed that

they would enter into a construction coordination Memorandum of Understanding (MOU). The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that utility-demand modifications can be coordinated.

### **2.13.7 UTILITY PROVIDERS AND OWNERSHIP**

#### **Comments**

14. Our property agreement reserves utility distribution to the Navy including water, wastewater, stormwater, gas and electrical systems. Will the transfer to TIDA include these distribution systems? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.11]
15. . . . Who will own and who will maintain the water lines and hydrants that are located on Job Corps property. (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.13]

#### **Response**

As noted above in the responses in Subsection 2.13.2, Stormwater, and Subsection 2.13.3.4, Firefighting Water Supply Infrastructure, after the transfer of property from the Navy to TIDA, ownership of the infrastructure on the Job Corps campus and Coast Guard Station and Sector Facility will remain in Federal hands (respectively, the U. S. Department of Labor for Job Corps, and Homeland Security for the Coast Guard Station and Sector Facility). As owners, the Federal entities would be responsible for maintaining their own systems; they may choose to enter into maintenance arrangements with TIDA or the SFPUC.

## 2.14 PUBLIC SERVICES

### 2.14.1 EMERGENCY RESPONSE

#### Comment

Over the years, I've always been keen about asking about emergency services, because of the unique location of the island. And the study, of course, stated, and all of us know that the Bay Bridge is the only emergency access to and from San Francisco as well as the East Bay. I feel that there could be a little bit more adequate information in terms of how we mitigate the measures, because certainly the increase in population over tenfold from what it is to date between now and built out, fully built out other projects will increase the amount in public services. I am, specifically, referring to under the analysis for fire department.

We are looking at national -- natural disasters, emergency medical services. The EIR talked about the new joint police and fire station. I think that's definitely something that needs to be done, but I would like to have more adequate information in terms of mitigation measures, because I think, purely because of the population increase, the impact is not insignificant or less significant.

And members of the public have mentioned that, you know, we are within the earthquake zone, and I think that many natural disasters can happen, as well as just because of the pure population increase, and I would like to see mitigation measures being suggested in terms of how we would deal with these situations. (*Claudine Cheng, Director, Treasure Island Development Authority Board*) [TR.22.3]

#### Response

Existing conditions related to emergency access to/from the Islands are discussed in EIR Section IV.E, Transportation, on EIR p. IV.E.25. Impacts of the Proposed Project on the need for and availability of emergency access are discussed in Impact TR-38, on EIR pp. IV.E.116-IV.E.117. Emergency medical service is discussed in EIR Section IV.L, Public Services, Subsection L.2, Fire and Emergency Medical Services, on pp. IV.L.12-IV.L.20. As explained on p. IV.L.18, the Fire Department may need to station additional personnel and/or deploy additional equipment on Treasure Island to address the increased demand for emergency medical service; however, the need for additional staff and/or equipment does not, in itself, constitute a significant physical environmental impact. The need for additional physical space to house the staff and equipment would be met by the Proposed Project providing for the construction of a new joint police/fire station. Earthquake emergencies are discussed in EIR Section IV.N, Geology and Soils, particularly in Impacts GE-2 and GE-3, on EIR pp. IV.N.24-IV.N.29. As explained there, adherence to building code requirements in effect at the time that new buildings are constructed, and implementation of established geotechnical stabilization measures that are part of the Proposed Project, would reduce the impacts of groundshaking to less-than-significant levels.

The *Treasure and Yerba Buena Emergency Response Plan* was prepared by the Treasure Island Development Authority and the City's Department of Emergency Management in January 2009,

and is discussed at the beginning of the Impacts discussion in EIR Section IV.P, Hazards and Hazardous Materials, on pp. IV.P.38-IV.P.39. The discussion explains that the Proposed Project would not impede emergency access and would implement a transportation system that meets current standards for emergency response. The *Emergency Response Plan* includes a provision requiring it to be updated regularly as the resident and employee populations increase during implementation of the Proposed Project.

No significant physical environmental impacts were identified in the EIR that require mitigation.

### **2.14.2 VANDALISM**

#### **Comment**

Refer to: 1.2, 1.3; II.28-29; IV.C.15: HOMELESS: I recall that on visits to T.I. that housing near homeless residences was marred by vandalism and graffiti. Would hope that perpetrators not be allowed to live on the Island. (*Neil Malloch*) [44.5]

#### **Response**

The comment raises concerns about vandalism and graffiti on Treasure Island, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the EIR. Vandalism and similar issues would continue to be addressed by the San Francisco Police Department. There is an existing police station on Treasure Island, serving the existing businesses and residents. A new joint police/fire station is included in the Proposed Project (see EIR Chapter II, Project Description, p. II.16, and the discussion of police services in EIR Section IV.L, Public Services). Therefore, police services would continue to be provided on the Islands.

## 2.15 BIOLOGICAL RESOURCES

### 2.15.1 BASELINE ASSUMPTIONS

#### Comments

Section IV.M (“Biological Resources”) begins with an assessment of the current setting of the Treasure Island-Yerba Buena Island (TI-YBI) setting. While accurate that TI was heavily used for decades when the base was functioning, the Biological Resources section does not appear to account for the decrease in use after the closure of the base. The suitability of TI-YBI and its adjacent waters for wildlife may depend on overall resident and transient (especially work-related) human population on the island.

It is not appropriate to consider the “baseline” as the conditions at the base during its peak operations. Rather, the environmental assessment should be based on the use and population exists today. The proposed development will increase use and population on the island much more significantly over current use than it might have over the historical use of the island. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.2]

The DEIR states that the non-native plants incorporated into landscaping result in a habitat type that is “of low value” to wildlife. (DEIR at IV.M.4). The DEIR provides no means to assess the scale of the habitat’s value; in other words, how are “high value” and “low value” habitats measured, respectively—by species diversity, density, breeding success, population demographics, individual lifespan? Moreover, the only citation provided for this assessment is the San Francisco Planning Department (presumably the 2005 EIR). This is not an adequate citation for such a broad characterization, especially given that it does not even cite to a specific page or other reference in the 2005 EIR (or some other verifiable document).

While the human-altered landscape of TI could be greatly improved for wildlife, it is likely that it currently provides better habitat for wildlife than it will after the completion of the project. If the DEIR downplays the importance now, it is easier to show no significant impact to wildlife, and therefore avoid minimization or mitigation measures required by law. Therefore, if such assessments are to be made in the DEIR, they must be supported by a quantifiable and verifiable metric of “habitat value”. We also note that while the DEIR emphasizes that TI is of “low value” for habitat for wildlife, it offers no such blanket assessment for YBI. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.5]

#### Response

The “baseline” or environmental setting against which the impacts of a project are measured normally consists of physical conditions as they exist at the time the lead agency publishes the Notice of Preparation (“NOP”) for a project (*CEQA Guidelines*, § 15125(a)). CEQA authorizes agencies to use an alternative baseline where the project at issue consists of a reuse plan for a military base; under this section, the “baseline” may instead consist of conditions as they existed at the time the Federal government made the base closure decision (CEQA Section 21083.8.1.) In this case, however, this “alternative baseline” was not used. Rather, baseline conditions were defined as those that existed at the time of the NOP, which was in January 2008. This approach is more conservative than the approach authorized by CEQA Section 21083.8.1. The biological surveys

and analyses prepared for the EIR were performed in 2008-2010; these surveys and analyses thus reflect the existing environmental conditions of the project site.

The history of the Islands is included as context and explanation for many of their current biological attributes. This history is not provided to suggest that the baseline for the analysis is the period of its heaviest use. It is true, however that the construction and operation of a military facility is now reflected in conditions less than optimal for plants and animals. Treasure Island, for example, has 90 acres in developed open space, used primarily for active recreation, and the balance in residential, institutional and community, retail and office, industrial, parking and roads.<sup>1</sup> While the comment is correct in assuming that the proposed development would increase use and population on Treasure Island, the Proposed Project would provide 300 acres of parks and open space, including a created wetland on about 10-15 acres. The proposed open space program includes developing approximately 95 acres of natural open space on Treasure Island and restoring, enhancing and protecting approximately 80 acres of natural open space and habitat areas on Yerba Buena Island. Thus, there would be substantially more natural open space with the Proposed Project than existed with Navy use or than exists now under baseline conditions. The comment is correct in stating that the human-altered landscape of Treasure Island could be greatly improved for wildlife. However, the biological surveys and analyses prepared for the EIR do not support the comment's contention that the existing conditions on Treasure Island provide better habitat for wildlife than it would after the completion of the Proposed Project. The open space improvements included in the Proposed Project would provide larger areas of continuous open space uninterrupted by buildings and streets compared to existing open spaces on Treasure Island. The landscaping in the Proposed Project would have more California native plants and smaller areas of exotic, non-native plants on Treasure Island than currently exist. These and other features would provide better wildlife habitat than is found under existing baseline conditions.

Under CEQA, the lead agency must make determinations as to the value of existing habitat, based on established ecological principles. In this case, based on the knowledge and expertise of trained biologists, the EIR found that the Islands' ruderal habitats comprising non-native species and a built environment, are of relatively low biological value based on a number of measures: e.g., habitat for sensitive species, species diversity, and community stability over time. A comment notes that no such assessment is made for Yerba Buena Island, and indeed the designation of "low value" on p. IV.M.4 of the EIR does not apply to the remaining natural habitats on Yerba Buena Island, rather, the "low value" designation is specific to Treasure Island. The EIR text describing Yerba Buena Island states that it is "markedly different from Treasure Island" and notes that the description of existing biological resources that follows is for Yerba Buena Island unless otherwise indicated. The text then goes on to describe multiple relatively

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<sup>1</sup> San Francisco Planning Department, 2005. *Transfer and Reuse of Naval Station Treasure Island; Final Environmental Impact Report*. State Clearinghouse No. 1996092073.

rich habitats. Appendix H to the EIR is a survey of flora on Yerba Buena Island; the survey illustrates the diversity of plant life on the island. The clearest available metric for supporting the relative determinations is the nesting bird diversity counts for the two areas reported in the *San Francisco Breeding Bird Atlas*,<sup>2</sup> with Treasure Island reporting 22 species and Yerba Buena Island 32. The Atlas observes that more species occur in areas with more natural habitats. The citation referred to in the comment is footnote 15 on EIR p. IV.M.4, which is a reference to the 2005 EIR; the full reference is in footnote 1 on EIR p. IV.M.1. Footnote 15 is clarified to provide a more specific citation (new text is underlined):

<sup>15</sup> San Francisco Planning Department, 2005, *op.cit.*, Section 3.8, Biological Resources, and specifically pp. 3-94.

## 2.15.2 SETTING

### 2.15.2.1 Setting – General

#### Comments

2. The DEIR cites at p. IV.M.50, Stenzel, *et al.*, *Abundance and Distribution of Shorebirds in the San Francisco Area*, however, does the DEIR rely on any more specific studies than this? If so, please give the author and title of such materials.

3. Please provide a description of each and every species of (a) migrating bird, (b) resident bird, for which the project could have potential impact or affect, and for each and every species the nature and scope of such impact or affect. (*Judy Irving, Executive Director, Pelican Media*) [14.2]

18. Which bird species would be considered to have a known or high potential to nest on any of the project’s proposed high-rise towers? (*Judy Irving, Executive Director, Pelican Media*) [14.9]

The description of the wetlands on YBI is minimal, at best. (See DEIR at IV.M.30). It would be appropriate to at least quantify the amount of wetlands on YBI, rather than referring it to a “small band” of indeterminate size. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.10]

The TI-YBI development must be considered within the context of cumulative impacts throughout the Bay Area (or, at a minimum, the Central Bay). In order to best understand these cumulative impacts, readers must be provided with a more complete assessment of the regional setting.

As a first step, the Regional Setting section would be improved with a statement regarding the current state of baylands (as defined in the section) and open water habitats in the Bay Area. The Bay Area has lost more than 90% of its historic wetlands and 40% of its open water habitat. (See Bay Conservation and Development Commission, *San Francisco Bay Plan* (2008), at 15) Similarly, the Bay Area has suffered the loss of considerabl[e] amounts of coastal prairie, coastal

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<sup>2</sup> *San Francisco Breeding Bird Atlas*. n.d. San Francisco Field Ornithologist’s Home Page, <http://www.sffo.org>. Accessed June 1, 2003.

riparian, mixed woodland, coastal scrub, intertidal, and subtidal habitats. These declines in available habitat have resulted in increased pressure on resident and migratory birds and other wildlife that depend on the Bay. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.3]

Treasure Island and Yerba Buena Island are located in San Francisco Bay which is an important part of the Pacific Flyway. The Pacific Flyway is a migratory route for birds travelling from as far away as Alaska and Canada in the north to South America. Millions of birds come to San Francisco Bay and rely on it to forage and rest from the fall through the spring. Other birds are residents and breed and raise their young on the island. Some birds like the Orange-crowned Warbler and Cliff Swallow come to Yerba Buena Island to breed and then migrate away during the fall and return in the spring. Many shorebirds and waterbirds depend on the waters surrounding Yerba Buena Island and Treasure Island particularly from fall through the spring each year. This project provides many opportunities for people to learn more about and improve this area for the native plants, marine mammals, fish, birds and other wildlife that depend on Treasure Island and Yerba Buena Island. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.1]

Finally, Christmas Bird Count (CBC) data since 1984 indicate that at least 112 species have been observed using the island during the CBC counts in December of those years. (Attached hereto as Attachment A; available from the National Audubon Society at <http://www.audubon.org>) Other species are present during the fall and spring migrations and the spring-summer bird breeding season. These birds use different parts of the landscape—including non-native ornamental plants—for a variety of purposes. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.6]

As an initial matter, we are confused as to why the section on birds is identified as “Breeding Birds” when it is clear from the text that it is intended to cover all bird that use YBI. (See DEIR at IV.M.17-18) If this section is intended to cover only breeding birds, then the inclusion of a bird list from January is probably inappropriate, as few (if any) birds are breeding on the island at that time.

The DEIR never expressly states that increasing the human population will inevitably result in significant impacts to the birds and other wildlife that live on and around TI-YBI. Humans introduce direct disturbances, trash (which attracts predators and subsidizes non-native pests), light, and pollution; all these increase by the mere presence of more people near wildlife. The DEIR should more specifically discuss the impacts that will arise from a larger human population on the islands and identify mitigation, avoidance and minimization measures.

The DEIR assumes that only non-native birds breed in non-native habitat in Treasure Island but that is untrue. Native bird species will nest in non-native habitat when native habitat choices. Golden Gate Audubon requested that the project include surveys throughout the year to census all of the birds and other wildlife that depend on the island including the resident, migrant and possible vagrant species. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.7]

In any event, it appears that the research conducted in building the bird list on page IV.M.18 is inadequate. First, it is unfortunate that the DEIR’s authors would rely on a single bird list from a walk in January 2007 as a source for birds using YBI and adjacent waters in the winter. San Francisco Bay is extremely important to over-wintering birds and an assessment of their diversity

and abundance merits more than checking a list from a single bird walk. This is particularly disturbing given that there is over 25 years of Christmas Bird Count data conducted by knowledgeable birders for YBI and TI that is freely available online. We also invite the DEIR's authors to review results posted on the SFBirds group on Yahoo.com, on which birders post sightings and lists from walks on YBI. A simple search would have greatly expanded the list provided in the DEIR. Consultation with experienced biologists and birders in the area would probably also be extremely productive for understanding the biodiversity of YBI and its adjacent waters.

In any event, the Christmas Bird Count data and SFBirds lists indicate that the following species in addition to those listed in the DEIR that use YBI and TI:

Snow goose	American coot	Mourning dove
American wigeon	Black-bellied plover	Barn owl
Greater scaup	Black oystercatcher	Belted kingfisher
Lesser Scaup	Greater Yellow-legs	Acorn woodpecker
White-winged scoter	Willet	Downy woodpecker
Long-tailed duck	Wandering tattler	Northern (Red-shafted) Flicker
Common goldeneye	Ruddy turnstone	Say's Phoebe
Barrow's goldeneye	Sanderling	Hutton's Vireo
Red-breasted merganser	Western sandpiper	American crow
Red-throated loon	Least sandpiper	Red-breasted nuthatch
Pacific loon	Bonaparte's gull	House wren
Pied-billed grebe	Heermann's gull	Golden-crowned kinglet
Great-blue heron	Mew gull	Varied thrush
Green heron	Herring gull	Wrentit
Sharp-shinned hawk	Western x Glaucous-winged gull	Palm warbler
Red-shouldered hawk	Glaucous-winged gull	Brown-headed cowbird
American kestrel	Pigeon Guillemot	
Peregrine Falcon		

Golden Gate Audubon finds it extremely worrisome that the DEIR's authors would produce a bird list for the island that falls so short of the truth, especially given the ease with which such information is available. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.9]

This section would also be improved by including citations to appropriate scientific and technical sources. For example, there is no citation provided for the following:

The dominant marine birds regularly inhabiting or utilizing the Central Bay include cormorants (*Phalacrocorax* spp.), pigeon guillemot (*Cephus columba*), herring gull (*Larus argentatus*), mew gull (*L. canus*) and California brown pelican (*Pelecanus occidentalis californicus*). Among the diving benthivores guild, canvasback (*Aythya valisineria*), greater scaup (*A. marila*), lesser scaup (*A. affinis*), and surf scoter (*Melanitta perspicillata*) are the most common. (DEIR at § IV.M.3).

Moreover, the apparent reliance on only a few of the available scientific and technical resources available about the Central Bay is worrisome. There are only four publications cited in this section and one, *Baylands Ecosystem Habitat Goals*, is used only to define endemism (despite providing very useful information about the regional setting for this project). We are concerned because the DEIR's assessment of biological impacts will be incomplete unless a thorough

review of available information is conducted and the relevant information is incorporated into the EIR. If additional documents were reviewed in the preparation of this section, we ask that an appendix or reference list be provided to verify the information presented in the DEIR. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.4]

**Response**

One of the comments from Golden Gate Audubon Society describes the importance of the Bay as part of the Pacific Flyway, as stated in EIR Section IV.M, Biological Resources on p. IV.M.3. Other comments question the amount and source of bird use information in the EIR Biological Resources Setting Section, especially regarding use of Christmas Count data and bird lists. One comment suggests adding information about past trends in the Biological Resources Section regional description. The following text is added to the second full paragraph on EIR p. IV.M.2 (new text is underlined):

The San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. The estuary's populations of fish and wildlife have changed markedly in the past 150 years, with losses due to over-harvest, habitat loss and degradation, introduced species, pollutants, and the modification of freshwater flows. It encompasses 479 square miles, including shallow mudflats. San Francisco Bay is divided into four main basins: South Bay, Central Bay, San Pablo or North Bay, and Suisun Bay. This assessment focuses on the Central Bay, which is located between the San Francisco-Oakland Bay Bridge ("Bay Bridge") and the Richmond-San Rafael Bridge and connects to the Pacific Ocean through the Golden Gate. The regional setting for purposes of this evaluation includes both the shallow water habitats around San Francisco Bay – the "baylands"<sup>3</sup> and the waters of the Bay itself.

The last two sentences in the last full paragraph on EIR p. IV.M.3 are quoted in a comment, with a request for a citation. The citation for the entire paragraph is referenced in footnote 13 at the beginning of the paragraph. The source is NOAA *Report on the Subtidal Habitats and Associated Biological Taxa in San Francisco Bay*, prepared by NOAA National Marine Fisheries Service, Santa Rosa, California, June 2007. The EIR used primary or peer-reviewed sources, field surveys, and personal communications. The primary sources are cited in the EIR on p. IV.M.1.

While there is value in Audubon Christmas Count data (comment 32.6), and it can be useful in CEQA analyses to document species richness or diversity at a particular site that has suitable habitat, comprehensive winter bird lists can be confusing for a CEQA analysis of a site that is primarily a stopover for transient animals. Information on all birds that might use the island at any time suggests that the site under examination can be assumed, mistakenly, to support these species, and that the project would cause significant impacts on any of these transient species. Breeding birds, on the other hand, would be expected to be exposed to direct impacts. The EIR uses the San Francisco Breeding Bird Atlas and Baylands Ecosystem literature, as these are

generally considered to be reputable, citable authorities to use a basis for analyzing the potential impacts on breeding birds.

The discussion of impacts in the EIR *does* consider non-nesting birds in the appropriate context, especially in Impact BI-4 on EIR pp. IV.M.50-IV.M.51, in discussing impacts on migratory birds and rafting waterfowl where cause and effect can be established.

The comment asserts that the EIR never expressly states that increasing the human population would inevitably result in significant impacts on the birds and other wildlife that live on and around TI-YBI. The comment is correct that an increase in human population brings with it environmental disturbances and stressors, as stated on EIR p. IV.M.42: “In the post-development period, Treasure Island and Yerba Buena Island would have a higher population that would exert a greater human impact on remaining natural areas and human use of nearshore areas.” The impact of higher population is to some extent offset by the greater amounts of open space (including the 10-15 acre wetland) that are part of the Proposed Project (see the response in Subsection 2.15.1, above) and the improved natural conditions resulting from the implementation of the draft Habitat Management Plan for Yerba Buena Island. The EIR accurately analyzes the remaining impacts by considering the discrete human-associated impacts themselves rather than by generally discussing the increase in the presence of humans; for example, the EIR addresses buildings the humans would occupy in analyzing bird strike impacts and lighting on EIR p. IV.M.50, and domestic and feral animals on EIR p. IV.M.46.

As recommended by the comments, the EIR text is revised and augmented to address native and non-native breeding bird use of Treasure Island. The following text is added to EIR p. IV.M.18, after the list of species known or presumed to nest on Treasure Island (new text is underlined):

In addition, the San Francisco Breeding Bird Atlas lists 22 species as confirmed or probable breeding birds on Treasure Island.

- Double-crested cormorant
- Pelagic cormorant
- Brandt’s cormorant
- Black-crowned night-heron
- Killdeer
- Western gull
- Mourning dove
- Anna’s hummingbird
- Allen’s hummingbird
- Common raven
- Chestnut-backed chickadee
- Bushtit
- American robin
- Sitta canadensis, Red-breasted nuthatch
- European starling
- White-crowned sparrow
- Song sparrow
- Red-winged blackbird
- Brewer’s Blackbird
- House finch
- American goldfinch
- House Sparrow

In response to the wetland inquiry in one comment: the wetland on Yerba Buena Island is a narrow band of salt marsh that extends for several hundred feet along the southeast side of Clipper Cove. The Proposed Project would have minimal, if any, direct or indirect impact on this wetland. (See EIR pp. IV.M.30 and IV.M.40.)

A comment requests information about source documents and, more generally requests descriptions of all birds potentially exposed to impacts. The EIR uses sources that were themselves compiled from scores of more detailed and specific studies, such as the reference cited in the EIR in note 6 on p. IV.M.2, Goals Project, 2000, *Baylands Ecosystem Species and Community Profiles: Life Histories and Environmental Requirements of Key Plants, Fish and Wildlife*. Because describing each of the resident and migratory birds would require multiple volumes of work that has already been compiled by other sources, the EIR uses more standard references such as the San Francisco Breeding Bird Atlas, cited on EIR p. IV.M.17. Further, as established in the City's significance criteria, the EIR considers impacts on resources that are sensitive or have "Special Status." Although the EIR does not attempt to describe all impacts on all species that are not special status, it does analyze impacts on the movement of migratory birds and rafting waterfowl in general.

One comment poses questions about the potential for birds nesting on buildings on Treasure Island. Common birds that nest on low-rise buildings include house finches, barn swallows, and robins. For these species, nesting could occur where there is adequate substrate (e.g., overhangs, eaves, planter boxes). Some larger birds and raptors, for example, ravens and the red-tailed hawk (e.g., New York's famous "Pale Male"), might nest on taller buildings. The peregrine falcon is the best known urban nest builder, well-adapted to urban towers. A peregrine falcon nest is often found on one of the Bay Bridge towers (see EIR p. IV.M.17), and their nests are also built on ledges or rooftops of downtown high-rise buildings.

### **2.15.2.2 Setting – Regulatory**

#### **Comments**

The following regulations (and others) applicable to the Project were adopted for the specific purpose of avoiding environmental effects on biological resources. In addition to the materials contained in Chapter IV of the DEIR, please answer the following as to the regulations listed below: (1) On what factual basis does the DEIR conclude that the project does not conflict with each of these regulations? (2) What are the results of the required consultations with the applicable regulatory agency(ies), including the dates of these consultations?

- Federal Endangered Species Act (FESA)
- California Endangered Species Act (CESA) . . . (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.15]

It is our understanding that the description of the applicability of the McAteer-Petris Act (DEIR at IV.M.37) is inaccurate because it states that the Bay Conservation & Development

Commission (BCDC) does not have a role to play on federal lands. However, according to the BCDC website and other sources, BCDC must make a federal consistency determination with the Bay Plan and any other applicable plans where federal action may affect a specially designated area. (See <http://www.coastal.ca.gov/fedcd/faq-fc.html>) (Mike Lynes, Conservation Director, Golden Gate Audubon Society) [32.13]

### **Response**

As part of the CEQA process, the EIR must consider whether the Proposed Project would conflict with any plans, policies or regulations from agencies with jurisdiction over the Project Area or Project resources that are adopted for the purpose of avoiding or mitigating an environmental impact. This requirement is covered in the *Regulatory Framework* subsection of Section IV.M, Biological Resources, EIR pp. IV.M.31-IV.M.39. The EIR includes an analysis of special status species, including species that are listed under the Federal Endangered Species Act (“FESA”) and the California Endangered Species Act (“CESA”) (see the discussion of special status species in the subsections entitled “Special Status Wildlife and Fish Species Considered in this EIR,” on EIR pp. IV.M.20-IV.M.21, and “Special Status Plants” on EIR, pp. IV.M.19-IV.M.20) This analysis includes the factual support for the EIR’s conclusion that the Proposed Project would not conflict with the referenced regulations. However, CEQA is not a permit process; its basic procedures and in some cases its conclusions may be different from the permitting processes. The permitting processes and associated consultations will begin after the EIR is certified if the Proposed Project is approved. The responsible regulatory agencies would make determinations of the potential for take under FESA and CESA during the permitting process as described in Section IV.M, Biological Resources, on EIR pp. IV.M.31-IV.M.33.

As part of the CEQA process, agencies with jurisdiction or permitting authority over biological resources have been consulted and were provided copies of the Notice of Preparation. These include the California Department of Fish and Game, the Bay Conservation and Development Commission (“BCDC”), and the State Lands Commission, among others. The City also provided these and other agencies with a copy of the Draft EIR. Finally, as described in the response in Subsection 2.2.4, BCDC Regulations, in Section 2.2, Plans and Policies, of this Comments and Responses document, the project sponsors have had discussions with many outside agencies, including BCDC and State Lands Commission staff members.

A comment questions the explanation of BCDC’s jurisdiction as described in the EIR. BCDC cannot require Federal agencies to submit permit applications under the McAtteer-Petris Act, but BCDC *does* play a role when Federal actions are taken, and this is stated in the EIR. “The Coastal Zone Management Act of 1972 (‘CZMA’) requires that all applicants for Federal permits and Federal agency sponsors obtain certification from the State’s approved coastal program that a proposed project is consistent with the State’s program. In San Francisco Bay, BCDC is charged with making this consistency determination” (see EIR pp. IV.M.34-IV.M.35).

### 2.15.3 HABITAT VALUES, ONSHORE HABITATS, AND HMP

#### Comments

Offshore, the island's habitats include open water, rocky intertidal, and at least one eelgrass bed, all vital areas for birds and aquatic life.

While the DEIR does identify the major habitat types on the island, we are concerned about whether it adequately describes their values. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.3]

On land, we are particularly concerned about the coastal riparian, coastal scrub, California buckeye, and coast live oak habitat types on the island. Each of these habitat types has been significantly reduced in the Bay Area, to the severe detriment of native bird populations and other wildlife species. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.2]

Golden Gate Audubon joins in the comments provided by the California Native Plant Society, Yerba Buena Chapter, and the Bay Chapter of the Sierra Club regarding impacts to native plant communities. The coastal scrub, riparian, coastal oak woodland, and native mixed woodland sites in on YBI should be fully protected and, where possible, enhanced by the Project. Doing so would provide benefits for the plants, wildlife, and human community on TI-YBI. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.15]

In this process, we ask that the Redevelopment Authority and the Commission remember that native bird and plant populations in San Francisco continue to decline and that the need for jobs, housing, and new development ought to be balanced by preserving sustainable populations of our natural history. It is the responsibility of these bodies to do more than meet the meager requirements of CEQA; rather, it is your duty to ensure that San Francisco's natural history is preserved for future generations of Bay Area residents.

The EIR is accurate in stating that the habitat of Yerba Buena Island has been severely compromised by years of construction and occupancy on the island, and by a lack of stewardship for the area's natural values. This is why the Yerba Buena Island Habitat Management Plan must be completed before construction on the project begins, and why the Management Plan should be the guide for how the island's natural habitats are managed going forward. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.1]

p. 64 The statement that the habitat management plan (HMP) for YBI would provide biological improvements and additional protection for sensitive resources does not apply to marine and intertidal resources because intertidal and offshore resources are specifically excluded from coverage by the HMP (p. 25) which refers back to the DEIR for coverage of intertidal and marine species. Please correct in the DEIR that the HMP does not provide protection or enhancement for these particular species and their habitats. Please amend the HMP so that it does protect and enhance intertidal and offshore resources. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.7]

One of the concerns that came up in one of our sessions at CAB was the removal of nonindigenous plants. And I notice that also some of the costs of removal and continued costs of maintaining removal of the nonindigenous plants are kind of brought up to the residents or added to the resident's costs. We brought up that concern, that 50 percent of the lands right now are going to be owned by Coast Guards.

We'd like to incorporate some of the costs to be shared also by the federal government, because this removal of this plant is going to be continuously asked of us. And if half of the plant is also going to be located on the other side of the land, we need to incorporate some kind of considerations as far as the cost so it won't be burdened on the residents continuously. (*Atta Pilram*) [TR.18.1]

### **Response**

One comment requests completion of the Habitat Management Plan for Yerba Buena Island ("HMP") *before* construction begins. It is not clear whether the comment is recommending that the HMP document be completed or whether the actions recommended in the draft HMP be *implemented* before construction of the Proposed Project occurs on Yerba Buena Island. Regarding the timing for approval of the HMP, the document is in proposed final form. The TIDA Board and the Board of Supervisors would consider approval of the final HMP along with all other project approvals, and as such, the HMP itself would be formally "completed" prior to initiation of construction if it is approved. Implementation of the HMP is part of the Proposed Project. Therefore, it cannot be approved by the TIDA Board or implemented by the project sponsors until after the EIR is certified and the Proposed Project is approved. Some actions in the HMP (e.g., removal of invasive species) may be started while construction of the Proposed Project is underway. Other activities of the HMP would likely be implemented when all or most of the Proposed Project's construction on Yerba Buena Island is complete and potentially disruptive activities in an area have ceased.

Contrary to one comment, the EIR describes the value of habitat on the Islands and immediately offshore. The EIR states, for example: "The San Francisco Bay-Delta is an important wintering and stop-over site for the Pacific Flyway. More than 300,000 wintering waterfowl use the region and associated ponds" (EIR p. IV.M.3); "The intertidal regions of the Islands contain highly diverse and varied habitats dominated by rocky substrates that support an abundance of marine flora and fauna" (EIR p. IV.M.9); and "Central Coast Riparian Scrub (riparian habitat), California Buckeye, or SAV/eelgrass beds" (EIR p. IV.M.47). All of these habitats are recognized in the EIR as sensitive, and hence valuable, natural communities.

The comment is correct, however, in noting that the HMP is limited to onshore habitats and that intertidal and offshore resources are specifically excluded from the HMP. As part of the Proposed Project, the HMP scope was limited to the upland areas on Yerba Buena Island outside of the proposed developable acreage (see p. IV.M.1). Impacts from construction and operation of the Proposed Project on intertidal and open water marine resources are analyzed in detail in EIR Section IV.M, Biological Resources, and mitigation measures are identified to protect these resources where appropriate. The EIR does not state that the HMP would protect offshore resources. Rather, significant impacts on offshore resources would be addressed via

implementation of relevant mitigation measures identified in the EIR (see, e.g., Mitigation Measures M-BI-2a, M-BI-2b, M-BI-2c, and M-BI-4b.).

As discussed on EIR p. IV.M.47, implementation of the HMP as part of the Proposed Project would protect native communities or enhance them. The scope of the HMP is limited to lands within the control of TIDA, and therefore excludes the lands owned by the Coast Guard. The comment is correct in noting that similar plants exist throughout the Island, and that the efforts under the HMP would be constrained by the fact that certain property would not be managed by the project sponsors. However, the HMP was formulated with this constraint in mind, and the restoration and management actions are achievable even without Coast Guard participation. No costs of the habitat management actions would be incurred on Coast Guard property. . For this reason, it would not be appropriate to request that the Coast Guard contribute to implementation.

#### **2.15.4 BIRDS**

##### **Comment**

A particular concern to the Audubon Society are the impacts, the unavoidable impacts to birds. The first and easiest one to identify is the massive increase in population on the island, itself. There is no doubt by increasing the population overall -- (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [TR.12.2]

##### **Response**

The comments express concern about unavoidable impacts on birds. Regarding the increased population's impacts on birds, the EIR addresses these impacts by considering the discrete human-associated impacts themselves rather than by generally discussing the simple increase in the population on the site. For example, the EIR addresses buildings the humans would occupy in analyzing bird strike impacts and lighting on EIR p. IV.M.5, and domestic and feral animals on EIR p. IV.M.46. The EIR finds that impacts on birds are potentially significant, proposes feasible mitigation measures to lessen those potentially significant impacts, and in one case concludes that the impacts of the Proposed Project on rafting waterfowl would be significant and unavoidable due to the uncertainty of implementation of the proposed mitigation measures by an agency outside of the jurisdiction of the City (EIR p. IV.M.51).

##### **2.15.4.1 Bird Strikes**

##### **Comments**

5. Pg. S.39, Impact BI-4, *Educating Residents and Occupants*: This statement says ... *permit applicant agrees to provide educational materials to tenants and occupants ... and ... closing window coverings at night*. The CAB feels that artificial light can be minimized (both outside and reflective) by **design** rather than by **training**, and we question that training would be

either a viable or effective mitigation tool. (*Treasure Island/Yerba Buena Island Citizens' Advisory Board*) [8.5]

1. As I understand it, numerous high-rise towers (multi-story commercial and residential), may be planned for Treasure Island. In that regard, DEIR Impact BI-4 deals with avian collisions with buildings. What studies, if any, not including the subject DEIR, have been done to determine whether the Pacific Flyway for migratory birds could be significantly impacted or affected by high-rise towers built on or proximate to such Flyway path? (*Judy Irving, Executive Director, Pelican Media*) [14.1]

2. The DEIR cites at p. 1V.M.50, Stenzel, *et.al*., *Abundance and Distribution of Shorebirds in the San Francisco Area*, however, does the DEIR rely on any more specific studies than this? If so, please give the author and title of such materials.

3. Please provide a description of each and every species of (a)migrating bird, (b) resident bird, for which the project could have potential impact or affect, and for each and every species the nature and scope of such impact or affect.[14.2]

4. Please describe in detail as to each local and regional bird species, how glass surfaces on the project's high-rise towers would "affect the viability of local and regional bird populations."

5. Please describe which species of migratory birds would be vulnerable to illuminated buildings at night. (*Judy Irving, Executive Director, Pelican Media*) [14.3]

7. Please describe in detail, as to each species of migratory bird, why "avian collisions are a potentially significant impact."

8. Please describe at least five locations in the United States where patterned and fritted glass has been used in high-rise towers, and what has been the result of such use in each such location in diminishing avian collisions.

9. Please set forth in detail why, with Mitigation Measure M-BI-4a, "the impacts on birds from the Proposed Project would be less than significant."

10. Why do the "ground floor and first few stories of buildings present the greatest hazards to birds"?

11. Which "breeding birds" within the project area may be at risk of colliding with the project's possible high-rise towers? (*Judy Irving, Executive Director, Pelican Media*) [14.5]

12. Specifically to the peregrine falcon, please describe the nature and extent of the project's potential impacts on this endangered species. (*Judy Irving, Executive Director, Pelican Media*) [14.6]

13. Specifically to the California brown pelican, please describe the nature and extent of the project's potential impacts. (*Judy Irving, Executive Director, Pelican Media*) [14.7]

14. What species of birds listed under the Federal Endangered Species Act, or proposed to be listed, may be subject to impact from or affected by the proposed project's buildings, including high-rise towers?

15. As to Question # 14, would such impacts or affects be considered significant? If so how? If not, why not?

16. What species of birds listed under the California Endangered Species Act, including candidate species, and any species of special concern, may be impacted or affected by the proposed project's buildings, including high-rise towers?

17. As to Question # 16, would such impacts be considered significant? If so, how? If not, why not? (*Judy Irving, Executive Director, Pelican Media*) [14.8]

19. What measures would be taken to minimize avian collision with antennae, monopole and rooftop elements on any of the project's buildings, including high-rise towers? (*Judy Irving, Executive Director, Pelican Media*) [14.10]

Golden Gate Audubon appreciates the fairly thorough explanation of the bird-building collision issues presented by the new development on TI. (*See DEIR at IV.M.50*) While Mitigation Measure M-BI-4a: Minimizing Bird Strikes is an excellent start, and should be applauded as one of the first of its kind in a Bay Area major development EIR, we remain concerned about the DEIR's determination that the measure will reduce the impacts to a "less than significant" level. The DEIR provides no basis for how it reached this estimation. For example, how many birds are expected to be affected, even assuming the Mitigation Measures are successful? How do the DEIR authors know that the proposed measures are effective? Is there a scientific or technical basis for making these assumptions? Without this information, we cannot determine the veracity of the claim that the impacts will be "less than significant." (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.17]

- What evidence is there that the mitigation measures proposed to "minimize" bird strikes will in actually reduce this impact to "less than significant" given the undisputed facts that the Project is a prominent cluster of 19 high-rise towers at the center of the San Francisco Bay in the path of over 500,000 spring migrating shorebirds and more than 300,000 wintering waterfowl?
- Please provide proof that the measures listed for "minimizing" bird strikes have been successfully used for similar clusters of high-rise buildings in the middle of a similar bay environment in the path of over 500,000 spring migrating shorebirds and more than 300,000 wintering waterfowl. Please list specific examples.
- How can the DEIR conclude that "minimizing" the impacts to birds - based on TIDA's review of some future yet-to-be-designed buildings -- would result in a "less than significant" impact to birds?
- The mitigation measure (M-BI-4a) states that in the future "[b]uilding developers are encouraged to coordinate with TIDA early in the design process regarding design features intended to minimize bird strikes." What expertise does TIDA have with regard to birds and bird strikes? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.71]

Refer to: S.36-S.39: BIRD STRIKES: I believe views from windows sho[uld] not be interfered with. Some of the mitigations sound extremeley restictive. The EIR does not say how widespread the threat to bir[ds] is. Is it worse than in the rest of the city? T.I. occupies only a small portion of the Bay over which the birds fly. (*Neil Malloch*) [44.6]

The DEIR is inadequate insofar as it assesses impacts to birds resulting from collisions with new structures. It is estimated that more than I billion birds die in the United States each year due to impacts with man-made structures, such as the high rise structures proposed for the island. It is unclear why the DEIR states that this is a "less than significant impact" when, in fact, it should be

considered both significant and unavoidable, especially when considered in cumulative effect with existing collision threats and proposed new structures (such as the redeveloped landscape at Hunter's Point and Candlestick Point). We applaud the inclusion of the requirement that measures, such as fritted glass, be part of any new building design, but are concerned that this measure will not be adequately implemented or enforced. The DEIR should be revised to address these impacts and to propose additional minimization and mitigation measures. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.5]

### **Response**

Many comments pose questions about bird strike impacts on individual species, or in one case *all* species. Although the EIR used the best available information, details regarding bird strike impacts on specific species are poorly documented at the scale and specific location of the Proposed Project. Comments frequently request additional information about the scope of the impact of bird strikes on a larger scale, and assurances that mitigation measures would be effective. The responses below provide additional references, especially from peer-reviewed and informational articles by Dr. Daniel Klem, Jr., a recognized authority, and Professor of Biology at Muhlenberg College, Allentown, Pennsylvania, who has studied the relationship between birds and buildings for the last 35 years.

First, it is important to note the October 10, 2010, release of the City's Public Review Draft *Standards for Bird-Safe Buildings* ("Standards").<sup>3</sup> The draft Standards were developed simultaneously with (but independent of) the mitigation measures identified in the EIR. Also, the draft standards are currently under review by the public; the Planning Commission is expected to consider adoption of an Ordinance to implement them in final form in 2011. Both the draft Standards and the EIR mitigation measures were derived from many of the same sources, e.g., similar guidelines established in New York and Toronto, and similar scientific literature. The two are generally consistent, although side-by-side comparison reveals some differences: spacing between window patterns is wider in the EIR mitigation than in the draft City Standards; the EIR has special provisions for building facades facing the shoreline; the draft City Standards do not. In addition, the EIR mitigation measure would apply to all proposed new buildings in the project area, whereas the draft City Standards would apply only to new buildings or buildings being remodeled that have a combination of characteristics that present the greatest risk to birds. These are buildings that are within or immediately adjacent to open spaces of over one acre or to wetlands, water features, or open water; have a façade with over 35 percent glazing; or propose known bird traps such as a glass courtyard or transparent building corners. The differences reflect the specifics of the Treasure Island building context and the relative novelty of this type of urban design consideration: most strike-avoidance measures have never been comparatively

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<sup>3</sup> Available at [http://www.sf-planning.org/ftp/files/publications\\_reports/bird\\_safe\\_bldgs/Standards\\_for\\_Bird\\_Safe\\_Buildings\\_DRAFT\\_OCT2010.pdf](http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird_Safe_Buildings_DRAFT_OCT2010.pdf).

● tested. The EIR recognizes this. In Mitigation Measure M-BI-4a, the EIR on p. IV.M.52 states, “The building developer shall provide to the Planning Department a written description of the measures and features of the building design that are intended to address potential impacts on birds....The design shall include some of the following measures or measures that are equivalent to, but not necessarily identical to, those listed below, as new, more effective technology for addressing bird strikes may become available in the future.” Thus, to implement this measure, prior to the issuance of the first building permit for each building in the Proposed Project, the building developer would have a qualified biologist experienced with bird strikes review and the Planning Department would approve the design of the building to ensure that it sufficiently minimizes the potential for bird strikes based on the current state of knowledge at that time. This approach strikes a balance between the Project’s commitment to reduce bird strikes and the ability of individual development proposals in the Proposed Project to adapt to new methodologies as they change over time. As a practical matter, this would allow the reviewing biologist to choose suitable measures from the City’s final standards or from other, newer, emerging research results.

One comment states a preference for design, rather than education, as a method of reducing night lighting-related bird strikes (the EIR includes a provision for providing educational materials to building tenants and occupants on p. IV.M.54). While the EIR proposes design features for light reduction (see Mitigation Measure M-BI-4a: *Minimizing Bird Strikes*, EIR pp. IV.M.52-IV.M.54), it is reasonable to expect that light reduction measures would be more effective, if residents were informed of the effort to protect wildlife. For this reason, education and design efforts are considered complementary, and both are included in the identified mitigation measure.

The comments about bird strikes in the Pelican Media letter ask a series of questions and the responses below generally follow the sequence in the letter:

- Comments request sources of information on the actual effects of collisions on birds using the Pacific Flyway. There has been much study of the bird collision phenomenon, and several annotated bibliographies and websites are helpful, for example *Avian Collision and Electrocutation: An Annotated Bibliography*, California Energy Commission Publication Number: P700-95-001, October 1995, which is now supported by an on-line database: [www.energy.ca.gov/research/environmental/avian\\_bibliography/](http://www.energy.ca.gov/research/environmental/avian_bibliography/). More research has been done in the eastern U.S., but while it is important to recognize that the problem is real, population modeling based on collisions as a mortality factor at the continental scale are speculative, especially given the size of this Proposed Project relative to the magnitude of the impact nationally. Consequently, this EIR examined best available solutions to the problem (mitigation) as a better way to address this impact.
- The EIR used sources in addition to Stenzel et al. These references can be found in the chapter footnotes.
- A comment asks how glass surfaces would have the effect stated in the EIR and asks for information about the vulnerability of each species to such impacts. The statement from the EIR apparently referenced in the comment (p. IV.M.50) is as follows: “Recent increases in the amount of glass surfaces used to better daylight buildings can be

considered a ‘biologically significant’ issue, potentially affecting the viability of local and regional bird populations.” The EIR took a cautious approach and concurs with the New York City Audubon Society’s conclusion that birds have more difficulty seeing an obstruction that is transparent than one that is not. As cited in the EIR New York City Audubon has presented evidence that a nationwide increase in glass surfaces in buildings, nationwide, is a potentially serious issue. Most migratory birds use light as directional clues, and they seem to be both disoriented and attracted to lights, as noted in the EIR (p. IV.M.50). Passerine (perching) birds are very numerous, and these may represent the largest vulnerable taxonomic group impacted.

- The differences in susceptibility between individual species are not known with any certainty, but studies have attempted to aggregate anecdotal data, e.g., Klem<sup>4</sup> who found robins, juncos, and waxwings as those most frequently striking windows in the United States and Canada. Taking migratory birds as a whole, and given the discussion in the EIR, the balance of the literature and professional judgment supports a conclusion of a potentially significant impact.
- There has been relatively little research on the effectiveness of the mitigations proposed in the EIR, but some results are encouraging. See for example: Klem et al.<sup>5</sup>. See also the expanded discussion about bird strike mitigation measures on pp. 2.15.17-2.15.18, below. Although the efficacy of the proposed measures has not been scientifically validated, these mitigation measures represent the most widely accepted methods for reducing avian collisions.
- In the professional opinion of the biologists who assisted in the preparation of the EIR, implementation of Mitigation Measure M-BI-4a, incorporates new technology as it becomes available at the time of construction. In this way, the effect of bird strikes would be lowered below the threshold of “Substantial” impact, per the significance criteria on EIR, p. IV.M.39. This measure would not necessarily eliminate the impact. See also the expanded discussion of the significance determination below, pp. 2.15.17-2.17.18.
- The flight activity of most birds occurs at relatively low altitudes, except during migration, when they may fly much higher; as a result, for most birds’ daily activities, collision with the lower stories of a building would represent the greatest collision risk.<sup>6</sup>
- The EIR conservatively assumes that all breeding and migrant species would be potentially at risk.
- The peregrine falcon has adapted well to cities, including San Francisco. As an extremely agile predator accustomed to an environment of cliffs and valleys, and to the current built environment of the Bay Bridge, no significant impacts on this species are expected. For both peregrine falcons and brown pelicans, the EIR concludes (EIR p. IV.M.42) “Special-status animals (see below for marine mammals) include American peregrine falcon, double-crested cormorant, and California brown pelican. The existing

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<sup>4</sup> Klem, D. 1989. *Bird-Window Collisions*. Wilson Bulletin, 101(4), pp. 606-620.

<sup>5</sup> Klem, D. Jr., D.C. Keck, L. Marty, A.J. Miller Ball, E.E. Niciu, and C.T. Platt. 2004. *Effects of Window Angling, Feeder Placement, and Scavengers on Avian Mortality at Plate Glass*. Wilson Bulletin, Vol. 116, No. 1, pp. 69-73.

<sup>6</sup> Terres, John K. 1991. *The Audubon Society Encyclopedia of North American Birds*. Wings Books, New York, pp. 13, 14.

environment is one of high ambient disturbance due to the proximity of the Bay Bridge and the noise generated there, and, taken together with the fact that no terrestrial habitat for these species would be affected, effects would be less than significant.”

- With the delisting of the brown pelican in 2009, there are no Federal Endangered Species of birds in the project area of potential impact. Clapper rails, least terns, and snowy plovers are Federally listed species occurring in the Bay, but there is minimal habitat suitable for foraging or nesting for these species on the Islands and they are not likely to occur in the project area.
- Like the Federal government, the State has delisted both peregrine falcons and the brown pelican from its Endangered List. Because of the Proposed Project’s location, there are other special-status species, including transitory visitors such as the Alameda song sparrow, that could potentially strike buildings during dispersal around the Bay Area or during longer-distance migrations. However, because of the absence of suitable breeding habitat for other special status birds in the project area and the scarcity of suitable habitat for special status, tidal marsh-associated birds such as the Alameda song sparrow in the Central Bay, occurrence of those species in the project area would be very infrequent. Nevertheless, the EIR considered these categories of birds, along with general migrants and residents, in the discussion in Impact BI-4 (EIR pp. IV.M.50-IV.M.52) and Mitigation Measure M-BI-4a on EIR pp. IV.M.52-IV.M.54. The impact would be significant without mitigation.
- Mitigation Measure M-BI-4a in the EIR addresses the question about mitigating bird collisions with antennae as follows: “Sponsor shall minimize the number of and co-locate rooftop-antennas and other rooftop structures. Monopole structures or antennas shall not include guy wires.” (EIR p. IV.M.54.)

A different comment requests additional information on how the EIR was able to conclude that the mitigation measures would be successful in reducing bird strike impacts to less-than-significant levels. Data are limited on bird strike impacts, the significance of those impacts, and the effectiveness of mitigation measures. For these reasons, the significance of this impact and the effectiveness of the mitigation both require a substantial amount of professional judgment. Much of the evidence for the significance of the impact is anecdotal, but compelling.<sup>7</sup> The evidence for effectiveness of mitigation is also persuasive, but somewhat limited. As noted above, Klem et al.<sup>8,9</sup> was able to demonstrate the effectiveness of angled glass, and other techniques, and popular publications such as *California Coast & Oceans* (Volume 24, No. 3 Autumn 2008) reported several cases of dramatic reductions in collisions when lighting was reduced. The EIR concluded that the problem was potentially significant but that mitigation would be effective, especially as the mitigation allows for “more effective technology for addressing bird strikes [which] may become available in the future” (EIR p. IV.M.52). In this fashion, the proposed mitigation would allow efforts to evolve and adapt as additional

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<sup>7</sup> Klem, D. 1989. *Op. Cit.*

<sup>8</sup> Klem, D. 2004. *Op. Cit.*

<sup>9</sup> Klem, D. 1990. Collisions between Birds and Windows: Mortality and Prevention. *Journal of Field Ornithology* 61:120-128.

information becomes available. Under CEQA Guidelines, Section 15126.4, mitigation must be roughly proportional to a project's impact, and for both bird strike impacts and mitigation, the conclusions are largely dependent on professional judgment of the analysts and experts in the field. Daniel J. Klem, Jr.<sup>10</sup> observed that "there are many solutions that effectively reduce or eliminate bird strikes," supporting the conclusion that implementation of Mitigation Measure M-BI-4a: *Minimizing Bird Strikes*, on EIR pp. IV.M.52-IV.M.54, would reduce potential adverse effects to less-than-significant levels.

Finally, comments ask about the enforceability of the proposed mitigation measures, and cumulative effects of other structures, such as components of the Candlestick Point – Hunters Point Shipyard Phase II project. The mitigation measures regarding bird strikes in the EIR that are adopted by decision-makers as part of the Mitigation Monitoring and Reporting Program ("MMRP") would become conditions of project approval, and would be enforced by the Planning Department. The Candlestick Point – Hunters Point project approval takes seriously the issue of bird strikes, and will require building design measures to minimize bird strike risk and lighting measures to reduce impacts on birds. These mitigation measures are similar to those identified in this EIR to avoid avian collisions. In both cases, the measures would reduce the impacts to a less-than-significant level.<sup>11</sup> See also the response in Subsection 2.15.10, Mitigation, below.

#### 2.15.4.2 Rafting Birds

##### Comments

Moreover, we note that the DEIR offers nothing substantive to offset the unavoidable impacts to rafting birds, who have already lost more than 40% of the open water habitat once provided by the Bay. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.6]

4. Pg. S.39, Impact BI-4 of the DEIR posits the slowing down and reducing number of ferries due to the water fowl around the island in December and January. While we understand and concur that slowing ferries may be necessary, we feel a reduction in the number of ferries is unreasonable and should be removed. It is our opinion that a reduction in ferry service would not be in keeping with a transit first and alternative modes of transportation policy that have been a major plan element for this community throughout our years of planning on this project. (*Treasure Island/Yerba Buena Island Citizens' Advisory Board*) [8.4]

The DEIR should be specific about what will be done to protect birds on the island. For example, with development of the ferry terminal, what will be done to protect the black-crowned night herons and shorebirds at the site?

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<sup>10</sup> Klem, D., Jr., *Sheet Glass: An Invisible and Lethal Hazard for Birds* (Undated), p. 2.  
<http://www.windowcollisions.info/public/WKPolicy-Stat-Handout-03.pdf>.

<sup>11</sup> San Francisco Planning Department. 2007. *Candlestick Point–Hunters Point Shipyard Phase II Development Plan EIR*, SFRA File No. ER06.05.07, Planning Department Case No. 2007.0946E, certified June 3, 2010.

Mitigation Measure M-BI-4b: Changes in Ferry Service to Protect Rafting Waterbirds appears to provide few, if any, real protections for rafting birds. At a minimum, the DEIR should identify mitigation to offset this impact. The Bay Area has already lost more than 40% of its open water habitat. The Project will likely reduce the available suitable habitat even further. Mitigation must be identified and included in the DEIR. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.18]

### **Response**

These comments mainly involve waterbirds, either those birds using the shoreline at the proposed Ferry Terminal such as black-crowned night herons or aggregated together (“rafting”) on the Bay, such as scaup or scoters. The EIR considers waterbirds at the Ferry Terminal itself to be exposed to the construction and operation disturbance created by the Proposed Project, but in no significant way different than other biota. Therefore, compared to the baseline situation at present, no mitigation measures were deemed necessary. These waterbirds are mobile and either learn to tolerate, or are able to fly away from, static stressors such as human presence and ambient noise. Further, the amount of shoreline that would be occupied by the proposed Ferry Terminal is small compared to the entirety of the shoreline area at Treasure Island.

Rafting waterfowl reaction to a mobile source of harassment such as a ferry is quite different, as discussed on EIR p. IV.M.51. The problem is more complex and problematic with the conclusion that “Long-term effects consist of site abandonment, reduced migration, and reduced reproductive success,” or as the comment states, there will be a reduction in open water habitat in the vicinity of well-traveled ferry routes. In the proposed mitigation measure, a buffer distance of 250 meters (Mitigation Measure M-BI-4b: *Changes in Ferry Service to Protect Rafting Waterbirds*, EIR pp. IV.M.54-IV.M.55) is expected to reduce the effect to less-than-significant levels, given the attenuation of noise and wake over such a distance. One comment indicates that slowing ferries may be a way to reduce impacts to rafting waterfowl, but also states that a reduction in the number of ferries is unreasonable and should be removed. Mitigation Measure M-BI-4b: *Changes in Ferry Service to Protect Rafting Waterbirds* offers two alternatives, a reduction in numbers of ferries or maintaining a buffer zone of 250 meters from areas of high-use by rafting waterbirds. Either of these would be an effective mitigation, but because adoption of these measures by the Water Emergency Transit Authority (“WETA”) is not assured and is outside the jurisdiction of the City, the impact on rafting waterfowl is determined in the EIR to be potentially significant and unavoidable (EIR p. IV.M.54).

## 2.15.5 MARINE BIOLOGY

### 2.15.5.1 Setting

#### Comments

p. IV M 10. The clam species that dominate the benthic community, *Rocheportia coani* and *Musculista senhousi* are somewhat unusual. The 2007 Light's Manual lists the first as being uncommon and primarily offshore. Please expand on what it means to have these species so prevalent. For example, is the area already impacted or dominated by non-native species?

p. IV M 11 used the species name for bay shrimp *Crangon franciscorum* instead of *Lissocrangon* that was used previously. *Crangon* is the most familiar name. Please explain usage and make consistent throughout the document.

same page Please explain why eulachon, a Pacific northwest species was reported as a dominant species in this part of SF Bay.

Names of fishes *shokihaze* and plainfin and *henlei* are misspelled.

Table IV M 1 prickly sculpin one of the most abundant species? This is a freshwater species unlikely to be found in trawls in Central SF Bay. Please explain how this could be or correct the section.

brown bullhead and green sunfish at these stations? These are entirely freshwater species and unlikely to be found in trawl samples of Central SF Bay. Please check to see if there are errors in the CDFG data analyzed, or if the wrong station data were mistakenly analyzed, or otherwise explain the unlikely occurrence of freshwater species in marine waters around TI and YBI.

Heavy reliance on NOAA 2007, not the peer-reviewed literature for marine habitats and species. Please support statements with original sources, not summary overviews.

p. IV M 15 *nigricauda* should not be capitalized. *Crangon franciscorum* is misspelled and not consistent with prior use of the name *Lissocrangon*.

CDFG 2000-20008 is not a citation that can be looked up and checked. Please give a more complete reference or link to retrieving these data.

p. 19 I am not aware of squid being common in the bay. What is the documentation for the statement that squid are eaten by marine mammals in SF Bay around the island?

p. 23 a bird citation was used to footnote Chinook salmon presence in the bay. Is this the correct citation? Please use a fish citation to support statements about fish distribution and abundance.

Table 4. The status of longfin smelt is now State threatened, not Special concern. Please update and consider this change in status with regard to impacts and mitigation measures.

The green sturgeon is on the federal Endangered Species list as threatened, not Special Concern. Please check and correct current state and federal endangered status of this and other species.

p. 30 the statement that the green sturgeon are not significant inhabitants of the waters around TI and YBI miss the point that the waters around the islands, having been declared critical habitat for the green sturgeon by the federal government, are important to this listed species. Impacts to the critical habitat need to be addressed.

p. 31 incidental take of anadromous fish cannot be authorized by the USACE but must come from NOAA/NMFS or USFWS.

p. 33 the date for declaring SF Bay critical habitat for green sturgeon was 2009 not 2008.  
(*Michael F. McGowan, Ph.D., Arc Ecology*) [29.1]

p. 48 The native oyster is not typically known as the California oyster. It is known as the Olympia oyster. This needs to be corrected in the Habitat Management Plan for YBI too. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.4a]

p. 59 Crago franciscorum is not a polychaete. It is a shrimp and this is the third different name used for the same shrimp in the DEIR. Please correct and use the same name throughout.  
(*Michael F. McGowan, Ph.D., Arc Ecology*) [29.5]

### **Response**

A comment questions the ‘heavy-reliance’ on the National Oceanic and Atmospheric Administration’s (“NOAA”) 2007 *Report on the Subtidal Habitats and Associated Biological Taxa in San Francisco Bay* as a key reference for the description of the marine communities inhabiting the San Francisco Bay-Delta in the EIR. The subject NOAA document was, in part, prepared for use in environmental impact assessments and reviews in the San Francisco Bay-Delta and represents the most current compilation of knowledge concerning the highly diverse and complex marine habitats present in San Francisco Bay-Delta and the marine communities that inhabit those habitats. The report was authored by academic, private, and government scientists conducting current research on the Bay-Delta. The report’s authors use and reference the predominant peer-reviewed literature along with information from non-peer reviewed documents to provide the reader with a clear understanding of Bay-Delta habitats and communities as they currently exist. As such, the report serves as an appropriate primary reference for general information about the San Francisco Bay-Delta and its marine communities. The NOAA reference is supplemented by other peer reviewed and non-peer reviewed citations where needed. (See EIR pp. IV.M.2-IV.M.19.)

EIR p. IV.M.10 discusses the composition of the benthic infaunal communities reported to inhabit seafloor sediments surrounding Treasure Island and the area of the planned ferry terminal, respectively. The mollusks *Musculista senhousi* and *Rochefortia coani* were identified as being components of the benthic communities in those two locations. *M. senhousi* is a non-native mussel that has been reported in San Francisco Bay since the 1940s and *R. coani* has been reported in San Francisco Bay since its taxonomic identification in the late 1990s. *R. coani* was identified by Applied Marine Sciences, Inc., (AMS) in their benthic infauna survey of the Ferry Terminal site as being a dominant component of the coarser sand habitat community located very

near to the shoreline of Treasure Island, and *M. senhousi* is known to occur in the sandier sediments of Central San Francisco Bay-Delta in both the near subtidal and intertidal regions.<sup>12</sup>

The presence of *R. coani* in the relatively high-energy, coarser sand habitat along the west side of Treasure Island is not unexpected since this region of the Bay supports many coastal marine species as a result of its close proximity to the entrance to San Francisco Bay and marine influences. The presence of non-native species in San Francisco Bay-Delta and their being components of the marine communities around Treasure Island is the result of past intended or unintended actions and, as a result, they have become components of the baseline biological communities for the project site. Their presence in the intertidal or subtidal marine communities around Treasure Island is not an indication of either physical or contaminant impacts but rather the presence of favorable habitat.

San Francisco Bay and Estuary is inhabited by many species of Caridean shrimp including the California bay shrimp (*Crangon franciscorum*), the blackspotted bay shrimp (*Crangon nigromaculata*), the blacktail bay shrimp (*Crangon nigricauda*), the smooth bay shrimp (*Lissocrangon stylirostris*), the oriental shrimp (*Palaemon macrodactylus*), and Stimpson's coastal shrimp (*Heptacarpus stimpsoni*).<sup>13</sup> Of these species, *C. franciscorum* and *C. nigricauda* are the most abundant in the entire Estuary. However, within Central Bay, *L. stylirostris* and *C. nigromaculata* are the most common.<sup>14,15</sup> The reference to *L. stylirostris* in the full first paragraph on EIR p. IV.M.3 is correct. Additionally, in the second full paragraph on EIR p. IV.M.11, the statement that the California bay shrimp *C. franciscorum* are common in Central Bay is also correct, since this species is commonly found throughout Central Bay but is generally observed in lower numbers in this region of the Bay than *L. stylirostris*. To avoid confusion to the reader, the second full paragraph on EIR p. IV.M.11 is clarified to read (deletions are shown in ~~strikeout~~ and new text is underlined):

The most common large mobile invertebrate organisms in the Central Bay include blackspotted shrimp (*Crangon nigromaculata*), ~~California bay shrimp (*Crangon franciscorum*)~~ smooth shrimp (*Lissocrangon stylirostris*), Dungeness crab (*Metacarcinus magister*), and the slender rock crab (*Cancer gracilis*). Although other species of shrimp are present in the Central Bay, their numbers are substantially lower when compared to the number of ~~California~~ California smooth bay and blackspotted shrimps present.<sup>29, 30</sup>

<sup>12</sup> NOAA. 2007. *Report on the Subtidal Habitats and Associated Biological Taxa in San Francisco Bay*. Prepared by NOAA National Marine Fisheries Service. Santa Rosa, CA. June 2007. 86 pages. (NOAA, 2007)

<sup>13</sup> Baxter *et al.* 1999. Baxter, R., K. Hieb, S. DeLeon, K. Fleming, and J. Orsi. 1999. Pleuronectiformes. In: Orsi, James J. editor, *Report on the 1980-1995 Fish, Shrimp, and Crab Sampling in the San Francisco Estuary, California*, pp. 77– 133. Prepared by The Interagency Ecological Program for the Sacramento-San Joaquin Estuary.

<sup>14</sup> NOAA, 2007. *op. cit*

<sup>15</sup> Baxter *et al.* 1999. *Ibid.*

New footnote 30 is added to this page, as follows, and subsequent footnotes will be renumbered accordingly:

<sup>30</sup> Baxter *et al.* 1999. Baxter, R., K. Hieb, S. DeLeon, K. Fleming, and J. Orsi. 1999. Pleuronectiformes. In: Orsi, James J. editor, Report on the 1980-1995 Fish, Shrimp, and Crab Sampling in the San Francisco Estuary, California, pp. 77-133. Prepared by The Interagency Ecological Program for the Sacramento-San Joaquin Estuary.

Beginning with the third paragraph on EIR p. IV.M.11 and continuing through Table IV.M.1, the EIR discusses the composition of the bottom dwelling, or demersal fish community inhabiting the waters around Treasure Island. One comment questioned the presence of several fish species which are typically found in less saline waters than those present around Treasure Island. These comments prompted a review of the California Department of Fish and Game (“CDFG”) data used to generate Table IV.M.1 that lists the demersal fish populations inhabiting deep and shallow water environments in Central San Francisco Bay. This review discovered a computer programming error that resulted in an incorrect taxonomic list and relative fish species abundance estimates presented for the demersal fish community in Table IV.M.1 and the related text on EIR p. IV.M.11. The description and Table IV.M.2 for the pelagic fish community on EIR pp. IV.M.15-IV.M.16 was also checked and verified to be correct.

The third full paragraph on EIR p. IV.M.11 is revised as follows (deleted text is shown in ~~strikeout~~, new text is underlined):

The bottom, or demersal, fish community reported to inhabit the area surrounding Treasure Island comprises more than ~~6545~~ species. The ~~bay pipefish (Syngnathus leptorhynchus)~~, bay goby (*Lepidogobius lepidus*), ~~spiny dogfish shark (Squalus acanthias)~~, eulachon (*Thaleichthys pacificus*), speckled sanddab (*Citharichthys stigmaeus*), ~~prickly sculpin (Cottus asper)~~, shokhaze goby (*Tridentiger barbatus*), ~~shiner perch (Cymatogaster aggregata)~~, white seaperch (*Phanerodon furcatus*), plainfin midshipman (*Porichthys notatus*), minnows, Chinook salmon (*Oncorhynchus tshawytscha*), and brown smoothhound (*Mustelus henei*) English sole (*Parophrys vetulus*), plainfin midshipman (*Porichthys notatus*), Pacific staghorn sculpin (*Leptocottus armatus*), shiner perch (*Cymatogaster aggregata*), white croaker (*Genyonemus lineatus*), longfin smelt (*Spirinchus thaleichthys*), cheekspot goby (*Ilypnus gilberti*), and brown rockfish (*Sebastes auriculatus*) are the dominant taxa of this community, accounting for approximately ~~9496~~ percent of the fish present (see Table IV.M.1).

Table IV.M.1, on EIR pp. IV.M.12-IV.M.13, is revised as shown on the following three pages (deletions are shown as ~~strike through~~ and new text is underlined).

The first full paragraph on EIR p. IV.M.15 discusses the taxa that make up the meroplankton component of the plankton community inhabiting the Bay. Reference is made to *P. macrodactylus*, *C. francorum*, and *C. nigricauda*, being the dominant macrozooplankton shrimp species. Contrary to one of the comments, the statement in the EIR is correct since these three

**(Revised) Table IV.M.1: Benthic Fish Community Composition and Abundance Indices for Combined Shallow and Deep Water Sites near Treasure Island,<sup>1</sup> Based on Otter Trawl Data, 2000–2008 (fish per hectare)**

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Syngnathus leptorhynchus</i>	bay pipefish	634	797	213	97	326	155	996	272	429	435	20.1%
<i>Lepidogobius lepidus</i>	bay goby	552	772	207	86	301	146	923	199	391	397	29.1%
<i>Squalus acanthias</i>	spiny dogfish	801	334	253	107	86	171	174	471	567	329	15.2%
<i>Thaleichthys pacificus</i>	eulachon	182	400	221	84	13	254	516	179	98	217	10.0%
<i>Citharichthys stigmaeus</i>	speckled sanddab	478	235	172	78	54	104	75	299	425	213	9.8%
<i>Cottus asper</i>	prickly sculpin	801	334	253	107	86	171	174	471	567	329	22.0%
<i>Tridentiger barbatus</i>	shokihaze goby	263	95	258	110	238	335	357	96	166	213	9.8%
<i>Parophrys vetulus</i>	English sole	122	70	92	78	44	80	46	38	66	71	3.3%
<i>Porichthys notatus</i>	plainfin midshipman	182	400	221	84	31	254	516	179	98	217	14.5%
<i>Leptocottus armatus</i>	Pacific staghorn sculpin	263	95	258	110	238	335	357	96	166	213	14.2%
<i>Cymatogaster aggregata</i>	shiner perch	204	87	50	13	10	69	138	47	155	86	5.7%
<i>Phanerodon furcatus</i>	white seaperch	52	37	43	56	30	65	29	18	29	40	1.8%
<i>Porichthys notatus</i>	plainfin midshipman	122	70	92	78	44	80	46	38	66	71	4.7%
<i>Phanerodon furcatus</i>	white seaperch	31	26	30	12	9	17	3	95	45	30	1.4%
<i>Porichthys notatus</i>	plainfin midshipman	70	18	13	16	17	72	26	23	5	29	1.3%
<i>Oneorhynchus tshawytscha</i>	Chinook salmon	50	19	5	19	18	8	23	34	4	20	0.9%
<i>Mustelus henlei</i>	brown smoothhound	20	11	13	23	31	42	19	9	6	19	0.9%
<i>Leptocottus armatus</i>	Pacific staghorn sculpin	54	60	38	12	1	0	0	4	0	19	0.9%
<i>Sebastes auriculatus</i>	brown rockfish	27	23	15	4	6	7	26	14	27	16	0.8%
<i>Sebastes auriculatus</i>	brown rockfish	20	57	37	12	1	0	0	3	0	14	0.7%

(continued)

(Revised) Table IV.M.1 (continued)

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Genyonemus lineatus</i>	white croaker	26	13	13	8	9	16	3	32	10	14	0.7%
		31	26	30	12		17		95	45	30	2.0%
<i>Arctedius fenestralis</i>	padded sculpin	14	23	41	24	2	0	2	6	3	13	0.6%
(cont.)												
<i>Parophrys vetulus</i>	English sole	9	21	21	4	2	2	20	5	21	12	0.5%
<i>Spirinchus thaleichthys</i>	longfin smelt	50	19	5	19	18	8	23	34	4	20	1.3%
<i>Ilypnus gilberti</i>	cheekspot goby	20	11	13	23	31	42	19	9	6	19	1.3%
<i>Sebastes auriculatus</i>	brown rockfish	54	60	38	12	1	0	0	4	0	19	1.3%
<i>Microgadus proximus</i>	Pacific tomcod	5	11	28	22	2	0	1	2	2	8	0.4%
		14	23	41	24			2	6	3	13	0.8%
<i>Percina macrolepida</i>	bigscale logperch	9	3	8	5	3	3	16	3	14	7	0.3%
<i>Ilypnus gilberti</i>	cheekspot goby	2	0	0	2	1	19	29	2	0	6	0.3%
<i>Alosa sapidissima</i>	American shad	5	5	5	5	5	5	5	5	5	5	0.2%
<i>Sardinops sagax</i>	Pacific sardine	1	1	0	13	16	8	0	1	0	4	0.2%
<i>Lampetra tridentata</i>	Pacific lamprey	3	10	2	4	0	2	5	2	1	3	0.2%
<i>Psettichthys melanostictus</i>	sand sole	5	6	2	1	0	4	11	1	0	3	0.1%
<i>Ameiurus nebulosus</i>	brown bullhead	5	3	3	4	1	6	5	1	1	3	0.1%
<i>Ictalurus punctatus</i>	channel catfish	1	0	1	15	0	9	1	1	0	3	0.1%
<i>Spirinchus thaleichthys</i>	longfin smelt	2	10	3	1	1	4	1	3	3	3	0.1%
<i>Synodus lucioceps</i>	California lizardfish	1	1	1	5	6	5	2	3	3	3	0.1%
<i>Syngnathus leptorhynchus</i>	bay pipefish	9	3	8	5	3	3	16	3	14	7	0.5%
<i>Tridentiger trinocephalus</i>	chameleon goby	2	0	0	2	1	19	29	2	0	6	0.4%
<i>Citharichthys sordidus</i>	Pacific sandab	1	1	0	13	16	8	0	1	0	4	0.3%
<i>Clupea pallasii</i>	Pacific herring	3	10	2	4	0	2	5	2	1	3	0.2%

(continued)

(Revised) Table IV.M.1 (continued)

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Pholis ornate</i>	<u>saddleback gunnel</u>	<u>5</u>	<u>6</u>	<u>2</u>	<u>1</u>	<u>0</u>	<u>4</u>	<u>11</u>	<u>1</u>	<u>0</u>	<u>3</u>	<u>0.2</u>
<i>Artedius notospilotus</i>	<u>bonyhead sculpin</u>	<u>5</u>	<u>3</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>6</u>	<u>5</u>	<u>1</u>	<u>1</u>	<u>3</u>	<u>0.2%</u>
<i>Symphurus atricaudus</i>	<u>California tonguefish</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>15</u>	<u>0</u>	<u>9</u>	<u>1</u>	<u>1</u>	<u>0</u>	<u>3</u>	<u>0.2%</u>
<i>Paralichthys californicus</i>	California halibut	1	1	1	<u>4</u> <u>5</u>	6	5	2	3	3	3	<del>0.1%</del> <u>0.2%</u>
(cont.)												
<i>Hyperprosopon ellipticum</i>	<u>silver surfperch</u>	<u>4</u>	<u>0</u>	<u>4</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>7</u>	<u>8</u>	<u>0</u>	<u>2</u>	<u>0.1%</u>
<i>Iparis pulchellus</i>	<u>showy snailfish</u>	<u>4</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>7</u>	<u>8</u>	<u>0</u>	<u>2</u>	<u>0.2%</u>
<i>Mustelus henlei</i>	brown smoothhound	<u>4</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>1</u>	<u>2</u>	<u>0.1%</u>

Notes:

<sup>1</sup> CDFG/IEP trawl data, Stations 109, 110, 211, 212, and 214.

<sup>2</sup> Additional fish species that occurred in trawls at less than significant numbers include: walleye surfperch, big skate, broadnose sevengill shark, western brook lamprey, black bullhead, yellowtail rockfish, yellowfin goby, white seaperch, seabass, longjaw mudsucker, black rockfish, starry flounder, scalyhead sculpin, queenfish, Pacific sand lance, lingcod, black perch, sand sole, pygmy poacher, Pacific sardine, leopard shark, whitebait smelt, topsmelt, American shad, ~~white sturgeon~~, unidentified rockfish, yellowtail rockfish, diamond turbot, curlfin sole, buffalo sculpin, barred surfperch, slipskin snailfish, hornyhead turbot, vermilion rockfish, ~~tubenout~~, California tonguefish, arrow goby, yellow snake eel, Dover sole, delta smelt, barred surfperch, cabezon, Sacramento pikeminnow, bat ray, snake prickleback, hybrid sole, wakasagi, Pacific lamprey, pompano, unidentified river lamprey, rubberlip seaperch, kelp greenling, unidentified snailfish, pile perch, dwarf perch, threadfin shad, spiny dogfish, night smelt, spotfin surfperch, threespine stickleback, onespot fringehead, striped bass, striped seaperch, bonyhead sculpin, Pacific sanddab, threadfin shad, and green sunfish, bocaccio, Pacific pompano, thornback, brown Irish lord, green sturgeon, shimofuri goby.

Source: CDFG 2000–2008. Unpublished data of California Department of Fish and Game (CDFG Interagency Ecological Program for San Francisco Estuary. Monthly Mid-water and Otter-Trawl Survey Data for San Francisco Estuary. Available by contacting DCFG at khieb@dfg.ca.gov).

taxa are the most abundant shrimp species throughout the Bay-Estuary system where the waters of South, Central and North Bay regularly mix. The dominance of a particular shrimp species larvae in the water column does not directly relate to their dominance as adults in that portion of the Bay.

The first sentence in the first full paragraph on EIR p. IV.M.15 is revised to correct one Latin species name (deletions are shown as ~~strike through~~ and new text is underlined):

Central Bay meroplankton, including macrozooplankton and micronekton, is dominated by the ctenophore *Pleruobrachia bachei*, the isopod *Synidotea laticauda*, the shrimps (*Palaemon macrodactylus*, *Crangon franciscorum*, and *C. ~~N~~nigricauda*), the mysid *Neomysis kadiakensis*, and the medusa *Polyorchis* spp.<sup>45</sup>

A second note is added to Table IV.M.2 on EIR p. IV.M.16, with the note designation added to “Species” at the head of the first column in the table. The new note reads as follows:

<sup>2</sup> Additional fish species that were present in the trawls at less than significant numbers include: white croaker, longfin smelt, American shad, Chinook salmon, white seaperch, plainfin midshipman, bay goby, whitebait smelt, bat ray, threadfin shad, California halibut, Pacific staghorn sculpin, Pacific tomcod, big skate, speckled sanddab, English sole, surf smelt, brown smoothhound, Pacific electric ray, barred surfperch, threespine stickleback, diamond turbot, leopard shark, river lamprey, yellowfin goby, striped bass, starry flounder, cheekspot goby, bay pipefish, queenfish, lingcod, white seabass, pile perch, unidentified rockfish, kelp greenling, black perch, and redbtail surfperch.

One comment questioned the use of CDFG 2000-2008 as a valid citation that can be independently verified. This citation was used to identify the source of fisheries data collected by the California Department of Fish and Game’s Interagency Ecological Program for San Francisco Estuary, in which they sample on a monthly basis the demersal and pelagic fish populations from locations throughout the Bay-Delta. This data is made available by CDFG’s IEP program personnel upon request. Although the full reference is provided in the reference section of the EIR, it was not included as a footnoted reference in the body of Section IV.M, Biological Resources. The first use of this citation is in Table IV.M.1; the table has been expanded to contain the full reference and access to CDFG IEP data, as presented in the revised table in this response.

The second paragraph on EIR p. IV.M.19, in the biological setting discusses the food types consumed by Harbor seals (*Phocoo vitulina*) and the proximity of these prey items to Treasure Island. The prey listed is the preferred food for Harbor seals that forage not only within the Bay but also in the nearshore coastal waters outside the Golden Gate. The text provided could be read to suggest that squid (*Loligo spp.*) are common inhabitants in the waters surrounding Treasure Island as indicated in one comment; this reading was not what was intended. To avoid confusion, the last sentence in the second full paragraph on p. IV.M.19 is revised as follows (deleted text is shown in ~~strikeout~~ and new text is underlined):

Harbor seals forage throughout the Bay-Delta and in nearshore coastal waters feeding on schooling fish such as smelt, anchovies, and herring, rockfish, sculpin, perch, and midshipmen, along with squid and mysid shrimp, ~~all~~ most of which are ~~present~~ common inhabitants in the waters surrounding the Islands.

As noted in a comment, footnote 69 on p. IV.M.23 incorrectly cites USFWS 1987 and should instead cite Herbold, B. and P.B. Moyle, 1989. Footnote 69 is revised as follows:

<sup>69</sup> ~~USFWS. 1987. *Birds of San Francisco Bay and San Pablo Bay National Wildlife Refuges*. U.S. Fish and Wildlife Refuge. Unpaginated. Jamestown, ND: Northern Prairie Wildlife Research Center Online. <http://www.npwrc.usgs.gov/sfbay.htm>.~~  
Herbold, B. and P.B. Moyle. 1989. *Ibid.*

The special status designations in the EIR on p. IV.M.24, in the second column of Table IV.M.3, are revised to delete ~~SC/SC~~ and changed to read “T/C” for green sturgeon and “-/T” for longfin smelt to reflect current protected species status, as recommended in the comments.

EIR p. IV.M.30, in the first partial paragraph at the top of the page, identifies the designation by the United States Fish and Wildlife Service (“USFWS”) of all of San Francisco Bay-Delta as critical habitat for the green sturgeon (*Acipenser medirostris*). As the EIR states, based upon data collected by CDFG on a monthly basis, green sturgeon are not reported to be frequent inhabitants of the waters around Treasure Island. However, contrary to one comment, all potential physical changes to the subtidal habitats surrounding Treasure Island were carefully considered for their potential to affect green sturgeon movements and foraging, and the resulting potential to affect the species’ critical habitat, as illustrated in the discussions in Impacts BI-1, BI-4, and BI-6 starting on EIR p. IV.M.41.

As stated in a comment, the incidental take of any Federally listed endangered or threatened species is prohibited unless the take is authorized by USFWS or NOAA Fisheries, as indicated in the EIR on p. IV.M.31, fourth and fifth paragraphs. When an activity requires a permit or authorization from a Federal agency, such as a dredge and fill permit from the United States Army Corps of Engineers (“USACE”), the Federal agency is required to ensure that the proposed activity would not jeopardize the continued existence of any ESA-listed species or adversely affect designated critical habitat for any managed fish species. To this purpose, the Federal agency is required to consult with USFWS and/or NOAA Fisheries. The conclusion of this consultation with USFWS and/or NOAA Fisheries will be the issuance of a Biological Opinion that assesses the effect of a proposed activity on any listed species and their designated critical habitat. Assuming that the activity is found to not jeopardize any federally protected or managed species or adversely modify designated critical habitat, but could potentially result in the loss of a listed species or critical habitat, the Biological Opinion would include an incidental “take” of the listed species.

The referenced discussion in the EIR does not suggest that USACE is the agency that will authorize the “take” of listed species. Rather, it acknowledges that the USACE permitting process is the starting point for the evaluation of potential effect on ESA-listed species and/or critical habitat for ESA-listed and other managed species, and for discussions with USFWS and/or NOAA Fisheries. Based upon those discussions and potential effects of a proposed project or activity, the USFWS and/or NOAA Fisheries would issue a Biological Opinion and authorize incidental “take”. The USACE would then condition a dredge and fill permit on compliance with the terms and conditions included in any issued Biological Opinion covering the activity or project.

Although the EIR text in question specifically references federal actions and protections for listed or managed marine species, it should be noted that the State of California has a similar process for State-listed species under the California Endangered Species Act. Because of frequently overlapping jurisdictions and responsibilities, NOAA Marine Fisheries and USFWS routinely consult with and develop Biological Opinions in coordination with the California Department of Fish and Game (“CDFG”) for activities within overlapping jurisdictions. The state process is slightly different from the federal procedures when a species is listed by the State as endangered or threatened and the federal government does not, as in the case with Longfin Smelt. In these circumstances, the CDFG will require the project applicant to apply for an incidental “take” permit, rather than authorizing the incidental “take” as part of the Biological Opinion.

The date provided for the designation of critical habitat for green sturgeon is September 8, 2008 on EIR p. IV.M.33. This is the date of the Federal Register listing of proposed rulemaking to designate critical habitat for the threatened southern distinct population segment of North American Green Sturgeon. NOAA published final critical habitat designation on October 9, 2009. The last bullet item on EIR p. IV.M.33 is revised to read (deletions are shown as ~~strike-through~~ and new text is underlined):

Green Sturgeon, ~~September 8, 2008~~ October 9, 2009.

On EIR p. IV.M.59, second paragraph, the text discusses the different benthic organisms preyed upon by green sturgeon. A typographical error in the original referenced citation was inadvertently copied into the EIR and resulted in the bay shrimp, *Crago franciscorum* being identified as an annelid worm, as indicated in the comment. Additionally, the Caridean shrimps *Crangon franciscorum* and *Crago franciscorum* had, until recently, been identified as different taxonomic species. Currently the genus *Crangon* is the preferred usage but both species names continue to be and can be used interchangeably. To avoid confusion in the EIR, the species name of *Crangon franciscorum* has been used consistently.

The last sentence in the first full paragraph on EIR p. IV.M.59 is revised to read (deletions are shown as ~~strike-through~~ and new text is underlined):

Green sturgeons are known to feed upon opossum shrimps (*Neomysis mercedis* and *N. awatchensis*), the amphipod *Corophium*, ~~the annelid worms, the bay shrimp~~ *Crango* *Crangon franciscorum*, the isopod *Synidota liticsud*, the Asian clam *Corbula amurensis*, and the gastropod *Olivella baetica*.

The oyster, *Ostreola conchaphila*, which is taxonomically synonymous with *Ostrea lurida*, has many common names including Olympia oyster, California oyster, native oyster, shoalwater

oyster, Yaquina Bay oyster, rock oyster and native California oyster<sup>16</sup> (EIR p. IV.M.48). The recommended common name as mentioned in Comment 29.4 is ‘Olympia oyster’, although since its remarkable comeback in San Francisco Bay this past decade, ‘native California oyster’ and ‘native oyster’ are more commonly used locally.

The text revisions and clarifications in this and other responses in Section 2.15 do not change the analyses or conclusions in Section M, Biological Resources, in the EIR.

### 2.15.5.2 Eelgrass

#### Comments

Section IV.M Impact BI-2 recognizes potential impacts to eelgrass beds, which are sensitive habitat for Pacific herring, invertebrates and assorted fish species. In order for the Commission to permit the proposed project, the proposed eelgrass survey under Mitigation Measure M-BI-2c, should depict the eelgrass bed locations and which beds could be impacted from the proposed ferry, the sailing center, and other recreational activities that could impact eelgrass. The FEIR should further discuss the Best Management Practices to be utilized during and after construction, such as the use of barges and sediment curtains, as well as the approximate number, location and size of the proposed storm water outfalls in relation to how the project would impact the onsite biological resources. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.11]

#### **Mitigation Measure M-BI-2c: Eelgrass Bed Survey and Avoidance**

This mitigation measure does not provide any specific or enforceable measure for avoiding impacts to eelgrass beds. For example, how will the pilots of the barges or other watercraft that move through the area be made aware of the presence of the eelgrass beds and the applicable restrictions? How will these restrictions be enforced? Without adequate outreach, education and enforcement, this mitigation will not result in the minimization or avoidance required. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.23]

The island has eelgrass beds which are important for many native fish and bird species. (*See [http://www.dfg.ca.gov/marine/status/submerged\\_aquatic\\_plant.pdf](http://www.dfg.ca.gov/marine/status/submerged_aquatic_plant.pdf)*) Eelgrass was also a source of food for Native Americans and has value as a cultural resource. From its review of Section IV.M.12-13, Golden Gate Audubon cannot determine what protections, if any, are in place as part of the transportation plans to ensure the integrity of the eelgrass beds and other important parts of the subtidal ecosystem. The mitigation measure (discussed further below) offers to identify eelgrass beds, but offers no measurable, enforceable means of protecting the eelgrass beds. The DEIR should be revised to ensure adequate protections are included as mitigation and avoidance measures. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.11]

We also note that the DEIR states that all eelgrass beds will be surveyed prior to construction. However, this should occur prior to completion of the EIR to ensure adequate avoidance and

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<sup>16</sup> Couch, D., and T.J. Hassler, *Species profiles: life histories and environmental requirements of coastal fishes and invertebrates (Pacific Northwest)--Olympia oyster*, U.S. Fish Wildlife Service Biol. Rep. 82(11.124). U.S. Army Corps of Engineers, TR EL-82-4. 8pp.

mitigation measures are developed. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.4]

**Response**

Several comments concern the eelgrass beds near and adjacent to Treasure Island, the proposed mitigation measures, the adequacy of those measures to reduce potential impacts to less-than-significant levels or to prevent the impacts from occurring, and how the implementation of the requirements identified in the mitigation measures would be enforced.

At present, there are three eelgrass beds located near Treasure Island and Yerba Buena Island. The first and closest is located immediately adjacent to the eastern shoreline of Treasure Island, as determined by eelgrass surveys performed by AMS for the EIR in 2009 and earlier surveys performed by others. The second is located farther offshore to the north of Treasure Island, and the third is located in Clipper Cove, approximately 0.3-mile from the southeast shoreline of Treasure Island and adjacent to the northeast shoreline of Yerba Buena Island (see EIR pp. IV.M.9, IV.M.13-IV.M.14, and IV.M.48).

Proposed Project activities are not expected to have much, if any, impact on the existing eelgrass beds located to the north of Treasure Island and in Clipper Cove because of their distance from the Project Area. Vessels transiting to or from Treasure Island or temporarily anchoring while waiting to be used in redevelopment activities could inadvertently disturb these beds; this expected activity is, in part, addressed by Mitigation Measure M-BI-2c that requires all vessels to be made aware of the existence of these beds and to avoid them (EIR p. IV.M.49).

The eelgrass bed located along the eastern shoreline of Treasure Island has the greatest potential for disturbance from the Proposed Project because of its close proximity to the island and several of the planned redevelopment activities, as discussed on EIR p. IV.M.48 (e.g., shoreline stabilization and heightening, storm water drain replacement, onshore demolition). Mitigation Measures M-BI-2a and M-BI-2c were developed to address these potential impacts by preventing construction activities from occurring within the near subtidal areas surrounding Treasure Island, which include eelgrass beds, and prohibiting barges used to bring materials to the island and/or removing demolition waste from anchoring or otherwise disturbing this eelgrass bed.

The Proposed Project is expected to take many years to construct. A Variant for the Ferry Terminal design proposes construction of the south breakwater as long as 10 years after initial construction of the north breakwater (see the discussion of Ferry Terminal Breakwater Variant B3 on EIR pp. VI.20-VI.30). The Bay is a complex, dynamic system that changes over time. Available data shows that the location and density of eelgrass beds in the Bay have changed over

time.<sup>17</sup> These changes affect the suitability of various areas in the Bay as eelgrass habitat. Eelgrass beds are more likely to be present in less exposed areas of the Bay with underlying sediments with suitable organic content and coarseness. At present, the Bay is undergoing important physical changes as a result of global climate change, sea level rise, and reduced sediment load. Higher water temperatures and less turbid water can be expected to have a positive effect on eelgrass growth, whereas sea level rise could result in either positive or negative effects. As a result, during project implementation the existing eelgrass beds may grow and expand, decrease in size, or cease to exist. Additionally, new eelgrass beds may become established at other locations near or adjacent to Treasure Island.

The mitigation measure requirement for periodic surveys of eelgrass beds near or adjacent to Treasure Island whenever Project activities have the potential to affect them (MI-B-2c) is intended to ensure that any changes in the eelgrass beds is reflected in the actions and environmental protections applied to ongoing operations, regardless of how many years into the future they may be occurring, such that the beds are adequately protected. In response to the comment, Mitigation Measure M-B1-2c has been amended to include language that requires the identification and linkage of existing and possible future eelgrass beds to ongoing activities and the communication of this information to project personnel. In addition, if Breakwater Variant B3 is selected, implementation of Mitigation Measure M-BI-8 would add surveys of the Ferry Terminal area for the presence of eelgrass beds prior to construction of the south breakwater.

Implementation of the Mitigation Monitoring and Reporting Program (“MMRP”) is the mechanism where the adherence to all mitigation measures is ensured and enforced by TIDA. A key part of any mitigation monitoring program is the initial and periodic training of project personnel concerning mitigation measures and the on-site auditing and observation of project activities and their compliance with the MMRP. To ensure that this occurs, text is added to Mitigation Measure M-BI-2c (EIR p. IV.M.49) as follows (deletions are shown as ~~strike through~~ and new text is underlined):

~~Prior to~~ Within three to six months of the initiation of construction activities that might affect SAV beds, and not less frequently than biennially (every two years) thereafter, all eelgrass beds shall be surveyed or otherwise identified, including their proximity and potential impact from ongoing or pending onshore or offshore construction activities identified. All TIDA staff in charge of overseeing construction for the Proposed Project, and all construction contractors and subcontractors involved in Project construction activities in Bay waters that are within a quarter mile of Treasure Island and Yerba Buena Island, along Treasure Island’s shoreline, or involved in transporting materials and supplies by water to either Island shall be required to undergo thorough initial environmental training. ~~that~~ This training shall present

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<sup>17</sup> Bover, K.E. and S Wylie-Echerverria. 2010. Eelgrass Conservation and Restoration In San Francisco Bay: Opportunities And Constraints. Final report prepared for the San Francisco Bay Subtidal Habitat Goals Project.

information on the locations of all eelgrass beds, the kinds of construction and vessel transit activities that can impact eelgrass beds, all mitigation measures that contractors must adhere to so that they any disturbance or damage to eelgrass beds may be avoided and the beds protected and who to notify in the event of any disturbance. Any work barges or vessels engaged in construction activities shall avoid minimize-transiting through and avoid anchoring in any eelgrass beds located around Treasure Island. TIDA personnel responsible for overseeing Project contractors, as well as all Project contractor and subcontractor management personnel, shall ensure that all boat operators and work crews are aware of eelgrass bed locations and the requirement to avoid disturbing them.

In response to the comment concerning the inclusion of Best Management Practices (“BMPs”) in the EIR discussion on the potential for onshore and offshore Project activities to effect submerged aquatic vegetation (“SAV”) beds and most specifically eelgrass beds, the first sentence of the last paragraph on EIR p. IV.M.48 is revised to read (deletions are shown as ~~strike through~~ and new text is underlined):

As discussed above, conformance to new stormwater control regulations and the application of routine construction and deconstruction Best Management Practices (BMPs), such as filter berms, silt fences, straw bales, storm drain inlet protection and vegetated buffers, methods are expected to constrain any additional sedimentation and movement of potentially contaminated materials through existing and future storm drains; thus, impacts on SAV beds would be less than significant.

### 2.15.5.3 Ferry Impacts and Impacts of Light on Fish

#### Comments

The DEIR appears to offer Mitigation Measure M-BI-4a as the only mitigation measure for dealing with light. It does not appear to address or minimize impacts to fish (especially as written now). The mitigation measure should be revised, or another measure should be drafted, to address the impacts of lights on fish and other marine organisms (which can affect many other species on the food chain). (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.25]

We do not understand the DEIR’s conclusion that shading and other factors (turbidity, etc.) reducing phytoplankton activity are “less than significant” without requiring mitigation. (*See DEIR IV.M.61*) It appears to assume that because the ferry will cause increase turbidity, phytoplankton activity will not be very high; however, it would seem that the introduction of the ferry itself is an impact that must be minimized, avoided or mitigated. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.26]

p. 60-61 The vertical bulkhead habitat is not equivalent to the rocky intertidal that would be replaced. Some of the organisms that would colonize the bulkhead would be the same as some of those found in the rocky intertidal but; in general, they would more likely be non-native fouling organisms typically found on docks and in marinas around the bay. The less complex flat surface of the bulkheads does not provide the same habitat complexity as rocky intertidal and therefore does not support the same species diversity. Please correct this section and add a mitigation measure to compensate for the loss of habitat and implied species diversity by constructing rocky intertidal and subtidal habitat along with monitoring to confirm that what was lost has been replaced. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.6]

**Response**

The construction and operation of the proposed Ferry Terminal is expected to result in some alteration of the existing marine habitat along the western shoreline of Treasure Island and therein have an effect on marine biological communities inhabiting or using the area. The waters of San Francisco Bay, including those surrounding Treasure Island, are typically characterized as being highly turbid because of local watershed runoff, inflow from the Sacramento and San Joaquin Rivers and their watersheds, and constant resuspension of bottom sediments from tidal and wind action. Consequently, plankton abundance and productivity is low when compared to coastal waters and less turbid estuaries and embayments. In the Bay, light penetration is generally limited to the upper meter of water. Additionally, the waters along the western shoreline of Treasure Island are subject to high tidal currents that keep the plankton population in constant movement.

The installation of docks, pilings, and breakwaters at the new Ferry Terminal would result in some shading of sunlight into the water, as stated on EIR p. IV.M.61, but the existing turbidity of the water already limits light penetration and plankton productivity and what little additional shading would occur is not expected to result in any detectable or measurable reduction in that productivity. Additionally, the existing high tidal currents in the area would result in any individual plankton remaining within the shaded area of water for only a few seconds; therefore, the tidal currents would contribute to minimizing any effect of shading on plankton productivity. Prop wash from ferries docking at the new terminal can be expected to increase water turbidity in the immediate vicinity of the docks and possibly within the ferry basin. Any increased turbidity from prop wash is expected to be minimal when compared to existing turbid background conditions. Regardless, tidal currents and prop wash can be expected to keep the potentially more turbid waters inside the ferry basin mixing with the slightly less turbid waters outside the basin and limit the potential for reduced plankton productivity from shading or ferry operations. Thus, the conclusion in the EIR that the impact would be less than significant is correct. To clarify any confusion concerning plankton productivity within the waters surrounding the Islands and the effect of turbidity on that productivity, the following text is added to the partial paragraph at the top of p. IV.M.15, before the last sentence in the paragraph (new text is underlined):

The waters of San Francisco Bay, including those surrounding Treasure Island, are typically characterized as being turbid because of local watershed runoff, inflow from the Sacramento and San Joaquin Rivers, and constant resuspension of bottom sediments from tidal and wind action.<sup>44</sup> As a result, light penetration is greatly affected by turbidity levels and as a result are generally limited to the upper meter of water.<sup>45</sup> As a consequence, plankton abundance and productivity is typically lower than nearby coastal waters and less turbid estuaries and embayments. Unlike the North and South Bays, the Central Bay is the least affected by introduced exotic species.

New footnotes 44 and 45, shown below, are added to the bottom of p. IV.M.15 (new text is underlined), and subsequent footnotes will be renumbered accordingly:

<sup>44</sup> NOAA. 2007. *Ibid.*

<sup>45</sup> May, C. L., J. R. Kosefi, L. V. Luca., J. E. Cloern, and D. H. Schoellhamer. 2003. *Effects of spatial and temporal variability of turbidity on phytoplankton blooms. Mar. Ecol. Prog. Ser* 254: 111.128.

The potential for artificial light impacts on fish and other marine taxa from Ferry Terminal infrastructure and near-water street lighting can be reduced through the use of low light intensity street and dock lights, lights being placed vertically low relative to dock walkways, and shielding the lights to reduce night illumination of Bay waters. Mitigation Measure M-BI-4a, primarily intended to reduce impacts on birds, would also reduce lighting impacts on marine biota as stated on EIR p. IV.M.60. Thus, while the lighting mitigation measure to reduce the impacts of bird strikes does not specifically mention marine biota, the EIR explains that it would reduce light impacts on marine biota as well. In addition, the proposed *Design for Development* guidelines for lighting in open space areas call for “pedestrian scaled lighting” including relatively low light standards with limited spill, and the guidelines for the Northern Shoreline Park note that “lighting should be kept to a minimum around the perimeter of the Island.”<sup>18</sup> The general lighting standards and guidelines in the proposed *Design for Development* are in Section T5.11, Lighting. Standard T5.11.7 in the subsection on “Minimizing Light Trespass” has a specific standard for park areas. Standard “LZ1: Dark,” for park and rural settings, calls for very low amounts of lighting directed so that very limited horizontal light spill occurs.<sup>19</sup> The project sponsors are proposing an additional guideline and standard specifically for lighting along the shoreline and on piers projecting into the Bay to further limit light on the water in an update to the proposed *Design for Development*. Within its permit jurisdiction, which includes a 100’ shoreline band around both islands, the Bay Conservation and Development Commission would also apply its guidelines which call for locating night lighting away from sensitive habitat areas.

Concern was expressed in one comment that the creation of the new Ferry Terminal at Treasure Island would result in the creation of 2,000-3,000 horizontal feet of concrete breakwater protecting the terminal and the loss of 200-300 feet of intertidal area along the shoreline bulkhead of the terminal. The comment states that although the new hard surface provided by the breakwaters would be colonized by many of the same encrusting and sessile organisms that colonize hard substrate habitat in the mid to lower intertidal area, the new habitat would not provide as complex a hard substrate habitat as the existing intertidal area that would be lost, the

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<sup>18</sup> Treasure Island Development Authority, *Treasure Island – Yerba Buena Island Design for Development*, Public Review Draft, March 5, 2010, (hereinafter “*Design for Development*”) pp. 65 (Guidelines T1.4.9, T1.4.11), 67 (Guideline T1.5.11), 69 (Guideline T1.6.10), 71 (Guideline T1.7.13), 75 (Guideline T1.9.13) and 73 (Guideline T1.8.13, quoted above).

<sup>19</sup> *Design for Development*, p. 198 (Standard T5.11.7).

species diversity would be less, and the predominant colonizing taxa would consist of non-native fouling organisms. For these reasons, the commenter disagreed with the assessment of a less-than-significant impact and suggested that mitigation was required.

Hard substrate, whether natural rock or artificial material like wood or concrete, generally supports a higher species diversity, species abundance, and productivity than soft bottom sediments. One of the key limiting physical factors to colonization, species diversity, and productivity of intertidal and subtidal hard substrate communities is the amount of sedimentation and smothering that occurs. For this reason, the vertical surfaces of hard substrate are capable of supporting increased species diversity than normally observed or reported for heavily sedimented horizontal surfaces, as is occurring in the Treasure Island lower and mid intertidal zones. The intertidal study conducted by AMS at Treasure Island<sup>20</sup> reported that the artificial, quarried rock shoreline of Treasure Island provides more diverse habitats than natural rock intertidal areas, as observed at Yerba Buena Island, and as a result, supports a more diverse intertidal community. It also reported heavy sedimentation of the upper rock surfaces in the middle and lower intertidal regions.

As discussed in the EIR on pp. IV.M.60-IV.M.61, the new breakwater bulkhead would be colonized by many of the same organisms that are found in the lower intertidal areas of Treasure Island, including tunicates, bryozoans, encrusting diatoms, mussels, barnacles, and hydrozoans. Because the breakwater structures would provide only vertical surface, burial of the hard substrate by sedimentation can be expected to be minimal, and the breakwaters would provide preferable habitat for many species. The concrete vertical surfaces of the Ferry Terminal breakwaters would also provide habitat for the recovering native California oyster (*Ostreola conchaphila*), sponges, and assorted algae. Any attached algae and kelp can also be expected to provide additional herring spawning habitat.

The loss of 200-300 feet of rocky intertidal habitat is unavoidable in constructing the Ferry Terminal. Some would be replaced by rock armoring placed along the shoreside ends of the breakwall and bulkhead, but the exact amount is unknown. Approximately 10 times the horizontal area, and several orders of magnitude in actual subtidal hard surface habitat area would be provided in place of this loss of intertidal rocky habitat. Some of the taxa, such as crabs, that currently inhabit the lost intertidal habitat would not colonize the new vertical breakwater surfaces, but other native and non-native taxa would, and the anticipated species diversity can be expected to be comparable to or greater than that currently present in the lost intertidal habitat, which is very limited. The taxa expected to colonize the new habitat are those species currently

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<sup>20</sup> Applied Marine Sciences, Inc., (AMS) *Survey of Intertidal Habitat and Marine Biota at Treasure Island and Along the Western Shoreline of Yerba Buena Island*. Report prepared for the Treasure Island Redevelopment Project, San Francisco, CA, April 2009.

resident in San Francisco Bay, both native and non-natives that currently compose the marine biological communities of the Bay. Increased species diversity comes with increased complexity of community structures that the vertical surfaces of the breakwater structures can be expected to provide. For these reasons the potential impacts were determined to be less than significant and not requiring additional mitigation.

### **Comments**

p. 43 Temporary impacts to marine organisms of activities are listed but not the permanent impacts to their habitat of shoreline modifications and chronic disturbance (waves and incidental oil spills) of ferry traffic. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.2]

p. 57 The effects of chronic oil pollution from ferries and other marina operations are not addressed. These are thought to equal or exceed oil pollution from the highly publicized spill events. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.4b]

p. 63 The measures to address accidental fuel and oil spills do not address the impacts of chronic leakage of fuel and oil in marinas and at ferry terminals that are thought to equal or exceed the total volume of spills on an annual basis. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.6]

### **Response**

The EIR discusses the impacts of modifications to the shoreline as a result of the proposed Ferry Terminal on p. IV.M.61 (please see the response immediately above for a discussion of the impacts of the Ferry Terminal on the shoreline), and discusses the impacts of ferry operations on p. IV.M.63. The text on p. IV.M.63 acknowledges the potential for increased risk of accidental oil spills to Bay waters, and refers the reader to the detailed analysis of this issue in the *Final Program Environmental Impact Report Expansion of Ferry Transit Service in the San Francisco Bay Area* (“WETA Program EIR”), prepared by the Water Emergency Transportation Authority in 2003 (see footnote 159 on EIR p. IV.M.63). The results of the analysis in the WETA Program EIR are summarized on p. IV.M.63, and the mitigation measures identified in the WETA Program EIR to reduce the impacts of all accidental releases of hydrocarbons from ferry operations, including chronic leakage and larger fuel/oil spills are also summarized. Under existing Federal and State CWA and USCG regulations, the release of any fuel, lubricating oil, or other hydrocarbon-based products by commercial vessels is prohibited. As stated on EIR p. IV.M.63: “As was done by WETA for other WETA projects, such as the south San Francisco Ferry Terminal Project, it is expected that WETA would implement these mitigation measures in operating the Treasure Island ferry service, and no further mitigation would be required.” Footnote 159 is revised to read as follows (new text is underlined):

<sup>159</sup> Water Emergency Transportation Authority, *Final Program Environmental Impact Report Expansion of Ferry Transit Service in the San Francisco Bay Area*, June 2003, pp. 3.4–10 to 3.4-22. This information is incorporated by reference and summarized in the text above.

#### 2.15.5.4 Herring Spawning

##### Comment

pp. 43-44 There was no mention of impacts to the herring fishery. Herring would be expected to spawn on the eelgrass adjacent to TI and YBI. (*Michael F. McGowan, Ph.D., Arc Ecology*) [29.3]

##### Response

The Pacific herring (*Clupea pallasii*) fishery in San Francisco Bay occurs in three forms, whole fish, sac-roe, and roe on kelp. Roe on kelp and roe are the predominant fishery, with roe on kelp being grown on *Macrocystis* kelp fronds in San Pablo Bay and roe being harvested primarily from the eelgrass beds at Point San Pablo. Additionally, most of the whole fish herring fishery occurs north of Treasure Island. While the eel grass beds and other submerged aquatic vegetation beds surrounding Treasure Island provide suitable habitat for herring to spawn, they are too small and close to shore to support any commercial harvesting of herring roe or whole fish. As noted in the Regulatory Framework subsection of IV.M, Biological Resources, the Central Bay, including the waters surrounding the Islands, is designated as essential fish habitat for three Fishery Management Plans pursuant to the Magnuson-Stevens Fishery Conservation and Management Act – Pacific groundfish, coastal pelagic (including Pacific herring), and Pacific coast salmon (EIR p. IV.M.36). The Pacific herring is not one of the listed special-status fish species found near the Islands (see EIR pp. IV.M.23-IV.M.30). The EIR on pp. IV.M.43-IV.M.44 discusses construction impacts on marine species, including impacts of pile driving noise on fish such as Pacific herring. Mitigation Measure M-BI-1e specifically restricts pile driving to June 1 – November 30 to protect herring and salmonids (p. IV.M.47). Eelgrass beds and their relationship to herring spawning are discussed on pp. IV.M.9-IV.M.10. Additionally, the analysis for Impact BI-6, on EIR pp. IV.M.56-IV.M.63, considered whether there would be the potential for the Proposed Project to affect designated essential fish habitat. The first sentence in the second paragraph under the heading “Offshore” on EIR p. IV.M.56 is revised to clarify this point (new text is underlined):

The proposed Development Program on Treasure Island and portions of Yerba Buena Island, as outlined in Chapter II, Project Description, has the potential to adversely alter intertidal and subtidal marine habitat (including designated Essential Fish Habitat) located along Treasure Island’s shoreline and nearshore regions of the Bay as well as Bay waters.

#### 2.15.5.5 Mitigation – Aquatic Species

##### Comment

While Section IV.M.43 of the DEIR outlines potential impacts to endangered or threatened plant, fish other aquatic organisms or wildlife, it should also address the work windows established to protect the aquatic special status species, such as Chinook Salmon, Coho salmon, steelhead trout,

green sturgeon, and longfin smelt,... (Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission) [17.9]

### **Response**

The discussion about potential impacts of the Proposed Project on special status marine species, including fish and marine mammals on EIR pp. IV.M.43-IV.M.44, references how the San Francisco Bay Regional Water Quality Control Board (“RWCQB”) stormwater permits and practices would aid in reducing surface and sediment runoff impacts to protected species. The discussion does not mention the dredging work windows established by the USACE Long Term Management Strategy (“LTMS”) to prevent additional impacts to these taxa as mentioned in Comment 17.9. Dredging work windows are discussed in the second paragraph on EIR on p. IV.M.52.

A new sentence is added to the partial paragraph at the top of EIR p. IV.M.44 and a new footnote is added (new text is underlined):

...Island sediment from reaching Bay waters and causing significant effects on resident offshore biological resources. Additionally, strict adherence to the dredging work windows established by the USACE Long Term Management Strategy (“LTMS”)<sup>103</sup> would be required.

New footnote 103 is added to that page (new text is underlined), and subsequent footnotes will be renumbered accordingly:

<sup>103</sup> U.S. Army Corps of Engineers, LTMS Environmental Work Windows Informal Consultation Preparation Packet, February 2004.  
<http://www.spn.usae.army.mil/conops/informal.pdf>. Accessed January 2010.

### **Comment**

Impact BI-6 correctly identifies many impacts to the intertidal or subtidal marine habitat and biota, but it fails to identify (or point to) adequate mitigation and avoidance measures to reduce the impact to less than significant. In many places, the DEIR appears to state that the impacts are unavoidable; however, no mitigation measures are identified (perhaps because there are none available). Given the loss and degradation of the Bay’s open water and nearshore habitats, Golden Gate Audubon is concerned about the additional impacts this project will inflict on the Bay and its marine life.

Mitigation Measures M-BI-2a through M-BI-2c, as written, are not sufficient to reduce the impacts from the Proposed Project to a “less than significant” level. Notably, the DEIR is not at all specific in how those mitigations will achieve the less than significant level. At a minimum, the DEIR must be revised to provide more information about how the many, apparently unavoidable impacts, will be so substantially reduced. (Mike Lynes, Conservation Director, Golden Gate Audubon Society) [32.24]

Although the DEIR seeks to analyze the effect and possible consequences of a large part of the Project being a man-made/artificial island with poor fill and compaction by proposing mitigation

and improvement measures to rectify this inherent problem, including without limitation the possibility of liquefaction resulting in massive structural failures of the Project's improvements, it does not address the environmental impact on the surrounding tidal waters ... to effectuate such measure's improvements. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.8]

### **Response**

The Proposed Project has the potential to affect marine intertidal and subtidal habitats from both onshore and offshore activities. EIR pp. IV.M.56-IV.M.63 identify these potential changes, and the potential severity of these changes on specific marine habitats and associated biological communities. The Proposed Project actions and regulatory requirements that would eliminate or reduce the expected impacts to less-than-significant levels are also described, as well as appropriate mitigation that would address potentially significant marine habitat changes such that they would be reduced to less-than-significant levels. Specifically, short-term and permanent changes to the water column, soft bottom sediment, and hard bottom intertidal and near sub-tidal habitats are presented that are expected to occur from the Proposed Project. Not all changes or effects on marine systems result in negative impacts or harm. For those potential changes that are expected to occur, the anticipated habitat change is presented in the EIR together with an explanation for how that habitat change is expected to affect marine biota and ecosystems.

Mitigation Measures M-BI-2a through M-BI-2c and M-BI-4a as revised in response to comments, address Proposed Project activities that have the greatest potential for significant impacts to marine habitats, and the mitigation measures are expected to reduce the significant impacts to less-than-significant levels. Additionally, some of the identified potential impacts would be reduced to less-than-significant levels by established regulatory requirements, such as issuance of National Pollutant Discharge Elimination System ("NPDES") permits for potential new discharges, application of USACE dredging requirements to minimize turbidity from dredging activities, or construction design applications that eliminate the impact from occurring. Some of the identified habitat impacts might not occur because the source of the potential impact (e.g., mercury contaminated sediments) may not exist, or the conversion to methyl mercury might not occur if the construction of the proposed wetland is done in a manner that prevents the methylation process itself. Therefore, the analyses in the EIR are conservative. Finally, some habitat changes, such as the shifting of soft bottom habitat from coarser to finer material as a result of sediment deposition after the Ferry Terminal breakwaters are constructed, or the creation of additional hard substrate habitat after the breakwater structures are installed, are anticipated to result in effects that could be beneficial to special status species and species of concern, such as green sturgeon and native oysters. These changes do not pose significant environmental impacts requiring mitigation.

### 2.15.6 METHYL MERCURY

#### Comment

How would compliance with NPDES permits prevent the discharge and transport of methyl mercury to Bay consumers? What conditions that would be placed on such permits? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.18]

#### Response

The discharge from the designed wetland could be considered by the RWQCB as a permitted wastewater discharge owing to the input of tertiary-treated wastewater into the wetland prior to its discharge, or as a permitted stormwater discharge, owing to the presence of stormwater in the wetland. Regardless of how the RWQCB decides to classify the wetland outflow into Bay waters, the quality of the discharged water would be required to comply with the State Basin Plan for San Francisco Bay and the contaminant loading limits and water quality objectives contained in that Plan. Therefore, mercury mass discharged to San Francisco Bay from this wetland (if present in the discharge) would be regulated through compliance with either a new NPDES wastewater permit, regulated under the existing permit for wastewater discharged from Treasure Island (No. CA0110116), as part of the new regional stormwater permit, or in a specific stormwater discharge permit for the Island. All such permits would be overseen by the RWQCB.

The RWQCB identified draft allocations for all permitted wastewater discharges to San Francisco Bay.<sup>21</sup> These allocations were developed to be consistent with antidegradation policies to protect beneficial uses and the water quality necessary to sustain them. The proposed numeric targets within the Mercury Total Maximum Daily Load (“TMDL”) are designed to implement the narrative water quality objective for bioaccumulation and the Basin Plan and California Toxic Rule numeric water quality objectives for mercury in water, consistent with Federal and State antidegradation policies.

The proposed TMDL allocation for mercury discharged from Treasure Island is currently specified as 0.026 kg/yr,<sup>22</sup> a number calculated based on secondary wastewater treatment technology used at Treasure Island at the time of development of the allocations. According to calculations prepared by Brown and Caldwell, current operations result in a discharge of 0.0046

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<sup>21</sup> RWQCB, 2006. Proposed Basin Plan Amendment and Staff Report for Revised Total Maximum Daily Load (TMDL) and Proposed Mercury Water Quality Objectives. San Francisco Regional Water Quality Control Board. Oakland, CA. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

<sup>22</sup> RWQCB, 2006 *op. cit.*

kg/yr.<sup>23</sup> The TMDL limit would continue to be met with a four-fold increase in the flow rate from the wastewater treatment plant.

As part of its compliance with the NPDES permit, the wastewater facility would be required to monitor the discharge and report to the RWQCB. To ensure that publicly owned treatment works (“POTWs”) comply with the requirements of the mercury TMDL, the RWQCB has developed performance-based triggers that, if exceeded, require follow-on actions to be conducted by the POTW. These actions may include evaluation of root cause of exceedance, potential technological fixes, and adequacy of monitoring program.<sup>24</sup> In addition, if required monitoring shows evidence that the discharges from Treasure Island were disproportionately contributing to mercury accumulation in the food web, the RWQCB reserves the right to impose discharge restrictions aimed at minimizing or avoiding adverse impacts.<sup>25</sup>

### **2.15.7 OTHER WILDLIFE**

#### **Comments**

Golden Gate Audubon reiterates its concern about the basis and adequacy of the safety buffer as identified as a mitigation for disturbance to bats. (See DEIR IV.M.46). The DEIR provides no basis for determining the adequacy of this mitigation measure. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.19]

The DEIR does not document raccoons on Treasure Island. Raccoons inhabit both islands. Given the problems in assessing bird life on the islands, Golden Gate Audubon is similarly concerned that the DEIR’s authors failed to conduct an adequate assessment of mammals. If an animal as obvious as the raccoon were missed, what else was missed in the biological survey? Additional studies conducted and the section should be revised to ensure its completeness. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.20]

While Section IV.M.43 of the DEIR outlines potential impacts to endangered or threatened plant, fish other aquatic organisms or wildlife, it should also address...any work windows established to address the upland special-status animals, such as the American peregrine falcon, double-crested cormorant, and the California brown pelican. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.10]

Habitat Restoration Further examination of the effects on plant and animal life while construction occurs in the various build out/up phases. Again the quality of the Air and Particular Contaminants in the air. (*Jorge Garcia*) [4.3]

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<sup>23</sup> Brown and Caldwell, Technical memorandum from Khalil Abusaba, Ph.D., Supervising Scientist, to Kheay Loke, Wilson, Meany, Sullivan, May 28, 2010, p. 4.

<sup>24</sup> RWQCB, 2003. Mercury in San Francisco Bay: Total Maximum Daily Load Project Report. San Francisco Regional Water Quality Control Board. Oakland, CA (hereinafter “RWQCB 2003”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

<sup>25</sup> RWQCB, 2003. *Ibid.*

**Response**

Bats are relatively resistant to disturbance, provided that the structure supporting their roosts is not affected. This is attested to by the presence of many bat species in urban areas, mines and under highway bridges. The disturbance proximity factor varies with different species, but the general prescriptions of the mitigation measure (Mitigation Measure M-BI-1c: *Minimizing Disturbance to Bats*) are standard for these mammals (EIR p. IV.M.46). The text of the mitigation measure is clarified as follows (deletions are shown in ~~strike through~~ and new text is underlined):

Removal of trees or demolition of buildings showing evidence of bat activity shall occur during the period least likely to impact the bats as determined by a qualified bat biologist (generally between February 15 and October 15 for winter hibernacula<sup>26</sup> and between August 15 and April 15 for maternity roosts). If active day or night roosts are found, the bat biologist shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. A reduced buffer could be provided for on a case-by-case basis by the bat biologist, at a distance to be determined in consultation with CDFG and based on site-specific conditions. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would be necessary.

Consulting with the responsible agency for California's wildlife (the California Department of Fish and Game) as called for in this measure will help ensure that the buffer is adequate.

Raccoons are discussed on EIR p. IV.M.18. The phrase "could be present" on Treasure Island was only qualified because signs were found only on Yerba Buena Island during the EIR surveys. They should be presumed to be on Treasure Island as well. Raccoons are not a special status species.

There are no work windows established for American peregrine falcon, double-crested cormorant, or the California brown pelican. The existing environment is one of high ambient disturbance due to the proximity of the Bay Bridge and the noise generated there, and, taken together with the fact that the birds would use the Islands and surrounding waters for foraging or roosting (EIR p. IV.M.17), but no nesting habitat for these species would be affected, effects would be less than significant and no restrictions are required. However, both birds and bats breeding on the Islands are protected during breeding and other vulnerable seasons: See Mitigation Measures M-BI-1b for nesting birds (EIR p. IV.M.45) and M-BI-1c for bats (EIR p. IV.M.46). Another comment requests further examination of the effects on plant and animal life while construction occurs in the various build out/up phases, especially regarding the effects of air quality. CEQA is organized around thresholds of significance, which consider impacts to

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<sup>26</sup> A hibernaculum is a shelter occupied during the winter by a dormant animal.

resources that are sensitive or have “Special Status.” In the EIR these Special Status resources were identified as the peregrine falcon and the double-crested cormorant (whose nesting colonies are protected by the California Department of Fish and Game (“CDFG”)), the brown pelican, harbor seals, various salmon species, the green sturgeon, and sensitive habitats such as eelgrass beds. The bird species are highly mobile, spend most of their time offshore, and would not be directly affected by changes in air quality. Noise and vibration from building construction were considered a potentially significant impact to harbor seals and fish. Measure M-BI-1e on pp. IV.M.46-IV.M.47, addresses this concern by setting sound limits on construction activity, and requiring the use of bubble curtains, if necessary. The air quality tolerances of other, more common animals and plants not identified as special status species are not well known and assessing impacts would be speculative, but would not be expected to result in significant impacts on special status species.

## 2.15.8 SIGNIFICANCE CRITERIA

### Comments

The DEIR does not specifically address the effect of increased illumination on wildlife, especially birds. It is widely known that artificial light affects the foraging, migrating, hunting, and breeding habits of birds and other wildlife. By increasing residential capacity so significantly on the island, the Project will undoubtedly increase overall illumination. Even with some measures in place (e.g., dimmer lights, shielded fixtures), increase in light pollution is inevitable. The DEIR does not appear to consider this a significant impact and offers no real solutions to offset it. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.8]

The description of the applicability of the Migratory Bird Treaty Act is not adequate because it fails to state whether the killing of migratory birds or the destruction of their nests would be considered “significant” within the scope of the EIR (compare to the subsequent section on the Fish & Game Code). This is [of] particular importance for this project, given that it includes plans to construct very tall, lighted structures on the island, which are known to cause collisions and birds with migratory birds. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.12]

It is inconsistent with the City General Plan Objective 8 (*Ensure the protection of plant and animal life in the City*) to hold significance of impacts to wildlife at a threshold of whether there is a “substantial impact” on a listed or specially-designated species. (DEIR at IV.M.38-39) Given that most native bird populations in the San Francisco Bay Area are suffering continuing declines, the impacts from the project on birds (and other wildlife and flora) should be considered in the context of cumulative impacts from projects throughout the Central Bay (at a minimum). Otherwise, the TI-YBI project is just another in the “death by a thousand cuts” that is pushing native bird and other wildlife populations toward extirpation or extinction.

If the Project is to be in compliance with Objective 8 (as well as the MBTA and the Fish & Game codes), then it must consider significant impacts as something more than just “substantial” impacts to specially-designated species. For example, if the project will have a significant impact on white-crowned sparrows (a once-common species in decline throughout San Francisco), then avoidance, minimization and mitigation measures must be developed to ensure the continued

viability of the sparrow on YBI. Moreover, if the tall structures (housing units, towers, etc.) result in collisions harming migratory birds, there should be a mechanism in the DEIR that establishes the threshold for significance of this impact (which heretofore did not exist on TI-YBI). (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.14]

The DEIR's reliance on identifying only special status plants and animals as the possible means of identifying "significant impacts" violates Objective 8 of the SF General Plan and waters down the purpose of CEQA. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.28]

### **Response**

The significance of impacts on birds of increased illumination from artificial light is discussed in the subsection entitled, "Avian Collisions with Buildings," in the discussion of Impact BI-4 on EIR p. IV.M.50. This impact is considered potentially significant, and detailed mitigation regarding lighting is included in Mitigation Measure M-BI-4a, on EIR pp. IV.M.53-IV.M.54. The central portion of San Francisco Bay is not a pristine environment and is well lit by the lights of multiple communities and facilities, as well as navigational lights on the water. The mitigation measures proposed are adequate to reduce the impact to a less-than-significant level, and are proportional to the impact, and the EIR determined the impact to be less than significant with mitigation.

One comment questions the relationship of the Migratory Bird Treaty Act to the significance criteria in the EIR. The relevant significance criterion is "Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors..." (EIR p. IV.M.40). The EIR text states that birds protected under the Act would be considered special-status, and hence, impacts to the nests of those birds could be significant, as stated in the EIR p. IV.M.42.

CEQA Section 21002.1(a) states "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Thus, the intent of a CEQA analysis is to identify and mitigate *significant* effects, with the significance criteria (or thresholds) established by the lead agency, with guidance from CEQA. For the purposes of this EIR, these significance criteria are identified on pp. IV.M.38-IV.M.39, and they are, with minor modification, drawn directly from the significance criteria listed in Appendix G to the State CEQA Guidelines (Title 14 California Code of Regulations sec. 15000-15387), including the use of the word "substantial." This approach is consistent with the letter and intent of CEQA and is consistent with Chapter 31 of the San Francisco Administrative Code. The EIR could consider an extensive loss of non-special status biological resources significant, as stated in the EIR on p. IV.M.46. The EIR uses this approach in the assessment of avian collisions, where impacts on largely non-special status migratory birds were considered potentially significant. As

a consequence, the EIR identified Mitigation Measure M-BI-4a: Minimizing Bird Strikes, the application of which would reduce the impact to a less-than-significant level.

The provisions of Objective 8 of the *San Francisco General Plan* are listed on EIR p. IV.M.39. These are the protection of:

- Plant and animal life in the City;
- The habitats of known plant and animal species that require a relatively natural environment; and
- Rare and endangered species.

The EIR's analysis of physical environmental effects does not present a conflict with Objective 8 considering its mitigation measures as well as through the Proposed Project's associated Habitat Management Plan for Yerba Buena Island. The EIR uses the mitigation measures combined with the actions in the Habitat Management Plan to avoid or restore sensitive and natural habitats, and protect terrestrial and aquatic (marine) life and rare species.

In addition, City decision-makers will consider consistency with relevant provisions of the *General Plan* as part of the actions related to formal approval of the Proposed Project.

### **2.15.9 CUMULATIVE IMPACTS**

#### **Comments**

Impact BI-7's claim that the cumulative impacts resulting from the project are less than significant is not credible. The DEIR notably focuses on impacts a very localized manner, without providing context to current state of the Bay subtidal or intertidal ecosystem or broader impacts from existing and concurrently planned projects. For example, the ferry system alone will result in the addition of lights, shoreline changes, benthic community alterations, mercury in the water column, oil spills and other contaminants, and other factors that will undoubtedly reduce the biological integrity of the system. Moreover, while the DEIR addresses current fish populations with some specificity, it offers no such specificity for birds or other wildlife (especially benthic organisms) that will be affected by the project; how can the reader assess these cumulative impacts if the DEIR provides no information or context with which to do so? (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.27]

Clearly, the project will inject a multitude of impacts into the TI-YBI system: it will increase housing by more than 10-fold (and, presumably, do the same with the human population; it will create a significantly larger business and tourist industry to draw visitors and workers to the island; and it will induce expanded recreational uses throughout the area. All of this will occur while additional developments (such as the Hunters Point-Candlestick redevelopment project) are occurring and the general Bay Area population is expected to expand. Yet, this extremely limited cumulative impacts analysis does not appear to take any of those factors into consideration.

This section must be improved so that the reader and decision-makers truly understand the cumulative impacts to wildlife, plants, air and water quality, social and cultural resources, and other values. Unless it does so, the final EIR will be inadequate.

Finally, unless improved, the DEIR will fail to provide adequate minimization, avoidance, and mitigation measures that are needed to contribute to the cessation of the decline in bird, fish and other wildlife populations in the San Francisco Bay Area. It will be another of the “thousand cuts” that is contributing to the loss of our natural history. The DEIR’s authors must know this, but have decided to ignore these facts to expedite the finding of no significance and move the project forward. At what point will the City of San Francisco take responsibility for introducing these cumulative environmental impacts? (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.29]

### **Response**

In general terms, because the Project Area is physically separated from other development sites in the region by San Francisco Bay and is not situated near land that could accommodate new large-scale development, the Proposed Project would not have an incremental impact on terrestrial biological resources that would be cumulatively considerable when combined with other major development within the City and County of San Francisco and the Bay Area region. However, as noted on EIR p. IV.M.63, the geographic scope of the area affected by potential cumulative impacts on biological resources is reasonably expanded beyond the Islands themselves to include biologically linked areas sharing the Bay and its waters.

Considering terrestrial impacts of the Proposed Project, additional projects on or near the Islands and other foreseeable projects include the proposed replacement of the existing on/off ramps from the Bay Bridge at the east side of Yerba Buena Island and the construction and operation of a 400-berth Marina in Clipper Cove. As explained in the EIR pp. IV.M.63-IV.M.64, the Proposed Project would not contribute significantly to any cumulative impacts of these projects.

Off-island, the analysis is broader and more complex. First, the analysis was logically restricted to impacts on linked biological resources defined by the significance criteria; increases in population, noise, and traffic are often, but not necessarily, impacts on special-status species, sensitive habitats, wetlands, etc. If additional projects are biologically linked, e.g., migrating birds and the potential for building collisions, they should be considered potentially cumulative with the Proposed Project because the same birds may pass through or over the airspace of other projects. However, on this basis, the effect is cumulative only if the effects are not mitigated. Both the Proposed Project and the one mentioned in Comment 32.9 (Candlestick Point) share similar approaches to mitigating the impacts to birds. See *Candlestick Point–Hunters Point Shipyard Phase II Development Plan EIR*, Case No. 2007.0946E, June 3, 2010.

Second, cumulative analyses must look at the effects of projects that restore habitats as well as those that harm them. A prime example is the South Bay Salt Pond Restoration Project, the largest tidal wetland restoration project on the West Coast. When complete, the project will restore 15,100 acres of tidal wetlands and other habitats, offsetting a large portion of potential habitat losses elsewhere.

Thus, while population growth and its associated effects can be viewed negatively, reasonably foreseeable terrestrial impacts of the Project Area are limited to projects taking place on the Islands and would not accumulate with development on the mainland. The off-island cumulative effects would be limited to those projects biologically linked to development at Treasure Island and Yerba Buena Island, that is, those that potentially affect habitat in the Central Bay – predominantly for birds and fish.

Hence, the EIR properly concludes that the cumulative effects of the project on biological resources, in combination with other foreseeable projects, would not be significant, with the exception of ferry traffic effects on rafting waterfowl, which remains a significant and unavoidable impact unless mitigated by the Water Emergency Transit Authority ferry operators.

Finally, one comment expresses concern about the incremental decline in natural resources and the City's lack of concern for its contribution. An EIR is required to address a project's contribution to significant cumulative impacts, but is not required to address mitigation for the entirety of a cumulative impact to which a project contributes. Nor is CEQA intended as an instrument to restore or recover damaged habitats if a project would not contribute substantially to their degradation. The EIR for the Proposed Project does examine potential contributions to past actions, as discussed above. San Francisco considers city-wide environmental issues on a regular basis, as evidenced by its recent efforts to reduce the effects of high-rise buildings on birds in the release of the draft Standards for Bird-Safe Buildings on October 10, 2010 (see discussion at the beginning of the response in Subsection 2.15.4.1, Bird Strikes, above).

## **2.15.10 MITIGATION**

### **Comments**

In addressing each Biological Impact, the DEIR states that impacts to these habitats are less than significant with mitigation, but given the City's recent track record of requiring insufficient mitigation measures, we are not convinced the mitigation measures proposed will be adequate to offset the impacts from the project. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.7]

20. As to breeding birds on Treasure Island, what steps will be taken during each stage of project development to mitigate impacts? (*Judy Irving, Executive Director, Pelican Media*) [14.11]

Golden Gate Audubon agrees that the breeding bird season is generally considered to run from February 1 to August 15 of each year. (*See DEIR at IV.M.45*) While the DEIR states that a "qualified biologist" will conduct surveys near construction sites during this time, the DEIR does not provide a basis for the adequacy of the 100 foot buffer between construction sites and nesting birds. Golden Gate Audubon reminds the agency that forcing a migratory bird to abandon its nest is a violation of the Migratory Bird Treaty Act, for which there is no take permit provided. Therefore, the DEIR should either document the adequacy of the proposed 100-foot buffer or establish additional steps to ensure that breeding birds are not disturbed to the point of

abandoning nests or young. Moreover, the DEIR makes no effort to determine whether there will be significant disturbances to birds during the non-breeding season and what, if any, impacts that will have on local populations.

Moreover, Mitigation Measure M-BI-1b: Pre-project Surveys for Nesting Birds provides no mitigation measures for other impacts (other than direct disturbances to nesting birds). For example, the construction of additional outdoor lighting fixtures, tall buildings, and other structures is likely to increase ambient light and noise levels, perches and other sources for predators, and collisions risks. The DEIR must address these additional potential impacts and provide mitigation measures for them. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.16]

But one constant that has been missing in this City has been protection of wildlife and habitats. It's always a secondary or tertiary consideration in any of these. And the EIR should address those. The EIR is adequate in saying that the habitat, particularly on Yerba Buena Island, has been compromised, but there are still very valuable habitat types out there. Coastal scrub, coastal riparian, the near intertidal zones, offshore eel grass, and each of these will be -- will suffer impacts because of the proposed project. The EIR concedes these, but says that each of them is less than significant.

We would ask that the drafters of the EIR look at the written comments that are proposed and also really ask itself whether these, the mitigations that are proposed, really do reduce it to a less-than-significant impact. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [TR.12.1]

#### **Mitigation Measure M-BI-2b: Seasonal Limitations on Construction Work**

Golden Gate Audubon supports seasonal limitations on construction work to protect native fish populations and other wildlife. We remind the lead agency that the bird breeding season is from February 1 through August 15 of each year and that some species of shorebirds may breed along the shoreline of TI-YBI. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.22]

#### **Response**

Comments question whether the proposed mitigation measures in the EIR are adequate to offset the impacts of the Proposed Project.

The EIR authors share the opinion of the value of the remnant natural habitats on YBI and offshore. The EIR identifies mitigations to prevent impacts on eelgrass beds, for example: Mitigation Measure M-BI-2c: *Eelgrass Bed Survey and Avoidance*, on EIR p. IV.M.50. The overall vision of the development includes the Habitat Management Plan for Yerba Buena Island ("HMP") to restore and improve terrestrial habitats. The mitigation measures included in the EIR have been developed over the years by experts in the field, based on practical experience. The mitigation for some resource impacts, taken together with the improvement of other resources as part of the Proposed Project, allows a determination of less-than-significant in the majority of cases.

One comment reminds the lead agency that seasonal construction work restrictions would protect native fish populations and other wildlife, as well as shorebirds that breed along the shoreline of Treasure Island and Yerba Buena Island. The Proposed Project includes provisions to coordinate construction work so as to protect native fish populations and other wildlife. These provisions include strengthening the perimeter berm from inside the existing shoreline riprap and dike with no construction activities on the waterside of the berm (see EIR p. II.75). Surveys for breeding birds, including those along the islands' shorelines, are part of the biological resources mitigation program, as described in Mitigation Measure M-BI-1b on EIR p. IV.M.46, in part to ensure that the Proposed Project complies with California Fish and Game Code Sections prohibiting the disturbance of active birds' nests or eggs (see EIR p. IV.M.35 for a summary of these requirements). Other mitigation measures include limitations on some kinds of construction activities or locations, as appropriate for species protection (see e.g., Mitigation Measures M-BI-1c and M-BI-1e on pp. IV.M.46-IV.M.47). For additional discussion of seasonal construction work restrictions and other construction-related mitigation measures, see the Response in Subsection 2.15.4.2, Eelgrass.

Another comment acknowledges the EIR's pre-construction surveys for nesting birds but asserts there are no mitigation measures for other impacts: e.g., additional outdoor lighting fixtures, and other structures which are likely to increase ambient light and noise levels. The EIR includes mitigation to reduce lighting effects on birds to less-than-significant levels (EIR p. IV.M.53). Treasure Island already has a high level of ambient lighting, including street lights throughout the island, and considerable amounts of human activity; therefore, the change from the baseline would not be as great as it would be if the Proposed Project were built on undeveloped land. However, the change in habitat structure and use at buildout is a valid concern raised by this comment and was considered in the evaluation. It was not considered a significant impact for Yerba Buena Island, because the HMP would effectively retain or improve habitat structure over time. It was not considered significant on Treasure Island because identifying each factor of the new built environment and its effect on each species would be highly speculative. It is more than likely that the species using the Islands now would adapt to the new conditions, given that the principal determinants of nesting substrate and open space would be retained: there would be no net loss of street trees, and the Proposed Project would include 300 acres of open space and 5 or more acres of wetlands.

A comment queries the adequacy of the 100-foot buffer around active nests identified in Mitigation Measure M-BI-1b, Pre-project Surveys for Nesting Birds (pp. IV.M.45-IV.M.46). Mitigation Measure M-BI-1b does not prescribe a 100-foot buffer around active nests; rather the measure requires a qualified biologist to determine an appropriate buffer at the time:

If bird species protected under the Migratory Bird Treaty Act ("MBTA") or the California Fish and Game Code are found to be nesting in or near any work area, an appropriate no-work buffer zone (e.g., 100 feet for songbirds) shall be

designated by the biologist. Depending on the species involved, input from the California Department of Fish and Game (“CDFG”) and/or the U.S. Fish and Wildlife Service (“USFWS”) Division of Migratory Bird Management may be warranted. (EIR p. IV.M.45.)

This approach to setting buffer zones is appropriate because it allows a safe buffer to be set depending on the context. Factors that might affect the determination of the buffer could include the species of bird, the terrain, surrounding uses, the season, and the precise activity proposed at the site. If CDFG has adopted formal guidance for the relevant species, that would also be followed, as applicable.

### **2.15.11 WILDLIFE – ANIMAL CONTROLS**

#### **Comment**

Many of the proposed mitigations to assure the protection of indigenous plants and animals are very good, but the enforcement mechanisms are not made clear. For example, who is responsible for removing feral cat feeding stations? Who will issue citations to boaters seen within eelgrass zones? Please review the mitigation measures and add information about accountability and the resources needed to assure implementation. (*Ruth Gravanis*) [31.18]

#### **Mitigation Measure M-BI-1d: Control of Domestic and Feral Animals**

Golden Gate Audubon strongly endorses the creation of enclosed off-leash dog areas that provide ample room for dogs and their owners to enjoy outdoor recreation. We also strongly endorse ensuring that all other areas of the public space on TI-YBI are leash-only or, where necessary to protect biological resources, off-limits for pet-related recreation. As we have seen in other parts of San Francisco, enforcement of leash requirements is absolutely necessary to ensure that this kind of mitigation is actually effective. The Mitigation Measure should include requirements for active education of pet owners on the island about leash requirements and a statement that leash requirements will be enforced through citations, if necessary.

Golden Gate Audubon also endorses efforts to reduce feral cat populations. At a minimum, the Mitigation Measure should include a ban on feral cat feeding stations. Feral cat feeding stations promote “dumping” of cats, leading to larger feral cat populations. Contrary to the belief of some, the feeding stations do not provide an alternative for cats to hunting local birds and other wildlife; there are no studies that indicate that they result in lower predation rates on local wildlife. Instead, the feeding stations subsidize feral cat and other populations and prolong their deleterious impacts on local native wildlife populations. (*Citations omitted.*) (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.21]

#### **Response**

Acknowledging the comment’s concern about feral cats and active education of pet owners, the first paragraph of EIR Mitigation Measure M-BI-1d on p. IV.M.46 is revised as follows (new text is underlined):

To avoid conflicts with wildlife on Yerba Buena Island and the remaining natural habitats on Yerba Buena Island, the Islands’ Covenants, Conditions and Restrictions, TIDA Rules

and Regulations, and/or other similar enforceable instruments or regulations, shall prohibit off-leash dogs outside of designated, enclosed, off-leash dog parks on Yerba Buena Island and the feeding of feral cats on both islands. Building tenants shall be provided with educational materials regarding these restrictions, rules, and/or regulations. Non-resident pet owners and the public using the Islands shall be alerted to these restrictions, rules, and/or regulations through appropriate signage in public areas.

Mitigation measures that are included in the Proposed Project or are imposed as conditions of approval will be identified in the Mitigation Monitoring and Reporting Program (“MMRP”) that will be acted on by decision-makers if the Proposed Project is approved. The MMRP will include the parties responsible for implementing each measure and implementation schedules appropriate to the measure (e.g., prior to or during construction for some measures and at regular intervals during operations for others).

## 2.16 GEOLOGY AND SOILS

### 2.16.1 GEOTECHNICAL STABILIZATION

#### Comment

6. Copies of the pre-construction assessment and subsequent monitoring results on the subsurface conditions and nearby building structural conditions (p. 25 of Summary) should be provided to potentially affected parties (e.g., TI JCC, current residents, etc.). (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.4c]

#### Response

TIDA would provide a copy of the pre-construction assessment of subsurface conditions and Job Corps buildings in the vicinity of construction activities to the Job Corps for its information. TIDA would also provide the Job Corps with copies of the monitoring results for locations adjacent to the Job Corps campus for its information. TIDA anticipates that a Memorandum of Agreement would be entered into with the Job Corps, establishing construction rules and channels of communication during construction, as noted in the response in Subsection 2.8.5, Construction Hours, in Section 2.8, Noise, of this Comments and Responses document. This memorandum would include TIDA's responsibility to make appropriate reports available to the Job Corps.

#### Comments

Project Density With the proposed increase in housing units (8,000 +) and the increased in businesses and hotels, etc. Will the increased Mass, have an effect in lowering the threshold of the island, as it relates to the pending Sea Level Rise? (*Jorge Garcia*) [4.1]

Often times anything can be engineered to meet geotechnical standards, but the question should be at what cost to construct and maintain them in the future. The DEIR is completely silent on these issues (as noted, in part, above). The Project's developer is proposing expensive geotechnical methods that include population densification and the massive importation of clean fill. The indirect and very significant impact of removing Treasure Island's existing, seismically unstable, sand-based soil and replacing the same with massive amounts of imported fill should be fully evaluated in the DEIR. Just with addressing geotechnical issues, yet along with other Project concerns, the potential for this Project to become a problem in the future should be carefully evaluated. As noted above, future costs and safety risks to rest of the San Francisco taxpayers should be analyzed in the DEIR. As currently proposed, the Project relies on a specious premise of "build it and they will come" (i.e., someone will pay for it at any risk). (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.7]

#### Response

As stated in the EIR in Section IV.N, Geology and Soils, p. IV.N.21, Naval Station Treasure Island has been the subject of numerous geotechnical investigations, and as a result much is

known about the subsurface conditions. These subsurface data and additional geotechnical investigation data would form the basis for the geotechnical stabilization method(s) applied at any one site. A sound geotechnical approach typically includes improvements to the foundation soils, such as compaction or densification, combined with a building foundation design that takes into account underlying soil properties. Rather than removing the existing sand fill, the Proposed Project would use established geotechnical measures such as compaction or densification, which are known to reduce hazards such as settlement or dynamic (earthquake-induced) settlement to less-than-significant levels. Developers of individual buildings would then design appropriate foundation systems for those buildings, taking into account the specific loading requirements associated with that building. Typical foundation systems could include mat slabs, grade beams and pile-supported foundations. Larger multi-storied structures require a different approach than single-storied structures. Foundation systems for buildings would be designed and implemented in accordance with local and State building code requirements; given that there would be negligible changes in surface elevations experienced over the life of the Proposed Project even with the additional loading of the proposed structures. For more discussion on the effectiveness of the proposed ground improvement and foundation design techniques, see EIR p. IV.N.21 and the response in Section 2.16.2, Seismic, below. For more on the discussion of future potential sea level rise, see EIR Section IV.O, Hydrology and Water Quality, pp. IV.O.30-IV.O.35, and the response in Subsection 2.17.1, Sea Level Rise, in Section 2.17, Hydrology and Water Quality, of this Comments and Responses document.

The proposed geotechnical stabilization methods for Treasure Island would not remove substantial volumes of existing subsurface sandy soils and replace them with imported fills. As stated on EIR p. IV.N.21, “the overall approach for the Proposed Project is to create a long-term stable platform on Treasure Island by densifying the underlying loose sand fill, and consolidating the compressible Young Bay Mud.” Imported fill materials would be used for the purposes of surcharging existing soils and raising the existing grades to the proposed levels. Once implemented, these proposed geotechnical stabilization methods are designed to mitigate potential geologic and seismic hazards for the life of the project.

Geotechnical stabilization would be accomplished before new buildings and infrastructure are developed. Several stabilization techniques have been investigated (see *Treasure Island Infrastructure Update*, Section 4 and Appendices C-1 and C-2), and the costs of the various techniques, as well as potential environmental effects, have been taken into consideration and analyzed in this EIR. As noted on EIR p. IV.O.35, the Proposed Project includes a mechanism to create project-generated funding that would be dedicated to paying for flood protection improvements necessary to implement the adaptive management plan to address future potential sea-level rise. The project-generated funding, which may include land-secured financing (such as Mello-Roos tax assessments on benefited property owners), would not result in a cost to the rest of San Francisco taxpayers. It should be noted that the purpose of the EIR, in accordance with

*CEQA Guidelines* (Section 15131), is to provide an analysis of potential environmental impacts associated with the physical effects of a project; economic effects are not required to be analyzed.

### 2.16.2 SEISMIC

#### Comments

My second question deals with my background as an architectural engineer, as to whether there's sufficient test regarding compaction of the sand with regard, for example, the Loma Prieta earthquake, that under very mild conditions caused much of the pipage on the island to float to liquefaction. In fact, if one has satisfaction, liquefaction, you've got your answer. But in a severe earthquake this, in effect, proposal will not stand. (*Bernard Choden*) [TR.1.2]

The engineering feeds -- in this era and day, if they can put people on the moon and drive trains under the Bay, I am sure we can support Treasure Island to the fact of -- to be a positive addition to the San Francisco area. (*Richard Weller, Local 34, Pile Drivers*) [TR.7.2]

And we should not forget the impact of the Loma Prieta earthquake on the island. The Army Corp of Engineers dredged several hundred million cubic yards of material, most of it sand, from the bottom of the Bay to build the island. During the Loma Prieta earthquake, there were unmistakable signs of soil liquefaction and numerous gas, sewage and water line breaks. Ground motion was among the strongest recorded in the Bay Area, despite being 60 miles from the epicenter.

This may pale in comparison to what could happen during a similar if not more powerful quake along either the San Andreas or Hayward Faults with an epicenter closer than Loma Prieta.

As the 1990 report compiled for the Navy warned, such a quake could cause substantially more severe shaking on the island, and that liquefaction could be expected to be widespread. Be wary of terms like geotechnological stabilization, when the forces of nature are so great in an artificial island so weak. A liveable, sustainable and safe Treasure Island does not need high-rises. (*Tony Gantner*) [TR.10.2]

Another gentleman brought up the issue again about the seismic issue. If you look at the density of the north part of Treasure Island, it has the least development on the north side regarding density. I think you are going to have some sort of soccer, some field there. I think we need to focus. (*William Lee, Planning Commission*) [TR.24.3]

2. The near liquefaction of Treasure Island during the moderate Loma Prieta earthquake of 1989 should give rise to the especial seismic safety requirements required to both ensure the survivability of occupants and structural developments. The DEIR on pages II.72 thru 76 raises skepticism as to this possibility. For one, compacting sand cannot reach the density of even sandstone or consolidated rock and therefore cannot be expected to provide a safe seismic underpinning. Further, foundation mats, while structurally useful, cannot be secure if their underpinnings are liquefiable.

One means of testing the viability of the proposed seismic security measure is for the developers and city to provide evidence of the fiscal insurability of both the survivability of the island's occupants and its development and to demonstrate so before the DEIR is

approved. It is necessary to secure significant evidence of tests of these seismic safety measures before approval of the DEIR. (*Bernard Choden*) [2.3]

Moreover, it is incredible that the DEIR proposes underground garages to reduce the parking footprint when logically such will have to be below sea-level and disruptive to the environment (not to mention the high probability of future failure due to hydrostatic water pressure and catastrophic seismic activity). Indeed, it appears a governmental employee may have raised concerns over seismic difficulties posed by high rises and new, man-made development on an artificial island; for her troubles, she was allegedly demoted. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.11]

#### Total Failure Of DEIR To Address Sea Level Rise Interactions With Liquefaction & Hazardous Materials

The most important inadequacies of the DEIR and project plan lie in their failure to account adequately for the potential of sea level rise to severely exacerbate both liquefaction and the leaching and harmful interactions of hazardous materials in the project area.

#### Liquefaction

In the report entitled ‘Vulnerability assessment to liquefaction hazard induced by rising sea-levels due to global warming’ (see [http://www.thefreelibrary.com/\\_/print/PrintArticle.aspx?id=155784183](http://www.thefreelibrary.com/_/print/PrintArticle.aspx?id=155784183) - or purchase the full article with graphics at [http://eproceedings.worldscinet.com/9789812701602/preserved-docs/9789812701602\\_0069.pdf](http://eproceedings.worldscinet.com/9789812701602/preserved-docs/9789812701602_0069.pdf) ) the report authors establish clearly that liquefaction dangers increase as sea levels rise, and increase rapidly after sea level rise exceeds 1 meter.

Shockingly, of the pertinent DEIR sections, neither IV.N. ‘Geology’; IV.O. ‘Hydrology and Water Quality’; nor IV. P. ‘Hazards’, mention in any substantial way whatsoever the dangers of potential interactions between sea level rise and liquefaction.

It is absolutely imperative that the DEIR and the project plan, outline a detailed analysis of these potentially extremely hazardous interactions, and outline plans for how they would be prevented; all with the full range from to 2 to 5 meters worst case sea level rise assumed.

This analysis must be provided for all project areas, both those in which liquefaction mitigations are planned, and those in which such mitigations are not planned. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.2]

**Seismic Issues.** The near liquefaction of Treasure Island during the moderate Loma Prieta earthquake of 1989 should give rise to special seismic safety requirements required both to insure the of survival of occupants and the survivability of structures. The DEIR on pages II.72 thru 76 raises skepticism as to this possibility. For one, compacting sand cannot reach the density of even sandstone or consolidated rock and therefore cannot be expected to provide a safe seismic underpinning. Further, foundation mats, while structurally useful, cannot be secure if their underpinnings are liquefiable. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.30]

Evidence of independent tests of these seismic safety measures should be obtained before final approval of the DEIR. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.32]

**Response**

As noted in EIR Section IV.N, Geology and Soils, p. IV.N.24, Treasure Island experienced earthquake-related damage from the 1989 Loma Prieta earthquake, which was centered approximately 50 miles away. A larger seismic event located closer to the Project Area could produce even greater groundshaking in the project site. However, with the proposed geotechnical stabilization methods (e.g., dynamic compaction, densification, surcharging soils, vertical wick drains), and appropriate building foundation systems, the proposed structures would be designed to withstand the maximum design earthquake for the project site. The proposed ground stabilization methods have been prepared by a reputable geotechnical engineering firm in collaboration with other geotechnical firms with local experience and peer reviewed by both another independent geotechnical engineering firm and an independent panel (see EIR p. IV.N.24). The geotechnical stabilization methods would result in reconfigured subsurface soil particles with far greater seismic stability than existing soils. The use of deep foundation systems to anchor taller buildings (e.g., the 100 - to 650-foot high-rise structures proposed in the Island Center District<sup>1</sup>) in deeper, more competent materials has been a geotechnical method widely employed for structures located on bay fill similar to Treasure Island around the San Francisco Bay Area shoreline. As stated on EIR p. IV.N.27, “Geotechnical engineering methods for building design in accordance with [California Building Code] CBC requirements have been used throughout the Bay Area shoreline areas where similar challenges of development on thick deposits of Bay Mud and imported fills have been encountered.” Final design parameters would be based on site-specific data in accordance with Chapter 16, Structural Design, and Chapter 18, Soils and Foundation, of the San Francisco Building Code and reviewed by the San Francisco Department of Building Inspection. These methods have been successfully employed throughout the San Francisco Bay Area for similar structures with similar geotechnical conditions, including those that have subterranean garages with high groundwater tables. Therefore, the proposed methods are consistent with widely adopted methods that have proven effective for many other areas with similar conditions.

The intensity of seismic groundshaking depends on a variety of factors, as stated on EIR p. IV.N.24, such as magnitude of the event, distance to the epicenter, and geologic conditions at the site and surrounding area. In general, the intensity of the seismic effects experienced at any particular site is not, however, directly related to fluctuations in groundwater levels. Sea level rise would have a negligible effect on potential seismic hazards on the project site since portions of the soil that would experience an increase in the water level are the upper portions of the site,

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<sup>1</sup> As noted in the response in Subsection 2.3.4, Height Limits, in Section 2.3, Land Use, the project sponsors have lowered some of the proposed maximum building heights (among other changes) in an updated *Design for Development* that will be considered by decision-makers. The revisions under consideration would reduce the tallest tower from 650 feet to 450 feet in the updated *Design for Development*.

which would be densified and become non-liquefiable with the improvements proposed as part of the Project. Therefore, a potential rise in groundwater due to sea level rise would not represent a substantial increase in liquefaction hazard. As addressed on EIR pp. IV.N.28-IV.N.29, the potential for liquefaction would be mitigated through implementation of the proposed geotechnical stabilization measures, which include compliance with the Seismic Hazards Zonation Program. To account for the potential future impacts of sea level rise, design-level liquefaction analysis and modeling for individual buildings would be based on a range of groundwater table elevations that are higher than the existing conditions. The only areas that would not be directly subject to liquefaction measures are the proposed open space areas beyond the general footprint of the developed areas. These areas would continue to be subject to liquefaction. However, the improvements proposed to the perimeter berm adjacent to these open spaces would provide some protection from lateral spreading (related to liquefaction) and deep seated failure of the edges of the island. The open spaces that would be immediately adjacent to the developed areas and perimeter berm would have the ancillary benefit of being contained between two densified edges. Because most improvements in the open space areas would be surface improvements such as landscaping, fencing, and lighting, there would be no significant seismic-related life safety impacts due to future potential sea level rise.

For a discussion of the interactions of potential sea level rise and existing hazardous materials on the Project Area, see Subsection 2.17.1, Sea Level Rise, in Section 2.17, Hydrology and Water Quality, of this Comments and Responses document.

### **2.16.3 PERIMETER BERM MAINTENANCE**

#### **Comment**

We believe that there's no mechanism for the maintenance of the perimeter berm. It wasn't stated. It's not addressed under the Hazards and Hydrology section. And like other structures, like levees that serve the purpose of flood and storm weather control, berms are regulated to ensure they are maintained.

Future operations and maintenance should -- We believe that the future operation and maintenance should be included in the project description, and further analysis should be evaluated. (*Nick S. Rossi, representing Ken Masters*) [TR.5.1]

#### **Response**

The perimeter berm around Treasure Island has required repairs and improvements in the past largely due to the fact that much of the original berm was founded on dredged sands. As discussed in EIR Section IV.N, Geology and Soils, p. IV.N.25, the stability of the berms would benefit from densification of the sands or from the construction of soil-cement columns, either of which might be implemented through the proposed geotechnical stabilization methods for the

island. These established geotechnical techniques would reduce the potential hazards associated with settlement, liquefaction, or dynamic settlement to less-than-significant levels.

As noted in the EIR in Chapter II, Project Description, p. II.76, and in Section IV.O, Hydrology and Water Quality, EIR p. IV.O.27, the areas proposed for development would be raised above the 100-year flood plain. The perimeter berm would not be acting as a levee according to Federal Emergency Management Agency regulations. Ongoing maintenance of the perimeter berm would be performed by TIDA, likely via a contract with the Department of Public Works, the Port of San Francisco, or a private contractor. The level of ongoing maintenance required would not be extraordinary and does not significantly differ from activities that are being performed today.

For more discussion on protection from flooding, see the response in Subsection 2.17.2, Flooding, in Section 2.17, Hydrology and Water Quality, of this Comments and Responses document.

## 2.17 HYDROLOGY AND WATER QUALITY

### 2.17.1 SEA LEVEL RISE

#### Comments

I am writing to provide you with our staff's initial comments on portions of the Treasure Island Draft Environmental Impact Report pertaining to sea level rise. We will be providing further comments on or before the comment submission deadline of August 26, 2010, but I wanted to convey our overall support for the manner in which the issue of sea level rise is being addressed in the Treasure Island project.

We are proud that BCDC has been recognized as a leader in the development of sea level rise policy for the Bay Area. As part of our work, we actively participated with other departments in the California Natural Resources Agency in drafting the State of California's interagency 2009 Climate Adaptation Strategy, and we are currently working on amendments to our Commission's *San Francisco Bay Plan* to address this critical issue.

The Treasure Island project has already earned praise from local, state, national, and international governmental agencies and NGO's for its innovative approach to sea level rise and general sustainability measures. For example, as the attached letter indicates, Governor Schwarzenegger has recognized the City's approach on the Treasure Island project for its compliance and consistency with the State of California's Climate Adaptation Strategy.

Our staff has worked closely with the Treasure Island Development Authority (TIDA) and the project developer, Treasure Island Community Development, LLC (TICD), for the past three years on potential sea level rise issues and adaptation strategies to address this challenge. The TIDA's and TICD's ability to understand the complexities that must be confronted on this critical long-term issue has been impressive. In addition, their technical and engineering responses have been well thought-out and innovative, and their commitment to long-term adaption strategies, including funding those strategies, will ensure that this ABAG Priority Development Area will be well positioned to protect the community from future sea level rise. The implementation of the proposed anticipatory design and adaptive management approach offers the promise of becoming an example of techniques for sea level rise protection for other communities in the Bay Area and beyond. (*Will Travis, Executive Director, San Francisco Bay Conservation and Development Commission*) [1.1]

The proposed adaptive management strategy also includes monitoring and a decision-making framework to initiate the adaptive strategy measures. As proposed, the Project includes over 5-miles of trails and a variety of other public amenities directly adjacent to the shoreline. The Commission's Bay Plan policies regarding public access state, in part, that all fill projects "should increase public access to the Bay to the maximum extent feasible" and, further, that public access areas should be maintained over time. While the public access along the shoreline has been designed with a development setback to allow any future increases in elevation to accommodate higher sea level rise elevations, Section IV.O states that during large rain events occurring simultaneously with 100-year tides the adaptive strategies approach would allowing ponding to occur for 1 to 3 hours next to the levees. Due to the location of the public access along the entire shoreline around Treasure Island, we are concerned about the impact of the ponding on the usability of the public access.

Further, if sea level rises beyond 36 inches, it can be assumed that over time the levees would need to be raised and, likely, widened at the base, thereby partly or entirely obstructing the public's view of the Bay from inland areas, encroaching upon and reducing the area devoted for public use, and impacting the overall public access experience. In light of these potential impacts on the access area, the adaptive management approach should address these issues before the overtopping of the levees occurs without compromising the views of the Bay from the shoreline public access areas. While we are aware of the existing site constraints, seawalls are not the preferred adaptive management tool. Therefore, we are also concerned about the use and location of sea walls as an adaptation approach along the shoreline and how these sea walls would be modified in the future for a sea level rise greater than 36-inches. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.2]

BCDC released a series of maps showing areas vulnerable to 16 inches of sea level rise at mid-century and 55 inches by the end of the century. The map for Treasure Island is attached and shows areas subject to 55 inches of sea level rise, whereas the DEIR assumes sea level rise of 36 inches with 6 inches of freeboard (Hydrology and Water Quality page IV.O.29); therefore, it appears that the DEIR's analysis is inadequate. It is unknown if the attached map accounts for the perimeter berm in the modeling. The BCDC's and the DEIR's (again at Hydrology and Water Quality page IV.O.29) estimates only represent sea level rise in the next century; however, it is reasonable to assume that additional sea level rise will occur within the lifespan of the Project, which is expected to exceed a century. Therefore, it seems the DEIR did not adequately analyze a sea level rise of 55 inches or the risks to public safety for the lifetime of the Project (i.e. after 100 years).

In fact, Impacts HY-11 and HY-12 find that these concerns regarding tsunamis and sea-level rise are "...less than significant." The "less than significant" determination is without any justification or scientific (basis) discussion; indeed, it flies in the face of the clear facts stated and delineated on the attached Treasure Island Map and the findings of the California Coastal Commission (Addendum to Commission Meeting for Friday, June 12, 2009 – North Coast District Item F4a, Local Coastal Program Amendment No. CRC MAJ-1-09; Costa Norte) – i.e., tsunami resilience design proposes a minimum sea level rise rate of three feet per century. These findings also mention that tsunami hazard maps should account for sea level rates of three to six feet per century.

Moreover, no definitive publication has been produced that addresses sea level rise, making it impossible to determine the appropriate height of the berm. It is conceivable that, during the lifetime of the Project, the sea level may increase more than the Project's contemplated berm designed height; again, the DEIR fails to address this probability.

Sea level rise is especially problematic for Treasure Island because of its low elevation; thus, as water levels rise around Treasure Island, the shallow ground water table would be affected. This obvious fact/consequence may alter the liquefaction potential, structural foundations, and the perimeter berm affecting the Project, its viability and the safety of its inhabitants. Indeed, the implications of placing a community behind an inadequately designed (i.e., insufficient width, height and structural materials) perimeter berm could create problems that will be deferred to the future and costly to the detriment of the Project's inhabitants and San Francisco's taxpayers of. Proper, detailed, worst-case scenario future planning for sea level rise is technically feasible from an engineering and geologic perspective; however, the maintenance/repair/improvement costs in the future may be excessive and unrealistic. As such, these potential significant impacts must be fully addressed and mitigated at the full cost and liability of the Project's developer.

Furthermore, it seems the Project provides no study of alternative berm systems. Key to this analysis is that, although a soil/rock based system will be much cheaper for the developer to construct at the beginning of the Project, the completed structure will be very expensive to maintain; in addition, it cannot be easily raised/expanded, except at great difficulty and cost – to someone or entity other than the Project’s developer. A study for a superior alternative such as an "Amsterdam Dam" (*paraphrased*) [i.e., a core-tin, [sic] steel-plate, bulkwork system, anchored by foundation piles, as in Discovery Bay, California], and should have been included in the DEIR - it is a system that, although more costly to first install, can be easily expanded (i.e., its height raised) to address sea level rise if the foundation piles are of a sufficient diameter and driven to a bedrock depth. Normally and understandably, a developer does not want to pay for the very large, front-end costs, but rather seeks to have as little money in the system as possible and then “back-end load” the maintenance and future expansion onto the residents and public via a reclamation district; such a district will mostly likely fail if it does not conservatively estimate and collect very large future assessments. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.3]

#### 1) SERIOUS INADEQUACIES IN ADDRESSING, AND FAILURES TO ACCOUNT FOR, PROJECTED SEA LEVEL RISE

As is now commonly understood and established by widespread and overwhelming scientific consensus, the Earth’s oceans and the San Francisco Bay are now undergoing sea level rise due to planetary climate warming.

Until very recently, science policy groups, including and especially the Intergovernmental Panel on Climate Change (IPCC) had been projecting that the worst case scenario for global sea level rise would be no higher than 1.5 meters by the year 2100.

However new data and reports released in November 2009 indicate that the worst case scenario for global sea level rise is now projected to be at least 2 meters by the year 2100. More importantly, NASA’s James Hansen, widely recognized as the preeminent climate change expert on Earth, argued credibly as early as 2007 that worst case scenario sea level rise will instead be 5 meters by the year 2100. In light of the fact that the IPCC’s predictions of sea level rise from just two years ago have been found to be inadequate by an entire one half meter, and that James Hansen had previously argued in 2007 that the IPCC’s projections were indeed inadequate, Hansen’s projection of a worst case scenario of 5 meters sea level rise by the year 2100, must now be assumed as the guide for all plans for the Treasure Island and Yerba Buena Island Redevelopment Plan.

The following reports, with referenced data, prove this case:

- On Nov 22, 2009 NASA released new satellite gravimetric data from a 7 year study of Antarctica showing that the massive East Antarctic Ice Sheet, which scientists previously thought was gaining in volume, is suddenly (as of 2006) undergoing rapid and widespread melting. See <http://www.guardian.co.uk/environment/2009/nov/22/east-antarctic-ice-sheet-nasa>

The NASA study report itself can be ordered from Nature Geoscience at <http://www.nature.com/ngeo/journal/v2/n12/full/ngeo694.html> This research also shows massive new and more rapid melting in West Antarctica and Greenland. Quantified analysis of how this dramatic increase in melting will measurably impact sea level rise is shown in the next item.

- As of November 24, 2009, in a report entitled ‘The Copenhagen Diagnosis’, even historically overly equivocal IPCC scientists revised their sea level rise projections to a possible 2 meters (6.5 feet) by the year 2100. This report can be accessed at

<http://www.copenhagendiagnosis.org/download/default.html> The section of the report which describes the new sea level rise projections is on page 37 and 38 of the document.

- In a March 2007 report, NASA's James Hansen, who first alerted the general public and policy makers to the global climate crisis, discusses the probability of a 5 meter (16.25 feet) sea level rise. See Hansen's report at: [http://www.iop.org/EJ/article/1748-9326/2/2/024002/er17\\_2\\_024002.html](http://www.iop.org/EJ/article/1748-9326/2/2/024002/er17_2_024002.html) Note that Hansen's report is speculative by nature, simply because ice sheet melting and other data will not exist to prove the case that he argues, until that level of melting is already happening. However, given that the NASA gravimetric data noted above shows that Antarctic and Greenland ice sheets are currently undergoing rapidly accelerating melting at previously unforeseen rates (and at rates which continue to accelerate even further) there is absolutely no reason whatsoever to doubt Hansen's predictions; especially in light of the fact that Hansen's past predictions have consistently proved to be correct.

#### CONCLUSIONS - SEA RISE:

Since James Hansen's prediction of a worst case 5 meter sea level rise by the year 2100 is highly credible, it is, at the very least, the standard of a predicted 5 meter rise which must be used as the worst case guideline for all plans for the Treasure Island and Yerba Buena Island Redevelopment Plan.

More importantly, good engineering practice (especially when dealing with a factor with such high unpredictability and potentially severe and costly outcomes as climate induced sea level rise) would call for at least an additional 100% margin of safety over worst case projections to be adopted for the Treasure Island and Yerba Buena Island Redevelopment Plan. This means that the safest standard for assumed worst case sea level rise in the project would be at least 10 meters (32.5 feet) of sea level rise by the year 2100. Even if planners were to use the likely far too equivocal 2 meter worst case sea rise projection in The Copenhagen Diagnosis, an additional 100% margin of safety would still demand a minimum 4 meter rise assumption.

Since the project plans and DEIR for the Treasure Island and Yerba Buena Island Redevelopment Plan have not taken into account the November 2009 reports noted above, and since planners and drafters were apparently unaware of Hansen's earlier and even more serious 5 meter rise projection, the project plans and DEIR are therefore utterly inadequate in addressing and including sufficiently high sea level rise projections.

The DEIR cites findings of agencies such as the San Francisco Bay Conservation and Development Commission (these agencies themselves relying on data that is not sufficiently current) as a justification of its own findings. Clearly, citing any given agency's findings which are not sufficiently current, regardless of the recognized authority of that agency, is not in any way adequate for a proper DEIR.

#### Specific Inadequacies

The section of the DEIR which deals most comprehensively with sea level rise; IV.O. 'Hydrology and Water Quality', has numerous entries on sea level rise. In every instance, the core predictions and plans referenced in the DEIR are dramatically overwhelmed by even the new minimum worst case scenario described above of 2 meters (78 inches) rise by the year 2100. Most of the DEIR and project plan sections mentioning sea level rise assume a maximum of 36 inches sea level rise, and the highest specific potential rise addressed in the plan is 55 inches.

Furthermore, while the DEIR claims that the project plans allow for sea rise higher than 55 inches to be addressed through 'adaptive management' none of the references to this 'adaptive management' plan engage in any concrete scoping whatsoever of specifically enumerated

hypothetical heights of rise, exactly how such rise would be mitigated, and exactly how specifically quantified funding would be assured in order to guarantee that such mitigation would in fact take place. The so-called ‘elements’ and ‘activities’ of the ‘adaptive management’ plan are described in the DEIR beginning on page IV.O.33. under the heading ‘Adaptive Management Strategy’ and ending on page IV.O.35. under the heading ‘Reporting Requirements’. The total lack of specificity in this section is absolutely unacceptable.

The DEIR must be revised to describe a clear response strategy for specific higher sea rise levels of at least each progressive 6 inch increment above 36 inches, progressing all the way up to, at least, James Hansen’s hypothetical 5 meter rise. Specific cost projections must be provided for each of these scenarios. And clear, detailed, and fully plausible funding mechanisms which will finance necessary mitigations must be described and quantified.

Most importantly, it is conceivable that some given level of sea rise above two meters might make any sufficient, safe and affordable mitigation effectively impossible to achieve while still proceeding with the Treasure Island and Yerba Buena Island Redevelopment Plan. The revised section must give a clear projection of the specific threshold sea level rise at which such effective impossibility of mitigation will occur. This revised section must clearly detail sufficient ongoing assessment strategies to identify promptly when this threshold appears likely to in fact be reached, and accordingly, must provide a clear exit strategy for ceasing operations under the Treasure Island and Yerba Buena Island Redevelopment Plan, to instead adopt the ‘No Project Alternative’ as described in the DEIR. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.1]

Another highly troubling aspect of the DEIR and project plan’s neglect of sea level rise assessments is in their failure to sufficiently address potential sea level rise interaction with hazardous materials in and on the project site.

In ‘Implications of Sea Level Rise for Hazardous Waste Sites in Coastal Floodplains’ (see [http://www.epa.gov/climatechange/effects/downloads/Challenge\\_chapter9.pdf](http://www.epa.gov/climatechange/effects/downloads/Challenge_chapter9.pdf)) the authors establish clearly the extensive dangerous interactions that can occur as sea level rise exacerbates flooding and triggers other negative impacts in hazardous waste sites, such as those in the Treasure Island and Yerba Buena Island Redevelopment Plan.

Yet astoundingly, of the pertinent DEIR sections, neither IV.N. ‘Geology’; IV.O. ‘Hydrology and Water Quality’; nor IV. P. ‘Hazards’ assess in any comprehensive or substantial way the very serious dangers of potential interactions between sea level rise and the numerous hazardous materials and residues in the project plan area.

It is crucial that comprehensive detailed assessments of such potential interactions be included in the DEIR and project plan; assessments which assume the full spectrum of 2 to 5 meters sea level rise projected above.

And regardless of the findings of such new assessments, the dramatic sea level rise scenarios projected above, especially if also exacerbated by earthquake liquefaction, could so overwhelm the project area that unforeseen and unavoidable extremely dangerous leaching, flushing, mixing, out-gassing and dispersion of a veritable toxic soup of hazardous materials could take place in the project area. It is therefore imperative that all hazardous materials be completely removed from the entire project area before any development is permitted to proceed. Under a scenario of sea level rise between 2 and 5 meters, no capping, other on-site containment, or ‘Institutional Controls’ for any hazardous wastes can be adequate to ensure the prevention of unacceptably dangerous leaching, flushing, mixing, out-gassing and dispersion of hazardous materials; all

which in turn would lead to the inevitable poisoning of the environment, animals, and people, living in, working in, and visiting the area. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.3]

All Other Sections Of DEIR Are Dramatically Impacted By New Sea Rise Projections And Must Therefore Be Revised

Every -other- section of the DEIR and the project plan referenced, is fundamentally impacted by sea level rise; and in light of the much higher worst case 2 to 5 meter sea level rise projections now shown to be warranted, the -entire- DEIR, its appendices, and the project plan that it references, must likewise be carefully reexamined and revised to account for the much higher potential sea level rise impacts indicated by these new projections.

To get a sense of why such a detailed and comprehensive reassessment is necessary, see the following online interactive sea level rise projection maps:

The Project Area At 2 Meters Sea Level Rise: <http://flood.firetree.net/?ll=37.8240,-122.3724&z=2&m=2>

The Project Area At 5 Meters Sea Level Rise: <http://flood.firetree.net/?ll=37.8240,-122.3724&z=2&m=5>

Even at the minimum 2 meter rise worst case assumption, the sea inundations into the project area clearly and profoundly impact the entire project in fundamental ways that are not adequately addressed in the DEIR and the referenced project plan. The 5 meter projection map is undeniably astounding in its implications. Such sea rise would likely mandate that a ‘No Project Alternative’ be adopted. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.4]

A map showing the effect of sea level rise on Trust holdings would be helpful. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.29]

Moreover, notwithstanding the failure to define and regulate a perimeter berm as a levee, it is axiomatic that a perimeter berm serves the same function as a levee. The Federal Emergency Management Agency (“FEMA”) has defined a levee in the National Flood Insurance Program (NFIP) regulations at 44 *CFR* as “... a man-made structure, usually an earthen embankment, designed and constructed in accordance with sound engineering practices to contain, control, or divert the flow of water so as to provide protection from temporary flooding.” Its primary function is flood protection.

Here, the DEIR fails to properly evaluate the long term consequences of placing a community that is subject to sea level rise and flooding, with a limited ability to seek refuge from flooding events. In particular, FEMA manages the National Flood Insurance Program (“NFIP”), which is a cornerstone strategy for preparing communities for flood disasters. As part of that strategy, FEMA has developed certain certification criteria to confirm that levee systems are designed and constructed to an appropriate level for their needs and risk tolerance; moreover, these criteria ensure that these levees are adequately maintained and otherwise perform properly.

The levee owner is responsible for providing documentation to show that the levee meets these criteria. If a levee meets FEMA criteria, then the flood hazard map will show the area behind the levee as a moderate-risk zone. If it does not, then the map will show the area as a high-risk area, or Special Flood Hazard Area (“SFHA”). The SFHA is the area subject to inundation by the 1 percent annual-chance flood (FEMA, 2010).

The responsibility for seeking levee certification is that of the local agency with jurisdiction over the floodplain in question. The local agency may perform the certification analysis with staff or consultants, or may request such technical determination by others. FEMA does not certify levees; instead, FEMA is the recipient of levee certification determination documentation forwarded by the local agency. If levee certification documentation is found to be in order, then FEMA will accredit the levee and the associated flood insurance rate maps depicting flood hazard will show the floodplain areas as protected from the base (regulatory) flood (FEMA, 2010).

On February 24, 2006, following sustained heavy rainfall and runoff, Governor Arnold Schwarzenegger declared a State of Emergency for California's levee system, commissioning up to \$500 million of state funds to repair and evaluate state/federal project levees. This declaration was a necessary step in preventing possible catastrophic consequences of Hurricane Katrina-like proportions. Following the emergency declaration, Governor Schwarzenegger directed the California Department of Water Resources to secure the necessary means to fast-track repairs of critical erosion sites. *Levees or other flood prevention structures should not be used as a means to encourage the development in flood prone areas.* At the core of this debate should be determining what level of risk to public safety is acceptable. Levees require regular maintenance to retain their level of protection. The fact is that levees can and do decay over time, and maintenance can become a serious challenge. When levees do fail, or are overtopped, they fail catastrophically (FEMA, 2010). The aforesaid/above-discourse dramatically illustrates the DEIR's failure to properly evaluate the long-term consequences of the Project being subject to sea-level rise and flooding with a minimal ability to seek refuge from flooding events. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.4]

The DEIR (at IV. Environmental Setting and Impacts, O. Hydrology and Water Quality, Page IV.O.33) proposes an adaptive management strategy implemented by Treasure Island Development Authority ("TIDA"). By properly naming the perimeter berm as a levee, another level of accredited management structure would exist to ensure that necessary maintenance is conducted appropriately and timely. However, as noted above, failure to require that the berm be certified as a levee under and otherwise subject to FEMA jurisdiction creates an unnecessary risk of flooding in the future due to lack of maintenance; this risk will ultimately increase maintenance costs and safety risks to property owners/residents. In addition, it should be noted that most lenders will not provide any purchase or construction financing without proper FEMA certification and recognition. The developer's attempt to use sleight of hand to falsely label the berm as anything other than a levee should not go unaddressed – the obvious motivation is greed and not the best interests of the Project's future inhabitants.

Consistent with the above, there should be great consternation about the creation of a funding mechanism for the berm maintenance based on fees assessed by property owners/homeowners; the failure of the berm because of improper design or underfunded maintenance will have a significant impact. Considering the Project's significant affordable housing component/population, it seems unrealistic that the Treasure Island population alone would be able to afford the studies and/or any future repairs. Moreover, there has been no analysis of how the property owners would be able to afford the consequences of a catastrophic failure of any part of the perimeter berm, unless San Francisco's taxpayers are willing to share this burden. As currently proposed, in light of this inadequately proposed rock berm and undefined repair/maintenance obligation, it is obvious that the Project is susceptible to a "Katrina"-like disaster. If the awareness of climate change and other causes of profound environmental variances lead to additional pressures upon levees and flood control systems (and their failures), then courts will find themselves entangled in property owner claims asserted against government

entities. If government flood control structures are not designated and built to accommodate the anticipated changes in the environment, and the inevitable results associated with them, then the government will face increasing liability burdens with the taxpayers will bear the full economic burden. The aforesaid significant impact was not addressed in the DEIR. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.6]

In the previous staff reports, and I reference you to the addendum to the Commission meeting for Friday June 2nd, 2012 -- 2009, North Coast District, Item F4A, Local Coastal Program Amendment, No. CRCMAJ-1-09, Costo Norday.

For the SUMI Reliance design purposes, a minimum sea level rate of 3 feet per century is going to be used. You mention in the report that the Tsunami hazards should account for sea levels of 3 to 6 feet per century; however, the project plans are accommodating only 36 inches of sea level rise plus an additional 6 inches of freeboard. You can find this reference in the Hydrology and Water Quality page, section 4, No. 29. However, we believe it won't be adequate for the lifetime of the project.

No definitive publication has been produced in the report that addresses the sea level rise, making it impossible to determine the appropriate height. It's conceivable that during the lifetime of the project, the sea level may increase more than the project design. Sea level is especially problematic for Treasure Island. (*Nick S. Rossi, representing Ken Masters*) [TR.5.2]

Venice is one area where you look at the future of the environment, where you work, look at Venice during parts of the year and the tide, the high tide and low tide, it floods St. Mark's Square in those areas. But I think we also look at the document here. Someone brought the issue about global warming and the issues of global warming and tides. In the next hundred years or so, how many feet will it go up? Or if you look at a hundred-year-flood area, I think the document addresses that adequately. (*William Lee, Planning Commission*) [TR.24.2]

### **Response**

The future potential for sea level rise to affect the Proposed Project is discussed in the EIR in Section IV.O, Hydrology and Water Quality, pp. IV.O.30-IV.O.35. As discussed there, a comprehensive review of scientifically credible literature was completed as part of the background research for the Proposed Project.<sup>1</sup> Peer-reviewed documents that represented widely recognized credible sources and were relevant to future potential sea level rise at the project site were selected for review. Additional studies were also reviewed to assess ongoing developments in the climate science community. As discussed in greater detail on EIR p. IV.O.31, the current state of the science indicates that the most likely rates of potential sea level rise range in magnitude from 12 to 55 inches by 2100. The San Francisco Bay Conservation and Development Commission ("BCDC") recommends consideration of a 16-inch sea level rise by

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<sup>1</sup> Moffatt and Nichol, *Treasure Island Development Project Coastal Flooding Study*, prepared for Treasure Island Community Development, April 2009 (hereinafter "Coastal Flooding Study 2009"); and Moffatt and Nichol, Memorandum from Dilip Trivedi to Alex Galovich, "*Treasure Island Sea Level Rise Update*," April 19, 2010.

2050 and a 55-inch sea level rise by 2100.<sup>2</sup> As discussed in the EIR, these estimates of sea level rise are not intended to represent every possible sea level rise scenario. Many other estimates of potential sea level rise exist, posited by qualified researchers, with projections that range from much lower to substantially higher than those considered. Exceptionally high estimates of potential sea level rise associated with potential instability of the Greenland and Antarctic ice sheets have also been discussed in the literature. However, potential contributions to future sea level rise from ice melt from all sources (including Greenland and Antarctic ice sheet thinning and ice shelf calving) have not been definitively established and are not widely accepted by the scientific community. Therefore these factors are considered speculative. Nevertheless, potentially higher levels of sea level rise beyond the current planning-level estimates on which the Proposed Project has based its initial improvements, while not quantified for purposes of the EIR analysis, would be addressed by the adaptive management strategy that is included in the EIR and discussed below.

As discussed on EIR pp. IV.O.32-IV.O.35, the Proposed Project would involve implementation of a range of elements that would accommodate future sea level rise. These include:

- (1) Immediate improvements and protective measures: raising the perimeter berm to prevent overtopping for up to 16 inches of sea level rise, raising infrastructure and proposed buildings to 36-42 inches above the current 100-year high tide elevation, and improvements to storm drain designs to accommodate up to 16 inches of sea level rise;
- (2) Implementation of an Adaptive Management Strategy that would include an ongoing monitoring program to review sea level rise data, an institutional framework for decision-making in support of future sea level rise protection measures, and a mechanism for paying costs of the Adaptive Management Strategy, including implementation of recommended new infrastructure, facilities, and management activities.

With adherence to these elements, the Proposed Project would ensure implementation of sufficient infrastructure to meet the effects of climate change, while protecting the community from potential risks of flooding and ocean/bay inundation. Proposed near-term and long-term future facilities would be required to meet applicable Federal, State, and local regulations, and to comply with permitting conditions, both in support of environmental protection and public safety.

The Proposed Project's adaptive management strategy is a key element of the long-term strategy to counter the potential effects of sea level rise on Treasure Island and Yerba Buena Island. As discussed above, the predicted rates of future sea level rise vary substantially. Selecting a single sea level rise scenario is therefore problematic. Selecting a scenario that is too low could potentially result in damage to proposed facilities from sea level rise in the near term. Selecting a

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<sup>2</sup> Bay Conservation and Development Commission, *San Francisco Bay: Preparing for the Next Level*, September 21, 2009, pp. 91-94. Available at [http://www.bcdc.ca.gov/planning/climate\\_change/SFBay\\_preparing\\_%20for\\_the\\_next\\_Level.pdf](http://www.bcdc.ca.gov/planning/climate_change/SFBay_preparing_%20for_the_next_Level.pdf), accessed October 25, 2010.

scenario that is high or very high, in an effort to conservatively plan for the potential worst case scenario, could lead to the over-installation of infrastructure that might never be needed and would come at a substantial cost – in terms of the amount of money, effort, and time required to install such infrastructure, in the environmental impacts that would be incurred as a result of installing such infrastructure, and in the costs to operate and maintain such infrastructure over a prolonged period of time when it is not in active use. For instance, near-term installation of high berms to protect against several meters of sea level rise would result in substantial additional environmental impacts along the margins of Treasure Island, potentially increasing the intensity of impacts to biological resources, stormwater drainage, water quality, air quality emissions, aesthetics and visual resources, and public access and recreation. According to available and widely accepted scientific studies and literature, the probability for exceedingly high rates of sea level rise to occur (more than 16 inches by 2050 or 55 inches by 2100) is low. Thus, substantially increasing the intensity of other environmental impacts to protect against very high rates of future sea level rise, when there is relatively little evidence in support of those high rates, is unwarranted.

In light of these considerations, the adaptive management strategy was chosen as the most reasonable, reliable, and feasible way to ensure long-term future protection of the project site. Under the adaptive management strategy, the best available sea level rise projections would be evaluated on an ongoing basis. Sea level rise prediction models and studies will become more sophisticated and more accurate over time, and current sea level rise projections will likely be replaced or refined as a result. Thus, the adaptive management strategy would include monitoring the actual rate of sea level rise locally and analyzing sea level rise prediction models and studies to ensure the best possible management outcome for the Proposed Project.

In terms of the potential for ponding to result along public access areas around the shoreline of Treasure Island, the comment correctly states that some shoreline areas could potentially become partially inundated in the future for short periods of time, following large rainstorm events that occur simultaneously with extreme high tides. Under existing conditions, some ponding does occur, and the Proposed Project would not increase ponding. However, public access under current conditions is more limited than it would be in the future. Therefore, current ponding on Treasure Island does not necessarily interfere with public access in the same manner as temporary ponding could potentially impact public access in the future. Inundation would potentially result in a temporary impact on recreational uses of the shoreline trail during periods of temporary flooding. However, as discussed on EIR p. IV.O.34, ponding is anticipated to be limited in duration, would occur at times of substantial rainfall when public use is generally limited, and is not anticipated to result in a long-term loss of public access. In the event that ponding continues in a manner that substantially affects beneficial use of the shoreline areas, the EIR provides the Treasure Island Development Authority (“TIDA”) with a range of options to consider, in order to address the problem. These options are discussed on EIR p. IV.O.34.

One comment questions the potential environmental and visual impacts that would result from implementing the recommendations of the adaptive management strategy, should sea level rise continue beyond 36 inches. Depending upon the extent of sea level rise, installing additional protective berms or other features could result in environmental impacts. The precise construction details of the sea-level-rise-related infrastructure and management updates that would be implemented under the adaptive management strategy are not known at present and therefore cannot be analyzed in detail, but EIR p. IV.O.34 discusses several options for raising the perimeter berm in the future, should sea level rise warrant it. Those options include raising portions of the public access trail along the perimeter berm to maintain beneficial uses such as views. Future actions taken under the adaptive management strategy would be subject to permit conditions imposed by the various permitting agencies, such as the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and BCDC, prior to implementation, including environmental review as appropriate. Additional measures would be implemented as warranted to minimize environmental impacts of proposed facilities, as required in these permits and environmental review documents.

One comment questions the use of sea walls along the perimeter and whether they can be raised to address future sea level rise. Structural design of seawalls and bulkheads is fairly standard in the engineering practice, and raising or replacing a vertical wall is possible without significant constraints. This is done routinely along commercial waterfront properties, such as waterfronts and marinas, and is the most probable scenario for retrofitting the San Francisco waterfront that is largely protected by seawalls at present.

As discussed on EIR p. IV.O.35, operations under the adaptive management strategy would be funded by either a dedicated tax assessment or an allocation of a portion of Mello-Roos tax assessments. Due to the flexible nature of the adaptive management strategy and the uncertainty in sea level rise rates, the precise amount of money that would be required to fund future upgrades will not be known for some time, and details regarding potential economic effects of such assessments of the future viability of the Proposed Project are not required in a CEQA document.

The amount of affordable housing included in the Proposed Project is higher than required in the San Francisco Planning Code §415 but is not so great as to make the Proposed Project infeasible. The need for maintenance and upgraded utilities in the future, including features related to tidal flooding and sea level rise, was taken into account as the land plan was developed. There is no expectation that the City's General Fund would be used to fund the adaptive management strategy. The upfront capital costs of the Proposed Project are paid for (in their simplest terms) using three sources: private capital, bonds supported by public tax increment financing, and bonds supported by a Community Facilities District ("CFD"). The first has no taxpayer burden. The second mechanism relies on the powers of redevelopment to redirect the 1 percent ad

valorem property tax from other State and local uses to the redevelopment project area. This does not increase property taxes paid by individual property owners within the project area. The last source, the CFD, does impose a tax assessment on property within the project area to pay for infrastructure improvements, including the geotechnical improvements. Homeowners who choose to purchase a home in the area will have full knowledge of this assessment (see the response in Subsection 2.23.1, Fiscal and Economic Effect of Geotechnical Stabilization, in Section 2.23, Fiscal Economic Issues, for a discussion of the effects of the proposed CFD on households in affordable units, including existing residents in affordable units who remain on the Islands during and after construction of the Proposed Project). The CFD assessment would require residents of the project area to help pay (over a long time period) for the infrastructure from which they benefit, and would not require San Francisco taxpayers at large to contribute.

One comment requests a map showing the effect of sea level rise on Tidelands Trust lands. As discussed above and on EIR pp. IV.O.30-IV.O.35, the amount of future sea level rise is a subject of substantial debate among experts. The consensus among the environmental community is that future potential sea level rise is likely to fall within a range of scientifically-based estimates, but there is a general recognition that precise estimates are not possible at this time. Therefore, producing a map that accurately represents the extent of inundation due to climate change would be speculative. The Proposed Project includes features intended to prevent flooding, including flooding from sea level rise, as discussed above. Therefore, there is no expectation that sea level rise would permanently affect Tidelands Trust lands (see the first comment and response in Subsection 2.2.1, Tidelands Trust, in Section 2.2, Plans and Policies). However, if the commenter is interested in the potential effects of a specific level of sea level rise that is not tied to a particular timeframe or any of the improvements included in the Proposed Project, BCDC has provided a series of maps that document the land area that would be inundated as a result of 16 and 55 inches of sea level rise. The following website provides a map of the central San Francisco Bay, including the project site, as it would be affected by 16 and 55 inch sea level rise scenarios: [http://www.bcdc.ca.gov/planning/climate\\_change/maps/16\\_55/cbay.pdf](http://www.bcdc.ca.gov/planning/climate_change/maps/16_55/cbay.pdf) (accessed October 20, 2010). A copy of the relevant portion of the map is reproduced in Figure C&R-1: Shoreline Areas Vulnerable to Sea Level Rise, Central San Francisco Bay, on the following page. It is important to note that these maps are based on existing conditions and do not reflect the initial improvements that would be constructed as part of the Proposed Project or over time under the Proposed Project's adaptive management strategy.

Regarding hazardous materials on site, sea level rise could potentially result in an increase in groundwater levels on site, which could potentially affect the distribution and extent of groundwater pollution plumes on site. However, as discussed in EIR Section IV.P, Hazards and Hazardous Materials, current/ongoing and anticipated continued groundwater cleanup efforts on Treasure Island are expected to substantially reduce pollutant loading in groundwater on site and groundwater pollutant levels, and the potential effects of those pollutants are anticipated to decline

- Area vulnerable to an approximate 16 inch sea level rise
- Area vulnerable to an approximate 55 inch sea level rise



SOURCE: San Francisco Bay Conservation and Development Commission

FIGURE C&R 1: SHORELINE AREAS VULNERABLE TO SEA LEVEL RISE, CENTRAL SAN FRANCISCO BAY

substantially over time as sea level rise occurs. Additionally, proposed ground-level increases would increase the distance between the island's surface and underlying groundwater pollutants, and improvements to the existing protective berms around the island would reduce the likelihood of Bay water washing over (overtopping) the berm as well as seepage from entering groundwater.

One comment raises the issue of alternative berm systems, indicating that the EIR does not evaluate alternative berm systems, such as steel plate or vertical bulkhead systems, and suggests that this was not done because soil and rock berm systems are inexpensive. These systems were not considered because the Proposed Project does not include removing and replacing the entire existing berm. However, EIR p. IV.O.34 identifies several alternative means for modifying the perimeter as some of the adaptive strategies that could be used in the future. Other systems, such as steel plates or bulkheads, could also be evaluated as part of consideration of future actions within the adaptive management strategy. These systems are not analyzed in the EIR, however, because they are not proposed as part of the Proposed Project, but may be under consideration at some future time as part of the adaptive management strategy. Proposals for such alternative systems would be subject to environmental review under CEQA as appropriate, as well as permit conditions imposed by the various permitting agencies including the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and BCDC, prior to implementation.

Comments regarding levees compared to berms correctly define a levee as “a man-made structure, usually an earthen embankment, designed and constructed in accordance with sound engineering practices to contain, control, or divert the flow of water so as to provide protection from temporary flooding.” The Proposed Project would not depend on the perimeter berm to function as a levee to protect the developed area from flooding; rather, the perimeter berm provides protection against wave overtopping and storm surges. The finish grades of the development areas would be raised 36 inches above the current 100-year high tide elevation, as described on EIR p. IV.O.29, meaning that development would be outside the flood hazard zone and the perimeter berm would not be subject to levee standards. As discussed on EIR p. IV.O.40, TIDA would apply for a Conditional Letter of Map Revision/Letter of Map Revision (explained on EIR pp. IV.O.11-IV.O.12) to establish that the developed areas would be excluded from the 100-year flood plain. No levee would be required to protect the area from flooding. The perimeter berm would continue to provide protection against wave overtopping during periods of storm-driven waves.

For more information on how sea level rise could affect the Proposed Project's geotechnical stability, including liquefaction potential and structural foundations, please refer to EIR Section IV.N, Geology and Soils, pp. IV.N.28-IV.N.29; to pp. IV.O.32-IV.O.35 and p. IV.O.49; and to the responses in Subsection 2.16.1, Geotechnical Stabilization, and Subsection 2.16.2, Seismic, in Section 2.16, Geology and Soils, of this Comments and Responses document.

### 2.17.1.1 Stormwater and Wastewater Discharge

#### Comment

**Sea Level Rise.** It is not clear that the impacts of sea level rise on the wastewater and stormwater systems has been adequately assessed. The document does note that additional pumping may be needed, but doesn't explain how stormwater and wastewater will be discharged during storm surges and high tides as mean sea level increases. How will the system be protected from seawater intrusion during high tides and storm surges? The San Francisco Public Utilities Commission already sees saltwater intrusion in its system 6-8 times per year. It anticipates having to install baffles to block intrusion by 2015, and, as sea level rises, closing its nearshore outfalls and pumping all of the stormwater flows to the treatment plants and offshore outfalls. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.37]

#### Response

As indicated in EIR Section IV.O, Hydrology and Water Quality, on p. IV.O.44, the Proposed Project would include a new or updated wastewater treatment plant that would treat wastewater from both Treasure Island and Yerba Buena Island, and discharge into San Francisco Bay. Discharges from the new or upgraded plant would be handled by the existing discharge facilities – that is, using the discharge pipeline that is already installed between the wastewater treatment plant and the Bay. These outlet facilities are submerged. It is estimated that the existing configuration of these discharge facilities would be able to continue to provide gravity drainage of treated wastewater for up to 3 feet of increase in sea level. If sea level were to rise to a level that the existing facilities could not handle, pumps could be required to enable discharge of treated wastewater. Installation of such facilities would be accounted for under the adaptive management strategy, discussed on EIR pp. IV.O.33-IV.O.35. Gate valves and backflow preventer valves would continue to prevent intrusion of sea water into the system.

For stormwater, existing stormwater facilities would be upgraded under the Proposed Project. As indicated on EIR p. IV.O.49, the upgraded storm drainage systems would be sufficient to permit stormwater drainage into the Bay by gravity with up to 16 inches of sea level rise. Installation of proposed facilities would allow for upgrade in the event that additional sea level rise was anticipated or observed. Thus, within the framework of the adaptive management strategy, larger or upgraded stormwater pumps and associated facilities would be added to the proposed facilities to enable stormwater discharge, even under a very high sea level rise scenario. See the response in Subsection 2.10.1, Baseline Assumptions, in Section 2.10, Greenhouse Gas Emissions, of this Comments and Responses document, for a discussion of the potential change in greenhouse gas emissions associated with future additional pumping for stormwater and wastewater discharges.

## 2.17.2 FLOODING

### Comment

One transportation-related element does appear to be missing from the analysis and the EIR. No mention is made in the Transportation section of an emergency evacuation plan. Page 29 of the Hydrology and Water Quality section states that engineered fill would be used to raise the ground level before constructing new buildings. After raising the ground level, the “finished floor elevations would likely range from 12.6 feet to 14.5 feet NAVD88 [North American Vertical Datum of 1988].” Also in the Hydrology and Water Quality section, it is revealed that the “maximum run-up conditions for combined astronomical tides, storm surge, waves, and tsunami would be 10.0 to 16.3 feet NAVD88.”

Despite the fact that the floor area is lower than the maximum run-up conditions, page 48 of the Hydrology and Water Quality section states that the proposed project would not be susceptible to inundation because the proposed project includes strengthening and raising the protective berms around the perimeter of Treasure Island. However, perimeter protective berms are not mentioned under Proposed Flood Improvements on pages 29 and 30 of the Hydrology and Water Quality section. When the berm is mentioned in the Executive Summary, the proposed height is not included. The Project Description does, however, reveal that the existing 10–14 ft berm would need to be strengthened and raised to heights of “about 14 to 16 feet.” (*Saul Bloom, Arc Ecology*) [28.6]

### Response

The comment is correct in stating that a maximum run-up condition of 16.3 feet would exceed the minimum finished floor elevation of between 12.6 and 14.5 feet. However, as discussed in EIR Section IV.O, Hydrology and Water Quality, on p. IV.O.7, the higher 16.3-foot run-up values are relevant only to the very northern portion of Treasure Island, in an area where buildings installed at the indicated minimum finished floor elevations would not be located. Additional detail is provided in the *Treasure Island Coastal Flooding Study*.<sup>3</sup> As discussed on p. iii of that document, the maximum crest elevation of 16.3 feet NAVD is indicated for the north reach of Treasure Island, with an overtopping rate of 0.2 cubic feet per second per 1,000 feet of berm. The southwest reach of Treasure Island, where most development is proposed, would have a crest elevation of 13.9 feet NAVD, and an overtopping rate of 2.1 cubic feet per second per 1,000 feet of berm. As discussed on EIR p. IV.O.29, topographically lower portions of Treasure Island that would contain open space may experience localized temporary ponding associated with large rain events that co-occur with 100-year high tides. However, these areas would not include residences or other buildings, and such an event would be consistent with planned programming and management for the affected open space areas. Thus, residential, commercial, and other built areas would be protected from flooding under the Proposed Project, while periodic flooding would be permitted in some open space areas.

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<sup>3</sup> Moffatt & Nichol. 2009, *Treasure Island Coastal Flooding Study*, San Francisco, CA. April 2009.

EIR Section IV.E, Transportation, discusses emergency access in Impact TR-38, on pp. IV.E.116-IV.E.117. EIR Section IV.P, Hazards and Hazardous Materials, includes a discussion of the *Treasure Island Emergency Response Plan* on pp. IV.P.38-IV.P.39. Also, see the response in Subsection 2.18.2, Emergency Response, in Section 2.18, Hazards and Hazardous Materials, of this Comments and Responses document, for further discussion of the *Emergency Response Plan*.

### 2.17.3 DREDGING

#### Comment

**Dredging.** While a proposed dredging plan is not included in the DEIR, the option to dredge at the project site is discussed in Section IV.O page 18 and 37. The Commission's dredging policies state, in part that dredging should be authorized with the Commission can find that "dredging is needed to serve a water-oriented use or other important public purpose, such as navigational safety" and "the siting and design of the project will result in the minimum dredging volume necessary for the project." The FEIR should clearly outline the proposed dredging at the project site, and how the goals of the project can be achieved while minimizing the volume of dredged material. The FEIR should also address dredging and disposal issues recognizing that (1) the Dredged Material Management Office has not taken action on any proposed dredging on site, and (2) the Commission's policy preference is for beneficial reuse of dredged material, where feasible. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.22]

#### Response

Regulations and requirements governing dredging associated with the Proposed Project are discussed in EIR Section IV.O, Hydrology and Water Quality, on pp. IV.O.17-IV.O.19, including discussions of the Dredged Material Management Office and requirements under the Long Term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region, Management Plan ("LTMS Management Plan"). Potential impacts associated with proposed dredging are discussed on EIR p. IV.O.37, including a discussion/outline of which proposed facilities would require dredging, potential impacts, and permit conditions that would be applied to dredging under the Proposed Project. As discussed, adherence to the conditions associated with required permits, including a BCDC Dredging Permit, a U.S. Army Corps of Engineers dredging permit, and a Clean Water Act Section 401 certification, would, together, implement the requirements discussed under the LTMS Management Plan.

Dredging associated with the Proposed Project would be for construction of the new Ferry Terminal and construction of the Treasure Island Sailing Center launch facility, both of which would be consistent with BCDC policies that restrict dredging to water-oriented uses or other important public purposes, and subject to BCDC's permit requirements. Although the amount of dredging cannot be precisely specified until the project design stage, it is anticipated to range from approximately 33,500 to 36,000 cubic yards. The Sailing Center dredging would account for a small portion of the total dredged amount, ranging from about 1,500 to 3,700 cubic yards.

The proposed siting of the Ferry Terminal and Sailing Center would not result in materially more dredging than if either were sited elsewhere within the Project Area, and would satisfy the BCDC policy to site and design the Proposed Project in a manner to minimize dredging. BCDC would review the final design and make a determination that the Proposed Project meets these policies before a dredging permit could be issued.

Therefore, potential dredging-related impacts and associated issues raised by the comment, including management/disposal of dredge spoils, would be reduced as a result of adhering to required permits. Details, such as the potential for beneficial re-use of dredge spoils, and locations for that re-use, would be subject to substantial input from permitting agencies during the permitting process. Attempting to establish the details of permitting outcomes when permits are not yet in process would be speculative. Potential impacts would be minimized to less-than-significant levels by adhering to the requirements of the LTMS Management Plan and associated regulations and permit requirements, as discussed on EIR pp. IV.O.35-IV.O.37. Please also see the response in Subsection 2.16.3, Perimeter Berm Maintenance, in Section 2.16, Geology and Soils, of this Comments and Responses document, regarding Bay fill.

#### **2.17.4 WATER QUALITY SETTING**

##### **Comment**

**Water Quality Impairments.** The list of 303 (d) impairments for San Francisco Bay in the vicinity of Treasure Island should include Polycyclic Aromatic Hydrocarbons (PAHs) – see 2006 CWA Section 303 (d) list of Water Quality Limited Segments. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.39]

##### **Response**

The list of 303 (d) water quality impairments that are relevant to the Proposed Project is shown in EIR Section IV.O, Hydrology and Water Quality, on p. IV.O.15, near the end of the first full paragraph. The comment indicates that an additional class of water quality constituent, polycyclic aromatic hydrocarbons (“PAHs”), should also be included on this list. However, the most recent approved 303 (d) list for the San Francisco Bay area in the vicinity of the Proposed Project does not include PAHs.<sup>4</sup> Therefore, no updates to the EIR are warranted.

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<sup>4</sup> RWQCB, 2007. 2006 CWA Section 303(d) List of Water Quality Limited Segments. Available at [http://www.waterboards.ca.gov/water\\_issues/programs/tmdl/docs/303dlists2006/epa/state\\_usepa\\_combin ed.pdf](http://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303dlists2006/epa/state_usepa_combin ed.pdf) Accessed on October 14, 2010. pp.66-70.

### 2.17.5 CUMULATIVE IMPACTS

#### Comment

The increase in air pollution (primarily from cars) and water pollution (from construction and storm water discharge) are downplayed in the DEIR and not adequately considered in the cumulative impacts analysis. We ask that these sections be revised and released for additional review and comment by the public. (*Mike Lynes, Conservation Director, Golden Gate Audubon Society*) [32.32]

#### Response

Potential sources of construction related water quality pollution are discussed in detail in EIR Section IV.O, Hydrology and Water Quality, on pp. IV.O.35-IV.O.37. As discussed therein, construction activities would include the use of heavy equipment that would disturb existing soils and that could result in the release of hydrocarbons, coolants, cement washout, and various other water quality constituents. Construction adjacent to or within the San Francisco Bay could release sediment and other construction-related pollutants directly into Bay waters. Construction-related pollutants could also potentially affect groundwater. However, as discussed on EIR pp. IV.O.36-IV.O.37, all landside construction activity on site would be required to adhere to the conditions of an NPDES General Permit for Construction Activities, while construction activities within the Bay would be required to adhere to various sediment and pollutant minimization requirements, as discussed in detail on EIR p. IV.O.36.

Potential cumulative water quality effects are discussed on EIR p. IV.O.50. As discussed on that page, a cumulatively considerable impact for construction-related water quality is not anticipated. As discussed on EIR p. IV.O.15, water quality in San Francisco Bay is considered impaired for chlordane, DDT, dieldrin, dioxin compounds (including 2,3, 7,8-TCDD), exotic (e.g., non-native) species, furan compounds, mercury, PCBs, PCBs (dioxin-like), and selenium. None of the construction activities on site would contribute additional loadings of these compounds to the San Francisco Bay. Additionally, as discussed on EIR p. IV.O.50, construction activities for other cumulative projects are not expected to degrade water quality such that a new impairment would occur. Any residual construction related water quality emissions from the Proposed Project would not be cumulatively considerable. Therefore, recirculation of the Draft EIR pursuant to *CEQA Guidelines* is not required. Under *CEQA Guidelines* Section 15088.5, recirculation would be required if new information is considered significant. Recirculation is not required if new information clarifies, amplifies, or makes insignificant modifications to an adequate EIR. In this instance, significant new information has not become available with respect to cumulative water quality impacts.

See the response in Subsection 2.9.6, Cumulative Impacts, in Section 2.9, Air Quality, of this Comments and Responses document, for a response to the comment on cumulative air quality impacts.

## 2.17.6 REGULATIONS AND REGULATORY FRAMEWORK

### Comments

**Water Quality.** The DEIR identifies various activities, including remediation, dredging, construction (earth moving, grading, and excavation), and operational work at the project site that could result in impacts, including erosion, turbidity, etc. The DEIR lists strategies to mitigate potential water quality impacts, including the application of Best Management Practices (BMPs) and certification by the San Francisco Bay Regional Water Quality Control Board (RWQCB). The DEIR does not include the San Francisco Bay Plan's policies on Water Quality. The Bay Plan Water Quality Policy No. 1 states, "[b]ay water pollution should be prevented to the greatest extent feasible. The Bay's tidal marshes, tidal flats, and water surface area and volume should be conserved and, whenever possible, restored and increased to protect and improve water quality. The Bay Plan's Water Quality Policy No. 2 states, in part, that "[w]ater quality in all parts of the Bay should be maintained...and...protected from all harmful or potentially harmful pollutants," and, further, that the RWQCB's recommendations provide "the basis for carrying out the Commission's water quality responsibilities." Pursuant to this policy, the RWQCB certification would need to be obtained in order for the Commission to file a permit application or federal consistency determination. (*Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission*) [17.21]

The following regulations (and others) applicable to the Project were adopted for the specific purpose of avoiding environmental effects on biological resources. In addition to the materials contained in Chapter IV of the DEIR, please answer the following as to the regulations listed below: (1) On what factual basis does the DEIR conclude that the project does not conflict with each of these regulations? (2) What are the results of the required consultations with the applicable regulatory agency(ies), including the dates of these consultations? . . .

- Section 404 of the Federal Clean Water Act (CWA)
- Rivers and Harbors Act (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.16]

### Response

Federal, State, and local regulations that are relevant to the analysis of hydrology and water quality are discussed in EIR Section IV.O, Hydrology and Water Quality, on pp. IV.O.11-IV.O.22. Generally speaking, the regulations cited in Comment 39.16 require adherence to a permitting process in order to maintain compliance for regulated activities. For instance, Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act both require acquisition of permits prior to the commencement of certain activities (e.g., placement or discharge of fill, alteration of navigable waterways, etc). Compliance with these regulations is achieved during a permitting process, in which proposed regulated activities are reviewed, required compliance measures and permit conditions are applied, and eventually a permit is either granted or denied. Because any project activities governed by Section 10 of the Rivers and Harbors Act and Section

404 of the Clean Water Act would be legally required to obtain permits under those laws and their applicable regulations to ensure regulatory compliance, the EIR concludes that the Proposed Project would not conflict with these laws and regulations.

One comment notes that the *San Francisco Bay Plan*, promulgated by BCDC, was not included in the Hydrology and Water Quality Setting section of the EIR, in the “Regulatory Framework” subsection. The comment is correct. There is a detailed discussion of relevant policies of the *San Francisco Bay Plan* in EIR Chapter III, Plans and Policies, on pp. III.9-III.12. The third paragraph on p. III.11 summarizes the general policies in the *Bay Plan* related to water quality. In response to the comment, the following text is inserted on EIR p. IV.O.20, immediately prior to the heading, “Local”:

### **Regional**

#### **San Francisco Bay Plan**

The San Francisco Bay Conservation and Development Commission has promulgated the *San Francisco Bay Plan* in order to support environmental protection of San Francisco Bay in consideration of the Bay as a valuable natural asset (see Chapter III, Plans and Policies, pp. III.9-III.12). The following policies contained in the *Bay Plan* are relevant to water quality:

**Water Quality Policy 1:** Bay water pollution should be prevented to the greatest extent feasible. The Bay’s tidal marshes, tidal flats, and water surface area and volume should be conserved and, whenever possible, restored and increased to protect and improve water quality. Fresh water inflow into the Bay should be maintained at a level adequate to protect Bay resources and beneficial uses.

**Water Quality Policy 2:** Water quality in all parts of the Bay should be maintained at a level that will support and promote the beneficial uses of the Bay as identified in the San Francisco Bay Regional Water Quality Control Board’s Water Quality Control Plan, San Francisco Bay Basin and should be protected from all harmful or potentially harmful pollutants. The policies, recommendations, decisions, advice and authority of the State Water Resources Control Board and the Regional Board, should be the basis for carrying out the Commission’s water quality responsibilities.

**Water Quality Policy 3:** New projects should be sited, designed, constructed and maintained to prevent or, if prevention is infeasible, to minimize the discharge of pollutants into the Bay by: (a) controlling pollutant sources at the project site; (b) using construction materials that contain nonpolluting materials; and (c) applying appropriate, accepted and effective best management practices, especially where water dispersion is poor and near shellfish beds and other significant biotic resources.

**Water Quality Policy 6:** To protect the Bay and its tributaries from the water quality impacts of nonpoint source pollution, new development should be sited and designed consistent with standards in municipal stormwater permits and state and regional stormwater management guidelines, where applicable, and with the protection of Bay

resources. To offset impacts from increased impervious areas and land disturbances, vegetated swales, permeable pavement materials, preservation of existing trees and vegetation, planting native vegetation and other appropriate measures should be evaluated and implemented where appropriate.

## 2.18 HAZARDS AND HAZARDOUS MATERIALS

### 2.18.1 CONSTRUCTION IMPACTS

#### Comment

9. Where will stockpiles of contaminated/unsuitable soils be located? (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.7]

Tangentially related to air quality is the fact that the Dust Control Ordinance requires additional dust control measures when winds exceed 15 miles per hour; mitigation measure M-AQ-4, contemplates that there may be winds that exceed twenty miles per hour, and impacts W-S3 and W-S4 recognize the possibility of a Section 148 wind disaster, possibly in different areas of the Project. Local history can be telling; Lennar Homes's poor efforts regarding the asbestos, manganese and other toxic elements that went into the air during the development at the Bayview Hunters Point project, led to three violation notices and over \$515,000 in civil penalties for violations of California Health and Safety Code Section 424. A regulatory commission should be established to monitor this development as old naval bases may similarly contain these toxic elements. Despite this recent experience, neither the Wind and Shadow Mitigation Measures (IV. I., S-73 through S-74) nor other proposed mitigation measures such as the Hazardous and Hazardous Materials DEIR analysis, including the Human Health Risk Assessment, adequately address this concern or otherwise propose sufficient mitigation/improvement measures. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.28]

#### Response

As stated in the EIR in Section IV.P, Hazards and Hazardous Materials, p. IV.P.42, all protocols for the management of excavated soils and stockpiles would be implemented in accordance with the Soil and Groundwater Management Plan ("SGMP") established by Mitigation Measure M-HZ-1. In general, the soils would be stockpiled on the same parcel where they originate. As also stated on EIR p. IV.P.42, the SGMP soil management requirements include protection and security measures for the public, including immediate neighboring sites. These measures would, at a minimum, meet the requirements of the San Francisco Dust Control Ordinance and, consistent with that Ordinance, would require implementation of additional measures when winds exceed 15 miles per hour. For example, the Dust Control Ordinance requires a site-specific dust control plan that includes monitoring the wind direction, placing particulate dust monitors upwind and downwind, keeping records of particulate monitoring results, and hiring an independent third party to conduct inspections for visible dust and keeping records of those inspections. See also Mitigation Measures M-AQ-1 and M-AQ-4, in EIR Section IV.G, Air Quality, on pp. IV.G.26 and IV.G.37, respectively, for additional requirements regarding fugitive dust control measures. Excavation under the Proposed Project would be limited to what is necessary for construction of the Proposed Project's development program. Excavation for the purposes of ongoing remediation is being conducted by the Navy and is not part of the Proposed Project. As stated on

EIR p. IV.P.43, remediation on most parcels will likely be completed prior to commencement of proposed construction activities and would occur without the Proposed Project. As also stated on this page, the SGMP would include dust control measures to protect the public “from exposure to any known or newly discovered hazardous materials.”

### **2.18.2 EMERGENCY RESPONSE**

#### **Comments**

Moreover, the Project’s emergency response plan, as analyzed by the DEIR (at Hazards and Hazardous Materials IV. P.38 and IV.P.39), should have included analysis/mitigation measures of practice and drills to ensure proper education/preparation for flooding as well as the adequacy of safety routes in areas designated for emergency evacuation. These analysis/mitigation measures are crucial due to the fact that TI/YBI are located in an area with high seismic activity and limited access off of them (as discussed below), which could further contribute to berm failure. The DEIR should include an analysis of seismic failures that could impede access off the islands as evidenced by the Bay Bridge collapse during the 1989 Loma Prieta earthquake. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.5]

And I’ve mentioned before, Treasure Island, being located in a Tsunami location, we don’t think the emergency response plan adequately addresses that, nor does it provide for drills or practical responses. (*Nick S. Rossi, representing Ken Masters*) [TR.5.4]

The safety danger is not addressed and the event of any need for large numbers of people to be moved off the island, one westbound onramp towards San Francisco on the other side of the island is not practical, it is dangerous and invites significant loss of life in the event of an emergency. I point to the SFPD’s & California Highway Patrol’s own event management currently and before the Macalla onramp was closed as part of the new spans construction. Their logistics were not included in this EIR... (*Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation*) [12.2]

Regardless of berm height, evacuation of Treasure Island is likely following a seismic event. Some discussion should be provided in the EIR describing the methods to be used to evacuate the 8,000 residential units and 550,000 sf of retail and commercial space. Analysis should include with and without Bay Bridge scenarios and should provide quantitative statements of time required to evacuate. (*Arc Ecology*) [28.7]

#### **Response**

The analysis of emergency response for the Proposed Project is covered in several sections of the EIR, including Section IV.P, Hazards and Hazardous Materials (pp. IV.P.38-IV.P.39), Section IV.N, Geology and Soils (pp. IV.N.31-IV.N.32), and Section IV.E, Transportation (pp. IV.E.116-IV.E.117). As stated on EIR p. IV.P.39, “TIDA and the San Francisco Department of Emergency Management have prepared an Emergency Response Plan for events that may occur on Treasure Island and Yerba Buena Island.” This plan includes preparedness efforts such as the creation of neighborhood emergency response teams and a crisis action team. New tenants would receive

information on protocols in the event of an emergency such as a flooding event. The Plan also addresses how evacuation would be carried out, if required.

A seismic retrofit of the western span of the Bay Bridge has just been completed, and the eastern span is being rebuilt as a lifeline facility designed to remain open even in a very large earthquake. Caltrans expects to open the new span by about 2013, which is well before any significant numbers of new residents would be added to the Project Area. Nevertheless, as discussed on EIR p. IV.N.31, the potential vehicular constraints that may occur in the event of an earthquake would be supported by the proposed ferry service as well as the alternate water access on the eastern side of the island at Pier 1. Seismic events, including tsunamis, were considered in the *Treasure and Yerba Buena Risk Assessment*, which is Appendix D to the *Treasure and Yerba Buena Emergency Response Plan*.<sup>1</sup> Impact GE-6, on EIR p. IV.N.31-IV.N.32, provides an analysis of potential seismic failures that might impede access off the Islands. The analysis concludes that the added ferry service, combined with the proposed seismic improvements and back-up utility infrastructure, would provide opportunities to evacuate the Islands in the event of an emergency, and reduce the potential impact to less-than-significant levels without requiring mitigation. To clarify that the improvements and ferry service would provide for both access to and egress from the Islands, the fifth and sixth sentences in the first paragraph in Impact GE-6 on EIR p. IV.N.31 are revised as follows (deletions are shown in ~~strike through~~ and new text is underlined):

In addition, Macalla Road, which is not a viaduct, could become temporarily two-way to be more available for emergency access and egress purposes. If the viaduct were to become unusable due to a major earthquake, ~~access to~~ transportation to and from Treasure Island would be available via ferry service, included as part of the Proposed Project.

Not all emergency situations would require evacuation or evacuation of everyone on the Islands. If evacuation of the Islands were necessary as a result of a seismic event or other emergency, the amount of time to evacuate would depend on the number of residents and visitors present at the time of that emergency. In the absence of any specific circumstances, it would be speculative to predict evacuation times. The *Emergency Response Plan* sets forth a comprehensive plan to enable evacuation efficiently, including priorities for evacuation based on need, so that injured persons, children attending schools on Treasure Island who are separated from their families, and medically dependent residents and visitors would be given priority. To address changes in the potential impact of hazards on facilities, the population, and response capabilities, the Plan provides for periodic revisions to respond to population increases and changes in the numbers and types of buildings on the Islands as development occurs (see the *Emergency Response Plan*, p. 3).

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<sup>1</sup> *Treasure and Yerba Buena Emergency Response Plan*, Prepared for the Treasure Island Development Authority and the City and County of San Francisco's Department of Emergency Management, January 2009.

See also the response in Section 2.14, Public Services, in this Comments and Responses document.

### **2.18.3 JOB CORPS CAMPUS**

#### **Comment**

16. Job Corps would like to explore receiving consideration for a Voluntary Clean-Up Agreement similar to that which will be afforded the school site (p. 46 of the Summary). (*Johannes Hoffman, AIA Contracting Officer's Technical Representative, U.S. Department of Labor, Employment and Training Administration*) [15.14]

#### **Response**

The comment refers to the programs that are overseen by the Department of Toxic Substances Control ("DTSC"). The Voluntary Cleanup Program is intended for responsible parties that are capable of funding cleanup and funding DTSC's oversight, to proceed with investigations and remediation at their sites in a more streamlined process. However, school sites are handled through a different program. State laws require all proposed school sites that will receive State funding for purchase or construction to go through DTSC's environmental review process specifically set up for schools. This process ensures that new school sites are uncontaminated, or if previously contaminated, that they have been remediated to a safe level. The Jobs Corps would not qualify for the School Program but should be able to participate in the regulatory process as appropriate to their circumstances.

### **2.18.4 IONIZING RADIATION**

#### **Comment**

2) FAILURE TO ACCOUNT FOR AND AVOID HEALTH AND ENVIRONMENTAL HAZARDS OF TOXIC MATERIALS, INCLUDING BUT NOT LIMITED TO IONIZING RADIATION; AND, FAILURE TO MEET THE LEGAL PRECAUTIONARY PRINCIPLE ESTABLISHED BY ORDINANCE IN THE SAN FRANCISCO, CALIFORNIA, ENVIRONMENT CODE CHAPTER 1: - PRECAUTIONARY PRINCIPLE POLICY STATEMENT - SECTIONS 100-104 (see <http://library.municode.com/HTML/14134/level1/CH1PRPRPOST.html> )

#### Ionizing Radiation

In June 2005 the National Academies of Science reported that there is no safe dose of ionizing radiation (see <http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=11340> )

Proceeding with any development while such wastes remain anywhere in the project area, presents unnecessary and unacceptable risks to human health and wildlife. Therefore the DEIR must be revised to direct that all radiological waste materials be removed from the Treasure Island and Yerba Buena Island Redevelopment Plan before any development may proceed.

### The Precautionary Principle And All Hazardous Materials

Furthermore, because San Francisco's own legally established Precautionary Principle also requires that no person be unnecessarily exposed to ionizing radiation or any other hazardous materials, it is doubly mandated that all radiological and other hazardous materials must be completely removed from the Treasure Island and Yerba Buena Island Redevelopment Plan area before any development is allowed to proceed.

Finally, because it is possible for human error and/or natural disaster to trigger their failure, none of the 'Institutional Controls' referred to in the DEIR and in the Treasure Island and Yerba Buena Island Redevelopment Plan itself are consistent with San Francisco's Precautionary Principle and therefore no such Institutional Controls are acceptable in the DEIR or project. Therefore the DEIR must be revised to direct that all reliance on 'Institutional Controls' be removed from the Treasure Island and Yerba Buena Island Redevelopment Plan. (*Eric Brooks, Sustainability Chair, San Francisco Green Party*) [30.5]

### Response

The potential hazard of ionizing radiation is included in the discussion of the Navy's Radiological Assessment Program for Treasure Island, which is summarized in EIR Section IV.P, Hazards and Hazardous Materials, on pp. IV.P.15-IV.P.16. As stated on EIR p. IV.P.15, "by law, the Navy retains responsibility for all radiological contamination, and must be responsible for its remediation." As stated on EIR pp. IV.P.15-IV.P.16, the radiological cleanup of the remaining radiological contamination (ionizing radiation) "will occur prior to regulatory closure, which will be obtained prior to transfer. TIDA cannot accept any property with known radiological contamination. If any radiological materials are subsequently discovered during construction activities, the Navy would be responsible and required to perform any necessary remedial activities to obtain 'free release' of the subject property." The Precautionary Principle requires a thorough exploration and careful analysis of a wide range of alternatives when considering threats to human health and the environment. The Navy's past efforts to identify and remove radiological waste have been consistent with the Precautionary Principle. As indicated on EIR p. IV.P.15, the Navy has determined under regulatory oversight that "the remaining low-level radiological material contamination at the Naval base is isolated to small portions of Site 12 and Building 233." Following cleanup, which will occur before the sites are transferred to TIDA, no remaining ionizing radiation will be present at sites proposed for new construction under the Proposed Project.

Some of the sites, as part of the CERCLA and FOST process, will have institutional controls that can limit access to a site, restrict uses of a particular site, or simply require DTSC notification in the event that any ground disturbing activities are proposed. These institutional controls are implemented as a result of CERCLA requirements to evaluate various alternatives, consistent with the Precautionary Principle, in a thorough process as described on EIR p. IV.P.5. However, as stated on EIR p. IV.P.3, the Navy's remediation efforts which include the final closure requirements mandated by the overseeing agency (DTSC or RWQCB), are not part of the

Proposed Project and are being carried out independent of the Proposed Project, and will be completed prior to transfer of the applicable parcels and the subsequent commencement of construction activities required to implement the Proposed Project. Any institutional or land use controls that are required by the overseeing agency, as stated on EIR p. IV.P.52, would be protective of human health and the environment. These types of controls are widely employed and have been proven effective. DTSC's Land Use Covenant Regulations are regulated by law and reflect DTSC's current policy (Official Policy and Procedure #87-14). The current policy became effective April 19, 2003, which added section 67391.1 to title 22, division 4.5, chapter 39 in the California Code of Regulations.

### **2.18.5 RISKS FROM CLOSED REMEDIATION SITES**

#### **Comment**

With further regard to the DEIR and potentially toxic issues affecting the Project, it should be noted that there are several active and closed hazardous sites located on Treasure Island. Incredibly, the DEIR appears to assume that no risk surrounds the hazardous sites that have been closed, unless it is related to construction or the school. It should be noted that closed hazardous sites can be reopened in the future if other contaminants are identified. Planning efforts should disclose the facts to future residents and analyze the risks. Additionally, the DEIR states continuing hazardous material cleanup will meet the requirements of applicable agencies. No specific information about the type of hazardous cleanup is mentioned in the DEIR. In addition, the DEIR fails to analyze and/or otherwise propose improvement/mitigation measures concerning the potential cost of any such future hazardous clean up. (See P. Hazards and Hazardous Materials, pages IV.p.9 and IV.P.17). (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.29]

#### **Response**

As detailed in EIR Section IV.P, Hazards and Hazardous Materials, p. IV.P.5, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) regulatory process is very thorough and requires substantiation that no significant threat to human health or the environment remains on the site following site closure. As mentioned on EIR p. IV.P.52, "neither site closure nor a FOST [Finding of Suitability to Transfer], FOSET [Finding of Suitability for Early Transfer], or LIFOC [Lease in Furtherance of Conveyance] would be approved by the overseeing regulatory agency unless the data clearly indicate that no significant risks to human health or the environment remains." While new data can cause a previously closed site to reopen, this would most likely occur during construction when subsurface soils are disturbed. This is addressed in the EIR under Impacts HZ-1 through HZ-7 and related mitigation measures, beginning on EIR p. IV.P.39. Any further analysis of potential impacts regarding later discovery of contaminants would be speculative and therefore is not presented in this document.

Various remediation approaches are being employed, evaluated, or proposed across Naval Station Treasure Island by the Navy as part of its remediation programs: these approaches include

excavation and offsite disposal, bioremediation, groundwater extraction and treatment, and institutional controls. These various remediation approaches are discussed throughout the summary of Installation Restoration (“IR”) sites beginning on EIR p. IV.P.17.

The comment suggests that mitigation or improvement measures be identified for the costs of any potential future remediation. Since the Navy is funding existing, ongoing remediation efforts, those costs are not related to the Proposed Project. Economic effects of a proposed project are not required to be analyzed in CEQA documents. The cost of remediation does not affect the physical environmental impacts identified in the EIR or change the severity of those impacts; no mitigation or improvement measures are necessary other than those already identified in the EIR.

### **2.18.6 EXISTING REMEDIATION EFFORTS**

#### **Comment**

The environmental issues here with hazardous waste, I am not worried about, the underground tanks have been removed. We have the oversight of the Water Resources Control Board and state toxics along BCDC also control the tide, the hundred feet where it comes in and out. (*William Lee, San Francisco Planning Commission*) [TR.24.4]

#### **Response**

The comment correctly states that a majority of the underground storage tanks have been removed, and the remaining remediation efforts are being overseen by various regulatory agencies.

## 2.19 MINERALS AND ENERGY

### 2.19.1 ALTERNATIVE ENERGY SOURCES

#### Comments

Also, I do represent the San Francisco Electrical Construction Industry. I have been intimately involved in discussions about this project through the mayor's office, with attendance in the Solar Power Task Force and the Wind Power Task force, and we're often addressing issues for Treasure Island and its importance. Like Bay View Hunter's Point and Park Merced, we're dealing with a very sizeable plot, which we don't usually encounter with projects in San Francisco. So we're really looking to utilize the land for wind power technology, and other renewable clean sources of energy, like solar power and energy storage. (*Joel Koppel*) [TR.15.1]

Transit Oriented Development...2) Develop alternative fuel infrastructure on Treasure Island to support the use of clean air vehicles, including the production of clean fuels such as bio-diesel and hydrogen and use of electric, bio-diesel, natural gas and hydrogen vehicles. (*Jorge Garcia*) [4.2b]

7. The CAB strongly encourages the inclusion of the study of wind technology as a sustainable energy source, in addition to solar and other alternatives, again remembering that throughout all the years of planning, the goal has been for the creation of a **green, sustainable** neighborhood. Much of the DEIR does not appear to reflect that goal. (*Treasure Island/Yerba Buena Island Citizens' Advisory Board*) [8.7]

To the extent that supplemental power generation is required the project should explore the use of tidal generation using the eastern pier-side as a possible staging area. Navy studies of the tidal forces for planned berthed ships done in the early and mid 1980's indicate that the movement of bay water past that location might provide sufficient energy to warrant the study of an in-bay power generating station for Island service. (*Saul Bloom, Arc Ecology*) [28.9]

#### Response

This response addresses comments recommending that certain alternative energy technologies or production of alternative fuels be provided as part of the Proposed Project.

Comments supporting the inclusion of renewable energy sources in the Proposed Project are noted. The EIR discusses the proposed use of renewable energy sources in Chapter II, Project Description, on pp. II-67 and II-69, and in Section IV.Q, Mineral and Energy Resources, on p. IV.Q.11. A variant to the Proposed Project includes a larger amount of solar photovoltaic, analyzed in EIR Chapter VI, Project Variants, on pp. VI.2-VI.11. Inclusion of additional renewable energy sources, while desirable, would not substantially lessen or avoid any significant adverse impacts identified in the EIR. The Proposed Project does not preclude adoption or use of a number of renewable energy resources in the future, including wind, tidal/wave energy and alternative fuel technologies. Furthermore, the Proposed Project is participating in a worldwide effort to foster large-scale urban projects that reduce the amount of on-site greenhouse gas

emissions to below zero. As discussed on EIR p. II.79, the Proposed Project is one of 17 projects worldwide selected for the Climate Positive Development Program. The Proposed Project is participating in the program's pilot efforts to develop a "Climate+" greenhouse gas metric and measurement standard and a roadmap for improvements that would be used by other projects to achieve the goals of the Climate Positive Development Program.

The number of projects in the Climate Positive Development Program on EIR p. II.79 is corrected in the first sentence on the page, as follows (deletions are shown in ~~strike through~~ and new text is underlined):

In May 2009, the Proposed Project was selected as one of a total of 17 ~~48~~ projects worldwide to join the Climate Positive Development Program, a joint initiative of the Clinton Climate Initiative, a project of the William J. Clinton Foundation, and the U.S. Green Building Council.

### Wind Energy

Regarding a study of wind technology, as recommended in one of the comments, the EIR discusses the potential for future use of wind energy on Treasure Island on p. II.67:

The proposed Treasure Island Infrastructure Update includes a renewable energy component, involving solar power and possibly small vertical-axis wind turbines. A minimum of 5 percent of peak power demand would be created through on-site renewable resources. This target would be achieved by designing building rooftops to accommodate photovoltaic systems, potentially using solar water heating, and potentially providing demonstration-level wind energy production.

The Proposed Project also includes strategies that could enable more than 5 percent of estimated peak demand to be generated on site. These could include:...

- Encouraging future development of wind power. Wind energy production facilities and locations are expected to be selected at some time in the future and would undergo appropriate environmental review at that time; wind power is not evaluated in this EIR.

The project sponsors selected solar photovoltaic technology to meet the requirement of generating 5 percent of peak electrical demand on-island, with the possibility of adding wind technology in the future.

Research demonstration of vertical-axis wind turbines is planned at Treasure Island in the near future,<sup>1</sup> and this may result in future, specific proposals to add wind turbines at Treasure Island.

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<sup>1</sup> San Francisco Dept. of Environment web site, "Ocean Beach May Be Center for Wave Power -- SF Examiner," available at [http://www.sfenvironment.com/our\\_sfenvironment/news.html?topic=details&ni=636](http://www.sfenvironment.com/our_sfenvironment/news.html?topic=details&ni=636), accessed October

However, at this time it is too speculative to predict what types of turbines might be located on the island and where they might be. As such, this EIR did not analyze potential wind technologies.

### Tidal or Wave Energy

Regarding tidal energy generation using the eastern pier on Treasure Island as a staging area, the comment refers to unidentified Navy studies circa the early and mid-1980s.

In recent years, interest in tidal or wave energy development has focused on areas where larger and more cost-effective machines might be placed. For example, the Mayor's legislative agenda included interest in harnessing the tidal power beneath the Golden Gate Bridge in 2007.<sup>2</sup> Currently, a wave power project in the Pacific Ocean off Ocean Beach is under consideration.<sup>3</sup>

The California Energy Commission ("CEC") has investigated the potential for using ocean energy in California. The three most well-developed ocean energy technologies are tidal power,<sup>4</sup> wave power, and ocean thermal energy conversion. According to the CEC, "Tidal power requires large tidal differences which, in the U.S., occur only in Maine and Alaska. Ocean thermal energy conversion is limited to tropical regions, such as Hawaii, and to a portion of the Atlantic coast. Wave energy has a more general application, with potential along the California coast."<sup>5</sup> According to the CEC, economics, environmental impacts, land use, and grid interconnection issues are likely to constrain wave energy in California, and the technology is still at a relatively immature pilot project stage.<sup>6</sup>

The interaction of winds with the ocean surface creates waves. Wave energy must be converted to a 60-Hertz frequency before it can be added to the electric grid.<sup>7</sup> Although there are several pilot projects under consideration in the ocean waters along the coast of California (e.g., one by

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12, 2010. See subpart entitled: "Treasure Island is planned site for turbine test." The article is from August 2010.

<sup>2</sup> Office of the Mayor Gavin Newsom, "City and County of San Francisco 2007 Legislative Priorities for 110th Congress," p. 9, available at <http://www.sfmayor.org/wp-content/themes/atahualpa/Policy/2007FederalPriorities.pdf>, accessed October 12, 2010.

<sup>3</sup> San Francisco Dept. of Environment web site, "Ocean Beach May Be Center for Wave Power -- SF Examiner," available at [http://www.sfenvironment.com/our\\_sfenvironment/news.html?topic=details&ni=636](http://www.sfenvironment.com/our_sfenvironment/news.html?topic=details&ni=636), accessed October 12, 2010.

<sup>4</sup> According to the California Energy Commission, for tidal energy to work well, there must be a large difference between tides, at least 16 feet. Only a few places on Earth have this much differential. According to the CEC, based on a European Union source, 90 percent of current tidal energy is from a single site, the La Rance Tidal Power Plant (240 MW). CEC, "Ocean Energy," available at <http://www.energy.ca.gov/oceanenergy/>, accessed October 12, 2010.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

the Sonoma County Water Agency), the CEC does not list any projects within San Francisco Bay.<sup>8</sup> The CEC lists several major obstacles to wave energy development: (1) disturbance or destruction of marine life, (2) possible threat to navigation from collisions due to the low profile of the conversion devices above the water, (3) interference of mooring and anchorage lines with commercial and sport-fishing, and (4) visual impacts of off-shore energy conversion devices and on-shore transmission lines.<sup>9</sup> The Asia-Pacific Economic Cooperation Energy Working Group's 2010 report on renewable energy for urban applications also noted safety concerns when conversion devices dislodge from anchors and become navigation hazards.<sup>10</sup>

The Asia-Pacific Economic Cooperation Energy Working Group noted that the first commercial application in the United States is not expected until 2014 to 2019, and dismissed wave energy from further consideration in its report.<sup>11</sup>

Wave energy intensity in the ocean is far greater than in the San Francisco Bay near Treasure Island.<sup>12</sup> Even with the greater wave energy available in the Pacific Ocean along the California coast, there are not yet economic, commercial applications. In addition, installation of wave energy generating facilities would not mitigate any significant environmental impacts identified in the EIR. For these reasons, a wave energy project is not included in the Treasure Island / Yerba Buena Island Area Plan and Special Use District ("SUD").

#### *Production Facilities for Biodiesel and Hydrogen for Vehicles*

This part of the response focuses on building fuel production facilities at Treasure Island. For a discussion of clean air vehicles, as mentioned in one of the comments, see the response in Subsection 2.7.2.2, Alternative Fuel Vehicles, in Section 2.7, Transportation, of this Comments and Responses document.

The CEC's latest Integrated Energy Policy Report sums up the long-term future for alternative vehicle fuels: With the Alternative and Renewable Fuel and Vehicle Technology Program,<sup>13</sup>

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<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> APEC Energy Working Group / Expert Group on New and Renewable Energy Technologies, "Renewable Energy for Urban Application in the APEC Region," January 29, 2010, p. 49, available at [http://www.energyandsecurity.com/images/ESG\\_APEC\\_report\\_on\\_Urban\\_Applications\\_of\\_Clean\\_Energy\\_-\\_2010.pdf](http://www.energyandsecurity.com/images/ESG_APEC_report_on_Urban_Applications_of_Clean_Energy_-_2010.pdf), accessed October 12, 2010. APEC means Asia-Pacific Economic Cooperation.

<sup>11</sup> Ibid.

<sup>12</sup> Concept Marine Associates, Inc., Treasure Island Ferry Terminal Location Study, November 2003, p. 8, available at <http://www.sftreasureisland.org/Modules/ShowDocument.aspx?documentid=116>, accessed October 12, 2010. The Study states that due to the configuration of the Golden Gate Bridge and associated headlands and islands within the Bay (particularly Alcatraz), Treasure Island is sheltered from large swells generated in the Pacific Ocean. Further, the west side of the island receives more wave energy than the east side (Pier One) of the island.

<sup>13</sup> This program was created by legislation in 2007.

Low Carbon Fuel Standard, and Federal waiver allowing California to set its own carbon dioxide standard for vehicle emissions, the State is poised to develop alternative transportation fuels.<sup>14</sup> However, alternative transportation fuels face a serious lack of infrastructure, particularly in the short term.<sup>15</sup>

Biodiesel means a non-petroleum-based diesel fuel made from vegetable oils or animal fats using a process called “transesterification.”<sup>16</sup> Biodiesel is often mixed with conventional diesel in a ratio of 5 percent to 95 percent (called B5), and this blend can be used without requiring modifications to vehicles and downstream infrastructure.<sup>17</sup> A biodiesel to conventional diesel ratio of 20 percent to 80 percent (called B20) can be used by some vehicles. However, higher proportions of biodiesel or pure biodiesel require modifications to vehicles and downstream infrastructure.

The CEC’s 2010-2011 renewable energy investment plan summarizes the potential for biodiesel in the short term. Bulk storage and rack modifications<sup>18</sup> of infrastructure would be needed to expand biodiesel production in the State above its current 20-million-gallon-per-year level.<sup>19</sup> Heavy-duty vehicles and off-road vehicles make up 92 percent of the market for biomass-based fuels.<sup>20</sup> Biodiesel has unique fuel properties and poses challenges in engine durability, fuel plugging, variable fuel quality, and cold weather properties.<sup>21</sup> The CEC envisions that most biodiesel would be produced in the Central Valley, remote areas, and areas not served by pipelines connected to oil refineries.<sup>22</sup>

According to the CEC, the main barrier to expanded B20 use is the 20 cent to 40 cent per gallon higher price than regular diesel.<sup>23</sup> Other key obstacles to biodiesel in general are high feedstock

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<sup>14</sup> California Energy Commission, 2009 Integrated Energy Policy Report, publication CEC-100-2009-003-CMF, p. 14, available at <http://www.energy.ca.gov/2009publications/CEC-100-2009-003/CEC-100-2009-003-CMF.PDF>, accessed October 11, 2010.

<sup>15</sup> Ibid.

<sup>16</sup> Baroody, Leslie, Charles Smith, Michael A. Smith, Charles Mizutani, 2010. “2010-2011 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program” Commission Report, California Energy Commission, Fuels and Transportation Division, Publication No. CEC-600-2010-001-CMF, p. 68 (see pp. 46-56 generally), available at <http://www.energy.ca.gov/2010publications/CEC-600-2010-001/CEC-600-2010-001-CMF.PDF>, accessed October 11, 2010.

<sup>17</sup> Ibid.

<sup>18</sup> Bulk receiving terminals with access to marine ports, railroads, and pipelines are sufficient to move fuel volumes in California’s market, but biofuel capacity at the bulk terminals is needed. At the terminals, blending racks store bulk volumes of unblended fuels and dispense blended fuels to trucks for delivery. These terminal racks need to be modified to handle biofuels to lower costs. Ibid., p. 74.

<sup>19</sup> Ibid., p. 69.

<sup>20</sup> Ibid., p. 71.

<sup>21</sup> Ibid., p. 71.

<sup>22</sup> Ibid., p. 69.

<sup>23</sup> Ibid., p. 71.

costs and lack of California bulk infrastructure.<sup>24</sup> (Recycled cooking oil is the lowest cost and lowest GHG feedstock, while a variety of plant and animal oils, such as soybean and palm oil, are higher cost feedstocks.<sup>25</sup>) California has 11 biodiesel plants, but 6 of them, representing one-third of the capacity, were idled at the time of the CEC report because of the price disparity.<sup>26</sup> According to the CEC, financial institutions are not currently funding biodiesel infrastructure projects, nor are the Federal government, California air quality agencies, or the CEC.<sup>27</sup>

In conclusion, because of the various technological, land use conflict, infrastructure, pricing, and other issues discussed above, production of biodiesel fuel on site is not planned or feasible at Treasure Island. This information on biodiesel does not mean that the fuel would not be available to or used by vehicles on the Islands, only that it would not be *produced* there. If service stations were built on Treasure Island, nothing in the Area Plan/SUD or the draft *Design for Development* would prohibit storage and sale of biodiesel.

Regarding the use of hydrogen as a vehicle fuel, while pure hydrogen, and hydrogen mixed with natural gas (hythane), can be used in internal combustion engines for vehicles, hydrogen presents challenges for use in transportation. Hydrogen is a colorless, odorless, nontoxic gas at atmospheric pressures and temperatures, and is highly flammable. It can explode and rupture pressure vessels. When on fire, hydrogen shows only a pale blue, almost invisible flame. Besides the safety risks, according to the Oregon Department of Energy, “When stored in a compressed or even liquid state, hydrogen has less energy content than the same quantity of conventional fuels like gasoline or diesel. Currently no large quantity manufacturing, transportation or distribution system exists for hydrogen.”<sup>28</sup> In addition, producing hydrogen requires another energy source, either fossil fuel or electricity (to hydrolize water). For example, natural gas, methanol, coal, or biomass can be gasified and “steam-reformed” to make hydrogen. One version of vehicle hydrogen infrastructure is based on natural gas steam reformation at the service station.<sup>29</sup> Due to these drawbacks, much research focuses on use of non-gaseous hydrogen in vehicles, such as in fuel cells.

The CEC has an Alternative and Renewable Fuel and Vehicle Technology Program with an annual program budget of approximately \$100 million to fund research.<sup>30</sup> According to the

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<sup>24</sup> Ibid., p. 70.

<sup>25</sup> Ibid., p. 72.

<sup>26</sup> Ibid., p. 72.

<sup>27</sup> Ibid., p. 74.

<sup>28</sup> Oregon Department of Energy - Transportation, “Alternative Fuel Descriptions,” available at <http://www.oregon.gov/ENERGY/TRANS/fueldes.shtml>, accessed October 11, 2010.

<sup>29</sup> Ibid.

<sup>30</sup> CEC web site, “2010-2011 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program,” available at <http://www.energy.ca.gov/2009-ALT-1/index.html>, accessed October 11, 2010.

CEC's latest investment report, one forecast indicates that there could be approximately 250 fuel cell vehicles in the Bay Area by 2014, and Toyota estimated a \$50,000 cost per vehicle in 2015.<sup>31</sup> The cost to build a new hydrogen dispensing station capable of dispensing 100 kilograms of hydrogen per day is \$2 to \$3 million.<sup>32</sup>

Finally, Treasure Island is an inappropriate location for a biodiesel production facility. Such facilities are typically located in areas designated for industrial uses. Examples include Community Fuels' 10-million-gallon facility<sup>33</sup> at the Port of Stockton; Energy Alternative Solutions, Inc.'s 2.5-million-gallon facility<sup>34</sup> in Gonzales; and Crimson Renewable Energy LP's 30-million-gallon facility<sup>35</sup> near Bakersfield. These facilities refine biofuels into diesel fuel.

These facilities are located in areas zoned for industrial uses, where such uses are compatible with their surroundings. The Proposed Project includes lands designated for residential, office, open space, institutional and mixed uses, but does not include lands suitable for industrial uses (see the discussion of proposed land uses on EIR pp. II.24-II.33). The inclusion of an industrial area would be inconsistent with the basic objectives of the Proposed Project, which call for redevelopment of the site as a mixed-use community that would establish a new neighborhood and regional destination (see the discussion of the project sponsors' objectives on EIR pp. II.4-II.6).

In conclusion, because hydrogen fuel cell vehicles are just at the beginning of commercialization, and because of the significant costs in terms of costs per vehicle, costs per dispensing station, and fossil-fuels used, production of hydrogen fuel on Treasure Island is not planned at this time. This does not mean that hydrogen fuel cell vehicles would not be used on the Islands. As explained in EIR Section IV.G, Air Quality, in footnote 46 on p. IV.G.40, AC Transit currently has three hydrogen fuel cell buses in a demonstration project and plans to purchase more. Because these buses represent a very small percentage of the entire AC Transit fleet, the EIR technical analyses

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<sup>31</sup> Baroody, Leslie, Charles Smith, Michael A. Smith, Charles Mizutani, 2010. "2010-2011 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program" Commission Report, California Energy Commission, Fuels and Transportation Division, Publication No. CEC-600-2010-001-CMF, p. 49 (see pp. 46-56 generally), available at <http://www.energy.ca.gov/2010publications/CEC-600-2010-001/CEC-600-2010-001-CMF.PDF>, accessed October 11, 2010.

<sup>32</sup> *Ibid.*, p. 50.

<sup>33</sup> Community Fuels' web site, "Active Projects," available at <http://www.communityfuels.com/projects.html>, accessed December 3, 2010.

<sup>34</sup> Energy Alternative Solutions, Inc.'s web site, "Biodiesel Plants," available at <http://www.bioeasi.com/plants.html>, accessed December 3, 2010.

<sup>35</sup> Crimson Renewable Energy LP's web site, "Biodiesel," available at <http://crimsonrenewable.com/biodiesel.php>, accessed December 3, 2010. Valley Voice Archive, "Largest Biodiesel Plant Rises in South Valley," January 23, 2008, available at <http://www.valleyvoicenewspaper.com/vvarc/2008/jan232008.htm>, accessed December 3, 2010 and also available at <http://crimsonrenewable.com/ValleyVoice.pdf>, accessed December 3, 2010.

conservatively assume that none would be used to serve the Islands. It is likely that they could be used for travel to and from Treasure Island in the future.

### **2.19.2 OTHER ENERGY ISSUES**

#### **Comment**

- A. Energy variants: To the maximum extent practicable the use of fossil fuel powered Heating, Cooling, & Electricity Central District strategy should be avoided. Even densely packed developments [lose] heating, cooling and electrical capacity through transport from the generation point to the end user. For solutions to be sustainable they need to be to the maximum extent practicable building specific so as to minimize transmission loss. Strategies that maximize building surface areas for heat control and energy production should be implemented. (*Saul Bloom, Arc Ecology*) [28.8b]

#### **Response**

The comment opposes the Variants involving District Energy, noting transmission losses in heating, cooling, and electricity. The comment advocates for building-specific solutions that maximize building surface areas for heat control and energy production. This is interpreted to mean that the comment supports the production of heating and cooling services, as well as electricity, at each building. The comment is noted.

Although there are transmission losses of electricity and of heating and cooling fluids, there are also offsetting economies of scale in energy production, differences in generation efficiencies and pollution control, discussed below, and vast differences in production prices by technology. Whether a particular energy technology is most cost-effective and efficient at a building scale, a community scale, a city scale, or a regional scale depends upon many factors.

The Proposed Project would rely primarily on natural gas and electricity distributed to each building from the regional gas supply system and the regional electrical system. The regional systems enjoy economies of scale in production, transmission, distribution, and control.

Regarding the District Energy Variants, the EIR states in Chapter VI, Project Variants, p. VI.11, “District Energy plants generally provide higher efficiencies and better pollution control than boilers and chillers located in each building...The stated purpose of these District Energy options is to provide greater efficiency, reduce distribution infrastructure, and provide additional energy options with the intent of reducing the overall energy use and air pollutant emissions from operation of the Proposed Project.” On p. VI.12, the EIR states, “Subvariant B...[proposes] smaller and more distributed district plants that may be more feasible to implement because they could be built in phases, would occupy less space and could pay for themselves over a shorter period of time.”

Although future advancements in technology may make building-specific production of heating, chilling, and electricity more efficient and cost-effective than the proposed District Energy Variants, at this time, the District Energy Variants are practical and have reasonable costs.

Regarding “sustainable” solutions, EIR Section IV.Q, Mineral and Energy Resources, p. IV.Q.10, discusses the portions of the *Treasure Island Sustainability Plan* pertaining to energy production and consumption. EIR p. IV.Q.10 lists the Proposed Project’s goal to “reduce energy demand, create sustainable supply, and achieve carbon neutrality,” and lists six strategies (E1 – E6) proposed to achieve this goal. Strategy E2 is relevant to the comment: “Centralize heating and cooling where appropriate to maximize efficiency and reliability,” as is Strategy E3: “Maximize the percentage of on-island power generation from renewable sources.” However, CEQA does not require an EIR to evaluate the merits of a sustainability plan proposed for a project. Rather, an EIR must address whether a project would have a significant adverse effect on the environment. For energy, the criterion is whether the project would “encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner” (see the discussion of significance criteria on EIR p. IV.Q.9). The EIR does not evaluate the relative merits of the strategies in the *Treasure Island Sustainability Plan*. The EIR does evaluate components of the Proposed Project or Variants embodying aspects of the *Treasure Island Sustainability Plan* that could result in physical environmental effects. This includes evaluation of Energy Variant A1, which would increase the area devoted to solar photovoltaic technology, in line with Strategy E3 (see EIR pp. VI.2-VI.11). This also includes evaluation of District Energy Variants A2 and A3, in line with Strategy E2 (see EIR pp. VI.11-VI.19).

**Comment**

Except for the windy north end, the Climate is not worse than the rest of S.F. Air conditioning should not be necessa[ry]. (*Neil Malloch*) [44.8]

**Response**

Air conditioning, meaning cooling or providing chilled air, is necessary in high-rise buildings, even in San Francisco’s climate. High-rise buildings generate internal heat due to lighting, equipment, and human occupants, and solar energy through windows also heats interiors. These heating loads cannot be well-controlled by outside air coming through windows. Furthermore, in order to meet California Title 24 energy efficiency standards, these types of buildings generally are not equipped with windows that open, because great amounts of heat can be lost through open windows during cool weather.

The energy analysis for Treasure Island prepared by Arup assumed that no cooling would be provided for low-rise and mid-rise residential buildings, because of the temperate climate<sup>36</sup> (see the discussion in EIR Section IV.Q, Mineral and Energy Resources, on p. IV.Q.13). These buildings are small enough to be reasonably well cooled by outside ventilation and do not have the internal heat loads that high-rise buildings have. In contrast, cooling would be provided for high-rise residential, commercial, retail, hotel, and adaptive reuse buildings under Arup's scenario.

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<sup>36</sup> Arup North America Ltd., *Treasure Island Development Energy Study*, prepared for TICD, December 2009, p. 3. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

## 2.20 VARIANTS

### 2.20.1 APPROACH TO VARIANTS

#### Comment

Sometimes the options are called **variants** and they comprise options regarding energy, water, air, greenhouse gasses, etc (Vol II, VI. 1-54);

Another example of options which are called variants are changes in the shape of the Ferry Terminal/Breakwater and size of the harbor and express a wide range in numbers of ferry boat berths and ferry service (*Jennifer Clary, President, San Francisco Tomorrow*) [38.2]

#### Response

As explained in the introduction to EIR Chapter VI, Project Variants, on p. VI.1, each variant modifies one limited feature or aspect of the Proposed Project. The EIR provides a project-level analysis for each variant. In this fashion, the EIR will provide the City with the information to incorporate one or more variants into the Proposed Project if it chooses to do so. The aim of this approach is to define different options for providing certain infrastructure or project features.

In contrast, Alternatives to the Proposed Project, as described and analyzed in EIR Chapter VII, provide a different approach to the Proposed Project. Alternatives are analyzed in an EIR to determine whether most of the basic project objectives can be achieved in a manner that avoids one or more of the proposed project's significant and unavoidable environmental effects.

The separate chapter in the EIR devoted to variants is meant to reduce confusion by separating the analysis of each variant from the environmental impact analysis of the Proposed Project presented in EIR Chapter IV, Environmental Setting and Impacts. The impacts of each variant are fully disclosed and identified using this approach. (See the second response in Subsection 2.1.15, Project Details, in Section 2.1, Project Description, of this Comments and Responses document, for further discussion.)

The Ferry Terminal Breakwater Variants discussed in EIR Section VI.B would all support the same numbers of ferry vessels at full buildout. Breakwater Variant B3, however, would accommodate somewhat smaller vessels that could carry fewer passengers. As explained on p. VI.25, with implementation of Mitigation Measure M-TR-2, identified for the Proposed Project and providing for three ferry boats, Variant B3 would result in less-than-significant transportation impacts as with the Proposed Project and Measure M-TR-2.

## 2.20.2 WETLANDS VARIANTS AND GREENHOUSE GASES

### Comment

The review should calculate and compare the Greenhouse Gas (GHG) emissions of the preferred wastewater treatment alternative with the proposed variants. That comparison should include a discussion of biosolids handling, co-generation of electricity, and the potential of constructed treatment wetlands to act as a GHG sink.

#### *Recommendation;*

□ Provide an accurate comparison of the traditional wastewater treatment system included in the preferred alternative with the constructed treatment wetlands in variants D1 and D2, including widely available information on the multiple benefits of the latter options (Jennifer Clary, President, San Francisco Tomorrow) [38.36]

### Response

For context, as described in EIR Chapter VI, Project Variants, beginning on p. VI.38, Wastewater Wetlands Variant D1 would use constructed wetlands as part of tertiary wastewater treatment. Unrestricted public access to the wetlands would not be permitted because the effluent would not be disinfected before being discharged there. Wastewater Wetlands Variant D2 would use constructed wetlands for water polishing after disinfection, and public access to the wetlands could be permitted.

Regarding the greenhouse gas (“GHG”) issues raised in the comment, neither biosolids handling nor co-generation of electricity using digester gas are considered as variants in the EIR. EIR Chapter II, Project Description, pp. II.59-II.60, discusses possibilities regarding future biosolids handling, including co-generation using digester gas, but these possibilities are speculative, and none is a variant. (See also the response in Subsection 2.13.1.1, Wastewater Biosolids, in Section 2.13, Utilities and Service Systems, of this Comments and Responses document, regarding the discussion of biosolids in the EIR.) As these possible uses are not part of the Proposed Project or a variant, any future proposal for such uses would be subject to environmental review.

Biogenic carbon dioxide emissions result from materials that are derived from living cells and include biological matter in wastewater, decaying vegetation, and so on. Under the Bay Area Air Quality Management District’s (“BAAQMD”) CEQA guidance, biogenic carbon dioxide

emissions should not be included in the quantification of GHG emissions for a project,<sup>1</sup> and they have properly been excluded in this EIR.

Regarding the potential of constructed treatment wetlands to act as a GHG sink, the BAAQMD CEQA guidance takes into account many types of GHG emission reductions from a project.<sup>2</sup> Due in part to the difficulty of quantifying the carbon dioxide that would be sequestered in a treatment wetlands, the EIR analysis does not attempt to subtract such sequestration from the emissions of the wetlands under the Proposed Project, Variant D1, or Variant D2. This approach is conservative, and the difference in overall GHG emissions between the Proposed Project and Variants D1 and D2 would likely be small. As the analysis of GHG emissions in the EIR showed that the Proposed Project would not result in a significant impact (see Section IV.H, Greenhouse Gas Emissions, pp. IV.H.44-IV.H.45), any reductions that might occur as a result of sequestration by wetlands vegetation would not result in a significant impact.

Regarding the recommendation to include “widely available information on the multiple benefits of the latter options,” an EIR’s focus is to assess the adverse environmental impacts of a proposed project, rather than to assess its relative benefits of different approaches. Either with or without the implementation of Variants D1 or D2, the Proposed Project would have a less-than-significant impact on GHG emissions. The EIR does discuss at least one benefit of the wetlands, public access, under Variant D2 (p. VI.41).

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<sup>1</sup> BAAQMD, *California Environmental Quality: Act Air Quality Guidelines*, June 2010, p. 4-5 and Table 4.2 on p. 4-6, available via a link at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, accessed October 26, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

<sup>2</sup> *Ibid.*, pp. 4-7-4-19.

## 2.21 ALTERNATIVES

### 2.21.1 PURPOSE OF ALTERNATIVES IN EIRS

#### Comments

So regarding the EIR with the transportation and the environment and some of the alternatives, again, I am going back to the role of the EIR, how we look at the alternatives, how we look at -- and I think we have adequately looked at the alternatives. We know we have -- there is mitigation issues, but going back again, the public should understand, this is a document to look - - how we look at all the alternatives. (*William Lee, San Francisco Planning Commission*) [TR.24.6]

As stated on page VII.1:

**The analysis of alternatives is of benefit to decision-makers because it provides more complete information about the potential impacts of land use decisions, and consequently a better understanding of the inter-relationships among all of the environmental topics under evaluation.**

The importance of having a basis of comparison to truly understand the Proposed Project's enormous auto-related impacts and the effectiveness of various possible mitigation measures outweighs the unproven possibility that reducing driving might make the project less profitable. (*Ruth Gravanis*) [31.9]

**Need for Alternatives** Because this range of options cited above (“flex” and “variants”) is a moving target that cannot be nailed down for study, it would be more appropriate to set out several Alternatives that would contain this range of options and tag them Small, Medium and Large. In any case, CEQA requires that the alternative with the highest numbers, greatest size, most dense, etc. is the subject to be studied in the EIR. It is self-evident that options with lower numbers would have less environmental impact. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.7]

- Provide a comparative analysis of all alternatives, including the “Minimum-Impact Alternative.” For each alternative and variant, please assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:
  - The total quantity of greenhouse gases and other criteria pollutants generated per year;
  - Vehicle miles traveled;
  - Impacts on the Tuolumne Watershed;
  - Walking time radii to transit stops for YBI as well as TI;
  - Impacts on YBI's biodiversity for various levels of management of harmful species;
  - Transportation impacts on the entire region, including Bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways;
  - Off-peak analysis of transportation impacts; and
  - Respective carbon footprints, including impacts associated with demolition/deconstruction, disposal and re-building. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.86]

For each alternative and variant, the EIR should assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:

- The total quantity of greenhouse gases and other criteria pollutants generated per year;
- Vehicle miles traveled;
- Impacts on the Tuolumne Watershed;
- Walking time radii to transit stops for YBI as well as TI;
- Building durability: the EIR should undertake a comparative analysis of durable and non-durable high-rise buildings, assessing all environmental impacts, including the respective carbon footprints. The analysis should include all impacts related to seismic activity and any associated demolition/deconstruction, disposal and re-building. The EIR should also describe the performance standards that will apply to the proposed buildings in the various alternatives;
- Impacts on YBI's biodiversity for various levels of management of harmful species;
- Transportation impacts on the entire region, including bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways; and
- Off-peak analysis of transportation impacts. (*Jared Blumenthal, Department of the Environment, letter of February 25, 2008, submitted as an attachment to comment letter from Vedica Puri, President, Telegraph Hill Dwellers*) [39.91]

### **Response**

*CEQA Guidelines* Section 15126.6 addresses the purpose and required content of the consideration and discussion of Alternatives. Section 15126.6(c) of the *CEQA Guidelines* (a) states that an EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merit of the alternatives.” Refer to Response 2.21.2 below for a discussion of a Reduced Parking Alternative.

The range of options referred to as “flex” zones and “variants” are not project alternatives. As discussed in Chapter II, Project Description (Vol. 1) on EIR page II.24 - 26, flex zones refer to specific areas within the Project Area in which the height limits of buildings would be taller than what would be allowed under base height limits. Project variants describe variations on infrastructure features of the Proposed Project. Unlike the alternatives to the Proposed Project, each variant modifies limited features or aspects of the Proposed Project, and do not alter the land use components or overall Development Program.

Section 15126.6(c) of the *CEQA Guidelines* state that the range of potential alternatives “shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA does not require that the alternative with the highest number, greatest size, or most dense development be studied in the EIR. Because of the different mix of uses and transportation options of the two build alternatives, Alternative B, Reduced Development Alternative, and Alternative C, No Ferry

Service Alternative, lower density development would not necessarily have the least significant environmental impacts. This point was noted by several commenters during the public scoping process for this EIR in 2008.

Chapter VII. Alternatives of the EIR provides an analysis and comparison of a range of alternatives which comply with Section 15126.6 of the *CEQA Guidelines*. As stated on EIR p. VII.1, an EIR need not consider every conceivable alternative to a proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. A comparative analysis of the specific issues listed in the comments above is not required by CEQA, and would be relevant only to the extent that the issues relate to potential significant environmental impacts as compared to the Proposed Project. See also the responses in Subsection 2.21.9, Environmentally Superior Alternative, and Subsection 2.22.4, Public Scoping.

The Alternatives discussed on EIR pp. VII.1 - VII.72, include the No Project Alternative, which would entail minimum environmental impacts. Other elements listed in the comment that could result in significant environmental effects as defined by CEQA, such as greenhouse gas emissions, vehicle miles traveled, impacts on biodiversity on Yerba Buena Island, and Bay Bridge and regional transportation impacts, are discussed and compared in the discussion of alternatives.

The comment identified as from the San Francisco Department of the Environment dated February 25, 2008, and attached to the comment letter from Telegraph Hill Dwellers appears to be a formal response to the Notice of Preparation and public scoping process for this EIR. A letter dated February 25, 2008, was received by the Planning Department from the San Francisco Department of the Environment during public scoping. A copy of this letter is included in Appendix B, Public Scoping Report, in the EIR (Vol. 3). However, the letter attached to the Telegraph Hill Dwellers includes different text than the official letter received by the Planning Department. The comment included above was not in the formal scoping letter.

### **2.21.2 REDUCED PARKING ALTERNATIVE**

#### **Comments**

The only thing that sort of struck me would be an alternative, I feel should be provided. And kind of along the lines of what Commission[er] Moore said. But I'm focused on the parking piece that would look at an alternative to what we have here, which would see a reduction in parking, a project alternative with a reduction in parking. So I would like to see something like that provided in the future.

There is some much rhetoric around sustainability. We have AB32 and SB375. Mandates that are coming from the federal government, as well as state government, that is directing, I think, local planning efforts to consider reduction in carbon emissions. And it seems to me that, given

that focus or that -- we should be looking at an alternative that would provide at least a .5 or something, some reduction in parking. (*Christina Olague, Planning Commission*) [TR.21.1]

...indicates that the EIR should include a minimum impact alternative instead of a less intensive development alternative. What really the challenges are here is, to balance high density with a decrease in cars, and not use parking as an argument for economic feasibility. I regret that, and I strongly urge that the EIR indeed, looks at, with the challenges it poses.

I think if we want to be truly a green neighborhood, we need to be able to at least go through the motions and examine how we can do that with an emphasis on a robust transportation network. (*Kathrin Moore, San Francisco Planning Commission*) [TR.20.3]

Third, page IV.E.139 relies on a strawman argument when it states that with “no” offstreet parking, there would be insufficient funding for transit service and the TDM Plan. If page VII.75 is accurate, proponents of a reduced-parking alternative were not asking for a prohibition on all offstreet parking. They instead requested consideration of parking maximums similar to maximums that the City has established in other neighborhoods where the City has adopted a strategy of minimizing automobile use. The EIR should evaluate how various reduced-parking scenarios would affect the TDM program. As pointed out previously in this letter, reduced residential parking would apparently not have any direct effect on revenues. Reduced supply of commercial parking conceivably might reduce revenue, or it might increase revenue by increasing the prices that could be charged for parking, or it might be a wash. It’s impossible to tell given the lack of analysis in the DEIR. (*Christopher Pederson*) [5.5]

The DEIR fails to adequately explain its refusal to evaluate a reduced-parking alternative. There appear to be ways to reduce parking supply (e.g., for affordable units) that would be both environmentally beneficial and do no harm to the financial viability of the project. The final EIR should therefore include analysis of a reduced-parking alternative or provide a reasonable, accurate, and internally consistent explanation for its refusal to do so. (*Christopher Pederson*) [5.7b]

The DEIR for the TI/YBI Redevelopment Project is legally and practically insufficient because it does not include study of a true environmentally superior alternative. Such an alternative would include enough density to support realistically cost-effective public transit and neighborhood-serving retail businesses. It would also minimize parking.

I urge the Department to include a full and impartial analysis of such an alternative in the FEIR. (*Donald Forman*) [11.1]

It makes sense, therefore, to analyze a “truly environmentally superior alternative” whose major difference from the Proposed Project is its decreased reliance on the private auto and its significantly less impact on traffic and transit currently assessed as “Significant and Unavoidable with Mitigation” in numerous locations. For the sake of convenience, this comment letter will use the term “Reduced Driving Alternative,” though other labels would work as well. It is similar to, but not the same as, the “Reduced Parking Alternative” that is described and rejected in the DEIR. (*Ruth Gravanis*) [31.3]

The Proposed Project is to be commended for specifying that parking spaces will be unbundled from residential units. In the Reduced Driving Alternative, a dedicated parking space could only be rented and not purchased, even if the dwelling unit is purchased. (*Ruth Gravanis*) [31.5]

Whether or not deemed economically infeasible by the Project Sponsor, the DEIR should include an analysis of a Reduced Driving Alternative in which the provision of adequate transit service is not dependent on car-generated revenues. The analysis should take into account that the more

people taking transit, the cheaper per passenger mile to provide that transit. And the fewer cars on the road, the more reliable and efficient the bus transit will be. (*Ruth Gravanis*) [31.8]

The analysis should also include the increased desirability of living on and visiting the islands due to greater safety, especially for families, and reduced noise and pollution. Also include the increase in bicycle use that is likely to result from having fewer cars on the roads, especially on Macalla and Treasure Island Roads. (*Ruth Gravanis*) [31.10]

Please also note the following, from AB 981 (Leno), Treasure Island Transportation Management Act:

#### CHAPTER 9. TREASURE ISLAND TRANSPORTATION MANAGEMENT

1967. This act shall be known and may be cited as the Treasure Island Transportation Management Act.

1967.1. The Legislature finds and declares all of the following:

(a) It is essential for the economic well-being of the state and the maintenance of a high quality of life that the people of California have efficient transportation systems that will reduce traffic congestion, vehicle miles traveled, and greenhouse gas emissions, and improve travel times and air quality.

(b) In 2006, the Legislature passed Assembly Bill 32 (Ch. 488, Stats. 2006), which enacted the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), a landmark act that establishes a first-in-the-world comprehensive program of regulatory and market mechanisms to achieve real, quantifiable, cost-effective reductions of greenhouse gases.

(c) Implementation of the California Global Warming Solutions Act of 2006 will require creative and innovative solutions, including strategies designed to integrate land use and transportation measures to reduce vehicle miles traveled and traffic congestion, improve travel times, and encourage transit use.

(d) The proposed development of Treasure Island includes an innovative and comprehensive land use and transportation program designed to discourage motor vehicle usage, reduce vehicle miles traveled, encourage public transit, and serve as a model of sustainable neighborhood development. An element of the transportation program is the use of congestion pricing.

...

(h) The purpose of the Treasure Island transportation program is to accomplish all of the following:

(1) To facilitate the implementation of an innovative, sustainable transportation program for Treasure Island that will encourage public transit, bicycle, pedestrian, and waterborne modes of transportation, reduce vehicle miles traveled, and minimize the impact of Treasure Island development on the system of state and local roadways affected by the San Francisco-Oakland Bay Bridge, as well as on the bridge itself, in furtherance of the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code).

How can we say that the development will reduce vehicle miles traveled and minimize the impact on the bridge when the DEIR states that the Proposed Project will have significant and unavoidable impacts on the bridge?

It is essential to identify and fully analyze an alternative that complies with AB 32, AB 981, and the Proposed Project's own objectives. That has not been done. (*Ruth Gravanis*) [31.11]

We agree with Ruth Gravanis and disagree with MEA's rejection of the low-parking alternatives. The DEIR does not adequately support the contention that providing fewer parking spaces will make the project economically infeasible. Given that the project's purpose is to create a world-class model of sustainable, carbon-neutral development the sponsors should not create an economic pro forma that depends on parking revenues, thereby creating an incentive for them to encourage driving. (*Arc Ecology*) [28.12]

Based on the above, the Sierra Club requests that the EIR analyze an alternative project with minimum transportation impacts to include:

- 1) At least 8,000 units because this residential density seems to provide an adequate market size for most necessary continuous retail so that residents will not have to regularly drive off the island;
- 2) Fewer than 4,000 unbundled residential off street parking spaces, including car share because: a) The Planning Department produced a paper showing that 1:2 parking was adequate for SOMA, a short bus ride away; b) This project will have good transit like SOMA; c) This project will have a higher percentage of affordable units than SOMA and lower income people will own fewer cars; d) While fewer people will walk to work than in SOMA the necessity of less driving is even more clear today. e) Expanding on the analysis included in the Appendix, of the impacts of delay and cost on drivers, other reasons for less parking, on the island, include: probable congestion pricing fees to enter or leave San Francisco's downtown on top of the proposed TI/YB congestion pricing exit fees; no expectation that sufficient additional parking will be provided in the downtown for all of the additional drivers; improved transit to other San Francisco areas to meet the transit needs induced by congestion pricing; and reduced construction costs, on TI, for less parking, with less of the parking below sea level.
- 3) An expanded "prepaid transit voucher" requirement including all adults and reduced fare passes for all senior and high school age residents because a majority of trips are not to work sites.
- 4) Limiting the total area of commercial services to those that will actually reduce the need for residents to drive off the island for services, more than the services increase the desire for others to drive to the island for these services. Driving long distances from the mainland and paying Bay Bridge tolls and possible congestion fees to enter and leave the island does not seem probable anyway and we are concerned that additional commercial spaces, along with its parking spaces (see 5 below) will provide additional parking for residents. This commercial limit should not preclude essential services for visitors and if regional-serving shopping is provided it should not be perceived as requiring a car to take purchases home.
- 5) Reduced supply of off-street parking with market rate fees for commercial services for: a) Hotels at 0.1 parking spaces per room; b) Retail and "Flex" (commercial) Space at 0.2 spaces per 1,000 square feet, same as downtown San Francisco; and c) Marina at 0.3 parking spaces per berth; and reduced open space parking based on greater use of shuttles and transit. Any commercial off-street parking provided should incur parking fees that are at least as high as downtown San Francisco so that the availability of cheap parking will not induce people to drive.
- 6) Reduced curbside parking to provide pedestrian ambiance improvements (mini parks etc.); and 24/7 metering with market rate fees to induce drivers to park off-street rather than cruising around looking for cheaper parking along with night rates high enough such that residents will not chose curbside parking over residential off street parking.

- 7) Complete transit equity relative to: island residents, Muni and AC and their riders and TI ferry riders vs. bus riders. The EIR should show the total amount of subsidy over fare box revenue for the: ferry; the Muni 108 bus and AC buses serving TI. This should be broken down, in two ways, to show the subsidy contributed by TI and all other sources. We note that when this project was initially conceived the subsidy for each ferry ride from Marin was greater than the subsidy for each bus rider. It was not equitable, at that time, to provide a greater subsidy, from Golden Gate Bridge tolls, for those willing to pay more for a more luxurious ride than those who could only afford the bus. This inequity has since been corrected. In the same way it is not equitable for the subsidy for TI ferry riders to be greater than the subsidy for bus riders on essentially the same route. The EIR should be revised to analyze ridership for the bus and ferry when ferry fares are increased to over all ferry costs less the same amount of subsidy per ride as the 108 bus. It is good that the TI congestion charges will be used to fund transit. However the distribution of these funds should be equitable and also fund improvements for: pedestrians; bicyclists; sailors (see 16 below); additional recreational shuttles; bus transit and not used mostly for ferry subsidies. The EIR should analyze driving changes with this redistribution of funding.
- 8) Providing one ramp to the bridge in each direction that will allow buses and HOV vehicles to bypass all other traffic approaching the bridge and including a flashing warning light indicating an entering bus on the bridge right side lanes.
- 9) Adequate bus service because the EIR shows additional service increases use.
- 10) Stop-on-request Muni bus stops on Yerba Buena so that more YBI residents can use the bus without having to transfer from the shuttle.
- 11) Fareless shuttle service, as proposed, and nearly fareless Muni bus service on the island. The Muni bus could appear fareless for all island residents and visitors and fareless for those with a fast pass at the bus terminal, proof of payment boarding area. Those entering the POP area with a transfer will pay their return fare in advance. Those entering the POP area with neither a fast pass or transfer will purchase a two-way ticket as they enter the boarding area. This will speed up bus service and increase ridership.
- 12) A community service area including: library depot; minimum post office and UPS; food court and coffee shops; religious and community meetings areas etc. This will further reduce the need to drive off the island and increase the commercial viability of other services. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.4]

Reduced Parking alternatives: One or more alternatives should include reduced parking. San Francisco has consistently used reduced parking as a strategy to meet its environmental, transportation, and housing affordability goals, as well as the objectives of the city's General Plan and area plans, in every neighborhood plan approved over the past decade and before, including the Downtown Plan (1985), Rincon Hill Plan (2005), Downtown Parking reform (2006), Market & Octavia Plan (2006), Mission Plan (2008), Eastern SoMa Plan (2008), Showplace Square/Potrero Hill Plan (2008), Central Waterfront Plan (2008), and Balboa Park Plan (2009) MEA's conclusion that a reduced parking alternative is "infeasible or did not meet most of the Proposed Project's basic objectives." (p. S.86) is laughable. If it is feasible in every single other neighborhood plan in San Francisco, why is it infeasible for TI? Also, this plan is the first to contain explicit sustainability goals, and is the first neighborhood plan to be undertaken since the Passage of AB 32 and SB 375, which make reducing greenhouse gas emissions a requirement of state law. A reduced parking alternative will better meet 'The proposed project's basic objectives' than the alternatives assessed in the DEIR.

Similarly, the document's rejection of "Measures to Reduce Automobile Ownership" as "infeasible or did not meet most of the Proposed Project's basic objectives." (p. II.7) is not supported by evidence, and renders the DEIR's evaluation of alternatives inadequate.

A reduced parking alternative should include:

- \* limiting residential parking to less than one parking space per residential unit. Residential parking ratios in recently adopted plans range from one space for every four units to three spaces for every four units.
- \* limited commercial and visitor parking.
- \* unbundled residential and commercial parking.
- \* limiting on-street and public parking, and pricing it in keeping with SF park program standards.
- \* mandatory participation in transportation demand management programs, including transportation brokerage services, providing transit passes to all residents workers, etc.
- \* other transportation management strategies which further the project's land use, transportation, and sustainability goals, and reduce the environmental impacts of the project. (*Tom Radulovich, Livable City*) [37.2]

It is also not clear why this document fails to identify an alternative that utilizes parking formulas employed in the rest of San Francisco. It seems wholly inappropriate for a community with limited access to provide not only 1:1 residential parking, but an additional 3100 spaces for other uses.

*Recommendation:*

*Provide an environmentally superior alternative that, at minimum, utilizes existing downtown parking ratios, reinstates neighborhood serving retail uses, and includes ferry service as means to reduce bridge congestion due to the project. (Jennifer Clary, President, San Francisco Tomorrow)* [38.10]

Only by increasing public transit in the form of non-road transit, i.e. ferries, can auto trips be decreased. A regional shopping mall would increase, not decrease, the intensity of use. Further, it is not just by reducing the number of dwelling units and the number of parking spaces that transportation impacts would be lessened, as long as road-based (and bridge-based) travel is all that exists. Such a reduction would require a different mode, that is, ferries, a water-based mode. This mode of transit was envisioned from the very beginning of planning efforts for the islands more than twenty years ago; this has been the only way to bring numbers of people to Treasure Island without severe impacts to the Bay Bridge. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.20]

The DEIR considers three (3) alternatives to the Proposed Project. In addition to the "no project alternative," it includes an analysis of a "reduced development alternative" and a "no ferry service alternative." The DEIR is inadequate because it fails to consider a "Minimum-Impact Alternative" or and "Environmentally Superior Alternative" that reduces or avoids the significant traffic impacts of the Proposed Project.

As it is clear from the DEIR, neither the reduced development alternative nor no ferry service alternative would reduce the significant environmental impacts of the project. In fact, they increase the significant traffic impacts. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.80]

Without the inclusion of a "Minimum-Impact Alternative" or "Environmentally Superior Alternative" the DEIR is inadequate under CEQA because it fails to inform the decision makers and public citizens of a potentially feasible alternative that would reduce or avoid the significant

traffic and air quality impacts of the Proposed Project identified in this DEIR. Without a “Minimum-Impact Alternative,” the decision makers and the public cannot make an informed decision. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.82]

- Please include a “Minimum-Impact Alternative” or “Environmentally Superior Alternative” instead of the “Reduced Development Alternative.” The Minimum-Impact Alternative should call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water quality and resource conservation. The Minimum-Impact Alternative would include all of the characteristics listed by Mr. Jared Blumenfeld, Director, SF Environment, to Mr. Bill Wycko, dated February 25, 2008, which letter is attached hereto as **Exhibit C**, and by this reference incorporated herein (the “Blumenfeld Letter”). (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.84]
- Is there a scenario with enough density for the residents to meet their basic retail and service needs on the islands with a maximum of transit options and a minimum of cars? Please discuss in detail. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.87]

### **Response**

The Draft EIR included a discussion of a “Reduced Parking Alternative” and concluded that such an alternative would be infeasible. Since the alternative was considered infeasible, the Draft EIR did not include lengthy and detailed discussion about the transportation-related effects of implementing it. As explained in CEQA Guidelines Section 15126.6(c), an EIR should briefly explain the reasons underlying alternatives that were considered but rejected during the public scoping process; this brief explanation was provided in the Draft EIR in Section VII.D.3. However, in response to the above comments requesting more analysis and detail related to a reduced parking alternative, the discussion of the “Reduced Parking Alternative” has been expanded and revised, analysis of the alternative has been performed, and additional information has been provided about the feasibility of such an alternative.

The description of the Reduced Parking Alternative has been modified based on the comments received. Comments proposed a variety of reduced parking ratios. Reduced parking ratios proposed by commenters generally focused on the number of off-street spaces provided per residential unit and ranged from 0.75 to 0.25 spaces per unit. As explained below, the Reduced Parking Alternative uses a figure of 0.50 spaces per residential unit because this ratio represents the approximate mid-point of those suggested by commenters. Some commenters also requested reductions in non-residential parking ratios. For the purposes of this analysis, the non-residential parking ratios for the Reduced Parking Alternative were generally reduced by 50 percent from those proposed under the Proposed Project. However, some areas, such as Open Space and Retail, were not reduced because of the unique nature of the proposed land uses (*e.g.* Public Trust policies that require public roadway access to the shoreline) or because the proposed parking ratios are already significantly lower than similar *San Francisco Planning Code* ratios.

Commenters also suggested a number of other features that might be included in the Reduced Parking Alternative. Some of these features are already features of the Proposed Project (or are

already identified as mitigation measures to reduce impacts to the Proposed Project) and are therefore, also included in the Reduced Parking Alternative., while others specifically related to reductions in parking supply, have been included in the Reduced Parking Alternative only. These include:

#### Features Included in Both Proposed Project and Reduced Parking Alternative

- High-density, mixed-use, transit oriented development, including 8,000 residential units, sufficient to support a robust transit system and an adequate supply of neighborhood-serving retail to reduce the need for trips off of the Islands. Both of these are included as part of the Proposed Project and the Reduced Parking Alternative. See the responses in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description for a full description of land uses proposed as part of the project. See also EIR pp. IV.E.55 – IV.E.61 for a discussion of the way in which the density of development and the provision of neighborhood-serving retail affect the project’s vehicle trip generation.
- Prepaid transit voucher program for all residents of market-rate units regardless of age, and for all types of trips. (Residents of affordable units could choose to purchase prepaid transit vouchers, but would not be required to do so.)
- Market-driven pricing for all on-street parking. Transit-only on-ramp to the westbound Bay Bridge
- Robust bus service to and from the Islands
- Fare-free on-island shuttle service and reduced-fare bus service. Although neither the project sponsors nor the Treasure Island Transportation Management Agency (“TITMA”) would have the authority to set the fares that AC Transit or Muni charge for rides, as noted throughout the EIR, residents of market-rate units of the Islands would receive a pre-paid transit voucher for transit rides, effectively achieving the same goal as suggested in comments (i.e., reduced or no out-of-pocket cost to ride transit).
- Community facility space including library, post office, food/coffee shops, community meeting space. As noted throughout the EIR, the Proposed Project and therefore, the Reduced Parking Alternative, includes over 200,000 square feet of such local, neighborhood-serving retail uses.

#### Features Included in the Reduced Parking Alternative Only

- Reductions to Hotel, Office/Flex, and Marina parking spaces:
  - Some comments suggested hotel parking should be provided at 0.1 spaces per room. As discussed below, the Reduced Parking Alternative does include reduced parking for hotel uses at 50 percent of the rate included as part of the Proposed Project, which equates to 0.4 spaces per room and is slightly higher than the rate proposed in some comments, but still represents a reduction from the Proposed Project.
  - Some comments suggested that parking for Office and Flex uses both be provided at 0.2 spaces per 1,000 square feet. Parking for Office and Flex uses are proposed at 1.0 space per 1,000 square feet as part of the Proposed Project. The Reduced Parking Alternative would provide the same Office Flex parking rate of 1.0 space per 1,000 square feet, which is higher than the rate proposed in some comments.

Other proposed features were not included because, while they may be policy proposals appropriate for consideration by decision-makers, no quantifiable reduction in impacts (e.g., quantifiable reduction in trip generation rates) could be associated with them, or they have been considered and determined to be infeasible. Features in this category include:

- Some comments suggested that parking for Marina uses be provided at 0.3 spaces per berth. Due to the uniqueness of this land use and the fact that it represents such a small portion of total project-related parking and a very small portion of trip generation on the Islands, no adjustments were made to the proposed parking rate of 0.59 spaces per berth. (As noted in footnote 2 in Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, the Marina uses are not considered part of the Proposed Project, since they have already been analyzed in a previous EIR.)
- Some comments suggested that parking for Retail uses be provided at a lower rate. Parking for retail uses is proposed at 2.0 spaces per 1,000 square feet as part of the Proposed Project. This ratio is already 50 percent lower than the minimum generally required by the *San Francisco Planning Code* for buildings greater than 20,000 square feet. As a result, no adjustments to the Retail parking rates are proposed as part of the Reduced Parking Alternative. (Please also see discussion titled *Non-Residential Parking Supply* below on p. 2.21.21).
- Restrictions on retail uses and commercial services such that all retail or commercial uses provided on the Islands be designed to reduce trips onto or off of the Islands. The retail uses proposed as part of the project would include both local-serving and regional retail. For more discussion on why regional retail uses are included in the Proposed Project, please see the response to comments in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description.
- Reductions in on-street parking to provide more open space (mini-parks) and enhanced pedestrian amenities. While it would be technically feasible to reduce on-street parking and instead provide more open space and pedestrian amenities, the Proposed Project already includes adequate sidewalks with landscaped buffers separating pedestrians from roadways, as well as fully separated bicycle and pedestrian paths throughout both islands. The Proposed Project also includes a substantial amount of recreational open space (300 acres), complete with pedestrian paths for both recreational use and non-recreational travel by foot. The Proposed Project's supply of on-street parking already includes on-street parking restrictions to accommodate pedestrian amenities, such as corner bulb-outs, at the most logical locations. Therefore, no additional reductions to on-street parking have been included.
- Transit-only on-ramp to the eastbound Bay Bridge. Unlike the westbound direction, where two on-ramps will be in place, allowing for conversion of one ramp to transit only, there will only be one on-ramp to the eastbound Bay Bridge. Conversion of this ramp to transit-only would preclude private automobiles from entering the eastbound direction of the Bay Bridge.
- Stop on request Muni bus stops on Yerba Buena Island, such that users would not have to transfer to the on-island shuttle. While this may make bus travel more attractive to the relatively small number of residents on Yerba Buena Island, it would also increase travel times for the larger number of residents on Treasure Island who would have to travel through Yerba Buena Island. In addition to being inconsistent with Muni policies, which

do not allow stop-on-request service, it is unlikely that this arrangement would reduce auto impacts through increased transit ridership, because it would increase transit travel times for the majority of projected riders.

- Requirement that unbundled parking spaces be rented or leased, and not purchased. This is not included as part of the Proposed Project or the Reduced Parking Alternative, and there is no clear evidence suggesting how this policy difference would affect peak hour vehicle trip generation, and therefore how or whether it would reduce any significant impacts associated with the Proposed Project or the Reduced Parking Alternative.

Several comments included in this section referenced topics that have been discussed elsewhere in this Comments and Responses document. Those comments are described below and cross-references to the location where the respective response discussions are provided.

Several comments noted that AB 32, AB 981, and SB 375 have been adopted by the State legislature and are being implemented by various state and local agencies. The response in Subsection 2.7.13, Regulatory Framework, in Section 2.7, Transportation, includes a discussion of the relationship between AB 32 and AB 981 and this EIR. Subsection 2.10.3, Greenhouse Gas Analysis Data and Assumptions, in Section 2.10, Air Quality, contains a discussion of the relationship between SB 375 and this EIR. No additional changes have been made.

Comments also suggested that the EIR does not include an environmentally superior alternative. Subsection 2.21.9, Environmentally Superior Alternative, and Subsection 2.22.4, Public Scoping, contain discussion regarding the identified environmentally superior alternative in the EIR and what is required under CEQA as part of developing and identifying this alternative.

A number of comments noted that the mechanism proposed for financing for TITMA to provide a number of the Proposed Project's transportation demand management programs, including the funding of new or increased transit service, relies, in part, on revenues generated by automobile traffic. Commenters suggested that this provides an incentive for TITMA to encourage automobile travel to and from the Islands. Subsection 2.21.2.1, Reasons for Rejecting Reduced Parking Alternative, includes a discussion of the funding mechanisms and their relation to automobile travel on the Islands.

Some comments queried whether an adequate project density and mix of uses had been proposed, such that neighborhood-serving retail would be adequate to serve the needs of residents on the Islands. The discussion on EIR pp. IV.E.55 – 61 describes the way in which both the Proposed Project's density and mix of uses affect travel demand, including the interaction between retail and residential uses. The response in Section 2.7, Transportation, Subsection 2.7.3.6, Accounting for Density, includes additional discussion of the way in which the Proposed Project's density has been accounted for, and the response in Subsection 2.7.3.15, Trip Generation – Retail and Sports Facility, includes additional discussion regarding the neighborhood serving retail component of the Proposed Project. The retail component of the Proposed Project would be a mix of regional

and local-serving space. The EIR analysis made a reasonable estimate of how much of the retail space would be primarily local-serving. If in the future there were a greater demand for local-serving retail uses as the new residential units on the Islands were occupied, some of the regional-serving retail space might change to local-serving insofar as this would be allowable on non-Tidelands Trust properties. Note that the alternatives selected for analysis in an EIR should describe and analyze alternatives to the Proposed Project that reduce one or more significant impacts identified for the Proposed Project (see the response in Subsection 2.21.9, Environmentally Superior Alternative). The EIR describes a reasonable range of alternatives, as discussed in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, above.

As a result of the revisions and expansion of the reduced parking alternative, the following new alternative is added to Chapter VII, Alternatives, as Alternative D, Reduced Parking Alternative, beginning on EIR p. VII.72. Section VII.D, Alternatives Considered But Rejected, is redesignated E, and subsections D.1 and D.2 are redesignated E.1 and E.2. Subsection D.3, Reduced Parking Alternative, on pp. VII.75 – VII-76, is deleted, as it is replaced with the new alternative presented below, and subsections D.4 and D.5 are redesignated E.3 and E.4. Section E, Environmentally Superior Alternative, is redesignated F. Other minor revisions are made in the text of the Alternatives Chapter to reflect the addition of this alternative. The new text for Alternative D is not underlined to make it easier to read.

#### **D. REDUCED PARKING ALTERNATIVE**

##### **DESCRIPTION**

The Reduced Parking Alternative would reduce the maximum total amount of off-street parking that could be provided on the Islands. The alternative would provide a maximum of 0.5 parking spaces per residential unit, for a total of 4,000 parking spaces available to residents on an Islands-wide basis. It would provide a maximum of 1 parking space per 1,000 sq. ft. of commercial/flex space in Buildings 1, 2, and 3 and for office uses, and a maximum of 0.4 parking spaces per hotel room. Retail parking would continue to be provided at a maximum of 2 spaces per 1,000 sq. ft., as in the Proposed Project. The amount of parking for open space uses and the marina and Sailing Center would also remain as in the Proposed Project. On-street parking, all of which would continue to be metered spaces, would remain at 1,035 spaces because the on-street parking supply is a function of the layout of the street network, which was not assumed to change. On-street parking spaces represent less than 10 percent of the overall supply. Taken together, the reduction in parking ratios for the above listed land uses in the Reduced Parking Alternative would reduce the total number of off-street parking spaces by about 4,030, from about 9,646 in the Proposed Project to about 5,616 spaces.

As with the Proposed Project, the parking supply discussed within this section refers to the Islands-wide maximums for individual uses, and as with the Proposed Project, there are no

parking minimums for individual uses. Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use, compares, by land use, the amount of parking in the Proposed Project with the Reduced Parking Alternative. The Reduced Parking Alternative's parking supply would be about one-half of that generally required by the City's Planning Code for similar land uses. However, there are some areas of San Francisco, such as Downtown (e.g., the Rincon Hill and South of Market areas), the Eastern Neighborhoods, North Beach, and the Market/Octavia neighborhood, among others, where other public and private on-street and off-street parking facilities supplement parking provided by individual developments; these neighborhoods have parking maximums lower than required generally in other parts of the City. For comparison purposes, Table VII.20 summarizes a variety of different parking requirements from the City's Planning Code, both generally for the City and for neighborhoods with unique requirements. However, it is important to note that supplemental parking facilities would not be permitted on Treasure Island under the proposed *Design for Development*, because the 1:1 residential parking ratio represents an Islands-wide cap, unlike the other San Francisco neighborhoods noted above.

Land uses would remain the same as in the Proposed Project, except that fewer parking spaces would be permitted to be constructed for residential and hotel uses and less parking would be permitted to be constructed for certain commercial uses. The numbers, types, and sizes of buildings would not change substantially with the alternative; some buildings might have fewer basement levels for parking, and some buildings that might have included above-ground parking wrapped by residential or commercial uses might not include parking. As in the Proposed Project, stand-alone parking garages with no other uses included were not proposed for off-street parking; any above-ground parking garages in residential or mixed-use buildings would be required to be wrapped by active commercial or residential uses, and parking would not be visible from public rights-of-way.<sup>1</sup> Also as in the Proposed Project, parking would not be required to be included in buildings; therefore, while more buildings might be constructed with no parking in the Reduced Parking Alternative, some also might be constructed with no parking in the Proposed Project, as there are no parking minimums on either a building or Islands-wide basis.

The Reduced Parking Alternative would provide the same base transit service, with the Muni line 108 - Treasure Island bus service at existing headways, new bus service to the East Bay at approximately 10 minute peak headways, and ferry service to San Francisco at approximately 50 minute headways. Fare-free shuttle service throughout the Islands would be provided and would be available to residents and visitors as described for the Proposed Project. Bicycle and pedestrian networks on the Islands would remain the same as in the Proposed Project. Utilities

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<sup>1</sup> *Treasure Island + Yerba Buena Island Design For Development*, Draft dated March 5, 2010, Section 6.1.2, p. 204.

● (New) Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use

Land Use	Size	Proposed Project		Reduced Parking Alternative	
		Ratio	Supply	Ratio	Supply
Residential	8,000 d.u.	1 space/d.u. <sup>2</sup>	8,000	0.5 space/d.u.	4,000
Hotel (Treasure Island)	450 Rooms	0.4 spaces/room <sup>3</sup>	180	0.4 spaces/room	180
Hotel (Yerba Buena Island)	50 Rooms	0.8 spaces/room <sup>3</sup>	40	0.4 spaces/room	20
Retail	207,000 square feet	2/1,000 square feet <sup>4</sup>	414	2/1,000 square feet <sup>9</sup>	414
Open Space (Athletic Fields)	40 acres	5.1/acre <sup>5</sup>	204	5.1/acre	204
Open Space (Other)	260 acres	1/acre <sup>5</sup>	260	1/acre	260
Marina	400 slips	0.59/slip <sup>5</sup>	236	0.59/slip	236
Flex <sup>1</sup>	202,000 square feet <sup>1</sup>	1/1,000 square feet <sup>6</sup>	202	1/1,000 square feet	202
Office	100,000 square feet	1/1,000 square feet <sup>6</sup>	100	1/1,000 square feet	100
Police/Fire	30,000 square feet	None <sup>7</sup>	N/A	None	N/A
School	105,000 square feet	None <sup>7</sup>	N/A	None	N/A
Community Center	48,500 square feet	Street parking <sup>8</sup>	N/A	Street parking	N/A
Cultural Park/Museum	75,000 square feet	Street parking <sup>8</sup>	<u>N/A</u>	Street parking	<u>N/A</u>
<b>Off-Street Parking Subtotal</b>			9,646		5,616
General On-Street Parking	N/A	N/A	<u>1,035</u>	N/A	<u>1,035</u>
<b>Total</b>			<b>10,681</b>		<b>6,651</b>

Notes:

General note: Land uses where parking rates differ from the Proposed Project are shaded in gray.

<sup>1</sup> Includes 22 ksf food production/industrial/manufacturing, 150 ksf entertainment, and 30 ksf community/office uses.

<sup>2</sup> Consistent with *San Francisco Planning Code* for neighborhoods in San Francisco without specific and unique requirements except that Treasure Island parking requirements are a maximum and thus, not required, whereas *Planning Code* requirements are a minimum. See (New) Table VII.20 for comparison of parking requirements for various land uses in several districts in San Francisco.

<sup>3</sup> Hotel rate is the same as or less than the rate for hotels in Neighborhood Commercial District, *San Francisco Planning Code*.

<sup>4</sup> Lower than permitted in *San Francisco Planning Code* for comparable neighborhoods, which permits up to 2 spaces per 1,000 square feet and up to 4 spaces per 1,000 square feet above 20,000 square feet. (Retail parking rates were not adjusted between the Proposed Project and the Reduced Parking Alternative, as explained in footnote 9).

<sup>5</sup> Consistent with *Parking Generation*, Third Edition, Institute of Transportation Engineers. As somewhat unique land uses compared to retail, hotel, housing, and office uses, parking rates for the open space and marina uses were not adjusted from standard rates.

<sup>6</sup> Consistent with *San Francisco Planning Code* rate for Office uses, although for flex space, in addition to office space, uses could include entertainment and some production, distribution, and repair uses, some of which have higher and some of which have lower parking rates than included in the *San Francisco Planning Code*.

<sup>7</sup> Parking for police/fire and school facilities expected to be provided separately within the respective sites. Neither parking demand nor supply for these uses is included in this analysis.

<sup>8</sup> These uses would share from the available pool of 1,035 on-street parking listed under the general on-street parking.

<sup>9</sup> Although requested by some commenters, the retail rate was not adjusted in the Reduced Parking Alternative because the rate included in the Proposed Project is already 50 percent lower than what is permitted by the *San Francisco Planning Code*. Under both the Proposed Project and the Reduced Parking Alternative, the proposed retail parking rates do represent a reduction from the Planning Code – see footnote 4 above. In addition, parking for retail uses (414 spaces) represents a relatively small percentage (under 4 percent) of the overall supply of parking for the Proposed Project.

Source: TICD, 2009; Fehr & Peers, 2010

**(New) Table VII.20: San Francisco Off-Street Parking Required or Permitted as Accessory for Select Districts and Uses**

<b>Land Use</b>	<b>Permitted or Required Parking<sup>1</sup></b>	<b>Parking Permitted with Planning Commission Approval</b>	<b>Parking Maximum</b>
<b><u>Citywide Parking (except as below)</u></b>			
Dwelling Units	1 space / unit		
Office <sup>2</sup>	2.0 spaces/1,000 square feet		
Retail (<5,000 square feet)	None required		
Retail (between 5,000 and 20,000 square feet)	2.0 spaces/1,000 square feet		
Retail (for each 1,000 square feet in excess of 20,000)	4.0 spaces/1,000 square feet		
Retail devoted to handling bulky merchandise (>5,000 square feet)	1.0 space/1,000 square feet		
Restaurant, bar, nightclub, pool hall, dance hall, bowling alley, or other similar enterprise (>5,000 square feet)	5.0 spaces/1,000 square feet		
<b><u>Commercial Districts (C-3)</u></b>			
Dwelling Units	.25 space/unit	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	.25 space/unit	1.0 space/unit	1.0 space/unit
Non-residential uses	None required		7 Percent of Gross Floor Area
<b><u>Van Ness and Market DTR Special Use District</u></b>			
Dwelling Units	.25 space/unit	.50 space/unit	.50 space/unit
<b><u>Neighborhood Commercial Transit (NCT)</u></b>			
Dwelling Units	.5 space/unit	.75 space/unit	.75 space/unit
<u>Non-Residential</u>	None required		1.0 space / 1,500 square feet
<b><u>Residential Transit-Oriented (RTO)</u></b>			
Dwelling Units	.75 space/unit	1 space/unit	1 space/unit
<u>Non-Residential</u>	None permitted	None permitted	None permitted
<b><u>Rincon Hill DTR District</u></b>			
Dwelling Units	.50 space/unit	1.0 space/unit	1.0 space/unit
<b><u>Eastern Neighborhoods: Mixed Use General, Mixed Use Office, and Mixed Use Residential</u></b>			
Dwelling Units	.25 space/unit	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	.25 space/unit	1.0 space/unit	1.0 space/unit
Office	None required		7 Percent of Gross Floor Area

**Table VII.20 (cont.)**

Retail (where any portion of the parcel is less than ¼ mile from Market, Mission, Third, and Fourth Streets, except grocery stores >20,000 gross square feet)	1.0 space / 1,500 square feet	1.0 space / 1,500 square feet
<b><u>Eastern Neighborhoods: Urban Mixed Use</u></b>		
Dwelling Units	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	1.0 space/unit	1.0 space/unit
Office	1.0 space/1,000 square feet	1.0 space/1,000 square feet
Office (where the entire parcel is greater than ¼ mile from Market, Mission, Third, or Fourth Streets)	2.0 spaces/1,000 square feet	2.0 spaces/1,000 square feet

*Notes:*

<sup>1</sup> Parking rates shown for “Citywide” are minimum parking requirements. Parking rates shown for other special districts are parking maximums.

<sup>2</sup> Section 151 of the Planning Code makes a distinction between several different types of office. The rate presented here is for the “Other Business Office” category and is intended to illustrate the rate that is most commonly applied. Please refer to Planning Code Sections 151 and 151.1 for details or rates for other types of office use.

<sup>3</sup> Retail grocery stores with over 20,000 square feet of occupied floor area are permitted 1 space/500 square feet and can receive Planning Commission Authorization for up to 1 space/250 square feet.

*Source: San Francisco Planning Code*

and infrastructure included in the Proposed Project would be the same in the Reduced Parking Alternative. Geotechnical stabilization would occur in the same manner and in the same locations as in the Proposed Project. The Reduced Parking Alternative would require all of the same approval actions as those listed for the Proposed Project on pp. II.83 – II.84.

The Proposed Project’s basic objectives include: a) to implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles; b) to provide high-density, mixed-income housing consistent with transit-oriented development; c) to create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation; d) to create a development that is financially feasible, that allows for the delivery of infrastructure, public benefits, and affordable housing subsidies; and that is able to fund the Proposed Project’s capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site; and e) construct a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment.

The Reduced Parking Alternative would not meet some of these basic project objectives. In particular, the project sponsors believe that the Reduced Parking Alternative would not “create a development that is financially feasible, that allows for the delivery of infrastructure, public

benefits, and affordable housing subsidies; and that is able to fund the Proposed Project's capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site." In addition, the project sponsors believe that the Reduced Parking Alternative would not result in "a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment." The alternative would not "minimize the...impacts of private automobiles" more than would the Proposed Project, as significant traffic impacts identified for the Proposed Project would not be substantially reduced. Therefore the alternative would not be more effective at meeting this basic project objective than would the Proposed Project.

## ENVIRONMENTAL ANALYSIS

### Transportation

The Reduced Parking Alternative would include the same transportation improvements as the Proposed Project, as described in Section IV.E, Transportation, beginning on p. IV.E.30, with the exception of the reduced parking program as described above. The Reduced Parking Alternative would include the same roadway network as the Proposed Project, and the developed area would be on the same footprint. With the Reduced Parking Alternative, the total number of off-street parking spaces would be up to about 5,615 compared with up to about 9,645 spaces included in the Proposed Project. Both alternatives would include 1,035 on-street parking spaces. All other uses would be the same as those for the Proposed Project.

### Methodology

A number of comments requested a Reduced Parking Alternative be analyzed and suggested that such an alternative would likely reduce transportation impacts by reducing automobile trips. This section summarizes the available methodologies for assessing the effects of reduced parking supplies on peak hour vehicle trip generation based on a literature review conducted by the EIR preparers. Additional discussion of the travel demand methodology for the Reduced Parking Alternative is included in the memorandum titled *Supplemental Transportation Analysis for Reduced Parking Alternative Treasure Island/Yerba Buena Island EIR*, February 25, 2011 ("*Supplemental Transportation Analysis memorandum*").<sup>2</sup>

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<sup>2</sup> Fehr & Peers, February 25, 2011, Letter to San Francisco Planning Department, *Supplemental Transportation Analysis for Reduced Parking Alternative: Treasure Island / Yerba Buena Island Redevelopment Plan EIR* (hereinafter cited as "Supplemental Transportation Analysis memorandum, 2/25/11"). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

Comments suggested reductions to both residential and non-residential parking supply. As the effects of residential and non-residential parking supply on travel demand are somewhat independent with respect to the Proposed Project, each is discussed separately below.

### *Residential Parking Supply*

As part of the transportation analysis effort for the Proposed Project, a literature review was conducted on the effects that parking supply has on trip generation (documented in Fehr & Peers letter to Planning Department dated February 15, 2010) to determine whether independent research has established a direct correlation between parking supply and vehicle trip generation. Although reducing parking supplies may be an effective land use strategy, particularly in areas well-served by transit like Downtown or the Market/Octavia area of San Francisco, where public and private on-street and off-street parking facilities supplement parking provided by individual uses, there is inadequate data to accurately predict and quantify reductions in vehicle trip generation associated with the individual effect of reduced parking supply.<sup>3</sup>

One of the reports included in the literature review, published by the Transit Cooperative Research Program (“TCRP”), a cooperative effort of the Federal Transit Administration, the Transportation Research Board, and the Transit Development Corporation, Inc., *TCRP Report 128 – Effects of TOD on Housing, Parking, and Travel* (“TCRP Report”),<sup>4</sup> did identify relationships between residential parking supply and peak hour trip generation, although the identified relationships are statistically very weak. In fact, it is precisely because these relationships are very weak that transportation engineers and planners who study them do not commonly use them in forecasting travel demand. Because of the weak linkages in the study, caution should be exercised in using them to make major land use or policy decisions. However, in light of the public comments received on the Draft EIR, the City elected to analyze the potential effects of a reduced parking supply on trip generation based on the data available from the TCRP Report, even though the limitations of that study and generally low confidence in the data are acknowledged.

The equations in the TCRP Report predict some reduction in peak hour vehicle trip generation based on reductions in residential parking supply. Generally, as residential parking supply ratios decrease from 1 space per dwelling unit to 0.5 spaces per dwelling unit, the TCRP Report’s equations predict a vehicle trip reduction for residential uses of 24 percent daily, 30 percent in the AM peak hour, and 16 percent in the PM peak hour. Although the TCRP report does not include

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<sup>3</sup> Supplemental Transportation Analysis memorandum, 2/25/11.

<sup>4</sup> *TCRP Report 128 – Effects of TOD on Housing, Parking, and Travel*; Arrington, G.B., and Cervero, R.; Transportation Research Board, Washington, D.C., 2008). A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

data regarding Saturday peak hour travel demand, Fehr & Peers derived relationships and applied the weekday data from the TCRP Report to Saturday peak hour travel demand. The result of this analysis suggests a 10 percent reduction in Saturday peak hour residential travel demand associated with the reduced residential parking.

However, the City does not believe it would be appropriate to rely on the TCRP Report's predictive equations to quantify trip reductions for a number of reasons outlined in the *Supplemental Transportation Analysis* memorandum. Specific reasons described in the memorandum are if:

- The relationships are described in the TCRP report itself as “fairly weak;”
- The relationships are derived primarily from areas with parking supplies higher than what is proposed in the Reduced Parking Alternative, which may mean that the TCRP data is not entirely applicable to the Reduced Parking Alternative; and
- The sites that were surveyed to derive the relationships were not consistent with respect to density, land use diversity, and other variables that may have a greater effect on trip generation, which suggests that other factors may be affecting the relationships and not exclusively parking supply.

Thus, for the reasons stated above, the City has concluded that it would not be appropriate to assume that the trip reductions predicted by the TCRP Report's equation would materialize, and therefore, the Reduced Parking Alternative could not be relied upon to reduce traffic impacts. The trip generation assumptions for the Proposed Project included in the EIR already account for many of the more influential factors noted in the TCRP Report, such as the project's density, development scale, diversity of uses, and design of its street network (collectively referred to as the 4D's<sup>5</sup> throughout the EIR).

However, the City also acknowledges that despite the lack of conclusive data demonstrating a link between parking supply and trip generation, it is possible that such a link could exist for the Proposed Project. The Proposed Project is unique in a number of respects from other projects. The Proposed Project is located on two islands and isolated from other peripheral parking lots and garages. The Proposed Project uses an Islands-wide cap on parking supply, rather than the building-by-building parking limits that are more commonly found in parking codes that seek to restrict parking supply. (All of the parking ratios in the current San Francisco Planning Code that are summarized in (New) Table VII.20 are applied on a building-by-building basis.) Together, these factors mean that parking supply restrictions on the Islands may produce different results from those in many downtown San Francisco projects. In downtown San Francisco, for example, individual buildings have limitations on parking supply, but there are other nearby free-standing parking facilities, surface lots, or street parking that can serve the building occupants, allowing

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<sup>5</sup> Refer to the *Transportation Impact Study* in Appendix C of the EIR for additional discussion of the 4Ds.

some residents who do not have parking in their building to secure parking in another location. This would not be possible on the Islands, as constructing any additional reservoirs of parking exceeding the Islands-wide maximums would not be permitted, no additional parking would be available on the periphery or in an adjacent neighborhood, and all on-street parking would be priced for short-term usage by both residents and visitors. While the City acknowledges it is possible that the unique conditions of the Proposed Project might make it more likely that the reductions in parking supply would influence vehicle trip generation, the City does not have data to support this conclusion. Further, there are not adequate examples in the United States of neighborhoods located on islands with the mix of land uses, proximity to transit supply, and regional connectivity characteristics similar to the Proposed Project from which additional studies could be performed or data could be obtained.

While the City is not able to rely on trip reductions in its impact analysis, the analysis of the Reduced Parking Alternative includes a discussion as to how the reduced parking supply might affect the travel behavior and resulting impacts discussed in the EIR. The quantification of potential reductions associated with the Reduced Parking Alternative included in the discussion below is not meant to suggest a confident forecast of travel behavior changes that may be expected due to a reduced parking supply, nor does the City intend to use the quantification for the purposes of evaluating travel demand for future projects. Rather, the purpose of the discussion is meant to illustrate how reductions in trip generation might affect the impacts concluded for the Proposed Project, if in fact, they were to materialize, despite limited empirical evidence.

In the absence of other independent, verifiable data, the City relied on the TCRP Report's predicted traffic generation reductions as the basis for this discussion.

#### *Non-Residential Parking Supply*

Comments also requested that the Reduced Parking Alternative examine the effects of reduced parking supply for non-residential uses. In response, as discussed earlier in this section, the Reduced Parking Alternative includes reductions to maximum parking supply rates for Flex, Hotel, and Office uses compared to the rates in the Proposed Project. No adjustments to the Retail parking rate are proposed as part of the Reduced Parking Alternative, because unlike other uses, the rate proposed as part of the Proposed Project is already 50 percent lower than the minimum generally required by the *San Francisco Planning Code* for buildings greater than 20,000 square feet. As a result, the Reduced Parking Alternative includes maximum parking supply rates for Residential, Hotel, Retail, Flex, and Office uses that are approximately 50 percent lower than the minimum generally required by the *San Francisco Planning Code*.

As shown in Appendix D2 to the Project's *Transportation Impact Study*, the Flex, Hotel, and Office components of the Proposed Project generate relatively small amounts of vehicle trips,

compared to the Proposed Project as a whole. Combined, these uses generate 15 percent of the project's total vehicle trip generation in the AM peak hour and 11 percent in the PM peak hour. Therefore, even if reductions to parking supplies for these non-residential uses were to result in a reduction in peak hour vehicle trip generation, the overall effect to the number of vehicle trips generated onto and off of the Islands would be relatively small.

However, in response to numerous comments on the subject, the literature review conducted for the Proposed Project also looked for studies that examine the links between non-residential parking supply and vehicle trip generation. No studies were found that identified such links specifically and exclusively for non-residential parking supply. However, a few more comprehensive studies were found that identified the total vehicle trip reductions that have been observed associated with a number of different travel demand management strategies (including parking supply reductions) individually and combined. These studies suggest that there are limits as to how much total vehicle trip reduction can be achieved, and that the Reduced Parking Alternative, including vehicle trip reductions associated with residential parking reductions, would meet or exceed those limits, even without accounting for non-residential parking reductions.

One of the more exhaustive studies on the effectiveness of various strategies at reducing vehicle trip generation was a report prepared by Fehr & Peers for the California Air Pollution Control Officers Association ("CAPCOA"), *Quantifying Greenhouse Gas Mitigation Measures – A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*. The CAPCOA report summarized a number of other studies, including one conducted by Nelson\Nygaard Consulting Associates that specifically discussed the general relationship between parking supply and vehicle trip generation. Although not specific to non-residential parking supply, the Nelson\Nygaard study could be applied to the non-residential uses for purposes of assessing the effects on vehicle trip generation of the Reduced Parking Alternative. The Nelson\Nygaard study developed a model that uses the ITE *Parking Generation* handbook as the baseline figure for parking supply.<sup>6</sup> The Nelson\Nygaard study assumes data in the ITE research to represent unconstrained demand (or, the parking demand in a typical, auto-oriented, suburban setting), since ITE parking rates are based on suburban development and have tended to overestimate the demand for parking in more urbanized areas. However, the literature suggests no reductions to trip generation associated with reductions in parking supply should be taken once trip generation forecasts are below 50 percent of typical rates as suggested by ITE. That is, once the forecast of trip generation rates has been reduced by 50 percent by virtue of the high-density, mixed-use, or transit-oriented characteristics of the project, as compared to standard ITE trip

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<sup>6</sup> Nelson\Nygaard, 2005. *Crediting Low-Traffic Developments* (p. 16)  
<http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf>

generation rates, no data supports further reductions beyond 50 percent by virtue of constraining the parking supply available to the project.

In the case of both the Reduced Parking Alternative and the Proposed Project, the reductions already taken to account for the Proposed Project's characteristics (density, diversity of uses, robust transit supply, and reductions to residential parking supply exceed 50 percent of the unadjusted ITE trip generation forecasts. For example, as shown in Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58 of the EIR, in the PM peak hour the combined effect of adjustments made for the projects' density, diversity of uses, etc. (collectively, the 4D's) is 39 percent. As shown on Table IV.E.5: Person-Trip Generation by Mode, on p. IV.E.60 of the EIR, 25 percent of the trips coming to or leaving the Islands would be by transit. This represents 15 percent of total trips (internal and external) generated during the PM peak hour. The combined effect of the 4D's and the reduction associated with transit is 54 percent (39 percent associated with the 4D's and 15 percent associated with transit use). Therefore, since the analysis has already included reductions of more than 50 percent due to other features of the Proposed Project, the data suggests additional trip reductions should not be taken as a result of non-residential parking supply reductions; and, as noted earlier, even if reductions to vehicle trip generation were to materialize, the effect would be relatively small since the affected uses generate a relatively small portion of overall vehicle trips associated with the Proposed Project. In summary, although the Reduced Parking Alternative includes reductions to the parking supply for the flex, hotel, and office uses, no associated reductions were made to the trip generation associated with these uses.

#### *Travel Demand*

As described above, the potential changes to trip generation associated with the reduction in parking supply included in the Reduced Parking Alternative have been quantified. Overall, except for the accounting for reduced parking supply as described above, the methodology for assessing travel demand of the Reduced Parking Alternative was the same as that used for the Proposed Project. Table VII.21 summarizes the project travel demand for the Proposed Project and the Reduced Parking Alternative that would occur if the reduction in vehicle trips associated with the reduced parking supply implied by the TCRP Report data presented above were to materialize. The TCRP Report does not quantify whether the reduced automobile trip generation would result from a net decrease in total person-trips or whether all of the trips that would no longer be made by auto would still be made during the peak hours, but via different mode. To be conservative, this analysis assumes the total person trip-generation would not change; instead there would be a shift from auto use to bus and ferry use, resulting in a decrease in vehicle trips but an increase in transit trips. The allocation of those new transit trips between buses and ferries was done using the same methodology as that of the Proposed Project, based on the type of land use generating the trips (in this case, residential) and the type of trips generated by that land use during the peak hours (50 percent work and 50 percent non-work). In this case, all of the

additional peak-hour transit trips were residential, which are more likely to be work trips than the average trip generated by the project. Because work and non-work trips have different propensities to choose buses or ferries, the ferry and bus ridership did not increase proportionally to the ferry and bus ridership of the Proposed Project. The data presented in Table VII.21 are for the same base transit service proposed by the Project, without expanded transit service as proposed in Mitigation Measure M-TR-2<sup>7</sup>. Table VII.22 compares the same information under conditions with Mitigation Measure M-TR-2 in place. The percentage reduction in vehicle trips associated with congestion pricing has not been re-analyzed because the change would be very small. Instead, the trip generation forecasts assume the same percentage reduction to total vehicle trip generation associated with congestion pricing for the Proposed Project would apply to the Reduced Parking Alternative.

**(New) Table VII.21: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative**

Peak hour	Person-Trip Generation <sup>1</sup>				Total Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Proposed Project					
AM	641	621	3,391	3,296	1,613
PM	817	898	5,124	4,850	2,462
Saturday	473	595	5,913	5,743	2,861
Reduced Parking Alternative					
AM	948	991	2,714	3,296	1,277
PM	1,003	1,125	4,711	4,850	2,255
Saturday	580	754	5,647	5,743	2,728

*Notes:*

<sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

<sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

<sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

*Source:* Fehr & Peers 2010

<sup>7</sup> Mitigation Measure M-TR-2 would increase peak period ferry service from 50 minute frequencies to as much as 15-minute frequencies. It would increase peak period frequencies on the 108-Treasure Island bus route from 15 minutes to between 5 and 7 minutes. It would also create a new bus route to another location in San Francisco, such as the Civic Center area, with frequencies as low as 12-minutes during peak periods. Bus service to the East Bay would not be affected.

**(New) Table VII.22: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative (With Implementation of Mitigation Measure M-TR-2)**

Peak hour	Person-Trip Generation <sup>1</sup>				Total Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Proposed Project (With M-TR-2)					
AM	958	1,075	2,619	3,296	1,228
PM	1,235	1,567	4,175	4,850	1,983
Saturday	718	1,078	5,043	5,743	2,437
Reduced Parking Alternative (With M-TR-2)					
AM	1,186	1,365	2,101	3,296	961
PM	1,369	1,746	3,862	4,850	1,827
Saturday	807	1,223	4,809	5,743	2,319

**Notes:**

<sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

<sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

<sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

Source: Fehr & Peers 2010

For conditions without Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 336 fewer vehicle trips during the weekday AM peak hour (a reduction of 21 percent), 207 fewer vehicles during the PM peak hour (a reduction of 8 percent), and 133 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 677 more person-trips by ferry or bus during the AM peak hour, 413 more ferry/bus trips during the PM peak hour, and 266 more ferry/bus trips during the Saturday peak hour. Although the number of internal trips is expected to be the same between the Proposed Project and the Reduced Parking Alternative, the increased transit ridership in the Reduced Parking Alternative may result in an increased number of bicycle and pedestrian trips on the Islands.

For conditions with Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 312 fewer vehicle trips during the weekday AM peak hour (a reduction of 25 percent), 156 fewer vehicles during the PM peak hour (a reduction of 8 percent), and 118 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 518 more person-trips by transit during the AM peak hour, 313 more ferry/bus trips during the PM peak hour, and 234 more ferry/bus trips during the Saturday peak hour.

### Construction Impacts

Construction activities associated with the Reduced Parking Alternative would be similar and only somewhat reduced due to the slightly lesser amount of overall construction as compared to the Proposed Project. Mitigation Measure M-TR-1, a Construction Management Program, described in Section IV.E, Transportation, beginning on p. IV.E.69, would minimize the alternative's contribution to construction-related traffic impacts. However, some disruption and increased delays could still occur even with implementation of M-TR-1, and, as with the Proposed Project, construction-related traffic impacts would remain significant and unavoidable (Impact TR-1).<sup>8</sup>

### Operational Impacts

#### Traffic

During the peak study periods, the Reduced Parking Alternative would reduce peak hour vehicle trips by approximately 336 trips in the AM peak hour (from 1,613 to 1,277), 207 trips in the PM peak hour (from 2,462 to 2,255), and 133 trips in the Saturday peak hour (from 2,861 to 2,728). Because the analysis assumes that these reductions would be to residential trip generation, they would most likely occur in the peak direction of travel during each peak hour, since travel associated with the Proposed Project would be highly influenced by the residential component.

The Draft EIR included an analysis of the traffic impacts of the Reduced Development Alternative. The person trip generation under the Reduced Development Alternative and under the Reduced Parking Alternative is summarized in Table VII.23, below. As this table shows, the vehicle trip generation for the Reduced Parking Alternative is predicted to be very similar to that of the Reduced Development Alternative, described in Chapter VII, Alternatives as Alternative B, Reduced Development Alternative, beginning on EIR p. VI.15. Further analysis was performed to confirm that the overall geographic distribution of these vehicle trips would also be very similar.<sup>9</sup>

Due to the similarity in vehicle trip generation between the Reduced Development Alternative and the Reduced Parking Alternative, it is possible to use the traffic impact analysis from the Reduced Development Alternative to understand the possible impacts for the Reduced Parking Alternative. Accordingly, if the trip reductions associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to those described in the Reduced

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<sup>8</sup> The identification of an impact number (i.e., Impact TR-1) refers to the enumeration of impacts in the EIR associated with the Proposed Project. It is provided to facilitate the comparison of impacts of the Reduced Parking Alternative to the Proposed Project. However, the traffic impacts of the Reduced Parking Alternative would be most similar to the impacts of the Reduced Development Alternative.

<sup>9</sup> *Supplemental Transportation Analysis* memorandum, 2/25/11.

**(New) Table VII.23: Person-Trip Generation by Mode – Reduced Development Alternative and Reduced Parking Alternative (Without Implementation of M-TR-2)**

Peak hour	Person-Trip Generation <sup>1</sup>				Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Reduced Development Alternative					
AM	522	486	2,748	2,745	1,294
PM	696	766	4,652	4,240	2,218
Saturday	426	527	5,321	5,164	2,565
Reduced Parking Alternative					
AM	948	991	2,714	3,296	1,277
PM	1,003	1,125	4,711	4,850	2,255
Saturday	580	754	5,647	5,743	2,728

*Notes:*

<sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

<sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

<sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

*Source:* Fehr & Peers 2010

Development Alternative. Thus, for comparison purposes, the discussion below summarizes the results of the transportation impact analysis conducted for the Reduced Development Alternative, as presented on pp. VII.20 – VII.33, above.

The Reduced Parking Alternative could result in similar significant and unavoidable impacts related to extensive queues and vehicle delays as the Reduced Development Alternative (summarized in Tables VII.4: Ramp Junction Analysis – Existing, Existing plus Proposed Project, and Existing plus Reduced Development Alternative, and Table VII.5: Maximum On-Ramp Queues and Average Delays – Existing plus Project and Existing plus Reduced Development Alternative Conditions, on pp. VII.23 and VII.24), at the following study ramp locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island during the PM peak hour (Impact TR-2);
- Under conditions without the Ramps Project, at the two westbound on-ramps during the AM, PM and Saturday peak hours (Impact TR-3); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp on the east side of Yerba Buena Island during the AM and PM peak hours (Impact TR-4).

Similar to both the Proposed Project and the Reduced Development Alternative, under conditions without and with the Ramps Project, the Reduced Parking Alternative would result in less-than-

significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-5). Similarly, under conditions without and with the Ramps Project, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM peak hour (Impact TR-6), and on San Francisco streets approaching the Bay Bridge during the PM peak hour (Impact TR-7).

Table VII.6: Intersection Levels of Service – Existing and 2030 Cumulative Conditions, on pp. VII.25 – VII.26, presents the comparison of intersection Levels of Service (“LOS”) for Existing plus Project and Existing plus Reduced Development Alternative conditions. Since the Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of traffic impacts, similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in significant impacts at eight study intersections (compared with nine for the Proposed Project).<sup>10</sup>

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-8 through TR-13).
- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at four signalized study intersections that operate at LOS E or LOS F under Existing conditions and that would continue to operate at LOS E or LOS F under Existing plus Project conditions (First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, The Embarcadero/Harrison, and Second/Folsom) (Impacts TR-14 and TR-15).
- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at five signalized study intersections that would operate at LOS D or better under Existing plus Project conditions (Impact TR-16).
- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would contribute considerably to two uncontrolled study intersections that operate poorly under Existing conditions, resulting in a project-specific impact (Folsom/Essex and Bryant/Sterling) (Impacts TR-17 and TR-18).

As with the Proposed Project and the Reduced Development Alternative, the traffic impacts at ramps and intersections would be minimized but not eliminated with implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) as discussed in Section IV.E,

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<sup>10</sup> The project-specific impact at Second/Folsom would be less-than-significant under the Reduced Development Alternative and, therefore, under the Reduced Parking Alternative.

Transportation, pp. IV.E.74 – IV.E.75. This mitigation measure would reduce vehicle trip generation and would reinforce the proposed TDM practices included as part of the Reduced Parking Alternative, including ramp metering, congestion pricing, etc. As with the Proposed Project and the Reduced Development Alternative, because of uncertainties regarding sources for full funding to implement M-TR-2, its feasibility is uncertain and the impacts that could be mitigated by implementation of M-TR-2 are assumed to remain significant and unavoidable. Aside from increasing the availability of transit service, as proposed by Mitigation Measure M-TR-2, there do not appear to be other proven and/or feasible techniques that are not already part of the Proposed Project that would achieve a substantial increase in transit ridership.

In sum, the Reduced Parking Alternative could potentially have traffic impacts similar to the Reduced Development Alternative, which would be similar to those of the Proposed Project except for one intersection, Second/Folsom (Impact TR-14). That intersection would experience a significant and unavoidable impact with mitigation under the Proposed Project, but the impact could be less-than-significant without mitigation under the Reduced Development Alternative and the Reduced Parking Alternative. However, as noted above, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that reductions in impacts would occur.

#### Transit Impacts

The Reduced Parking Alternative transit conditions assume implementation of Project-related transit improvements as described in Section IV.E., Transportation, p. IV.E.94. If travel demand characteristics of the Reduced Parking Alternative shown in Table VII.23 were to materialize, transit ridership in the Reduced Parking Alternative would exceed what was projected for the Proposed Project. Table VII.24 presents the transit ridership and capacity utilization information for the Reduced Parking Alternative (with the base level of transit). As shown in Table VII.24, similar to the Proposed Project, the Reduced Parking Alternative would have a significant impact on transit capacity for Muni service between the Islands and San Francisco because Muni's transit capacity utilization standard of 85 percent would be exceeded. This was also identified as a significant impact associated with the Proposed Project (Impact TR-19, p. IV.E.95). However, the impact would be exacerbated with the Reduced Parking Alternative, since transit demand would increase. Similar to the Proposed Project, implementation of Mitigation Measure M-TR-2 would increase transit capacity and ridership; however, the capacity increases would be far greater than the ridership increases, and with implementation of Mitigation Measure M-TR-2, the capacity would be adequate to serve projected demand. However, as explained in Section IV.E., Transportation, implementation of M-TR-2 is uncertain, and therefore, the impacts to Muni capacity utilization would remain significant and unavoidable.

**(New) Table VII.24: Transit Ridership and Capacity Utilization – Existing plus Project and Existing plus Reduced Parking Alternative (Prior to Implementation of M-TR-2)**

Route	Existing plus Project			Existing plus Reduced Parking Alternative		
	Capacity	Rider-ship	% Utilization <sup>1</sup>	Capacity	Rider-ship	% Utilization <sup>1</sup>
<b><i>AM Peak Hour</i></b>						
AC Transit EB <sup>2</sup>	324	107	33%	324	155	48%
AC Transit WB <sup>2</sup>	324	67	21%	324	97	30%
Muni EB Bus Service from SF <sup>3</sup>	<b>252</b>	<b>261</b>	<b>104%</b>	<b>252</b>	<b>367</b>	<b>146%</b>
Muni WB Bus Service to SF <sup>3</sup>	<b>252</b>	<b>384</b>	<b>152%</b>	<b>252</b>	<b>571</b>	<b>227%</b>
Ferry EB 4	839	238	28%	839	352	42%
Ferry WB 4	839	403	48%	839	596	71%
<b><i>PM Peak Hour</i></b>						
AC Transit EB	324	96	30%	324	116	36%
AC Transit WB	324	134	41%	324	162	50%
Muni EB Bus Service from SF	<b>252</b>	<b>515</b>	<b>204%</b>	<b>252</b>	<b>612</b>	<b>243%</b>
Muni WB Bus Service to SF	<b>252</b>	<b>431</b>	<b>171%</b>	<b>252</b>	<b>513</b>	<b>203%</b>
Ferry EB	839	479	57%	839	584	70%
Ferry WB	839	343	41%	839	419	50%
<b><i>Saturday Peak Hour</i></b>						
AC Transit EB	324	79	24%	324	94	39%
AC Transit WB	324	90	28%	324	108	33%
Muni EB Bus Service from SF	<b>189</b>	<b>328</b>	<b>174%</b>	<b>189</b>	<b>391</b>	<b>207%</b>
Muni WB Bus Service to SF	<b>189</b>	<b>320</b>	<b>169%</b>	<b>189</b>	<b>383</b>	<b>203%</b>
Ferry EB	839	221	26%	839	271	32%
Ferry WB	839	252	30%	839	309	37%

*Notes:*

N/A = Not Applicable

<sup>1</sup> **Bold** indicates capacity utilization exceeds the 85 percent capacity utilization standard for Muni line 108-Treasure Island, and the 100 percent capacity utilization standard for new ferry and AC Transit service. Exceedance of the capacity utilization standard is considered a significant impact. Implementation of Mitigation Measure M-TR-2 would result in adequate transit capacity reducing the impacts to less than significant levels.

<sup>2</sup> New AC Transit bus service between the Islands and downtown Oakland at 10-minute peak headways.

<sup>3</sup> Muni line 108-Treasure Island service at 15-minute headways during peak periods.

<sup>4</sup> New ferry service between Treasure Island and San Francisco at 50-minute peak headways.

*Source:* Fehr & Peers 2010

Similar to the Proposed Project, impacts on the new AC Transit bus service and ferry serving the Islands, and impacts on other AC Transit, BART, Golden Gate Transit, SamTrans and other ferry lines would be less than significant (Impacts TR-20, TR-21, and TR-23). As presented in Table IV.E.18 on p. IV.E.98, the Muni downtown San Francisco screenlines are not expected to operate near their capacity utilization threshold of 85 percent under conditions with the Proposed Project. The additional transit riders that would occur with the Reduced Parking Alternative would not be enough to cause the downtown screenlines to exceed capacity utilization thresholds and therefore, the Reduced Parking Alternative's impacts to the downtown screenlines would be less than significant (Impact TR-22).

As with the Proposed Project and Reduced Development Alternative, some transit impacts would result from increased traffic congestion at the approaches to the Bay Bridge on-ramps at Yerba Buena Island (Impacts TR-24, TR-25, TR-26, and TR-27). As noted earlier, if reductions in vehicle trip generation associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to the Reduced Development Alternative. Thus, similar to the Proposed Project and the Reduced Development Alternative, under conditions with and without the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island may impact Muni line 108-Treasure Island and AC Transit bus operations during the AM, PM and Saturday peak hours, causing delays to bus service. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) described in Section IV.E, Transportation, on p. IV.E.100, the impact on Muni operations would be reduced to a less-than-significant level (Impacts TR-24 and TR-26). Implementation of Mitigation Measure M-TR-24 would improve operations for AC Transit buses destined for the eastbound on-ramp. However, because this improvement would extend only to the transit and emergency vehicle-only westbound on-ramp on the west side of Yerba Buena Island, and because sufficient right-of-way is not available to extend a transit-only lane beyond the transit and emergency vehicle-only westbound on-ramp, AC Transit vehicles would continue to experience congestion between the transit and emergency vehicle-only westbound on-ramp and the eastbound on-ramp. Therefore, similar to the Proposed Project and the Reduced Development Alternative, the impact on AC Transit operations would remain significant and unavoidable (Impacts TR-25 and TR-27).

Similar to the Proposed Project, implementation of the Reduced Parking Alternative would result in less-than-significant impacts to the existing and proposed ferry services on the San Francisco Bay (Impact TR-28).

As with the Proposed Project and the Reduced Development Alternative, transit impacts would occur from traffic congestion delay in downtown San Francisco with the Reduced Parking Alternative. The transit delay conditions with the Reduced Parking Alternative would affect the same lines as the Proposed Project and the Reduced Development Alternative (27-Bryant, 30X-Marina Express, and 47-Van Ness), resulting in significant and unavoidable impacts (Impacts

TR-29 through TR-31). As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would not adversely affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-32).

Implementation of Mitigation Measure M-TR-2 would reduce, but not eliminate, traffic impacts at the study intersections, and therefore, the transit delay impacts of the Reduced Parking Alternative on the Muni lines would remain significant and unavoidable.

In summary, the Reduced Parking Alternative would have the same number of significant transit-related impacts as the Proposed Project, although the severity of the impacts may be somewhat different. If automobile trip generation reductions associated with reduced parking supply were to materialize, the significant impacts due to transit ridership increases would be more severe than the Proposed Project and the significant impacts due to traffic congestion would be less severe than the Proposed Project (and comparable to those of the Reduced Development Alternative). However, as noted earlier in the discussion of traffic impacts, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that differences in the severity of impacts would occur.

### Bicycles

The Reduced Parking Alternative bicycle trips would be accommodated within the proposed street network on the Islands and on mainland San Francisco, and similar to the Proposed Project, impacts related to bicycle accessibility would be less than significant, and no mitigation measures are required (Impacts TR-33 and TR-34). Also, as with the Proposed Project, implementation of Mitigation Measure M-TR-24 would result in the removal of the proposed bicycle lane on a portion of Treasure Island and Hillcrest Roads to accommodate a transit-only lane (Mitigation Measure M-TR-24 would only be implemented if queues on Treasure Island Road materialize and substantially affect transit operations); however, cyclists would continue to have a continuous Class I shared bicycle and pedestrian facility connecting Treasure Island and the Class I shared bicycle and pedestrian facility currently under construction on the Bay Bridge east span, from the intermodal transit hub to Treasure Island Road across the causeway and continuing along Macalla Road on Yerba Buena Island.

As discussed in the methodology section above and presented in Table VII.20, the analysis assumes that the reduction in vehicle traffic would manifest itself entirely in a mode shift to transit. It is possible that a small portion of the mode shift would be to bicycle instead of to transit; however, given the lack of a bicycle connection to San Francisco, the only travelers this mode shift would affect would be those traveling between the Proposed Project and the East Bay. Further, it is likely that an increase in bicycling would not be so substantial as to affect the analysis of other modes.

### Pedestrians

The pedestrian network and improvements would not change materially between the Proposed Project and the Reduced Parking Alternative. Generally, similar to the Proposed Project, the pedestrian environment would be improved compared to existing conditions. As such, the Reduced Parking Alternative would not create potentially hazardous conditions for pedestrians (Impact TR-35). Although the data is uncertain, if the travel characteristics of the Reduced Parking Alternative materialized as summarized in Table VII.21, the Reduced Parking Alternative would result in more pedestrian trips near the Ferry Building in San Francisco than the Proposed Project because there would be increased ferry ridership.

Further, the increased transit ridership may result in an increase in bicycle and pedestrian trips on the Islands. However, the on-island bicycle and pedestrian circulation network would remain adequate to serve expected demands.

Compared to the Proposed Project, the Reduced Parking Alternative would result in 307 more ferry trips during the AM peak hour, 181 more ferry trips during the PM peak hour, and 107 more ferry trips during the Saturday peak hour. With implementation of Mitigation Measure M-TR-2 there would be even more pedestrian trips since the increased transit service would attract more riders.

As shown in Table VII.25, these pedestrians would be accommodated at the crosswalks in the vicinity of the Ferry Building, most of which were projected to operate at LOS C or better under the Proposed Project. Under the Reduced Parking Alternative, the crosswalk at Market Street across from the Ferry Building is projected to operate at LOS D, which is still considered acceptable. Therefore, impacts related to pedestrians would be less than significant, and no mitigation measures are required (Impact TR-36).

### Loading

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to the freight loading space requirements to accommodate the loading demand, and would be designed to minimize impacts on autos, transit, bicyclists and pedestrians and to ensure that loading activities do not result in hazardous conditions. The Reduced Parking Alternative impacts related to loading operations would be less than significant, and no mitigation measures are required (Impact TR-37).

**(New) Table VII.25: Pedestrian Crosswalk Levels of Service – Existing plus Project and Existing plus Reduced Parking Alternative**

Crosswalk <sup>1</sup>	Existing plus Project			Existing plus Reduced Parking Alternative		
	Project Trips	Density <sup>3</sup>	LOS	Project Trips	Density <sup>3</sup>	LOS
<b><i>AM Peak Hour</i></b>						
Washington Street <sup>1</sup>	26	27.4	A	39	25.2	A
Ferry Bldg (North)	87	6.6	C	129	6.1	C
Market Street	427	6.7	C	631	6.2	C
Don Chee Way	29	17.3	A	43	15.9	A
Mission Street <sup>1</sup>	72	9.9	C	107	9.1	C
<b><i>PM Peak Hour</i></b>						
Washington Street <sup>1</sup>	46	13.0	A	57	12.6	B
Ferry Bldg (North)	67	7.2	C	82	7.0	C
Market Street	614	3.9	D	749	3.8	D
Don Chee Way	33	12.9	B	40	12.5	B
Mission Street <sup>1</sup>	61	9.9	C	75	9.5	C
<b><i>Saturday Peak Hour<sup>2</sup></i></b>						
Market Street	334	4.0	D	410	3.9	D
Don Chee Way	28	6.9	C	34	6.8	C

*Notes:*

<sup>1</sup> Since the intersections of The Embarcadero with Washington Street and Mission Street each have two crosswalks, the north and south legs of each intersection were averaged.

<sup>2</sup> The Ferry Building hosts a farmers market on Saturdays.

<sup>3</sup> Density measured in square feet per pedestrian

*Source:* Fehr & Peers 2011

**Emergency Access**

The Reduced Parking Alternative impacts on emergency access would be the same as for the Proposed Project. Local police and fire facilities would provide first response to incidents on the Islands, and existing emergency routes would be maintained in their existing locations or rerouted as necessary. Similar to the Proposed Project, impacts to emergency access would be less than significant and no mitigation measures are required (Impact TR-38).

### Cumulative Conditions

The Reduced Parking Alternative would result in similar construction activities to that of the Proposed Project. As with the Proposed Project, given the overall magnitude of development, the project's prolonged construction period, and the lack of certainty of timing of other construction projects on the Islands, the Reduced Parking Alternative would also result in significant contributions to cumulative construction-related traffic impacts (Impact TR-39).

Overall, if vehicle trip generation reductions associated with the Reduced Parking Alternative were to materialize as described in this section, 2030 Cumulative Conditions traffic operational impacts would be nearly identical to those described for the Reduced Development Alternative. In those circumstances, under 2030 Cumulative conditions, as with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would contribute to significant cumulative traffic impacts at the following locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island (Impact TR-40);
- Under conditions without the Ramps Project, at the two westbound on-ramps (Impact TR-41); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp at the east side of Yerba Buena Island (Impact TR-42).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would result in less-than-significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-43).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM and PM peak hours, and on San Francisco streets approaching the Bay Bridge during the weekday AM and PM and Saturday peak hours (Impacts TR-44 and TR-45).

Table VII.6, on pp. VII.25 – VII.26, includes the comparison of intersection LOS for 2030 Cumulative plus Proposed Project and 2030 Cumulative plus Reduced Development Alternative conditions. The Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of vehicular trip generation and therefore, would result in the same significant impacts at study intersections as the Reduced Development Alternative and the Proposed Project. Although the Reduced Development Alternative had one fewer project-related impacts than the Proposed Project, the Reduced Development Alternative, and therefore the Reduced Parking Alternative, would have the same number of cumulative impacts as the Proposed Project.

- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions. Because the Reduced Parking Alternative would result in significant project-related impacts at these intersections, it would also result in cumulative impacts at these six intersections (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-46 through TR-51).
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to critical movements at one study intersection that would operate at LOS E or LOS F under 2030 Cumulative plus Reduced Parking Alternative conditions, resulting in a project impact (Second/Folsom). (Impact TR-52)
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would have less-than-significant contributions at seven study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions (Fremont/Howard, Fremont/Folsom, Fremont/I-80 Westbound Off-Ramp/Harrison, First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, Second/Bryant, and The Embarcadero/Harrison). (Impact TR-53).
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to significant cumulative impacts at two uncontrolled study intersections (Folsom/Essex and Bryant/Sterling) (Impacts TR-54 and TR-55).

As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative's contribution to cumulative traffic impacts at ramps and intersections would be lessened, but not eliminated, with implementation of Mitigation Measure M-TR-2.

Under 2030 Cumulative conditions, implementation of the Reduced Parking Alternative would have transit impacts similar to those of the Proposed Project, although transit ridership would be higher than under conditions with the Proposed Project. Similar to the Proposed Project, ridership under this alternative would also exceed the capacity of the Muni screenline between the Islands and Downtown San Francisco. Impacts to this screenline would be the same as identified for Existing plus Reduced Parking Alternative conditions, and summarized in Table VII.21. The Reduced Parking Alternative would also add more transit trips to the standard Muni downtown San Francisco screenlines than the Proposed Project; however, the increase is not expected to be severe enough such that ridership demand would exceed capacity, and cumulative impacts on the standard downtown San Francisco screenlines would be less than significant (Impact TR-56). The Reduced Parking Alternative's contributions to cumulative transit trips on AC Transit, BART, Golden Gate Transit, SamTrans, Caltrain, and other ferry routes would not increase demand in excess of available capacity (Impact TR-57). Transit impacts would result from traffic congestion delay in downtown San Francisco and would affect the same lines as the Proposed

Project and Reduced Development Alternative would (10-Townsend, 27-Bryant, 30X-Marina Express, and 47-Van Ness) (Impacts TR-58 through TR-61). While implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) would somewhat reduce delays at the downtown study intersections, the impact on transit would remain significant and unavoidable. Increased traffic congestion delay in downtown San Francisco would not affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-62).

### Parking Information

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to parking space maximums; however, those maximums would be substantially lower than the Proposed Project. As summarized in Table VII.19, the Reduced Parking Alternative would include 6,651 parking spaces, including 4,000 off-street spaces for residential uses, 1,616 off-street spaces for non-residential uses, and 1,035 on-street parking spaces. If travel behavior materialized as summarized in Table VII.21, although the overall demand for spaces would be less than the Proposed Project, parking shortfalls associated with the Reduced Parking Alternative would likely exceed those projected for the Proposed Project.<sup>11</sup>

As with the Proposed Project, implementation of the reduced parking supply maximums would result in secondary physical impacts caused by increased traffic congestion and a mode shift to transit that would exacerbate the degree to which capacity utilization standards were exceeded on Muni line 108-Treasure Island. As with the Proposed Project, impacts on the transit capacity utilization would be less than significant with implementation of Mitigation Measure M-TR-2. However, because implementation of Mitigation Measure M-TR-2 is uncertain, impacts would remain significant and unavoidable.

### **Aesthetics**

Off-street parking facilities constructed in mixed-use or residential buildings as part of development in the Reduced Parking Alternative would continue to be wrapped by residential or commercial uses and not be readily visible from public rights-of-way, as with the Proposed Project. Land uses would be the same as the Proposed Project, and heights and densities would also be the same. The numbers, types, and sizes of buildings would not change substantially with the alternative. Therefore, the visual impacts identified for the Proposed Project in Section IV.B, Aesthetics, would not change with the Reduced Parking Alternative.

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<sup>11</sup> Since parking supply is reduced for residential units by 50 percent, there would also have to be a reduction in residential trip generation of 50 percent to maintain the same parking shortfall. Since trip generation is not expected to decrease by as much as the parking supply is decreasing, the shortfall under the Reduced Parking Alternative would be greater than under the Proposed Project.

## **Noise**

As discussed under “Transportation” above, the City has very low confidence that traffic would be substantially reduced if less parking were provided on the Islands. If there were a reduction in vehicle trips as a result of reducing the amount of parking provided, there would be a slight reduction in traffic noise compared to operational traffic noise levels estimated for the Proposed Project in Section IV.F, Noise, in Impact NO-3. The reduction in daily vehicle traffic would not be more than approximately 10 percent. A reduction in traffic volumes of about 10 percent would not reduce the significant noise impacts identified in Impact NO-3 to less-than-significant levels, because the change in noise levels would continue to be 5 dBA or greater (see Table IV.F.6 on p. IV.F.23). Other operational noise impacts would remain the same as those identified for the Proposed Project. Construction noise impacts would not change with the Reduced Parking Alternative, and would remain significant and unavoidable. Mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

## **Air Quality**

As discussed under “Transportation,” the City has very low confidence that traffic would be substantially reduced if less parking were provided. If there were a reduction in vehicle trips as a result of reducing the amount of parking available, there would be a slight reduction in emissions of criteria pollutants compared to emissions from motor vehicles in the Proposed Project. Reducing motor vehicle emissions by approximately 10 percent would not reduce any of the significant air quality impacts identified in Impact AQ-5 and shown in Table IV.G.5 on p. IV.G.41, as the emissions from other sources would continue to be the same as for the Proposed Project. A reduction of over 50 percent in motor vehicle emissions would be required to reduce the significant impacts of PM 2.5 emissions to less-than-significant levels, and substantially greater reductions in motor vehicle emissions would be necessary to reduce the other significant air quality impacts to less-than-significant levels. A reduction of 50 percent in motor vehicle emissions would not be achieved under the Reduced Parking Alternative. The possible reduction in vehicle trips with reduced parking would not substantially change the amount of diesel particulate emissions, as few of the trips removed would be in diesel-fueled vehicles. Construction air emissions would not change substantially with the Reduced Parking Alternative. Therefore, the air quality impacts identified as significant and unavoidable in the analysis of the Proposed Project would continue to be significant and unavoidable with the Reduced Parking Alternative, and mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

## **Greenhouse Gases**

As described for noise and air emissions, greenhouse gas (“GHG”) emissions might be reduced somewhat with the Reduced Parking Alternative if the alternative were to result in reductions in

vehicle trips. Motor vehicle emissions are the largest single source of CO<sub>2</sub>e during operation of the Proposed Project (see Tables IV.H.3 and IV.H.4 on pp. IV.H.36 and IV.H.37); however, reductions of 10 percent in motor vehicle emissions would not make a substantial difference in the overall amount of annual CO<sub>2</sub>e emissions and therefore would not substantially change the emissions per year per service population presented on p. IV.H.45. The Proposed Project would have a less-than-significant impact on GHG emission, as discussed in Impact GHG-1 on pp. IV.H.44 and IV.H.45. Therefore the Reduced Parking Alternative, if it were to result in fewer vehicle trips, would not cause a significant impact to be reduced to less-than-significant levels.

### **Other Topics**

The Reduced Parking Alternative would have essentially the same impacts as the Proposed Project in the areas of Land Use, Population and Housing, Cultural Resources, Wind and Shadow, Recreation, Utilities, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Agricultural Resources, and Minerals and Energy Resources. Any mitigation measures identified in the subsections of Chapter IV covering these topics would be applicable to the Reduced Parking Alternative.

### **Conclusion**

Overall, the Reduced Parking Alternative would have the same significant impacts as those identified for the Proposed Project except for a possible reduction in one significant traffic impact from significant and unavoidable with mitigation to less-than-significant. In addition, the project sponsors believe that the reduction in parking would undermine the market acceptance of the alternative, yielding a reduced rate of return that is commercially infeasible and a reduction in funding available to support transit services that make this alternative infeasible.

#### **2.21.2.1 Reasons for Rejecting Reduced Parking Alternative**

##### **Comments**

The DEIR notes that members of the public had requested that the EIR consider a reduced-parking alternative, but summarily rejects it as an infeasible alternative. The DEIR's explanation for why the reduced-parking alternative is infeasible, however, is inadequate and internally inconsistent. (*Christopher Pederson*) [5.3]

Finally, page VII.76 of the DEIR asserts that reducing parking supply would result in less transit use, more automobile use, and greater impacts to air quality. These conclusions, however, rest on the unexplained and unexamined assumption that less parking means less revenue for the TDM program. Elsewhere (page IV.E.140), the DEIR points out that reduced parking supply will tend to increase transit ridership, so, using the DEIR's own assumptions, a reduced-parking alternative that is structured to minimize loss of revenue for the TDM Plan would actually reduce traffic and air quality impacts. (*Christopher Pederson*) [5.7a]

LSA queried data for vehicles per household in the City of San Francisco from the 2006–2008 American Community Survey conducted by the United States Census Bureau. The latest data available reveal that 29 percent of households in the City have no car, 43 percent have one car, and 28 percent have two or more cars. The average number of vehicles per household in the City of San Francisco is approximately 0.65. Because the average number of vehicles per San Francisco household is 0.65, an alternative providing 0.75 parking spaces per residential unit likely deserves more analysis than is currently provided in the “Alternatives Considered but Rejected” section. (*Saul Bloom, Arc Ecology*) [28.3]

The reasons offered for not analyzing an alternative with reduced parking and reduced automobile ownership are flimsy at best. It cannot be said that such an alternative would “not meet most of the Proposed Project’s basic objectives.” (page S.86) It has been demonstrated that reducing parking reduces driving, and reducing the number of automobile trips on the islands as well as to and from the islands would meet several of the project objectives (pages II.4 and II.5) significantly better than the Proposed Project does:

- Implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles.
- Provide a high-quality public realm, including a pedestrian and bicycle-friendly environment with high design standards for public open spaces, parks, and streetscape elements.
- Include enough residential density to create a sustainable community that supports neighborhood-serving retail, community facilities, and transit infrastructure and service.
- Demonstrate leadership in sustainable design and provide new benchmarks for sustainable development practices in accordance with the *Treasure Island Sustainability Plan*.
- Create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation and car-sharing, through a comprehensive transportation demand management program. (*Ruth Gravanis*) [31.1b]

Another possible reason for MEA’s refusal to even study reduced parking or reduced automobile ownership is that those options might be considered infeasible. If infeasible means unrealistic, a reduced parking alternative could not possibly be less realistic than the no-project, reduced development, or no ferry service alternatives.

The DEIR states, on p. VII.76, that the Reduced Parking Alternative was not considered for further study because **TIDA and the City “concluded** that it could exacerbate significant traffic impacts and would be financially infeasible.” Is it appropriate for the Office of Environmental Review to accept the conclusions of the Project Sponsor without independent analysis?

Please provide detailed documentation of factors that led to MEA’s conclusion that it would be economically infeasible to reduce parking spaces to numbers that would avoid the many instances of significant and unavoidable impacts cited in the Transportation section. (*Ruth Gravanis*) [31.4]

Please also address the illogical circuitousness of the argument on the same page [EIR p. VII.76] that says that the only way to achieve the project objective of “discouraging automobile use and

promoting the use of public transportation” is to encourage more driving and parking as the way to generate enough revenue to make it possible for people to take transit. This argument suggests that the Project Sponsor believes that it is economically infeasible for the Proposed Project to meet its own objectives. The implication that we should not try to encourage non-car owners to move to the islands because of the potential negative impacts on the 108 defies understanding of the development’s claims to be environmentally sustainable. How can greater use of public transit be considered a negative? Consider the City’s Transit First Policy objectives:

Objective 8 -- New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.

Objective 14 -- Develop and implement a plan for operational changes and land use policies that will maintain mobility and safety, despite a rise in travel demand that could otherwise result in system capacity deficiencies.

These objectives seem to be at odds with the statement on page IV.E.141 that a parking shortfall on the islands could result in a shift from auto to transit modes, resulting in an increase in transit travel and therefore in a negative impact on the 108. How can a mode shift from private autos to transit not be a good thing for the environment? If there’s an increase in transit demand, it is the City’s policy to meet that demand. (*Ruth Gravanis*) [31.7]

**Rejection of reduced parking and reduced auto ownership alternatives was inappropriate.**

The reasons provided for rejecting these alternatives do not conform to San Francisco’s General Plan considerations or priorities, most significantly the City’s Transit First policy; further, no evidence is provided to justify the reasoning provided – it is all supposition. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.11]

- Without a pro forma for the development, it is difficult to counter the economic argument used; however, redevelopment areas rely on a variety of revenue streams to pay for needed infrastructure. Relying on parking revenue to generate a majority of the funding for transit in a small area is a formula for a failed transit system, since the balance of parking revenue and transit availability will always restrict transit opportunities. This fails to achieve the sponsors’ objectives of “providing a high-density, compact residential development located within walking distance of transit...” Under this scenario, the project will be auto-driven rather than transit-driven.
- The statement that “some prospective residents would not be able to easily reach their place of employment via public transit” is first, unlikely, given the availability of transit options in downtown San Francisco; and second, runs counter to San Francisco’s transit first policy.
- The concern about home values being depressed because of lack of parking has been consistently proven false in San Francisco, where property values retain their greatest value in neighborhoods with limited parking. No evidence to the contrary is presented in this document. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.12]
- On what empirical basis did TIDA and the City and County of San Francisco conclude [Page VII.76] that a “Reduced Parking Alternative” would “*exacerbate significant traffic impacts and would be economically infeasible*”?
- Given all of the significant auto-related negative impacts of this Proposed Project identified in this DEIR that cannot be mitigated, how did the City and TIDA determine not to consider a “Reduced Parking Alternative” in this DEIR?

- Upon what expert evidence did the DEIR conclude that parking levels cannot be reduced because “the fees to be collected from commercial parking in the Proposed Project are necessary to fund transit improvements?”
- Please discuss the basis for the following statements in the DEIR:
  - “*Removing or reducing this source of revenue planned to be used to support construction of the ferry quay and subsidize the on-island shuttles and off-island ferry and bus transit service would make the proposed level of transit service economically infeasible.*”
  - “*...if reductions in funding based on reduced commercial parking were to lead to reductions in transit service, some residents may shift to automobile use, making more severe the significant traffic and air quality impacts identified for the Proposed Project.*”
- Why is the Proposed Project financially structured so that all of the proposed transit improvements (the only possible way to lessen the regionally significant transportation impacts from the Redevelopment Project) are to be paid for from parking fees on Treasure Island?
- Please analyze how many cars must come onto the Island and park each day/week/year in order to pay for all of the transit improvements and services identified in the 2006 *Transportation Plan* and in the 2006 *Sustainability Plan*.
- How can it be that the only way to reduce automobile use (and the resulting significant transportation and air quality impacts) is to increase parking on Treasure Island in order to generate funds to pay for the transit improvements in order to reduce the number of cars coming onto the Island to park? How is this financial scheme sustainable? Will the taxpayers of the region ultimately end up with this bill? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.89]

### **Response**

The reasons given in the Draft EIR for including a Reduced Parking Alternative in Subsection D, Alternatives Considered and Rejected, rather than a fully-analyzed alternative in Chapter VII, Alternatives, are found on Draft EIR pp. VII.76-VII.77. As explained in the response in Subsection 2.21.2, Reduced Parking Alternative, above, Chapter VII is expanded with a new Alternative D that provides a more detailed analysis of a Reduced Parking Alternative and its potential impacts, and the limited discussion in former Section D.3 is deleted, in response to public comments on the Draft EIR. This and the next response include a more detailed discussion of the feasibility of this alternative.

The discussion of parking on EIR pp. IV.E.140-IV.E.141 referenced in several comments concerns the parking shortfall that would result with the Proposed Project. As currently proposed, the Project would not provide sufficient parking to accommodate all of the estimated demand from the various proposed uses. The total shortfall would be approximately 1,150 spaces, as shown in Table IV.E.23 on EIR p. IV.E.139. That analysis concludes that this shortfall could result in more people using transit than might occur if the estimated parking demand were fully met. Additional use of transit with the Proposed Project would exacerbate the significant impacts on Muni line 108-Treasure Island identified in Impact TR-24 on P. IV.E.99, resulting in

overcrowding on Muni buses during peak commute hours. If the parking supply were reduced, as in a Reduced Parking Alternative, there could be further demands on transit and additional overcrowding that is likely to result in some riders shifting back to automobile use which would result in greater air quality impacts, as stated on EIR p. VII.76. Thus, the analysis in the EIR on pp. IV.E.140-IV.E.141 and p. VII.76, addresses travel demand behavior that could result in two distinct outcomes related to increased transit demand and parking shortfalls. Increased transit ridership would meet the objectives of the Proposed Project stated in the comment, and would also address the City's Transit First Policy. Nonetheless, if parking supply and availability is reduced to a certain level, travel behavior may result in increased transit use, which could cause overcrowding on transit. Overcrowding indirectly increases transit travel times, degrades transit reliability and encourages travel behavior that could cause riders to shift to back to automobile use.

One comment states that the average number of vehicles per household in San Francisco is approximately 0.65, sourced from the American Community Survey (“ACS”), based on U.S. Census Bureau data for 2006 – 2008. This statement is incorrect. When all households are taken into account (i.e., the total number of occupied households), the average number of vehicles available per household is close to 1, at about 0.95 per household. Recent ACS information for the 2005 to 2009 time frame shows an average of 0.99 vehicles available per household, based on a total number of occupied households of 324,185, and 29.4 percent with access to no vehicles, 41.5 percent with access to 1 vehicle, and 29 percent with access to 2 or 3 vehicles.<sup>12</sup>

As explained in the analysis of transportation impacts of the Reduced Parking Alternative in the response in Subsection 2.21.2 above, reducing the amount of available parking might reduce the total number of vehicle trips during the AM and PM peak commute periods; however, the reduction would not be sufficient to substantially reduce the significant transportation impacts identified for the Proposed Project. Therefore, while a Reduced Parking Alternative would meet some of the basic objectives of the Proposed Project, it would not meet the objective of minimizing the impacts of private automobile use, since the alternative would result in essentially the same significant traffic impacts (except for one traffic impact) as the Proposed Project. Although considerable amounts of the funding for public transit systems for the Islands is expected to be generated by congestion pricing fees and pre-paid transit vouchers, reducing commercial parking would reduce the amount of funding available to the Treasure Island Transportation Management Agency intended to be used to support transit operations and TDM programs for the Islands, thereby making it more difficult to meet objectives to support the use of

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<sup>12</sup> U.S. Census Bureau, American FactFinder, Selected Housing Characteristics: 2005-2009, available at [www.factfinder.census.gov/servlet/ADPTable?\\_bm=y&-geo.id=05000US06075&-qr\\_name=ACS\\_2009\\_5YR\\_G00\\_DP5YR4&-ds\\_name=&\\_lang=en&-redoLog=false....](http://www.factfinder.census.gov/servlet/ADPTable?_bm=y&-geo.id=05000US06075&-qr_name=ACS_2009_5YR_G00_DP5YR4&-ds_name=&_lang=en&-redoLog=false....) Accessed February 5, 2011.

public transportation.<sup>13</sup> Other objectives also would not be met, as explained in the new Reduced Parking Alternative analysis presented in Subsection 2.21.2.

Although it is the City's policy to increase transit service to meet demand, increased service to fully meet all demand is not always economically feasible. Other economic feasibility issues related to reduced parking are identified and addressed in the response in Subsection 2.21.2.2. They are based on analyses prepared by four separate, independent economic consulting firms. A financial pro forma was prepared for the 2010 Term Sheet Update endorsed by the San Francisco Board of Supervisors on May 18, 2010; this information is available on the Treasure Island Development Authority web site at [www.sftreasureisland.org/index.aspx?page=26](http://www.sftreasureisland.org/index.aspx?page=26). For additional discussion of the economic analysis of a reduced parking alternative, please see the response in Subsection 2.21.2.2, below.

The comment requesting an analysis of the number of cars coming to the Islands that would be needed to pay for transit improvements and services identified in the 2006 planning documents appears to incorrectly assume that there would only be two variables in the equation establishing the income to TITMA for transportation services: the number of vehicles using commercial parking and the price they would pay for that parking. There would be multiple variables, including the amount of commercial parking, the price charged for the commercial parking and amount of use of the commercial parking, the demand for and use of transit services (which affects both the cost of operation and fare box revenues), the congestion pricing fee charged, and the number of vehicles paying the congestion pricing fee, among others. The income from all of TITMA's sources would likely vary from year to year. Therefore, it is not possible to do a simple calculation of a number of vehicles using the commercial parking and the amount they would pay for parking and arrive at an income level to compare with the estimated cost of providing the transportation services that TITMA would manage.

For a discussion of other economic topics please see the responses in Section 2.23, Fiscal and Economic Issues.

### **2.21.2.2 Economic Analysis of Reduced Parking Alternative**

#### **Comment**

The DEIR states (page VII.76) that “less than one parking space per residential unit **could** adversely affect the marketability of the units ...”

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<sup>13</sup> Alex Galovich, Wilson Meany Sullivan, Memorandum to TI/YBI EIR Team dated December 17, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

Please consider that what may be marketable today may change in a few years. Consider advances in education, attitudes and circumstances that will lead to greater acceptance of and even the embracing of a car-free lifestyle. Consider, for example, the observations in this article:

It's a rarely acknowledged transformational shift that's been going on under the noses of marketers for as long as 15 years: The automobile, once a rite of passage for American youth, is becoming less relevant to a growing number of people under 30. And that could have broad implications for marketers in industries far beyond insurance, gasoline and retail....

The share of automobile miles driven by people aged 21 to 30 in the U.S. fell to 13.7% in 2009 from 18.3% in 2001 and 20.8% in 1995, according to data from the Federal Highway Administration's National Household Travel Survey released earlier this year. Meanwhile, Census data show the proportion of people aged 21-30 increased from 13.3% to 13.9%, so 20-somethings actually went from driving a disproportionate amount of the nation's highway miles in 1995 to under-indexing for driving in 2009.

William Draves blames (sic) the internet. Mr. Draves, president of Lern, a consulting firm which focuses mainly on higher education, and co-author of "Nine Shift," maintains that the digital age is reshaping the U.S. and world early in this century, much like the automobile reshaped American life early in the last century.

His theory is that almost everything about digital media and technology makes cars less desirable or useful and public transportation a lot more relevant. Texting while driving is dangerous and increasingly illegal, as is watching mobile TV or working on your laptop. All, at least under favorable wireless circumstances, work fine on the train. The internet and mobile devices also have made telecommuting increasingly common, displacing both cars and public transit.

The environment is the reason Gen Y-ers most often give for wanting to drive less, Mr. Draves said. But he sees the fundamental economic transformation wrought by the internet (and, apparently on the internet; research firm J.D. Power & Associates found that Gen Y-ers don't talk about cars nearly as much as their elders in social media). This demographic will be working on "intangibles" in professional jobs, not on tangible things that require physical presence, Mr. Draves said. "Time becomes really valuable to them," he said. "You can work on a train. You can't work in a car. And the difference is two to three hours a day, or about 25% of one's productive time."

Ford Motor Co. sees the trend as well ... "I don't think the car symbolizes freedom to Gen Y to the extent it did baby boomers, or to a lesser extent, Gen X-ers;" said Sheryl Connelly, global trends and futuring manager. "Part of it is that there are a lot more toys out there competing for the hard-earned dollars of older teens and young adults."

Digital technology "allows teens to transcend time and place," she said, "so they can feel connected to their friends virtually." New options like Zipcar also make it easier to do without permanent car ownership, she said.

... "This new generation, their first thought is not let's drive to the store to get these things," [Draves] said, "but 'let's get them the easiest, fastest, cheapest way.' We call them internet-first people. We think that's an important segment for us ..."

Of course, the trend is mainly bad news for an auto industry struggling to recover from its steepest downturn since the Great Depression. The combination of Millennials driving less and boomers retiring led Carlos Gomes, economist with ScotiaBank in Toronto, to

issue a downbeat forecast for long-term vehicle sales in North America in February. He projects growth in U.S. new vehicle sales of only around 0.6% annually over the next decade, cutting nearly by half the 1.1% growth rate of the prior decade. While the need to replace a fleet that averages 9.4 years old in the U.S. favors the auto industry short-term, demographics and driving trends argue against a robust recovery, he said. Citing his own teenage children and their friends in Toronto, Mr. Gomes said, “they just prefer taking the train.”

--”Is Digital Revolution Driving Decline in US Car Culture?  
Shift Toward Fewer Young Drivers Could have Repercussions for all Marketers”  
<http://adage.com/digital/article?article id=144155>

Please provide a thorough assessment of parking-related marketability of residential units as well as commercial space, taking into account future trends. (*Ruth Gravanis*) [31.6]

### **Response**

Analyses of the Reduced Parking Alternative and its effects on the marketability of the proposed residential units have been prepared. These analyses are based on the pro forma presented in the 2010 update of the *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC* (“2010 Term Sheet Update”) that was presented to the San Francisco Board of Supervisors in April 2010. The Proposed Project’s financial pro forma is and has been available to the public in documents that can be found on the Treasure Island Development Authority web site at <http://www.sftreasureisland.org/index.aspx?page=26>, including the 2010 Term Sheet Update. The information was presented in public meetings held from February through May 2010, including the Board of Supervisors’ public hearing on April 6, 2010.

### **Feasibility**

In response to comments on the potential impacts to the economic feasibility of the Proposed Project, TIDA commissioned an independent real estate economic and marketing firm to provide information on market acceptance and conduct economic analyses of the Reduced Parking Alternative.<sup>14</sup> That study concluded that, compared to the Proposed Project, the reduced parking ratios for residential uses would result in both decreased market acceptance and slower absorption of residential units and lower average sales prices.

The study considered the sensitivity of potential home buyers to the availability of parking with their new home, and concluded that there would be a correlation between the Islands’ desirability and the availability of secured parking. The study further concluded that a ratio of 0.5 parking stalls per residential unit would be considered to be less desirable by a large segment of the

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<sup>14</sup> Pacific Marketing Associates, Inc., Treasure Island Reduced Parking Memorandum, prepared for TIDA, February 14, 2011 (hereinafter “PMA 2010”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

potential home buyer market (e.g., professionals and dual-income young families) who would purchase homes as a full-time residence. Market acceptance and sensitivity also would be exacerbated because there would be no other on-Islands reservoirs of parking, either proposed or existing, that a household without parking would be able to access.

The study also states that some recent stand-alone development projects in downtown San Francisco that have fewer than 1:1 parking space ratios per residential unit have experienced slower sales than buildings with one space per unit.<sup>15</sup> In addition, some of those development projects with a reduced parking ratio have provided parking in nearby public parking garages for residents in order to increase sales, resulting in an effective parking supply higher than the constructed parking ratio within the individual project.<sup>16</sup> This opportunity would not be available on the Islands, as additional parking reservoirs would not be permitted beyond the parking maximums provided on the Islands. The lack of additional parking reservoirs on Treasure Island and Yerba Buena Island increases the market risk associated with the reduced residential parking ratios compared to other San Francisco neighborhoods where lower parking ratios have been adopted.

The market analysis conducted for TIDA concluded this would have the effect of reducing the project sales absorption over the life of the project by a significant margin, reducing the likely pool of buyers, limiting the project's market share capture, and a reduction in sales prices translating into slower sales. The study concluded that absorption rates would decline by about 37 percent as compared to the absorption rates from the Proposed Project.

In addition to the TIDA study, TICD also retained three real estate economic and marketing firms to conduct economic analyses of the Reduced Parking Alternative.<sup>17</sup> Each of these three studies also concluded that the Reduced Parking Alternative would result in a reduction in home sale prices compared to those expected for the Proposed Project, by about 10 percent, on average.<sup>18</sup> The studies concluded that absorption rates would decline by about 30 to 35 percent, as compared to the absorption rates of the Proposed Project, which was slightly less conservative than the study conducted by TIDA.

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<sup>15</sup> PMA, 2010, p. 4.

<sup>16</sup> PMA, 2010, p. 2.

<sup>17</sup> Alex Galovich, Wilson Meany Sullivan (hereinafter "WMS") Memorandum to Rick Cooper, Senior Planner, San Francisco Planning Department, and Barbara Sahm, Principal, Turnstone Consulting, "Market Studies on Reduced Parking," February 10, 2011. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

<sup>18</sup> WMS, 2011, p. 2.

Conclusions for both the TIDA study and TICD studies are based on market conditions and factors which indicate that many of the potential Islands residents would consider access to the personal vehicle an important element when deciding where to live. For example, they may be families who would consider access to a personal vehicle essential to address emergencies related to their children and access to activities for their children (daycare, schools, sports, music, and other afterschool or Saturday activities) that may not be accessible by transit; young professionals who would expect to stay on the mainland after the main commute hours and after the last ferry run at 9:00 PM; dual-income households, at least one of whom might work during off hours or in a location not well served by transit, and therefore would need a car for transportation to and from work; or older couples who would consider access to a personal vehicle essential for mobility outside of commute periods and/or to destinations not easily reached by transit. The market studies also noted that the potential buyers or residents of the Proposed Project would likely have a heightened awareness of mobility issues because of the island location. Concerns about safety, either in a personal emergency or a natural disaster, could make potential occupants consider access to an automobile essential, even if they did not intend to use it for daily commuting. (One comment suggested that the reduction in parking could lead to an increase in the desirability of living on and visiting the Islands due to greater safety, especially for families; this hypothesis was not supported by the market studies.)

Overall, the four economic and market analysis studies concluded that, with reduced parking, the pool of potential residents interested in moving to the Islands would be substantially reduced. A reduction in the pool of potential home buyers would, in turn, necessitate price reductions and result in slower absorption rates, both of which would severely undermine the financial feasibility of the Proposed Project.

TIDA also commissioned an independent peer review by Economic & Planning Systems ("EPS") of all four economic and market feasibility studies for the Reduced Parking Alternative.<sup>19</sup> EPS's findings supported the conclusions of the previous studies; key findings concluded that:

- - total land sales would be lowered by 20 to 30 percent;
  - revenues from public financing, including tax increment and special taxes, would be reduced by about ten percent;
  - rates of return for the project would fall, ranging from 5 to 10 percent and absorption rates would be reduced by 25 to 50 percent; and
  - investment returns would be substantially reduced, from about 20 percent to about 4.7 – 8.2 percent.

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●<sup>19</sup> Economic & Planning Systems, Inc., Financial Feasibility Impacts of Reduced Treasure Island Parking, Memorandum to Michael Tymoff, Office of Economic and Workforce Development/Treasure Island Development Authority, February 14, 2011. A copy of this memorandum is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

Slower absorption would mean that there would be less funding available in the early phases of the Proposed Project for the project sponsors to use to construct infrastructure. It would also result in overall lower project-generated revenues to pay for the public infrastructure and associated public benefits. With the reduced home sale prices combined with slower absorption,

in combination, and accounting for rental as well as for-sale housing and for the affordable housing components, the total revenue would be reduced by about 22 – 27 percent and the rate of return would be reduced from about 20 percent to about 5 percent or less. This would result in the inability to attract the amount of private equity investment required to launch the first phases of the development. Without this upfront capital investment in the Proposed Project, the tax exempt public financing mechanisms that are necessary to fund the \$1.5 billion in project costs could not be accessed.<sup>20</sup> The Reduced Parking Alternative therefore, could not be implemented without additional modifications to other elements of the program to substantially reduce costs. Based on the types of adjustments that have previously been made by the project sponsors during the planning process for the Proposed Project analyzed in the EIR, likely cost reduction measures would be to reduce affordable housing, community facilities, sustainability features, economic development and job opportunities, parks and open space improvements, transportation infrastructure and transit subsidies, some of the components of the Proposed Project that are supported by the sale of market-rate housing.

In summary, the analyses of the economic effects of providing less residential parking, prepared by four different financial consulting firms, concluded that home sales prices on Treasure Island and Yerba Buena Island would be lower and that absorption of the units would be substantially slower compared to the prices and absorption in the 2010 Term Sheet Update. This would result in reduced revenues and substantial reductions in investment returns, from about 20 percent to about 4.7 – 8.2 percent. In addition, TIDA's economic peer review consultant, EPS, has determined that a returns of this level are not acceptable to investors in projects of this scale, magnitude, and risk; returns of approximately 8% or less would render the project financially infeasible, since private investment capital would not be available for construction involving such low rates of return in relation to alternative, risk-free rates of return.

Other comments requested that these analyses take into account potential future trends in the marketability of residential units and commercial space associated with the requested reductions in parking ratios. Future trends are difficult to predict accurately and necessarily involve forecasting changes in the current market. Such forecasting is considered too speculative, and would provide no objective information regarding the Proposed Project's current economic feasibility, which is based on current economic conditions, capital market requirements and trends in the residential housing market.

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<sup>20</sup> *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC* (“2010 Term Sheet Update”), April 2010 Term Sheet Update, Exhibit R-1. This document is available on the Treasure Island Development Authority web site at [www.sftreasureisland.org/index.aspx?page=26](http://www.sftreasureisland.org/index.aspx?page=26).

### 2.21.3 ALTERNATIVE B, REDUCED DEVELOPMENT

#### Comments

Of the *Alternatives* [VII.1-78], the only one deserving any consideration would be the *Reduced Development Alternative* [VII.3]. However even this scenario is subject to the same comments above regarding the over-emphasis of auto use. (Ron Miguel, President, San Francisco Planning Commission) [7.8]

The Project's alternatives, including but not limited to "**Reduced Development Alternative**" (as identified therein), include a review of reduced densities, but not at a level that would actually reduce impacts to traffic. The primary difference between the Project and the Reduced Development Alternative is that residential development would be reduced from up to 8,000 dwelling units (which proposes a population density equal to that of the City of San Francisco's most populous areas and likely to cause many issues beyond traffic) to 6,000 units (see VII. Alternatives, page VII.15). The Reduced Development Alternative was included to determine if a reduced number of residential units on TI/YBI would avoid or substantially lessen traffic (and related air quality and noise) impacts, as well as an aesthetic impact on scenic vistas of the Project (VII. Alternatives, page VII.18). Pages VII.31 and VII.32 describe cumulative impacts of traffic under a reduced development alternative. In addition, no financial information was located to determine if a further reduction in dwelling units could still produce enough user fees to support wastewater and water services (this topic is further discussed below).

It is obvious that there would still be significant cumulative traffic impacts, and such should be addressed; however, it is also clear that even at 6,000 units, the Project is much too dense considering the traffic impacts it will generate. The DEIR should have studied a much lower density, including the creation of more open-space as a way to reduce the significant traffic impacts. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.25]

Vol. 2, VII.1, Alternatives: The 2006 Term Sheet and Transportation Plan, Land Use -, Sustainability and Infrastructure Plan work with a different set of program assumptions than what is used for the Proposed Project in this DEIR. Why were the numbers so drastically changed and why were the many Plan documents that are being referenced never amended? There is a 25% increase in dwelling units and a 22% increase in parking.

Vol. 2, VII.3, Alternatives: Why is "Reduced Development Alternative" not studied as the Proposed Project? The program summarized for this alternative is the basis for all studies that have been supported and formed the basis for numerous approvals by different public bodies, including the Board of Supervisors, the TI Board, the TI CAB, the Planning Commissions, etc. (*Kathrin Moore, San Francisco Planning Commission*) [20.35]

The label "Reduced Development Alternative" is a falsity: is it possible to present proofs that there would be a reduction of impacts due to creation of a Regional Shopping Mall? If not, then inclusion of a regional shopping center cannot be considered a reduced-impact alternative. If so, the reasons are not found in this DEIR. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.19]

As described in the DEIR, the reduced development alternative "reduces" only the number of residential units (from 8,000 units to 6,000 units). The DEIR explains that this would result in a 25% reduction in the amount of the "neighborhood-serving retail uses" and a 25% increase in "regional serving retail uses."

The “reduced development alternative” would not only necessitate more trips off-island by the residents, but the 25% increase in “regional serving retail uses” would attract more non-residents to the island. Logically, this alternative would result in even greater impacts related to private automobile use, as would the “no ferry service alternative.” (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.81]

- Please explain exactly why the “reduced development alternative” included in the DEIR requires a 25% reduction in neighborhood serving retail uses and a 25% increase in regional serving retail uses. How many additional private automobile trips will this generate? Please provide the source for your answers to these questions. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.83]

### **Response**

The comment regarding the over-emphasis of auto use is related to the parking ratios and the amount of parking provided in the Proposed Project. Refer to the response in Subsection 2.21.2, Reduced Parking Alternative.

One of the comments infers that the Project proposes a population density equal to densities of the most populous areas of the City. Instead of population density, the San Francisco Planning Department typically measures density by residential units per net acre because in a dense, compact city such as San Francisco, population density varies widely based on demographics, particularly changes over time in the number of persons per household. The northeastern area of the City has the largest stock of the City's high-density housing. This area encompasses the Downtown and South of Market Planning Districts, and the Northeast Planning District which includes the Chinatown and North Beach neighborhoods. Other areas of high-density housing include the Van Ness Avenue corridor. In San Francisco, housing density (measured as average units per acre) ranges from a low of 14 units per acre in single-family unit neighborhoods such as the Sunset, to a high of 283 units per acre in higher-density neighborhoods in the downtown. Moderate high-density housing along major transit corridors such as Van Ness Avenue and Upper Market Street and in major redevelopment areas such as the Western Addition, Golden Gateway and the northern edges of Mission Bay is about 91 units per acre.<sup>21</sup> As stated in Section IV.C, Housing and Population, on EIR p. IV.C.10, the Proposed Project would have an average overall residential density of about 100-110 housing units per acre, which is comparable to moderate high-density areas of the City.

As stated in one comment, Alternative B, the Reduced Development Alternative, would have similar impacts as the Proposed Project pertaining to traffic, traffic-related air quality and noise, and aesthetics. The EIR did consider an alternative with much lower density development, Alternative D.2, the 2800 Housing Unit Alternative with an Amusement Park, as described on

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<sup>21</sup> San Francisco Planning Department, *Draft 2 Housing Element, Part 1: Data and Needs Analysis*, June 2010, pp. 66-68.

EIR pp. VII.74 - VII.75. That alternative was rejected as infeasible because the Treasure Island Development Authority ("TIDA") and the Board of Supervisors determined that an amusement theme park would not be a desirable use for the long-term redevelopment of Treasure Island and Yerba Buena Island. The alternative with 2,800 residential units and an amusement park would not meet the project sponsors' objectives of providing a high-density, compact residential development located within walking distance of transit and providing high-density, mixed income housing with both ownership and rental opportunities. The 2800 Housing Unit Alternative also would not provide a sufficient population base to maximize transit use and support project feasibility and viable retail, transit, open space, community services, and infrastructure improvements.

The Reduced Development Alternative and the No Ferry Service Alternative each would include approximately 300 acres of athletic fields and open space, which would comprise 65 percent of the Development Plan Area on Treasure Island, and about 90 percent of the Development Plan Area on Yerba Buena Island (see EIR p. IV.J.15, Figure IV.J.1, Proposed Open Space). As such, a considerable amount of open space is included in these alternatives. Development of an alternative with substantially more open space than the Proposed Project would not be feasible without a corresponding increase in residential development to provide the population base, economic feasibility, and land use efficiencies to support open space amenities. Therefore, a significantly more dense alternative would be needed to support more open space than is currently proposed.

As stated in one of the comments, the 2006 Term Sheet and its associated exhibits such as the Transportation Plan, Land Use Plan, Sustainability Plan and Infrastructure Plan, are based on a different set of program assumptions than what is used for the Proposed Project in this EIR. This same comment also asks why the numbers in the Proposed Project changed so drastically from those in the 2006 Term Sheet, and why the Plan documents referenced in the EIR have not been amended. The comment is correct in noting the differences between the development program in the 2006 Term Sheet, which proposed 6,000 residential units and approximately 7,840 total off-street and on-street parking spaces, and the Proposed Project analyzed in the EIR, which would increase the number of allowable residential units by 25 percent, and increase the number of allowable parking spaces by 36 percent.

As discussed in Chapter I, Introduction, on EIR p. I.6, the *Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island* ("Term Sheet") was endorsed by the TIDA Board and the Treasure Island and Yerba Buena Island Citizens Advisory Board ("CAB") in October 2006 and by the San Francisco Board of Supervisors in December 2006. The 2006 Term Sheet presented a proposed development plan based on several years of discussion among various parties, including Treasure Island Community Development, LLC (TICD), the TIDA Board, the

CAB, the Land Use and Economic Development Committee of the Board of Supervisors, multiple City agencies, and interested members of the public regarding the future of NSTI.

At the time of the endorsement of the 2006 Term Sheet, the City had not yet reached agreement with the Navy on the terms for the transfer of the property to TIDA, and the 2006 Term Sheet explicitly anticipated a need to update the terms of the 2006 Term Sheet to reflect materially changed conditions, such as terms of the deal with the Navy and/or changes to economic assumptions.

The 2006 Term Sheet, and the endorsement by the TIDA Board, CAB and Board of Supervisors, acknowledged that there was considerable work remaining to be done over the next several years to reach final project approvals, including among other things: project-specific environmental review as required by CEQA; adoption of a Redevelopment Plan and Design for Development; negotiation of the final TICD Disposition and Development Agreement (“DDA”) and related transaction documents between TIDA and TICD; negotiation of the terms of a property conveyance agreement with the Navy; negotiation of a Trust Exchange Agreement with the State Lands Commission; the design and engineering of infrastructure and utility systems required to support development; and the development of design guidelines and standards to control development in the Development Plan Area.

Additionally, as discussed on EIR p. I.6, the City received comments on the Notice of Preparation (“NOP”) of the EIR suggesting that a project or alternative should be analyzed that would increase density in order to support project feasibility as well as increase the viability of transit, open space, community retail, and neighborhood oriented services.

Since the 2006 Term Sheet was endorsed, economic market conditions changed considerably as project planning and due diligence activities by TIDA and TICD, in coordination with numerous City agencies and stakeholders, continued to move forward. The studies and analyses from these planning efforts were publicly presented in numerous forums, including public workshops and open houses, resident meetings on Treasure Island, publicly noticed meetings of the CAB, TIDA, Land Use and Economic Development Committee of the Board of Supervisors, and in informal presentations to the Planning Commission and the Bay Conservation and Development Commission. These meetings included detailed presentations and supporting documents on the key aspects of the development program analyzed in the EIR, including, but not limited to, updates on the following exhibits in the 2006 Term Sheet: the Transportation Plan, the Land Use Plan and Design Guidelines, the Sustainability Plan and the Infrastructure Plan. Presentations on the Infrastructure Plan also included information on changes to the proposed geotechnical approach included in the Project. The revised approach was also selected to improve geotechnical performance and account for potential future sea level rise. The new approach increases the infrastructure costs of the Proposed Project by \$150 million.

TIDA and the Navy reached a conceptual agreement on the terms of property conveyance in December 2009. While the 2006 Term Sheet anticipated that the Navy would receive no monetary compensation for the property, the December 2009 agreement requires compensation estimated at \$117 million. Due to the terms of the property conveyance agreement with the Navy, the changes in economic conditions, and the increased costs of geotechnical improvements, the redevelopment plans were updated in a manner that TIDA and TICD have concluded would allow for a financially feasible project consistent with the project objectives. These updates to the 2006 Term Sheet increased overall density, which is consistent with and in response to, public comments on the NOP that requested that the EIR study a project with an increased number of residential units.

The 2006 Term Sheet has been amended with a number of updates that were formally endorsed in 2010. More specifically, the following updates to the Proposed Project have been incorporated as part of the *Update to the Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC* ("2010 Term Sheet Update"): (i) the terms of the Navy conveyance agreement; (ii) updates to the Development Program to include: (a) up to 8,000 homes; (b) up to 11,155 total off-street and on-street parking spaces; (c) up to 100,000 sq. ft. of office space; and (d) up to 207,000 sq. ft. of retail, comprised of 122,000 sq. ft. of neighborhood serving retail and 85,000 sq. ft. of regional serving retail; (iii) changes to the geotechnical and flood protection approach to mitigate geotechnical and sea level rise conditions; (iv) adjustments to the open space budget; (v) more efficient approaches to financing transit capital; (vi) agreements with the San Francisco Public Utilities Commission and San Francisco Fire Department on infrastructure and public facilities as part of the redevelopment project; (vii) an updated affordable housing program; and (viii) updates to the cost revenue and timing assumptions to be consistent with the program scope and budget adjustments just described, updated market revenue and public financing assumptions, and adjustments to the transaction structure consistent with the terms of the Navy agreement. The 2010 Term Sheet Update was endorsed by the TIDA Board and CAB in April 2010, and by the Board of Supervisors in May 2010.

As noted on EIR p. VII.15, Alternative B, the Reduced Development Alternative, is similar to the development program in the 2006 Term Sheet, with slightly less retail space. The Reduced Development Alternative would include the same amount of total retail space (207,000 sq. ft.) that is included in the Proposed Project. However, the proportion of neighborhood-serving and regional-serving retail space would be altered due to the decrease in the number of residential units (see chart below).

	<u>Reduced Development Alternative</u>	<u>Proposed Project</u>
	6,000 units	8,000 units
Neighborhood Retail	91,000 sq. ft.	122,000 sq. ft.
Regional Retail	116,000 sq. ft.	85,000 sq. ft.
Total	207,000 sq. ft.	207,000 sq. ft.

In comparison to the Proposed Project, the percentage of neighborhood-serving uses would decrease by about 25 percent because there would be 2,000 (25%) fewer residential units that would support or require neighborhood serving uses such as grocery stores, dry cleaners, and local serving eateries. Therefore, in comparison to the Proposed Project, a higher proportion of retail uses, approximately a 36 percent increase, would be devoted to regional- and visitor-serving uses such as specialty food stores and destination restaurants. While the change in retail mix is not a requirement, it is assumed as the likely market reaction if residential uses were reduced by 25 percent. The increase (31,000 sq. ft.) in regional serving retail uses would generate approximately 75 additional external trips during the weekday PM peak hour, and approximately 90 additional trips during the Saturday peak hour.<sup>22</sup> Table VII.3 on EIR p. VII.21 compares the total vehicle trips generated by the Reduced Development Alternative to the Proposed Project. During the peak hours, the total number of vehicle trips generated by the Reduced Development Alternative would be 2,218 trips during the PM peak, and 2,565 during the Saturday peak, as compared to 2,462 trips during the PM peak and 2,861 trips during the Saturday peak for the Proposed Project.

The traffic analysis for the Reduced Development Alternative is presented on EIR pp. VII.20 - VII.24. That analysis indicates that traffic impacts, even with the higher percentage of regional-serving retail uses, would be similar to the Proposed Project because significant traffic impacts would occur during weekday AM and PM commute peak hours that do not coincide with peak travel demand for visitor-serving uses. Therefore, the number of vehicle trips associated with increased regional-serving retail uses would not substantially affect traffic impacts. Visitors to regional-serving retail uses on the Islands would also be served by bus and ferry transit.

The Reduced Development Alternative would not create a “regional shopping mall,” as one of the comments suggest. Under this alternative, approximately 116,000 sq. ft. of regional-serving uses would be provided. Regional shopping malls typically contain between 400,000 and 800,000+ sq. ft. situated on 40 or more acres, and are anchored by 2 to 3+ major retail stores.<sup>23</sup> For example, the San Francisco Stonestown Galleria is a 42-acre regional mall that contains 862,000

<sup>22</sup> Fehr & Peers, *Treasure Island and Yerba Buena Island Redevelopment Plan Transportation Impact Study*, July 7, 2010, Table 18- Net Person-Trip Generation by Land Use, p. 72, and Table 29 - Net Person Trip Generation by Land Use (Reduced Development Alternative), p. 92. A copy of the *Transportation Impact Study* is included as EIR Appendix C.

<sup>23</sup> Appraisal Institute, CoStar and the International Council of Shopping Centers, April 2009.

sq. ft of retail space anchored by 3 major retail stores.<sup>24</sup> The 116,000 sq. ft. of regional serving uses that would be provided under the Reduced Development Alternative would likely be distributed among several regional, special purpose retail outlets that would be distinctly different than a regional shopping mall.

As shown in Table VII.3, on EIR p. VII.21, the Reduced Development Alternative would generate fewer vehicle trips in comparison to the Proposed Project, and would not result in increased impacts related to private automobile use. Nor would the No Ferry Service Alternative increase impacts related to private automobile use. As stated in the fourth paragraph on EIR p. VII.48, the No Ferry Service Alternative assumes that bus transit alone would be adequate to accommodate forecasted transit ridership without increasing peak-hour automobile travel, as compared to the Proposed Project. This assumes the same amount of bus capacity as in the Proposed Project's mitigated enhanced transit service scenario. The No Ferry Service Alternative is discussed more in Subsection 2.21.4, below.

#### **2.21.4 ALTERNATIVE C, NO FERRY SERVICE**

##### **Comments**

2. Pg. S.53 (Summary of Project Alternatives), Section C (*No Ferry Service Alternative*). The CAB adamantly disagrees with this as an “alternative”, and we cannot stress strongly enough that neither the city nor TIDA consider a “no ferry” option. We feel the DEIR should be changed with all *No Ferry Alternative* references removed. (*Treasure Island/Yerba Buena Island Citizens’ Advisory Board*) [8.2]
- 15) We applaud the study of the no ferry alternative because other EIRs show that the average ferry service consumes more energy per passenger mile than a typical Bay Area automobile with 1.2 passengers, including the driver. However, this alternative should be re-analyzed with at least 8,000 units to provide the number of residents required to support a level of, on island, neighborhood services necessary for most residents. This alternative should also be reanalyzed with the components 1) to 12) above. The EIR for this alternative should show how all of the funds available from the congestion pricing will be used while complying with AB 981. One good use will be contributions to Muni because TI residents will use other lines besides the 108 and the typical mainland Muni funding sources of meters and parking taxes will not flow from TI to Muni. This alternative should eliminate most needs for the shuttles, because all of the shuttle passengers will be transferring to a bus. During peak hours about 25% of the Muni buses could cover each half of TI with 50% turning back at the transit center, where it will be easy for most riders to access this bus on foot. Off peak more of the buses will have to serve the outer island or shuttles can be used. The EIR should analyze the extent that reducing the need to transfer will increase transit use. Only AC passengers would have

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<sup>24</sup> General Growth Properties website, <http://www.ggp.com/properties/mall-properties/stonestown-galleria>, accessed January 9, 2011.

to transfer and they will have free transit on the island at all times. (*Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group*) [35.7]

### **Response**

The first comment disagrees with including an analysis of the No Ferry Service Alternative in the EIR. As stated in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, the *CEQA Guidelines* Section 15126.6(a) requires that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merit of the alternatives.”

As noted on EIR p. VII.52, the No Ferry Service Alternative could feasibly meet most of the key objectives of the project sponsors and would avoid significant unavoidable impacts on the *U.S.S. Buttercup* training facility, an historical resource for purposes of CEQA, that is individually eligible for inclusion in the California Register of Historical Resources. With the No Ferry Service Alternative, the *U.S.S. Buttercup* would be retained; it is also assumed that the training facility would be stabilized; repaired in conformity with *the Secretary of the Interior’s Standards for Rehabilitation*; and reused and made accessible to the public. In addition, the No Ferry Service Alternative would reduce significant air quality, noise and biological impacts associated with ferry operations that would occur under the Proposed Project. Therefore, for purposes of CEQA, the Planning Department determined that it is both appropriate and reasonable to include an analysis of the No Ferry Service Alternative in the EIR.

As stated on EIR p. VII.1, final determination of feasibility of an alternative will be made by project decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments. The City must also consider approval of an alternative if that alternative would substantially lessen or avoid significant environmental impacts identified for a proposed project and if that alternative is determined to be feasible.

Refer also to Subsection 2.21.6, Proposed Project With No Ferry Service Alternative for additional discussion of the No Ferry Service Alternative with 8,000 units.

Administration of a congestion pricing fee is discussed on EIR p. IV.E.45. As part of implementation of the Proposed Project, a transportation management agency, authorized under the Treasure Island Transportation Management Act of 2008 (AB 981), would administer a variable congestion fee to residents of the Islands for accessing the Bay Bridge. Fees would be charged to Island residents for auto access between the Bay Bridge and the Islands during periods of peak congestion. The designated transportation management agency would be responsible for determining the use of funds collected from congestion pricing fees.

Funds for the San Francisco Municipal Transportation Authority ("SFMTA") to operate the Muni Line 108-Treasure Island bus route would continue to come from the San Francisco General Fund. Under the base transit scenario, Muni Line 108-Treasure Island is assumed to operate on its existing headways. With the expansion of Muni bus service proposed as part of Mitigation Measure M-TR-2, there would be an incremental cost increase to Muni; however, that cost increase is currently projected to be substantially less than the amount of revenue generated by the Proposed Project that would go to the General Fund through property taxes, sales taxes, hotel taxes, and other sources. Ongoing economic feasibility studies related to revenue projections and discussions between TIDA and SFMTA regarding funding and service levels will be documented as part of the final record for EIR certification.

Regarding the extent to which a reduction in the need to transfer would increase bus transit use, bus service routing and operations are the responsibility of the SFMTA. As described in the Project Description on EIR pp. II.39-II.44, the proposed shuttle routes are designed to be flexible, which allows for easy adjustments in service operations to meet changes in demand, unlike Muni fixed-route bus transit service. The street cross sections of the Major Arterials along Avenue C and California Avenue have been designed with sufficient width to accommodate buses should SFMTA choose to extend service into the neighborhoods, as one of the comments suggests. The proposed shuttle routes are shown on Figure II.9: Proposed Shuttle Routes on EIR p. II.40; the proposed street cross sections are shown on Figure II.11: Representative Street Cross Sections on EIR p. 41. The Proposed Project includes a number of elements to increase transit use, as described under the Transportation Demand Management Plan ("TDM") on EIR pp. IV.E.45 - IV.E.47. Specifically, the TDM measures, transit routes, and intermodal transit hub have been designed to minimize delays riders would experience in making transfers from shuttles to buses or ferries. All of these elements were considered, to the extent feasible, in the travel demand assumptions for the Proposed Project to the potential to increase transit ridership.

### **2.21.5 PRESERVATION ALTERNATIVE**

#### **Comment**

#### **II. The FEIR Should Evaluate Less Harmful Alternatives to Complete Removal of the *USS Buttercup* Battleship Simulator**

The proposed project calls for the demolition of the *USS Buttercup*; as such, its character-defining materials and features would be removed entirely and it would no longer convey historic significance. Although Mitigation Measure M-CP-9 calls for documentation and interpretation of the Damage Control Trainer, it would not lessen the impact of demolition to a less-than-significant level.

The DEIR finds that moving the *USS Buttercup* is not feasible because the Damage Control Trainer includes a large concrete sump, much like a swimming pool, which is partially built into the grade. Heritage requests that the Final EIR include more detailed analysis of **partial preservation alternatives**, such as relocation of the simulator onto a reconstructed sump and/or

into a museum setting. As noted in the DEIR, the proposed Development Program reserves over 100,000 square feet for recreational, interpretive, cultural and museum uses.\* If relocated, the *USS Buttercup* could be an interesting addition to one of these areas and would convey to the public information about the island's past use as a naval base. The FEIR should also assess the feasibility of transferring the *USS Buttercup* back to the Navy for active use. Any of these options is preferable to documentation and interpretation alone, and would potentially reduce impacts to a less-than-significant level.

[The comment letter includes the following footnote:

- The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and child care also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1." DEIR at II.33.]

If preservation options prove infeasible after detailed evaluation, Heritage proposes enhanced and creative interpretation of the *USS Buttercup* as part of Mitigation Measure M-CP-9, such as a video installation or other interactive media in the Treasure Island museum illustrating the use and function of the battleship simulator. (*Mike Buhler, Executive Director, San Francisco Architectural Heritage*) [18.2]

### **Response**

The *U.S.S. Buttercup* was identified as an historical resource for the purposes of CEQA in the Historic Resource Evaluation undertaken specifically for the Proposed Project. It was not identified as an historical resource in any earlier study of historic resources. As the comment notes, EIR p. IV.D.56 explains that retention of the Damage Control Center referred to as the *U.S.S. Buttercup* cannot be accommodated as part of the Proposed Project because its retention would preclude construction on two development blocks, resulting in a substantially different project than the Proposed Project.

However, while demolition is unavoidable under the Proposed Project, retention of this historic resource, by itself, is not infeasible. For these reasons, retention of the resource is not identified as a feasible mitigation measure for the Proposed Project, but is considered and analyzed as a component of Alternative C, the No Ferry Service Alternative. Retention of the *U.S.S. Buttercup* would also occur under the No Project Alternative. Retention of the resource could also feasibly be a component of the Reduced Development Alternative, but was not considered since retention was addressed as a component of Alternative C, the No Ferry Service Alternative.

As the last comment notes, Mitigation Measure M-CP-9, which is presented on EIR pp. IV.D.57 - IV.D.58, calls for documentation and interpretation of the Damage Control Trainer. Documentation would require the project sponsor to provide a permanent display of interpretive materials concerning the history and architectural features of the historical resource within public spaces of Treasure Island. The specific location, media, and other characteristics of such an

interpretive display would require approval by TIDA prior to any demolition or removal activities, and could include provisions for video installation and other interactive media illustrating the use and function of the battleship simulator. Implementation of Mitigation Measure M-CP-9 would lessen the impact of demolition of the *U.S.S. Buttercup*; however, as discussed on EIR p. IV.D.56, it would not mitigate adverse impacts on this historical resource to a less-than-significant level.

Partial retention of the Damage Control Trainer, as suggested by the comment, could be accomplished by disassembling the deck and hull assembly and reassembling it elsewhere. Assuming a suitable location could be identified to house and display the 48-foot-long by 24-foot-wide deck and hull assembly (either on Treasure Island or off-site), the deck and hull assembly would become a disconnected object, removed from the context of the building that now houses it, its concrete sump, and other water infrastructure that allowed it to simulate stormy ocean conditions. As a result, the Damage Control Trainer would lose its integrity of location, design, setting, materials, workmanship, feeling, and association such that it would no longer be eligible for inclusion in the California Register of Historical Resources. Similarly, if the Damage Control Trainer were partially preserved by relocating it into a museum setting, there would be a similar loss of historic features deemed eligible for inclusion in the California Register of Historical Resources. Therefore, partial preservation of the Damage Control Trainer, would still result in a significant and unavoidable adverse impact under CEQA. As such, partial retention of the resource would not effectively mitigate the significant impact on the historic significance of the resource and its ability to convey its significance.

At the time the Draft EIR was being prepared, TIDA contacted the Navy to assess the feasibility of transferring the *U.S.S. Buttercup* back to the Navy for either active or interpretive uses. The Navy responded that it is not interested in retaining the *U.S.S. Buttercup*. Moreover, even if the trainer facility was transferred back to the Navy for active or interpretive uses, the facility would no longer be eligible for inclusion in the California Register of Historical Resources because it would not retain its historic location and context on Treasure Island. As such, transferring the *U.S.S. Buttercup* to the Navy would continue to result in a significant and unavoidable adverse impact as defined by CEQA.

#### **2.21.6 PROPOSED PROJECT WITH NO FERRY SERVICE ALTERNATIVE**

##### **Comment**

In particular, the proposed ferry service relies on another agency to approve and conduct that service, while Alternative C includes no ferry service and provides fewer residential units and less neighborhood-serving retail space than in the Project. The DEIR should include an analysis of impacts of the preferred Project (such as traffic, air quality, evacuation plans) if no ferry service is provided. (See - VII. Alternatives, pages VII.48 through VII.60). (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.19]

**Response**

The first part of the comment discusses implementation of ferry service, and the development program for the No Ferry Service Alternative. As discussed on EIR p. VII.48, Alternative C, the No Ferry Service Alternative, would provide 2,900 fewer residential units and less neighborhood-serving space<sup>25</sup> than the Proposed Project. This reduction to 5,100 total residential units was determined by estimating the level of transit service that could be provided, assuming Muni service goals of buses operating at an average of 85 percent of seated and standing capacity would be met. Based on these factors, the residential portion of the Development Program was reduced to an amount such that bus transit alone (i.e., no ferry service) would be adequate to accommodate forecasted transit ridership, without increasing peak-hour automobile travel in comparison to the Proposed Project.

Development of the No Ferry Service Alternative with 5,100 residential units also assumes that funding would be available to provide the level of bus service that is described in transportation Mitigation Measure M-TR-2, Expanded Transit Service on EIR pp. IV.E.74 - IV.E.75 since, unlike the Proposed Project, project funding would not be required to construct a Ferry Terminal, lease ferry vessels or subsidize ferry operations. Instead, this funding could be available to provide additional buses and operators for increased bus service during the peak hours. As noted on EIR p. IV.E.20, the Water Emergency Transportation Authority (WETA) is responsible for implementing its Ferry Implementation and Operations Plan (the "IOP") which proposes new ferry service between the San Francisco and Treasure Island.

The second part of the comment requests that the EIR include an analysis of the Proposed Project with no ferry service. As part of the analysis of alternatives in the EIR, the Proposed Project was analyzed with elimination of ferry service and assuming implementation of increased bus transit as in Mitigation Measure M-TR-2, Expanded Transit Service, as would occur with the No Ferry Service Alternative. Providing no ferry service but adding more bus service to San Francisco would reduce one-way transit capacity on the Islands to and from San Francisco by 71 percent during the AM peak hour, from 3,917 to 1,121 passengers per hour, and by 66 percent, from 4,239 to 1,443 passengers per hour, during the PM and Saturday peak hours. Elimination of ferry service and adding bus service would result in a reduction in overall transit mode share from 43 percent to 25 percent. As a result, if the Proposed Project were to eliminate ferry service, approximately 70 percent of ferry riders would be estimated to switch to private vehicle and 30

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<sup>25</sup> The total amount of retail space under the No Ferry Alternative would be 207,000 sq. ft., the same amount provided by the Proposed Project; however, the alternative would likely include less neighborhood-serving retail uses (about 25 percent less) and more regional-serving uses due to the reduction in the amount of residential units. See also the discussion of neighborhood-serving retail for the Reduced Development Alternative in Subsection 2.21.3, above.

percent of ferry riders would switch to bus transit service.<sup>26</sup> Based on this assumption, the number of bus and auto trips to San Francisco would increase; the number of bus and auto trips to the East Bay would remain constant as the elimination of ferry service from Treasure Island to San Francisco would not result in changes in mode share for off-island trips destined for the East Bay.

Eliminating ferry service with development of 8,000 residential units would cause the number of external vehicle trips to increase between 150 and 500 vehicles during the peak hour, which would result in a greater number of vehicles than analyzed for the Proposed Project in the EIR. The number of Muni riders would increase between 150 and 350 peak hour riders.

Therefore, development of the Proposed Project with 8,000 residential units and no ferry service would result in increased traffic and traffic-related air quality impacts above those described for the Proposed Project in the EIR, as elimination of ferry service would increase the number of auto trips as described above. Emergency evacuation with no ferry service would be similar to conditions described for the EIR project, including implementation of an Emergency Response Plan or Evacuation Plan described on EIR pp. IV.P.38 - IV.P.39 in Section IV.P, Hazards and Hazardous Materials, and emergency access is described on EIR pp. IV.E.116 - IV.E.117 in Section IV.E, Transportation. However, water access would be limited to use of the existing Pier 1 facility on the east side of Treasure Island, as there would be no Ferry Terminal on the west side of the island. To the extent that the Proposed Project without ferry service resulted in increased vehicle traffic on the Bay Bridge off- and on-ramps, access for emergency vehicles could be impeded.

If it were to be assumed that all ferry riders shifted to bus transit (i.e., all riders made their trip despite the absence of the ferry, but none made auto trips), as with the No Ferry Service Alternative, increased transit ridership generated from development of 8,000 units with no ferry service would not meet Muni service goals, and would have substantial adverse impacts on transit. To accommodate additional transit ridership, development of 8,000 units without ferry service would further increase funding required for transit improvements beyond the levels described for implementation of Mitigation Measure M-TR-2, Expanded Transit Service in the EIR.

For the reasons discussed above, implementation of the Proposed Project with no ferry service would not be feasible, and was not considered for analysis in the EIR.

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<sup>26</sup> The analysis of transportation impacts of the Proposed Project with no ferry service is based on Fehr & Peers, *Treasure Island and Yerba Buena Island Redevelopment Plan, Transportation Impact Analysis - No Ferry Service Alternative*, Memorandum to Viktoriya Wise, San Francisco Planning Department, July 7, 2010. A copy of this memorandum is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

### 2.21.7 ALTERNATIVE A, NO PROJECT

#### Comment

On page VII.13, it states that the impacts of the No Project Alternative on the biological resources would be insignificant. While the resources have indeed been “ecologically compromised” the health of the remnant ecosystems could still deteriorate drastically over time if nothing is done. The same significant negative impacts would occur under the Proposed Project and other alternatives if funding does not become available to implement the Habitat Management Plan. Please provide a more thorough discussion of the impacts on YBI’s biodiversity that will result if the invasive introduced species are allowed to continue to out-compete, smother and displace the naturally occurring biotic communities. (*Ruth Gravanis*) [31.19]

#### Response

While the potential biological impact of the No Project Alternative is acknowledged in the EIR, it is appropriately identified as a less-than-significant impact as described below.

As stated by the comment and on EIR p. VII.13, the existing terrestrial biological resources on the Islands represent a baseline that is already ecologically compromised. This is detailed in the description of existing habitats and species in the Setting section of IV.M, Biological Resources, particularly pp. IV.M.4 – IV.M.9 and IV.M.16 – IV.M.23.

The analysis of impacts on biological resources for the Proposed Project as well as for all alternatives is based on the significance criteria used by San Francisco pursuant to CEQA and the CEQA Guidelines. These criteria are presented in Section IV.M, Biological Resources, on pp. IV.M.39 – IV.M.40. The criteria focus on impacts on species listed in local, regional, state, or federal plans, policies, or regulations; sensitive natural habitats or natural communities identified in local, regional, state, or federal plans, policies, or regulations; protected wetlands; or migratory species. The criteria also identify conflicts with adopted local policies or ordinances, habitat conservation plans, or natural community conservation plans as significant impacts. Finally, the *CEQA Guidelines* define a potential significant impact if a project has the potential to significantly degrade the quality of the environment, reduce the habitat of a fish or wildlife species, threaten to eliminate a plant or wildlife community, or substantially reduce the number of a special-status species.

As stated on EIR p. IV.M.21, there are no known federally- or state-listed terrestrial wildlife species known to breed on the Islands. Several special-status birds may use the Islands for foraging and roosting. There are no federally- or state-listed special status plant species documented on the Islands. There is only one plant species listed by the California Native Plant Society (CNPS) as a “species of conservation concern” – the dune gilia (see EIR pp. IV.M.19 – IV.M.20)—which is found in two small areas that are part of the Proposed Project and two other areas located on U.S. Coast Guard property. And there are several special-status plants of local

significance, listed by the local chapter of the CNPS. As noted in the EIR on p. IV.M.20, these plants have no protected status in local policies or ordinances, but are discussed in the EIR because of their small populations within San Francisco. Thus, there is a relatively small component of sensitive habitats or terrestrial plants and wildlife on the project site.

The No Project Alternative would not include implementation of the Habitat Management Plan for Yerba Buena Island ("HMP"), as stated on p. VII.13. The EIR text goes on to explain that without the HMP, there would be increased degradation of the remaining biological resources on the island, resulting in further degradation of the terrestrial biological resources than would occur if the Proposed Project, with the HMP, were implemented. This means that in areas where invasive species have begun encroaching into natural habitats, such as the areas of central coast riparian scrub (see EIR p. IV.M.7), this invasion would continue unchecked. However, as noted in the description of this habitat, the areas generally have low plant species diversity. Therefore, neither this habitat nor any other of the habitats on Yerba Buena Island are listed anywhere as significant or protected.

The dune gilia is a special-status plant found in several of the natural habitats on the island, including both the California annual grassland and the northern coastal scrub (see EIR p. IV.M.20). Two of the dune gilia communities are located on U.S. Coast Guard property in the grassland areas<sup>27</sup> and would not be affected whether the HMP is implemented or not. Therefore neither the Proposed Project (with or without the HMP as a component) nor the No Project Alternative would impact these populations. The other two are located on the west slope of Yerba Buena Island below the Treasure Island viaduct. One of these populations is found in the northern coastal scrub area,<sup>28</sup> which is relatively undisturbed and has a high diversity of native plant species (see EIR p. IV.M.7); therefore, the No Project Alternative would not be expected to result in substantial loss of this special status species in the reasonably foreseeable future. This would also be true under the Proposed Project with no HMP. The other population is found in a part of the eucalyptus woodland area that is also located on the west slope of the island.<sup>29</sup> This area is described in the HMP as follows: "Eucalyptus woodland with areas of iceplant [a non-native plant] in the understory. Includes small patches of dune gilia."<sup>30</sup> Because this is not the only, or even the main stand of dune gilia, if the small patch were affected by invasive species not removed because the HMP would not be implemented, the impact would not be considered significant.

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<sup>27</sup> *Draft Yerba Buena Island: Habitat Management Plan*, December 2009, pp. 14 – 15.

<sup>28</sup> *Ibid.*

<sup>29</sup> *Ibid.*, pp. 16-17.

<sup>30</sup> *Ibid.*, p. 18.

Existing birds and bats that may nest or roost on Yerba Island would not be significantly affected if the No Project Alternative were selected or the HMP not implemented as part of the Proposed Project. Conditions would remain generally the same as or similar to those described in the existing Setting in IV.M, Biological Resources, and no active nests would be disturbed.

If stands of the one CNPS-listed plant species or any of the locally important plant species were to be affected by invasive species, this would occur over a long period of time. During that time other development programs might be considered, and/or sources of funding to implement the HMP activities may be found, either separate from any development program or as part of another development program.

In summary, failure to implement the HMP would not result in a significant environmental impact as defined by CEQA because there would be no substantial change in existing conditions. Thus, while the potential biological impact of the No Project Alternative is acknowledged in the EIR, it is appropriately identified as a less-than-significant impact.

#### **2.21.8 OTHER ALTERNATIVES**

##### **Comments**

The traffic mitigation analysis focuses on transit options, not on providing the services on TI/YBI that would reduce transportation. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.21]

**Uses.** The Reduced Development option should come in two sizes and made into two separate Alternatives: one the 2003 version which had approximately 3000 units and the 6,000-unit version of 2007. These alternatives should also consider a mix of uses that would help mitigate the extreme impacts of the preferred alternative. We recommend an alternative that replaces the commercial office use (large peak-hour traffic generator) with visitor attracting use (off peak traffic) that would be more likely to utilize a regular ferry service. The success of the “F” Embarcadero line shows how unique transportation alternatives attract visitors – a short ferry ride that also provide opportunities for unique views would be extremely popular and help subsidize the cost of the service. Both of these alternatives should show full ferry service as described in the document. A major justification for full ferry service has not been studied as such, which is the entertainment/tourism component. This is the one factor which would make ferry service marketable and feasible.

The tourist attraction of the islands should be studied in various mixes to see what quantity of visitor use is required to make full ferry service viable. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.16]

##### *Recommendation:*

- *Study at least two alternatives which reduce or eliminate commercial office space, and vary visitor and resident numbers so that the important role of water transit can be seen to play a large part in mitigating the development of the islands. (Jennifer Clary, President, San Francisco Tomorrow) [38.18]*

**Response**

The Proposed Project sets forth a comprehensive development program that includes a range and mix of uses, and specific development components to support the level of retail services, infrastructure improvements, open space, public services, community-serving uses and transit improvements that are planned for development. The EIR transportation and mitigation analysis evaluates the Proposed Project, including the types and mix of uses, proposed by the project sponsors. The project sponsors may choose to modify the development program based on the EIR analysis; however it is not the role of the EIR to identify the services and types of uses that are appropriate for development.

Analysis of reduced development options suggested in the comment are addressed, respectively, in Chapter VII. Alternatives, EIR pp. VII.74 - VII.75 and VII.15 - VII.48.

A reduced development option with approximately 3,000 units and an entertainment/tourism component is discussed under Alternative D.2, 2800 Housing Unit Alternative with an Amusement Park, on EIR pp. VII.74 - VII.75. Under this alternative, residential land use would occupy about 30 percent of the Project Area, publicly oriented uses 35 percent, open space/recreation 26 percent, and community services 9 percent. The major publicly oriented development on Treasure Island would be a themed attraction with the potential to attract an average of 13,700 daily visitors and to employ up to approximately 3,500 seasonal and permanent workers. The plan would include 3 hotels, totaling 1,450 rooms. Existing film production facilities would be expanded by 100,000 square feet. No commercial office space is included in this alternative. As stated on EIR p. VII.75, Alternative D.2 was rejected from further consideration because TIDA and the City and County of San Francisco decided that an amusement theme park would not be a desirable use for the long-term development of Treasure Island and Yerba Buena Island. This alternative, with 2,800 residential units and an amusement park, also would not meet the project sponsors' objectives, and also would not provide sufficient revenue to support construction of the infrastructure improvements necessary for development and transit facilities, including revenues for construction of a ferry terminal and leasing ferry vessels, and project-generated revenues for ferry operations.

Alternative B, the Reduced Development Alternative, described on EIR pp. VII.15 - VII.48, would develop 6,000 residential units; no commercial office space would be built. Development of 6,000 units would not be compatible with a major regional-serving entertainment/tourism component; nor would it be able to accommodate a major entertainment/tourism use without reducing the amount of neighborhood and community-serving uses that would be needed to support the residential development. The Reduced Development Alternative would include a number of entertainment/tourism uses comprised of up to 150,000 sq. ft. of entertainment uses, 500 hotel rooms, 75,000 sq. ft. of cultural/museum space, a Sailing Center, and 360 acres of

athletics fields and general open space. Ferry service would be provided with this alternative, including construction of a ferry terminal, to serve both local- and regional-serving uses on the Island.

Tourist-attracting uses could increase the demand for ferry service to the Islands; however, due to the reduction in residential units, both reduced development options described above would decrease or make infeasible the ability to fund ferry service at the level proposed or at an expanded level in the future under Mitigation Measure M-TR-2.

### **2.21.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

#### **Comments**

The subject DEIR fails to identify, describe and analyze the CEQA-required “environmentally superior” alternative. What the DEIR calls the environmentally superior alternative - the no-ferry service alternative - clearly is not. As pointed out by many participants in the scoping process, the way to achieve fewer negative environmental impacts would be with a project with enough density for the residents to meet their basic retail and service needs on the islands, a maximum of transit options, a minimum of car trips, and a reduced level of car ownership. The “no ferry service” alternative, on the other hand, includes less density, fewer transit options, a 1:1 residential parking ratio and far too much commercial and visitor parking. A 1:1 residential ratio is no longer considered anywhere near the cutting edge of sustainability or carbon neutrality. (*Ruth Gravanis*) [31.1a]

Vol. 1.S.86, Summary: Why does the DEIR fail to evaluate an Environmentally Superior Alternative? An environmentally superior alternative is a Smart Growth alternative that balances sufficient density with the minimum number of cars, supporting ferry service and other modes of mass transit. (*Kathrin Moore, San Francisco Planning Commission*) [20.37]

We believe that the EIR is inadequate in several regards. Principally, it does not analyze an environmentally superior alternative or alternatives, as required by CEQA.

In order to comply with CEQA, the EIR should evaluate at least two alternatives which would meet the CEQA requirements for an “environmentally superior” alternative, and which will better accomplish the Project Objectives, as adopted by TIDA and TICD (DEIR pp. II.4 - II.6), as well as the policies and objectives of San Francisco’s general plan. (*Tom Radulovich, Livable City*) [37.1]

**Project Lacks an Environmentally Superior Alternative.** The identification of the “No Ferry” alternative as the environmentally superior alternative is flawed, as it fails to mitigate the extreme traffic impacts that make the preferred alternative so problematic. (*Jennifer Clary, President, San Francisco Tomorrow*) [38.8]

#### *Recommendation:*

- *Use the one of the two reduced auto alternatives as the environmentally superior alternative* (*Jennifer Clary, President, San Francisco Tomorrow*) [38.13]

The most serious deficiency of this DEIR is that, although it identifies the Redevelopment Plan’s impacts on aesthetics, historic resources, transportation, noise, air quality, wind and biological resources as “Significant and Unavoidable,” it fails to even consider a “Minimum Impact

Alternative” or an “Environmentally Superior Alternative” that would reduce or avoid these significant impacts. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.1]

- How can the DEIR conclude that the “No Ferry” alternative is the environmentally superior alternative -- with fewer transit options and with a 1:1 residential parking ratio? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.88]

...but the one thing I would like to put on the public record today is the fact that the CEQA required environmental superior alternative is really not enclosed in this document. And I’m actually surprised. (*Kathrin Moore, San Francisco Planning Commission*) [TR.20.1]

The project is very strong, and I think it should have dared to, indeed, address the environmentally superior alternative. Throughout the years of creating this project, there has been a strong emphasis on green, on the first truly green neighborhood of San Francisco. And the record shows that during the scoping process, scoping documents pointed out that the superior alternative would be one that would plan for enough density to support a robust public transit system, and basic neighborhood serving retail would minimize cars. (*Kathrin Moore, San Francisco Planning Commission*) [TR.20.2]

If the intent is to create an alternative that reduces or avoids the significant impacts of the Proposed Project, then we would recommend that the EIR include a “Minimum-Impact Alternative” instead of a “less intensive development” alternative.

The Minimum-Impact Alternative would call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water-quality and resource conservation. This alternative would include the following characteristics:

#### Transportation

- A reduction in the number of parking spaces, including reducing retail and commercial parking;
- Lowest feasible targets for vehicle miles traveled;
- Targets for minimizing automobile ownership, not just car use;
- Lockers at the transit hub so that visitors would be able to leave packages, extra shoes etc., there instead of in the trunks of cars – allowing fuller enjoyment of the variety of activities that the islands have to offer;
- Visitor draws that encourage ferry use, and marketing that encourages full ferries in both directions, to help assure economic viability of the ferry service;
- Weather-protected space for bikes on the ferries;
- Bus service to, from and on the islands that minimizes the number of transfers required;
- Dedicated bus access on the bridge; and
- Fully prepaid public transit passes for residents and employees, and transit fares bundled into the price of hotel rooms and any special events tickets

#### Resource Conservation

- Building standards to assure that high-rise buildings will be durable in an earthquake, avoiding the carbon emissions and waste of resources that would result from having to deconstruct, haul and re-build; performance standards that specify what is expected to happen to the buildings in quakes of various magnitudes; and
- On-site use of any clean excavation spoils

Energy Conservation and Carbon Neutrality (non-transportation)

- Remediation process to be as carbon neutral as possible, including hauling by rail instead of truck when long-distance hauling is required;
- Higher renewable energy generation targets, including on-island generation;
- Higher green building standards – higher LEED and Green Point Rated levels; and
- Maximum use of distributed energy systems

Water Conservation and Water Quality

- Higher standards for storm water discharges: higher level of treatment, greater detention times; more storage and reuse of roof runoff;
- Accommodation of flows greater than the 5-year storm event;
- Minimum of dredging;
- Tertiary-level treatment of all sewage;
- Maximum use of recycled water;
- Minimum use of Hetch-Hetchy water;
- Gray water systems in all residential buildings and hotels; and
- Climate-appropriate landscaping, requiring minimal supplemental water

Biology

- Biodiversity targets that protect and restore ecosystems, not just sensitive species; and
- Highest Green Point Rated points (or equivalent) for Bay-Friendly landscaping – for water conservation, Bay water quality, and habitat value. (*Jared Blumenthal, Department of the Environment, letter of February 25, 2008, submitted as an attachment to comment letter from Vedica Puri, President, Telegraph Hill Dwellers*) [39.90]

Response

The EIR includes identification and discussion of the “environmentally superior” alternative on p. VII.78, as called for in Section 15126.6(e)(2) of the *CEQA Guidelines*, which states: “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.” An EIR must describe a reasonable range of alternatives that avoid or substantially lessen one or more of the significant effects that would be caused by the Proposed Project, while accomplishing most of the project sponsor’s objectives (see also EIR p. VII.1).<sup>31</sup> CEQA does not require an EIR to provide a minimum-impact alternative, or a “smart-growth” alternative.

The No Project Alternative analyzed on EIR pp. VII.4-VII.14 would reduce or eliminate most of the significant impacts identified for the Proposed Project. Therefore, it would be the “environmentally superior” alternative, and another of the alternatives analyzed in the EIR is identified as the environmentally superior alternative, as required in Section 151256.(e)(2) of the *CEQA Guidelines*.

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<sup>31</sup> *CEQA Guidelines* section 15126.6(c).

Among the other alternatives, the No Ferry Service Alternative is identified as the environmentally superior alternative because it would eliminate the significant impact on the historic resource the *U.S.S. Buttercup*, and would substantially reduce the Proposed Project's air emissions impacts, noise impacts, and impacts on biological resources. Without ferry service, the emissions of diesel particulate matter, and the associated health risks would be substantially reduced compared to the Proposed Project and would be less than significant with no mitigation measures required (see EIR p. VII.62). Emissions of criteria pollutants (reactive organic gases, nitrogen oxides, and fine particulates) would be reduced by 24 percent or more, but the impacts would remain significant and unavoidable, as with the Proposed Project. Impacts on marine biological resources from construction and operation of the ferry service also would not occur; the significant impact on rafting birds would be eliminated. Biological mitigation measures identified for impacts resulting from construction and operation of the ferry service would not be necessary (see EIR p. VII.70). The No Ferry Service Alternative would not result in unavoidable, permanent increases in project-related ferry noise levels, and would not require implementation of a Ferry Terminal Noise Reduction Plan by WETA (Mitigation Measure M-NO-4) to reduce this impact to a less-than-significant level. The fact that the No Ferry Service Alternative would provide a 1:1 parking ratio for the residential units does not make it unsuitable for designation as the environmentally superior alternative. As explained in the Reduced Parking Alternative analysis presented in the response in Subsection 2.21.2, there is very limited evidence to support the assumption that reducing parking would substantially reduce traffic impacts. Because the No Ferry Service alternative does reduce or eliminate several significant impacts, it is appropriately identified as the environmentally superior alternative.

The other alternatives analyzed in the EIR in Chapter VII would reduce some of the significant impacts identified for the Proposed Project, but would not reduce as many significant impacts and would not reduce any impacts to less-than-significant levels, unlike the No Ferry Service Alternative. Therefore, the No Ferry Service Alternative was properly identified as the environmentally superior alternative.

See the response in Subsection 2.21.2 for an analysis of a Reduced Parking Alternative. It is not identified as the environmentally superior alternative because, unlike the No Ferry Service Alternative, it would not eliminate any significant impacts identified for the Proposed Project.

One comment notes that documentation submitted during the public scoping process for the EIR identified features of a superior alternative, including planning for sufficient density to support robust public transit and basic neighborhood-serving retail. The Proposed Project includes substantial additional public transit and plans considerable amounts of neighborhood-serving retail located in the historic Buildings 1 and 2 and in new retail space.

The final comment, from Telegraph Hill Dwellers, includes pages from a letter dated February 25, 2008, that appears to be from the San Francisco Department of the Environment, addressed to Bill Wycko, the Environmental Review Officer, regarding public scoping for the Treasure Island/Yerba Buena Island Redevelopment Project EIR.

A comment letter dated February 25, 2008, was received by the Planning Department from the San Francisco Department of the Environment during public scoping. A copy of that letter is provided in Appendix B, the Public Scoping Report, in the EIR. The letter attached by Telegraph Hill Dwellers includes the same first page as that received by the Planning Department; however, the second page of the letter attached by Telegraph Hill Dwellers is different from the second page in the Planning Department's official copy. (There is a third page in the letter attached by Telegraph Hill Dwellers, which is addressed in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs; there is no third page in the official copy).

The issues raised in the Department of the Environment's official scoping comments were taken into consideration when preparing the Draft EIR. As discussed above, there is no requirement in CEQA for a "minimum impact alternative" suggested in the Department of the Environment's official letter as well as in the copy submitted with the Telegraph Hill Dwellers comment letter.

A number of the suggestions in the Department of the Environment's official scoping comments are included in the Proposed Project that is analyzed in the EIR. With respect to transportation features, bicycle lockers would be provided at the Transit Hub (see EIR p. IV.E.33). Although not currently planned, lockers for personal effects could also be provided at the Transit Hub, depending on the final design of the facility. A more detailed analysis of an alternative with less parking is found in the response in Subsection 2.21.2, Reduced Parking Alternative than is provided in the Draft EIR in Section D.3. This expanded analysis includes reduced retail and residential parking, as suggested in the Department of the Environment's official letter. Weather protected space for bicycles on ferries is discussed in the response in Section 2.7.6.5, Ferry, in Subsection 2.7.6.5.3, Ferry Vessel.

Bus service that minimizes transfers would be accommodated by the Proposed Project in a number of ways. The proposed on-island shuttle service and routes are designed to be flexible to address transfer requirements of the shuttle riders. Additionally, TDM measures, transit routes, and the intermodal Transit Hub have been designed to minimize delays riders would experience in making transfers from shuttles to buses or ferries.

Dedicated bus access to the Bay Bridge would be provided using a transit-only lane on the causeway and Treasure Island Road if vehicle queues result in delays to the Muni line 108 – Treasure Island route (see EIR pp. IV.E.99 – IV.E.100). The westbound on-ramp on the west side of Yerba Buena Island would be restricted exclusively to transit and emergency vehicle-use only if the Ramps Project is approved and implemented by Caltrans (see EIR p. IV.E.7 for a

description of the Ramps Project, and p. IV.E.35 for a discussion of restricting use on the on-ramp). Mandatory purchase of pre-paid transit vouchers by residents and hotel visitors is included in the transportation demand management program that would be administered by the Treasure Island Transportation Management Agency (“TITMA”) (see EIR pp. II.51 and IV.E.46), although they would not be required of island employees.

The suggestions in the Telegraph Hill Dwellers’ attachment include establishing “targets” for vehicle miles traveled and automobile ownership. The vehicle miles traveled used in the air quality analyses in the EIR are based on standard regional travel distances in the URBEMIS2007 computer model, adjusted for the fact that the project site is in the middle of the Bay and therefore, the majority of the vehicle trips would be destined for off-island locations and result in slightly longer trips than those from origins on mainland San Francisco (see EIR p. IV.G.39). The EIR does not use target vehicle miles traveled in its analysis. If the vehicle miles traveled were assumed to be less, then the analysis of air quality impacts would show less emissions and could misrepresent the potential impacts of the Proposed Project. Similarly, if automobile ownership were assumed to be substantially lower, such that vehicle trip generation was affected, the transportation and air quality impact analyses could present less impact than would occur with the Proposed Project. Indirectly, automobile ownership and vehicle miles traveled would be discouraged through implementation of TDM measures such as congestion pricing and prohibiting free parking on the Islands.

The suggestion that marketing materials and types of visitor-serving uses be focused on encouraging ferry use to ensure economic viability of the ferry is one of the operational details that may be considered by project sponsors, TITMA, and the Water Emergency Transit Authority as ferry service is implemented. The project sponsors would provide funding to construct the Ferry Terminal and would provide project-generated funding for the lease of one ferry vessel (see EIR p. II.38). The proposed congestion pricing program and parking fees would help to support the ferry service as part of the overall transit system planned as part of the Proposed Project (see EIR p. II.51).

The Proposed Project would incorporate resource conservation features related to the use of excavated soil. Any clean soil excavated as part of site preparation would be used on the Islands, as is typical in most construction projects to reduce the need to import fill.<sup>32</sup> No excess dredging for either the Ferry Terminal basin or the Sailing Center would be expected, so the suggestion that a minimum of dredging occur would be implemented.

The suggestion that building standards require that buildings be “durable” in an earthquake appears to call for structures that would be habitable after an earthquake. This level of structural

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<sup>32</sup> *Infrastructure Update*, Section 5, Site Grading, Subsection 5.6.

safety is required for certain kinds of special-use buildings such as hospitals and other facilities that provide emergency services. The California and San Francisco Building Codes do not require this level for most buildings because it is not deemed appropriate by policy makers that create and adopt these codes, as well as being extremely expensive; the Building Code requires that buildings provide for life safety, allowing for evacuation following an earthquake, but does not require that a building be useable after a major event. Such a requirement is not necessary to avoid a significant impact of the Proposed Project. Compliance with a regulatory program, as is the case here with the Building Code, addresses the seismic issues raised in the comment.

Energy conservation and carbon neutrality features have also been considered in the Proposed Project. The suggestion that the remediation process use rail instead of trucks for long-distance hauling is appropriately directed to the U.S. Navy rather than the project sponsors, as the Navy is carrying out remediation as part of Base Closure (see EIR pp. IV.P.3 – IV.P.7 for a description of the base closure remediation requirements and procedures and the transfer process from the Navy to TIDA). Title 24 does not require or establish targets for the Proposed Project to provide on-island renewable energy generation; however, one of the objectives of the Proposed Project is to maximize opportunities for on-site renewable energy production. The Treasure Island Infrastructure Update includes a renewable energy component. The Proposed Project has a goal of providing a minimum of 5 percent of peak power demand created through on-site renewable resources, and includes strategies that would enable more than 5 percent of estimated peak demand to be generated on site (see EIR pp. II.67 – II.68). The Proposed Project also includes a new on-island energy distribution system described on EIR p. II.67. Energy Variants A2 and A3 also include options for satellite district energy plants and provisions for solar thermal energy (see EIR pp. VI.13 – VI.14). The Proposed Project would comply with Title 24 energy conservation requirements and would meet or exceed energy conservation requirements of San Francisco's Green Building Ordinance (see section IV.Q, Mineral and Energy Resources, EIR pp. IV.12 – IV.14).

A number of the suggested water conservation and water quality elements are included in the Proposed Project. Stormwater treatment would incorporate Best Management Practices (including reuse of roof runoff) based on the SFPUC *Stormwater Design Guidelines* which, when combined with the water treatment requirements for stormwater discharge set by the Region Water Quality Control Board, would meet the highest standards for stormwater discharge, treatment, reuse, and storage; refer to EIR pp. II.64-II.66. Under Wastewater Wetland Variant D1, treated effluent to be recycled would be discharged to constructed (man-made) wetlands for tertiary treatment before microfiltration.

The Proposed Project also includes a program to use recycled water on Treasure Island that would be treated to tertiary levels. As described on EIR p. II.60-II.61, the recycled water would be used for irrigation of open space areas, the Urban Agricultural Park, roadside plantings, and

landscape water features, and in appropriate plumbing fixtures in commercial and residential buildings to the extent permitted at the time of construction. The use of recycled water and implementation of water conservation measures would minimize the use of Hetch-Hetchy water.

The amount of recycled water projected to be used for the project described in the Notice of Preparation was increased for the Proposed Project, from about 340,000 gallons per day<sup>33</sup> to about 420,000 gallons per day (see EIR p. IV.K.17). Suggestions for full use of gray water systems in all residential buildings and hotels cannot be fully implemented under current state and local regulations. Title 24 of the California Code of Regulations allows the use of gray water (water from sinks, showers, and similar sources, captured for local reuse) in residential buildings under certain circumstances. Gray water use is not part of the Proposed Project at this time. Any future gray water in the Proposed Project would be required to conform to all applicable state and local regulations.

The *Land Use Plan* of the Proposed Project includes a sustainability component for the use of native or regionally-appropriate species for landscaping which would include climate-appropriate landscaping that requires minimal supplemental water.

The Proposed Project also proposes implementation of a Habitat Management Plan for Yerba Buena Island that would protect and restore ecosystems. As discussed above, the Proposed Project would meet or exceed requirements of San Francisco's Green Building Ordinance pertaining to landscaping.

The list of features of a "minimum impact alternative" would not reduce many of the impacts identified in the EIR as significant environmental impacts. For example, most of the water conservation and water quality suggestions listed in the comment are included as part of the Proposed Project. Incorporation of these features into a "minimum impact alternative" would not reduce or eliminate significant environmental impacts as defined by CEQA, but would further reduce an impact on water supply and water quality found to be less than significant (see Section IV.K, Utilities, EIR pp. IV.K.39 – IV.K.61, and specifically Impact UT-10 on pp. IV.K.56 – IV.K.60; and Section IV.O, Hydrology and Water Quality, and specifically Impact HY-1 on pp. IV.35 - IV.37). Therefore, an alternative that made greater use of recycled water and minimum use of Hetch Hetchy water, as would occur with the Proposed Project, would not reduce a significant impact. Similarly, no significant unavoidable impacts were identified as a result of storm water discharges (see EIR pp. IV.K.26 – IV.K.39, IV.O.45 – IV.O.46 and IV.O.47); therefore, imposition of higher standards for storm water discharges and accommodation of storm water flows greater than the 5-year storm event would not reduce a significant impact. As explained above, pursuant to the CEQA Guidelines, Section 15126.6(c), an EIR alternative must

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<sup>33</sup> *Infrastructure Plan*, Exhibit I to 2006 Term Sheet, September 2006, Table 7.2, p. 32.

reduce or avoid one or more significant impacts of a proposed project. Therefore, while many of the suggestions might be environmentally beneficial, they are not required to be addressed in alternatives in the EIR.

#### **2.21.10 NO REDEVELOPMENT PLAN**

##### **Comment**

Planning Code alternatives: One or more alternatives should also study adopting amendments to San Francisco's Planning Code to establish the land use controls and design standards and guidelines for the project site, rather than use a redevelopment Design for Development Document (D4D) (p. II-3). There is no requirement that land use controls within redevelopment areas be governed by design for development documents, rather than planning code amendments. Several recent redevelopment plans and survey areas have proposed amendments to the Planning Code to establish land use controls, including Transbay Redevelopment Area (partial), and the Mid-Market Redevelopment survey area. SB 1268, approved in 2004, explicitly permits the inclusion of form-based and illustrative codes in municipal planning codes, permitting a planning code to accomplish all of what a D4D document can.

Based on San Francisco's experience of the past few decades, setting land use controls via the Planning Code, rather than Design for Development, is an environmentally superior alternative. The Planning Code has been continuously amended over the past decade to reduce environmental impacts of new development and improve their environmental performance, shift trips from autos to walking, cycling, and public transit, improve pedestrian-oriented street design, require projects and fees which improve streetscapes and sustainable transportation infrastructure, limit impacts of new development on walking and cycling and transit, promote car-sharing and expand bicycle parking, and adopt transportation demand management measures in new projects. The history of these legislative changes is summarized in Livable City's "A Brief History of Parking Requirements in San Francisco" (<http://www.livablecity.org/campaigns/parkinghistory.html>)

In stark contrast, no Redevelopment Plan or Redevelopment Design for Development adopted over the past several decades has been amended to improve the environmental performance of the project, or to reduce environmental impacts from transportation. Currently, Redevelopment Plan areas remain stubborn enclaves of antiquated, traffic-inducing transportation policies, requirements, and standards in a sea of incremental improvement. At present, every redevelopment plan area in San Francisco requires or permits more parking than comparable neighboring districts governed by the Planning Code do.

Based on decades of evidence, an alternative or alternatives which rely on amendments to San Francisco's Planning Code to establish land use controls will prove environmentally superior, and better able to meet the project objectives, than alternatives which rely on Design for Development, and will prove increasingly environmentally superior over time. Such alternatives are demonstrably feasible, and can demonstrably meet the proposed project's basic objectives, and must be included among the alternatives studied. (*Tom Radulovich, Livable City*) [37.3]

##### **Response**

● As the comment indicates there are a number of ways to incorporate land use controls associated with the approval and adoption of redevelopment plans. The Draft EIR analyzes the Treasure Island / Yerba Buena Island Redevelopment Plan as it was proposed by the project sponsors, TIDA,

the designated California Redevelopment Agency, and TICD, the prospective master developer. Given the uncertainties in the availability of tax increment financing through use of a redevelopment plan, TIDA, in consultation with the Planning Department, has determined not to adopt a Redevelopment Plan. Instead, it has determined that the Proposed Project's land use controls would be implemented by adding an Area Plan to the City's *General Plan* (which would contain objectives and policies that would set the foundation for land use development on the Islands), and by amending the City's Planning Code to adopt a Special Use District for the area (which would contain zoning and height and bulk classifications within the Project Area and would reference the more detailed standards and guidelines in the *Design for Development*).

- Under California Community Redevelopment law (CRL), the Treasure Island / Yerba Buena Island Redevelopment Plan would be required to be consistent with the *San Francisco General Plan* ("*General Plan*") as is true for the Planning Code. Although no longer required by the CRL if the Proposed Project does not include adopting a Redevelopment Plan, to approve the Proposed Project, the Planning Commission would still have to make consistency findings stating that the Proposed Project is consistent with the *General Plan* and the Planning Code, Section 101.1 Priority Policies.

Land use controls based on the Planning Code would not be the environmentally superior alternative as defined by CEQA. CEQA Guidelines (Section 15126.6(a) and (e)(2)) require that an EIR analysis of alternatives identify the environmentally superior alternative, the purpose of which is to identify a superior alternative that has the fewest significant environmental impacts. This CEQA requirement does not pertain to how land use controls for a project are codified.

## 2.22 EIR PROCESS

### 2.22.1 PUBLIC REVIEW

#### Comments

As a final note, we echo the concerns raised by many others that the time to review the EIR is too short, particularly given the season. The Planning Department appears to have adopted the tactic favored by developers who wish to avoid close scrutiny of their projects by limiting the review of their DEIRs and setting hearings for inconvenient times and dates. We note that this EIR may come up for final certification during the holiday season as the Board of Supervisors is in flux. If this is indeed a tactic to circumvent potential opposition to the project, it is a very unfortunate development for the City and an attack on the transparent public process that is necessary for adequate CEQA compliance. At a minimum, we ask that the time to provide comments to the DEIR be extended by 30 days. (*Michael Lynes, Conservation Director, Golden Gate Audubon Society*) [3.8]

- Given the significant transportation impacts that the Proposed Project will have on the regional transportation system, have comments from the US Department of Transportation and CalTrans been requested and received? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.65]
- What comments have been received from the Audubon California? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.72]

We have some serious concerns about the transportation plan, about the habitat preservation, air quality issues, and impact on climate change, as well as many other issues. Our request today, and I'll be very brief, is that you please consider and we respectfully request a two-week extension on the public comment period for the Draft EIR. (*Kate Kelley, Sierra Club*) [TR13.1b]

...and we need the additional time in order to focus our attention on this project now. (*Sal Bloom, Arc Ecology*) [TR.16.2]

We have invested tens of thousands of dollars in review and assistance on this project, and we would love to see it succeed. We want to see jobs. We want to see the new vision for Treasure Island be implemented, but we want to see it properly sized for the carrying capacity of the island, so we can make this project as successful as possible.

And so we are asking for an additional two weeks so we can do the review of the EIR necessary to make that happen. And as you know, we do these things during Christmas and Thanksgiving and the summer vacation. I just cut mine short to be here today. I would very much appreciate more time to be able to go ahead and review this. All we're asking for is two weeks. (*Sal Bloom, Arc Ecology*) [TR.16.4]

#### Response

As explained in the Notice of Availability of the Draft EIR, the original comment period ran for 45 days, from July 12 to August 26, 2010. Based on the requests made at the August 12 public

hearing on the Draft EIR as well as other requests, the Planning Commission and Treasure Island Development Authority Board extended the public review period by an additional two weeks, from August 26 to September 10, 2010.

Comments on the Draft EIR were received from the California Department of Transportation (Caltrans) District 4 and from the Golden Gate Audubon Society. A list of commentors is provided in Section 1.4, in Chapter 1, Introduction, of this Comments and Responses document. Copies of all written comments are provided in Appendix A to this Comments and Responses document, and a copy of the public hearing transcript is in Appendix B.

### 2.22.2 PROCEDURAL ISSUES

#### Comments

I am submitting my comments by e-mail pursuant to California Public Resources Code section 21090(d) (3). In the future, you should let people know that they have the option of submitting comments on CEQA documents via e-mail. (*Christopher Pederson*) [5.1]

This firm represents Kenneth and Roseanna Masters (“**Clients**”) with regard to analyzing the DEIR for the proposed development of Treasure Island and Yerba Buena Island. Our Clients reside at 301-D Macalla Court (Treasure Island) SF, 94130. I respectfully request that should you choose to respond to this letter that such be addressed to my law office. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.1]

Additionally, neither the developer nor the City/County of San Francisco can ensure that the Regional Water Quality Control Board will permit a new facility. (See II. Project Description, pages II.56 to II.60). (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.31]

Another incurable defect is that, given the almost total lack of information as to the individual specific projects that would form a part of this massive Redevelopment Plan, a program or first tier EIR would be the appropriate approach under the California Environmental Quality Act (CEQA), followed by later project-level EIRs once site specific issues are identified for individual projects and phases of the Project. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.2]

Why was an Initial Study not prepared as a part of the scoping process for this DEIR? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.6]

As disclosed in the DEIR there are many unknowns, including, to name only a few, the specific locations and designs for the “prominent cluster of 19 high-rise towers at the center of the San Francisco Bay,” the specific plans for the “retrofit” of and additions to historic buildings, the transit-related facilities, and the phasing of development over the next 20 years in relation to the implementation of transportation mitigation measures.

- Given these many unknowns, please explain how this DEIR complies with the requirement of CEQA that an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.

- Because so many aspects of the Redevelopment Plan have yet to be defined and are unknown at this time, will there be individual environmental review of site specific impacts once the details of individual projects and phases of the redevelopment have been identified?
- Will the implementation of each individual project and phase of development be subject to a project-specific EIR as plans become clear and impacts are identified?
- Please explain the CEQA guidelines as to when a program or first tiered EIR are appropriate.
- Please explain on what basis the decision was made not to prepare a program or first tiered EIR for the Redevelopment Plan? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.8]

### **Response**

An Initial Study is not a required document when an EIR is being prepared. An Initial Study can be a useful tool to focus environmental review, as it provides an opportunity to determine whether any topics would result in no significant environmental impacts such that they do not require detailed analysis in an EIR. When an agency determines early in the environmental review process that an EIR will be required, however, an Initial Study is not required. All topics in the Planning Department's CEQA Checklist were fully addressed in the Treasure Island/Yerba Buena Island EIR and no Initial Study was necessary (*State CEQA Guidelines* Section 15063(a)).

Under CEQA, a Redevelopment Plan may be a project-level EIR (CEQA Section 21090; *CEQA Guidelines* Section 15180). The project proposed to be implemented under the Treasure Island / Yerba Buena Island Area Plan and Treasure Island / Yerba Buena Island Special Use District ("SUD"), as set forth in Chapter II, Project Description, is sufficiently well defined to prepare a project-level EIR. The EIR addresses the impacts of the Proposed Project at a project level, including planning, construction, and operation, not at a "program" level. In this respect, this EIR is unlike the Transfer EIR prepared and certified in 2005. Although specific designs for each potential building have not been prepared, there is sufficient information about building massing and form, about the locations of areas to be developed, and about proposed densities to provide a full and complete analysis of impacts. The proposed *Design for Development* presents detailed design controls and approval procedures that were taken into account in the analysis of impacts. The transportation features of the Proposed Project are summarized in EIR Chapter II, Project Description, on pp. II.35-II.52, and described in more detail in EIR Section IV.E, Transportation, on pp. IV.E.30-IV.E.47. Rehabilitation of historic structures is proposed to be carried out in compliance with the Secretary of the Interior's Standards for Rehabilitation, as explained in EIR Section IV.D, Cultural and Paleontological Resources (see pp. IV.D.49-IV.D.50 and pp. IV.D.52-IV.D.53). This is supported by the requirements in the proposed *Design for Development*. This information is sufficient to provide an analysis of potential significant impacts at a project level for the Area Plan/SUD. For these reasons, a program-level EIR that analyzes a series of related actions at a more general level, followed by subsequent project-specific analyses of later activities, is not necessary.

No further environmental review is expected or required for the Proposed Project after certification of this EIR unless the circumstances triggering supplemental or subsequent review as explained in *CEQA Guidelines* Sections 15162-15164 occur. For example, subsequent or supplemental review under Sections 15162 and 15163 may be necessary where substantial changes are proposed that require new discretionary decisions by a public agency and those changes would result in new or substantially more severe significant environmental impacts. If/when future discretionary approvals are considered by the City or another agency, the agency will determine whether supplemental environmental review should be performed in order to address significant new information concerning the Proposed Project or the surrounding circumstances.

The Notice of Availability mailed to public agencies and interested groups and individuals (see the response in Section 2.22.5, Availability of Documents, below, for further discussion) provides an e-mail address for the MEA EIR Coordinator for the Proposed Project, but does not expressly state that public comments will be accepted via e-mail. Nevertheless, many of the comment letters were provided and accepted electronically during the public comment period.

Responses to all comments made on the Draft EIR that raise physical environmental issues are provided in this Comments and Responses Document. No separate responses are prepared for each individual comment letter, nor are responses to individual letters transmitted separately to each commenter. The entire Comments and Responses document has been transmitted to each commenter for whom an address was available.

### **Comments**

What mitigation measures were identified in the Navy's Record of Decision (ROC)? How have each of these mitigation measures been incorporated in the Redevelopment Plan that is the subject of this DEIR and how will each mitigation measure be implemented and enforced? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.4]

Because NEPA requires federal environmental review of the currently Proposed Project prior to transfer by the Navy, why is this DEIR not an EIS/EIR? Please explain why in detail. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.9]

- When will NEPA be complied with? What is the relationship of this DEIR to the federal review of this proposed Redevelopment Plan under NEPA?
- Will a new Section 106 review and consultation under the NHPA be required prior to transfer by the Navy as a part of the updated federal environmental review? Will a new MOA be required? Why or why not? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.11]

### **Response**

The current document is a project-level EIR prepared pursuant to the California Environmental Quality Act ("CEQA") as required under California statutes in the Public Resources Code,

Section 21000 *et seq.* It has been prepared to inform City, regional and State agencies that may need to consider and act on approvals for the Proposed Project. It has not been prepared for use by Federal agencies, although the information contained in the EIR may be useful for Federal agencies such as the U.S. Army Corps of Engineers that may need to consider aspects of the Proposed Project at some time in the future. The analysis in this document examines the 2005 EIR, which analyzed the conveyance of Naval Station Treasure Island to the City at a programmatic level, for relevant material, including possible application of mitigation measures adopted in that document (please refer to the response in Subsection 2.1.17, Project Description – 2005 EIR and 2006 Term Sheet, in Section 2.1, Project Description, of this Comments and Responses document, for further information on this issue).

As described in EIR Chapter I, Introduction, on pp. I.4-I-5, the Navy previously prepared a Final Environmental Impact Statement (“EIS”) for the Disposal and Reuse of Naval Station Treasure Island in accordance with the National Environmental Policy Act (“NEPA”) and complied with Section 106 to meet Federal base closure and disposal requirements. The basis for the preferred alternative in the Navy’s NEPA EIS was the 1996 Draft Reuse Plan. After completing a draft EIS in 2002 and a final EIS in 2003, the Navy issued a Record of Decision in 2005, indicating that the proposed disposal of the Islands could be accomplished without significant harm to the environment through implementation of certain mitigation measures to allow reuse of the property in a manner consistent with the City’s reuse plan. The mitigation measures are summarized in the Navy’s Record of Decision on pp. 9 – 12.<sup>1</sup> The measures relate to transportation (upgrading the on-ramps from Yerba Buena Island to the Bay Bridge [the Record of Decision (“ROD”) acknowledges that the ramp on the west side of the island may be constrained by geologic conditions], installing signage encouraging residents and visitors to use the on-ramp on the east side of the island, implementing a transportation demand management program, monitoring bus and ferry transit demand to ensure that planned services are implemented to meet demand, restriping Treasure Island Road to accommodate additional traffic, installing ramp metering devices at the on-ramps on Yerba Buena Island, establishing direct transit service to the East Bay), air quality (incorporating transit-oriented design by integrating residential and commercial land uses near transportation routes and encouraging bicycle and pedestrian travel, providing shuttle service to major destinations, and similar measures to reduce vehicular emissions), biology (minimizing disturbance to sensitive habitats including eelgrass beds and to migratory birds during construction and from recreational use through signage and compliance with applicable laws and regulations), geology (creating a zone of “improved

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<sup>1</sup> Department of Defense, Department of the Navy, Record of Decision for the Disposal and Reuse of Naval Station Treasure Island, California, signed on 10/26/05. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E, and at the TIDA website at [www.sftreasureisland.org/index.aspx?page=28](http://www.sftreasureisland.org/index.aspx?page=28) under “Redevelopment” in the subtopic “United States Navy Base Closure Information.” Accessed February 12, 2011.

ground” around the perimeter of Treasure Island and improving interior areas to reduce differential settlement, providing specially designed foundations for buildings intended for public occupancy, and carrying out required geotechnical studies for individual development sites as required by City codes), and hydrology/flooding (filling low-lying portions prior to development and establishing a setback from the perimeter dike to reduced exposure to flooding hazards due to dike overtopping during storms, or raising the dike as necessary to account for rises in sea level).

Most of the mitigation measures summarized in the ROD have been included in the Proposed Project insofar as they are feasible and continue to be relevant to the substantially different development program now under consideration. The geology measures summarized in the ROD and included in the Navy’s Final EIS have been superseded by the geotechnical stabilization program included in the Proposed Project and described and analyzed in Section IV.N, Geology and Soils, in the current EIR (see especially EIR pp. IV.N.21 – IV.N.28). The approach to flooding hazards and sea level rise has been considerably refined since the 2003 Final EIS, as described on EIR pp. IV.O.32 – IV.O.35.

The Navy has conducted an assessment of whether new information or changed circumstances require the Navy to prepare a supplemental NEPA document and has determined that although there are variances between the Area Plan/SUD that is the subject of this EIR under CEQA and the 1996 Draft Reuse Plan that was the basis for the preferred alternative in the Navy’s final EIS for the Federal disposal action, the types and levels of environmental impacts associated with the current Area Plan/SUD are substantially similar to or less than those disclosed in the Navy’s FEIS. Accordingly, the Navy has determined that the final EIS for the disposal and reuse of the Islands is still valid and preparation of a supplemental NEPA document is not required.

The City determined that a joint EIR/EIS was neither required nor necessary because any additional environmental analysis performed by a Federal agency for subsequent Federal actions related to implementation of the Area Plan/SUD would be prepared pursuant to NEPA, Section 106 of the National Historic Preservation Act, and other Federal statutes, rather than be designed to meet CEQA requirements. The Navy will not act on this EIR.

### **2.22.3 AUTHORS**

#### **Comment**

19. Please provide the name, address, telephone number, email of the “independent photographer who photographed the Redevelopment Plan Project Area from a range of publicly accessible vantage points.” (*Anthony F. Gantner, Attorney-at-Law*) [13.9]

#### **Response**

The EIR Consultants are listed in EIR Chapter VIII, Authors and Persons Consulted.

#### 2.22.4 PUBLIC SCOPING

##### Comments

Vol 3, App. B, Scoping: Why are relevant Scoping Comments by J.Blumenfeld \_SF Environment, Letter dated Feb 25, 2008, not listed in their entirety? (*Kathrin Moore, San Francisco Planning Commission*) [20.3]

Have other federal and state agencies had input into the preparation of this DEIR? Which state and federal agencies have been consulted? When did such consultation take place? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.10]

- Please include the Blumenfeld Letter in its entirety as an attachment to this comment letter to be published in the Comments & Responses document to this DEIR.
- Please compare and explain why significant parts of the Blumenfeld Letter were deleted from the letter of the same date, which is published in the DEIR in Volume 3, Appendix C. (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.85]

##### Response

Public scoping for the EIR occurred from January 26 through February 26, 2008, beginning with publication of a Notice of Preparation on January 26, 2008 (see EIR Appendix B, Public Scoping Report). Two public scoping meetings were held, one on February 11, 2008, at the Port of San Francisco offices and the other on February 13, 2008, on Treasure Island. Notice of the public scoping was published in the *San Francisco Chronicle*, the newspaper used at the time by the City for public notices in San Francisco, as well as in the *Oakland Tribune* and the *Alameda Times-Star*. Notices of public scoping were mailed to over 190 public agencies and elected officials in the Bay Area region, as well as over 200 interested groups and individuals, and the Notice of Preparation was circulated through the State Clearinghouse. Comments were received from the Bay Area Air Quality Management District, the Bay Conservation and Development Commission (“BCDC”), the U.S. Coast Guard, and Caltrans District 4, among other public agencies.

The comment letter dated February 25, 2008 received during public scoping from the San Francisco Department of the Environment, signed by Jared Blumenfeld as the Director at the time public scoping occurred, is the one provided in the Public Scoping Report that is presented as EIR Appendix B. It is presented in its entirety as received. The letter from the Department of the Environment appended to the Telegraph Hill Dwellers letter of September 10, 2010, includes different text than the official letter received by the Planning Department during public scoping. Nevertheless, the Department of Environment comment letter in the Public Scoping Report and the letter appended to the Telegraph Hill Dwellers letter are substantially similar, and the EIR provided the analysis requested in the substantive comments in both letters. Refer also to the Response in Subsection 2.21.9, Environmentally Superior Alternative, for a detailed discussion of

the differences and contents of the February 25, 2008 Department of Environment public scoping letter and the September 10, 2010 Telegraph Hill Dwellers comment letter on the Draft EIR.

#### **2.22.5 AVAILABILITY OF DOCUMENTS**

##### **Comments**

Vol. 1, IV.B.2, Aesthetics: The impacts of the development of TIYBI are clearly regional in scope, has the Region been asked to comment on this DEIR, like communities in the East Bay, the North Bay, the South Bay? (*Kathrin Moore, San Francisco Planning Commission*) [20.9]

- Given the regional scope of the visual changes that the Proposed Project would have, to what extent has input been sought from the cities and counties surrounding the Bay?
- Have copies of the Development Plan and this DEIR been distributed to the cities and counties surrounding the Bay with a request for comments and input? To which cities and counties? Have any comments been received? (*Vedica Puri, President, Telegraph Hill Dwellers*) [39.20]

Secrecy. I went into the Planning Commission. Actually went down there yesterday, and they sent me to another department, and I was actually able to get two volumes. I just brought one here so everybody could see, this is one. It references two more, called the Planning Guide or the Design for Development. And those other two documents, that means four, they're not available online.

Why call for sunshine? How come they're not available online? (*Paul Currier*) [TR.6.2]

I actually don't think that the Environmental Impact Report should be approved until it's been open to the sunshine and people in the City and County of San Francisco and the people of the State of California can look at what you guys are doing. (*Paul Currier*) [TR.6.5]

##### **Response**

Public notice of the availability of the Draft EIR was provided by all of the means required in Chapter 31 of the San Francisco Administrative Code: by newspaper notice, by posting on the project site, and by mail to interested groups and individuals including tenants on the Islands.

Notices of availability of the Draft EIR were provided to Federal, State, and regional agencies by direct mail as well as through the State Clearinghouse. All adjacent cities and counties received a notice of availability. Public notice of the availability of the Draft EIR was published in the *San Francisco Chronicle*. Notices of the availability of the Draft EIR were posted at numerous locations on Treasure Island and Yerba Buena Island and at locations around the Ferry Building on the mainland, as well as at the Planning Department.

The Draft EIR is available electronically at the Planning Department's website (at [www.sf-planning.org/index.aspx?page=1828](http://www.sf-planning.org/index.aspx?page=1828)) under Case # 2007.0903E, and was posted on the website on July 12, 2010, the day that public notice of its availability was provided in a newspaper of

general circulation. Paper copies of the Draft EIR were made available at the Planning Department's Planning Information Counter at 1660 Mission Street, and copies were mailed to groups and individuals who had requested it in advance of the publication date, and in response to additional requests following publication. A notice of the availability of the Draft EIR was also posted on the Treasure Island Development Authority website (at <http://www.sftreasureisland.org/index.aspx?page=27>), with a link to the Planning Department website location. Documents referenced in the EIR are available for public review in the Planning Department's case file.

The proposed *Design for Development* was made available for public review on the Treasure Island website on March 5, 2010 (at [www.sftreasureisland.org/index.aspx?page=26](http://www.sftreasureisland.org/index.aspx?page=26)). Public presentations of the proposed *Design for Development* were made at the Treasure Island Board of Directors meeting on March 10, 2010, at the Citizen's Advisory Board ("CAB") meeting on March 16, 2010, at the Board of Supervisors' Land Use and Economic Development Committee meeting of March 15, 2010, and at the Planning Commission meeting on April 8, 2010. It was also discussed at the CAB meeting of May 4, 2010.

A Notice of Availability of the Draft EIR was provided to adjacent cities and counties, as well as responsible agencies. No comments were received on the Draft EIR from adjacent cities or counties. Comments were received from a variety of regional public agencies, including AC Transit, East Bay Municipal Utility District, BCDC, the Golden Gate Bridge District, Bay Area Air Quality Management District, and Caltrans District 4.

## 2.23 FISCAL AND ECONOMIC ISSUES

### 2.23.1 FISCAL AND ECONOMIC EFFECT OF GEOTECHNICAL STABILIZATION

#### Comment

Moreover, although it is generally true that every engineering problem has an engineering solution, such as the complete replacement of the poor, sand-based fill that constitutes the majority of Treasure Island itself, it is not true that the cost and the damaging impact to the surrounding environment is justified. Not only will this mitigation burden and improvement cost have to be subsidized by a variety of public-financing mechanisms, but the enduring effect of building something where it should not be built will endure for generations to come. The DEIR wholly and completely fails to analyze and propose acceptable mitigation measures to address this problem, including how such is not to become a future environmental problem and a burden on the taxpayers of San Francisco. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.10]

#### Response

The Proposed Project does not include replacing the existing sand-based fill on Treasure Island, although some fill would be imported to raise the ground level in some portions of the island for protection against flooding and sea level rise (see EIR Chapter II, Project Description, p. II.74, and Section IV.N, Geology and Soils, p. IV.N.22).

The project sponsors have evaluated several approaches to geotechnical stabilization. The approach selected, described on EIR pp. II.73-II.75 and pp. IV.N.21-IV.N.22, requires improving the entire development area prior to construction of individual buildings to limit the potential for differential settlement. This approach is intended in part to avoid more expensive long-term maintenance costs. It instead requires considerable initial capital costs.

- The overall financing structure for the Proposed Project had been a Redevelopment Plan that would use tax increment financing for infrastructure and affordable housing. Since the Draft EIR was published in July 2010, there has been discussion at the State level in Sacramento of eliminating redevelopment agencies as part of reducing the state's budget shortfall. Because of uncertainties regarding the status of redevelopment agencies and redevelopment funding, the project sponsors are no longer considering financing infrastructure improvements as part of a Redevelopment Plan. Instead, financing for infrastructure is proposed to be obtained using an Infrastructure Financing District ("IFD") mechanism rather than tax increment financing available with a Redevelopment Plan.

The initial capital costs of the Proposed Project would be paid for, in general, from three sources:

- private capital; bonds supported by incremental tax revenues generated solely by development within an Infrastructure Financing District or Districts; and bonds supported by a community

facilities district assessed solely on market-rate homes in the Project Area. Private capital and community facilities district assessments on market-rate homes are separate from financing under the IFD. Private capital has no taxpayer burden because the financial investment capital is from non-public parties. The use of IFD financing relies on incremental tax revenues generated within the district. The IFD financing

mechanism does not increase property taxes paid by individual property owners within a redevelopment project area or the city at-large.

The last source, the community facility district (“CFD”), would impose a tax assessment on property owners within the Project Area to pay for infrastructure and public improvements, including the geotechnical improvements. The CFD tax assessment secures the debt issued in order to finance the public improvements authorized within the district. The CFD tax assessment reflects the cost of the improvements constructed for the benefit of both the properties within the assessment district and the public at-large. Properties located outside of the district do not pay the assessment. Homeowners who choose to purchase a home in the area would have full knowledge of this assessment (see the response in Section 2.23.2, Economic Effects, below, for a brief discussion of how this assessment would be applied to existing residents and households in affordable units). The community facility district assessment appropriately asks residents within the assessment district to help pay (over a long time period) for the infrastructure from which they benefit. This mechanism avoids asking San Francisco taxpayers who own property outside the Project Area to contribute to infrastructure within the Project Area. Thus, implementation of the Proposed Project using these three sources for initial capital costs would not burden future generations of taxpayers throughout the City.

- In summary, the Proposed Project is depending on two public financing mechanisms, an Infrastructure Financing District and a Community Facility District, both of which are paid for using tax proceeds generated from development within the Project Area. The infrastructure being proposed as part of the Project, however, would also benefit people who do not pay those taxes. For example, the Proposed Project’s construction would generate jobs, many of which would be targeted to San Franciscans; also, non-residents would be provided use of the new public open spaces.

### **Comment**

*Recommendation: ...*

- *The City should evaluate ground leases rather than title conveyance as a way to generate a sustainable revenue stream to support island amenities such as adequate transit and maintenance of open space and infrastructure resources. (Jennifer Clary, President, San Francisco Tomorrow) [38.14]*

**Response**

The comment suggests that long-term ground leases would provide a long-term revenue stream to support project amenities. The project sponsors have indicated that the Proposed Project is economically viable if sufficient up-front capital is generated to support the public infrastructure construction (construction of public infrastructure would be one of the early construction activities of the Proposed Project) , and if a sustainable source of revenues is generated to support long-term maintenance.

Fee title transfers convey ownership of a particular piece of property with all of its property rights, whereas a ground lease is a rental interest where the land is retained by the original owner and use of the land is subject to the conditions of the lease. Generally, people are willing to pay more to own something outright than to rent it. In addition, development of ground leased parcels is significantly more difficult to finance, and has become increasingly so in the current economic environment. Because of these constraints, fee-title transfers are the most feasible way to solve both the short-term and long-term financial requirements of the project. In the short term, fee-title transfers of market rate lots create a source of capital that can be used to fund both construction of public infrastructure and other associated public benefits, such as affordable housing, transit, parks, and open space. Over the long term, the higher prices paid for condominiums built on fee-title ownership sites result in more property taxes being paid, which in turn sustain long-term island maintenance, including the support of the transit system. The Infrastructure Financing District funding mechanism enables the Proposed Project to capture such property tax increments for the short-term and long-term financial needs of the Islands.

Ground leases, in contrast, would not provide adequate short-term financial benefits or long-term maintenance funding. In the short term, a typical ground lease would generate very little money to support infrastructure construction since leases pay small amounts of money every year rather than a large sale payment. It is possible that ground leases could be pre-paid in order to turn this annual stream of payments into an upfront source of capital. This approach to financing would provide more limited amounts of capital than selling property, and lending institutions would require the borrower to maintain a much higher stake in property to be leased in comparison to for-sale property; as a result, less up-front financing is available for leased property than for-sale property, which in turn results in less up-front money, lower property values, and lower property tax revenues. Because property on leased land has a lower value, such upfront capitalizing of a ground lease provides less total dollars than an outright sale. These upfront financing structures would also mean that there would be no long-term ground lease revenues to pay for operating costs, defeating the aim of the commentor's proposal. Therefore, over the long-term, property on leased land has a lower value (since the land is being borrowed, not owned) and therefore generates less tax proceeds on both a short- and long-term basis.

### 2.23.2 ECONOMIC EFFECTS

#### Comments

Finally, although economic impacts are generally not evaluated in an environmental impact report (as here), this Project should include a thorough analysis of funding sources to determine if the Project can remain revenue neutral. The analysis should review the relocation of residents if they would not be able to afford the rental rates. Prior to the decision-making process, it is important to know: 1) if San Francisco residents will be burdened by the costs and 2) if affordable rates can be guaranteed for TI/YBI residents. The rate structure may limit the ability of middle- to low-income residents to remain on TI/YBI. Once the rates are established, an analysis could be conducted for the Population and Housing sections, respectively. Until then, it is unknown if the rental rates are acceptable to support middle- to low-income residents.

The financial burden on qualified, affordable income residents, and the distorting demographic effect (such as on the Project's and surrounding communities' traffic, water supplies, habitats and wastewater systems) was not studied in the DEIR - i.e., it is unlikely they can afford to be burdened with any of the anticipated items, such as: (a) reclamation district assessments, (b) street and lighting district assessments, (c) parks district assessments, (d) sewer district assessments, (e) water district assessments, and (f) public transportation fees such as the ferry service (unless such is heavily subsidized). (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.32]

Qualified affordable renters benefiting from restricted affordable rents cannot (logically or lawfully), through the rent structure or any other assessment, be charged or otherwise burdened with the costs noted in subclauses (a) through (f), above. Thus, if the Project and its developer are not required to underwrite these costs at the time of implementation and for the life of the Project, then such costs and burdens will necessarily fall to the property owners and the San Francisco taxpayers; the Project's developers will have made the profit and left the burden to those who remain. They will make their money under the guise of creating a civic asset for the benefit of all San Franciscans, while leaving the future costs to those supposed taxpayer beneficiaries and property owners. (*Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters*) [19.35]

#### Response

The comment correctly states that direct economic impacts of a proposed project are not a subject addressed in an EIR. Economic and social effects are not considered significant environmental effects of a project (see *State CEQA Guidelines* Section 15131(a)). The EIR does discuss affordable housing in Section IV.C, Population and Housing.

The EIR describes a transition housing program for existing residents in EIR Chapter II, Project Description, on pp. II.28-II.29, and in Section IV.C on pp. IV.C.13-IV.C.14. The intent of this program is to avoid displacing existing residents who reside on the Islands as of the date the Disposition and Development Agreement (“DDA”) is approved and who continuously remain residents in good standing during project construction and development. As stated on EIR pp. IV.C.13-IV.C.14, “The new housing would be leased to the existing residents eligible for

transitional housing at a price no greater than their rent at the time of DDA approval, plus annual adjustments for inflation. Depending upon the income of the household, the housing may be leased at rents lower than the household's rent at the time of DDA approval, plus annual adjustments for inflation.”

Treasure Island Development Authority (“TIDA”) staff have held a series of community meetings to present an update of the Proposed Project, and to introduce the proposed transition housing program for existing residents of Treasure Island. In June 2010, TIDA staff released draft rules and regulations for transition housing for residents of the rental units of the Villages at Treasure Island. In December 2010, TIDA staff held a second series of community meetings to present changes to the transition housing rules and regulations. In January 2011, the Draft Transition Housing Rules and Regulations were published and presented to the Citizen's Advisory Board and TIDA Board for their comments. TIDA will not approve the program unless and until the EIR is certified and the Proposed Project is approved.

The comment expresses concern about the impacts of potential fees and other financing mechanisms on affordable housing. The affordable housing that is proposed as stand-alone housing to be developed by TIDA or designees (including the Treasure Island Homeless Development Initiative, which is expected to provide an expanded number of units affordable to very low income residents) would not be subject to the community facilities district (“CFD”) assessments that are described above in the response in Subsection 2.23.1, Fiscal and Economic Effect of Geotechnical Stabilization. Inclusionary affordable housing that is constructed as part of buildings with market-rate housing would be subject to the CFD assessments. Those assessments would be taken into account, along with other costs, in determining the overall affordable rental or sales rate to be paid by the household; therefore, the total payment by a household determined eligible for affordable housing would not be increased because of the CFD assessments.

The comment lists a number of potential special districts that might be used for funding infrastructure, including reclamation districts, street and lighting districts, park districts, sewer assessment districts, and water districts. The Proposed Project does not propose to use these types of districts; see the response in Subsection 2.23.1, above for a brief discussion of the infrastructure funding that is proposed. San Francisco does not typically establish the types of special districts listed in the comment as funding mechanisms for infrastructure improvements, unlike most California cities and counties. Instead, an Infrastructure Financing District will be implemented. The funding mechanism and cost to property owners and San Francisco residents are discussed in the response in Subsection 2.23.1, above. Infrastructure in the City is constructed, operated and maintained by various City departments from property taxes and other sources of revenue in the City's General Fund and from bond funds.

In conclusion, the mechanism(s) that might be used to finance the proposed infrastructure may have implications for who bears the cost of the infrastructure. The selection of a particular financing mechanism does not affect the infrastructure itself, nor does it affect the environmental impacts associated with construction or maintenance of that infrastructure. Therefore, the analysis of the Proposed Project's potential impacts included in the EIR is not dependent on any particular financial structure.

## 2.24 SUPPORT FOR AND OPPOSITION TO PROPOSED PROJECT

### Comments

General Comment: While all of the environmental commentary on the NOP focused on supporting density, there is density and then there is this plan. The project is overly tall, overly dense and dramatically changes the nature of Bay and its view sheds. (*Saul Bloom, Arc Ecology*) [28.11]

The project includes sustainability features such as green building standards and an intermodal transit hub. It should be supported. (*Michael Theriault* Note: comment summarized based on notes of public hearing because there was a 10-minute interval with no audio recording, resulting in no transcription.) [TR.1.1a]

The Citizens Advisory Board discussed and resolved many issues including sea level rise, seismic safety, recycling, traffic, ferry service, housing, pedestrians, relocation of existing residents, a museum. The plan maximizes positive environmental benefits. The CAB will submit written comments. (*Karen Knowles-Pearce, Chair, Treasure Island Citizens Advisory Board* Note: comment summarized based on notes of public hearing because there was a 10-minute interval with no audio recording, resulting in no transcription.) [TR.1.1b]

My opposition to this plan really starts with the contradiction in the Mission Statement, which is, includes to create community and identity, when actually this is going to destroy the community and identity that exists on Yerba Buena Island today. (*Ken Masters*) [TR.9.1a]

We love this project, and we hope that it will move forward as quickly as possible. We're heartbroken about the current economic conditions that are holding it back. (*Tim Colen, San Francisco Housing Action Coalition*) [TR.2.3]

Obviously, we are here in full support of the project. I mean, it's a no-brainer. We're excited about it, and we'd like to plant the seed now and get going. We currently -- we're already out that as it is. The United Brotherhood of Carpenters and Joiners of America, we have a -- we're in partners with the Job Corp out there, so we currently have a training facility going out there, and bring us some classes there. So we've already landed, we just need -- bring the jobs in and we are currently looking for more women for our program, also. So with that, we will look for your blessing with the project of the Treasure Island. Thank you very much (*Manny Flores*) [TR.3.1]

We're very supportive of the redevelopment plan for Treasure Island and are pleased to make some comments today. (*Sherry Williams, Treasure Island Homeless Development Initiative*) [TR.4.1]

I am speaking on behalf of the Bay Conservation and Development Commission. And I just wanted to draw attention to a letter that was written by our executive director, Will Travis, in support of the project and in support of the work that TIDA has done with us on sea level rise. And also the letter written by the governor in support of the project, as well. (*Karen Weiss, Bay Conservation and Development Commission*) [TR.8.1]

I have been a resident since 1999, and I am just here to speak on behalf of that. I really appreciate all what you all are doing to fix up the island because when we first came out there I

was pregnant with my son and it wasn't nothing. And I really want to see something really nice. I want to see the bridge. I want to see other families, like me, because I have been there for a long time, for my son to go places, to go on a ferry.

So I just really appreciate what you all are doing, and I just want to make sure that everybody could come together on the island, because it's a beautiful place. (*Melanie Williams*) [TR.11.1]

First of all, I want to say that we support development on Treasure Island. We are not opposed to development on the island, but we want to make sure that the development is the proper development, and it's so important. (*Kate Kelley, Sierra Club*) [TR.13.1a]

And we're in full support of this project because of the many positive aspects to it. (*Patrick Huniacke, GAA Athletic Association*) [TR.14.1]

We are, having said all of that, we are in full support of the EIR. (*Patrick Huniacke, GAA Athletic Association*) [TR.14.5]

### **Response**

These comments express general support for or opposition to the Proposed Project but do not raise any specific comment on the adequacy and accuracy of the analysis presented in the EIR. The comments may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

### 3. DRAFT EIR REVISIONS

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Chapter 3 presents revisions to the text, tables, and figures of the *Treasure Island / Yerba Buena Island Redevelopment Project EIR*. The first part of this chapter presents revisions to the EIR gathered from Chapter 2, Comments and Responses. The second part of the chapter presents staff-initiated text changes to correct minor inconsistencies, to add minor information or clarification related to the Proposed Project, and to correct minor errors. These corrections do not change the analysis and conclusions presented in the Draft EIR. Revisions are listed in sequential order by volume/chapter/section (for Chapter IV)/page. Deletions in text and tables are shown in ~~strike through~~ and new text is shown in underline. Figures and tables are noted as “(New)” or “(Revised).” In addition to the revisions shown below, other minor changes are made to the EIR to correct typographical errors.

#### 3.1 CHANGES IN RESPONSE TO COMMENTS

##### VOLUME 1

##### SUMMARY

The last three sentences of the paragraph under the heading “Existing Uses” on EIR p. S.1 are revised as follows:

...The designated historic buildings within the Development Plan Area on the Islands are Buildings 1, 2 and 3 on Treasure Island, and the Torpedo Assembly Building, the Nimitz House, and Quarters 10 and its garage on Yerba Buena Island. In addition, the National Register-listed Senior Officers’ Quarters Historic District is located on Yerba Buena Island; it is comprised of Quarters 1 through 7, a family quarters, associated their garages and formal landscaping elements. The Islands also include areas that are not part of the Development Plan Area: U.S. Coast Guard facilities on Yerba Buena Island, a U.S. Department of Labor Job Corps campus on Treasure Island, and Federal Highway Administration (“FHWA”) land occupied by the San Francisco-Oakland Bay Bridge (“Bay Bridge”) and tunnel structures on Yerba Buena Island.

Text is added after the first sentence to the first full paragraph on EIR p. S.3 as follows:

The existing chapel would be retained in its current location and continue to be used for general assembly and non-denominational religious activities.

The second sentence of the paragraph under the heading “Tidelands Trust” on EIR p. S.5 is revised to delete reference to the 2 acres on Yerba Buena Island:

These areas include all of Treasure Island, ~~about 2 acres of land on Yerba Buena Island,~~ and all of the tidal and submerged lands within the Project Area.

Text is added to the first sentence of the second paragraph under Mitigation Measure M-TR-1 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.14 as follows:

The Plan shall disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation on the Islands is maintained to the extent possible, with particular focus on ensuring pedestrian, transit, and bicycle connectivity and access to the Bay and to recreational uses to the extent feasible.

A fifth bulleted item is added to the list of four bulleted items under Mitigation Measure M-TR-1 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.16 as follows:

- Require contractors to notify vendors that STAA trucks larger than 65 feet exiting from the eastbound direction of the Bay Bridge may only use the off-ramp on the east side of Yerba Buena Island.

Text is added to the third sentence of the first paragraph under Mitigation Measure M-TR-24 in Table S.1: Summary of Impacts and Mitigation Measures starting on EIR p. S.18 as follows:

If the queues between First Street and the westbound on-ramp on the west side of Yerba Buena Island result in an operational delay to Muni service equal to or greater than the prevailing headway during the AM, PM or Saturday peak periods, SFMTA, in consultation with TITMA, shall implement a southbound transit-only lane between First Street on Treasure Island and the transit and emergency vehicle-only westbound Bay Bridge on-ramp.

The second bulleted item under Mitigation Measure M-TR-24 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.19 is revised as follows:

- Elimination of the proposed southbound Class II bicycle lane on Treasure Island Road and a small portion of Hillcrest Road south of the intersection with Macalla Road. The Class I facility on Treasure Island Road connecting Treasure Island and the proposed new lookout point, just south of the Macalla Road intersection, would remain. Bicyclists who use the Class I path to the lookout point and continue on Treasure Island Road toward Hillcrest Road would have to share the lane with traffic, similar to other roadways where bicycle lanes are not provided. Bicyclists would still be able to use Class I bicycle paths and Class II bicycle lanes proposed on Macalla Road to connect between the Islands and the bicycle path on the new east span of the Bay Bridge.

The lead-in sentence and the second list of bulleted items under Mitigation Measure M-AQ-2 in Table S.1: Summary of Impacts and Mitigation Measures starting on EIR p. S.27 and continuing on p. S.28 are revised as follows:

TIDA shall require that, ~~to the extent feasible,~~ project sponsors also engage in early implementation of the following combustion emission reduction measures, during construction activities:

- ~~To the extent feasible, the project applicant shall utilize EPA Tier 3 engine standards or better at the start of construction for all off-road equipment, or utilize Retrofit Emission Control Devices which consist of diesel oxidation catalysts, diesel particulate filters or similar retrofit equipment control technology verified by the California Air Resources Board (“CARB”) (<http://www.arb.ca.gov/diesel/verdev/verdev.htm>).~~
- ~~To the extent feasible, the project applicant shall utilize EPA Tier 4 engine standards or better for 50 percent of the fleet at construction initiation, increasing to 75 percent by 2015, and 100 percent by 2020~~ 2018, to the extent that EPA Tier 4 equipment is commercially available.
- ~~To the extent feasible, the project applicant shall utilize 2007~~ 2010 or newer model year haul trucks, to the extent that they are commercially available.
- Diesel-powered generators for construction activity shall be prohibited as a condition of construction contracts for each Major Phase, unless TIDA has made a finding in writing in connection with the Major Phase that there are no other commercially available alternatives to providing localized power.

Text is added to the end of Mitigation Measure M-AQ-3 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.28 as follows:

TIDA shall also determine whether Tier 3 or Tier 4 engines, non-diesel powered generators, or year 2010 or newer haul trucks are commercially available for that phase, and, if so, require the use of such engines or haul trucks.

Text is added to Mitigation Measure M-AQ-5 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.29 as follows:

**Mitigation Measure M-AQ-5: Ferry Particulate Emissions.** All ferries providing service between Treasure Island and San Francisco shall meet applicable California Air Resources Board regulations. Additionally, all ferries shall be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions.

The third and fourth sentences under Mitigation Measure M-BI-1c in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.35 are revised as follows:

A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. A reduced buffer could be provided for on a case-by-case basis by the bat biologist, at a distance to be determined in consultation with CDFG and based on site-specific conditions.

Text is added to Mitigation Measure M-BI-1d in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.35 as follows:

**Mitigation Measure M-BI-1d: Control of Domestic and Feral Animals.** To avoid conflicts with wildlife on Yerba Buena Island and the remaining natural habitats on Yerba Buena Island, the Islands’ Covenants, Conditions and Restrictions, TIDA Rules

and Regulations, and/or other similar enforceable instruments or regulations, shall prohibit off-leash dogs outside of designated, enclosed, off-leash dog parks on Yerba Buena Island and the feeding of feral cats on both islands. Building tenants shall be provided with educational materials regarding these restrictions, rules, and/or regulations. Non-resident pet owners and the public using the Islands shall be alerted to these restrictions, rules, and/or regulations through appropriate signage in public areas.

Mitigation Measure M-BI-2c in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.37 is revised as follows:

**Mitigation Measure M-BI-2c: Eelgrass Bed Survey and Avoidance.** ~~Prior to~~ Within three to six months of the initiation of construction activities that might affect SAV beds, and not less frequently than biennially (every two years) thereafter, all eelgrass beds shall be surveyed or otherwise identified, including their proximity and potential impact from ongoing or pending onshore or offshore activities identified. All TIDA staff in charge of overseeing construction for the Proposed Project, and all construction contractors and subcontractors involved in Project construction activities in Bay waters that are within a quarter mile of Treasure Island and Yerba Buena Island, along Treasure Island's shoreline, or involved in transporting materials and supplies by water to either Island shall be required to undergo thorough environmental training. This training will shall present information on the locations of all eelgrass beds, the kinds of construction and vessel transit activities that can impact eelgrass beds, all mitigation measures that contractors must adhere to so that they any disturbance or damage to eelgrass beds may be avoided and the beds protected, and who to notify in the event of any disturbance. Any work barges or vessels engaged in construction activities shall avoid minimize transiting through and avoid anchoring in any eelgrass beds located around Treasure Island. TIDA personnel responsible for overseeing Project contractors, as well as all Project contractor and subcontractor management personnel, shall ensure that all boat operators and work crews are aware of eelgrass bed locations and the requirement to avoid disturbing them.

The first full paragraph on EIR p. S.56 is revised as follows:

Under the No Ferry Service Alternative, up to 5,100 residential units would be constructed, 2,900 fewer than with the Proposed Project. While the same amount of retail space would be developed, there would also be less neighborhood-serving retail than in the Proposed Project. Residential parking would also be reduced to about 8,255 parking spaces. Most other land uses would be the same as with the Proposed Project: 100,000 sq. ft. of office space; 500 hotel rooms, including 50 on Yerba Buena Island; adaptive reuse of about 311,000 sq. ft. of Buildings 1, 2, and 3 with retail, light industrial/food production, and entertainment uses; landside facilities to support the approved expanded Clipper Cove Marina; retention and continued use of the existing chapel for general assembly and non-denominational religious activities; new landside and waterside launch facilities at the existing sailing center on Treasure Island Sailing Center; and reuse or reconstruction of the existing Treasure Island elementary school at its current location.

New text summarizing the new Reduced Parking Alternative is added after the heading “C. No Ferry Service Alternative” on EIR p. S.57.

D. Reduced Parking Alternative

Under the Reduced Parking Alternative the number of off-street parking spaces would be reduced. The alternative would provide a maximum of 0.5 parking spaces per residential unit, for a total of 4,000 parking spaces available to residents on an Islands-wide basis. It would provide a maximum of 1 parking space per 1,000 sq. ft. of commercial/flex space in Buildings 1, 2, and 3 and for office uses, and a maximum of 0.4 parking spaces per hotel room. Retail parking would continue to be provided at a maximum of 2 spaces per 1,000 sq. ft., as in the Proposed Project. The amount of parking for open space uses and the marina and Sailing Center would also remain as in the Proposed Project. On-street parking, all of which would continue to be metered spaces, would remain at 1,035 spaces because the on-street parking supply is a function of the layout of the street network, which was not assumed to change.

● Thus the primary difference between the Proposed Project and the Reduced Parking Alternative is that the maximum amount of off-street parking spaces would be reduced by about 4,030 – from about 9,646 in the Proposed Project to about 5,616 spaces. Land uses would remain the same as those in the Proposed Project under this alternative, except that fewer parking spaces would be permitted to be constructed for residential and hotel uses and less parking would be permitted to be constructed for certain commercial uses. The numbers, types, and sizes of buildings would not change substantially with this alternative. This alternative would also include a new joint police/fire station, an upgraded or replaced school, and new and/or upgraded public utilities, including a water distribution system, wastewater collection and treatment, and stormwater collection and treatment similar to the Proposed Project. Under this alternative, there would also be approximately 300 acres of parks and public open space on Treasure Island and Yerba Buena Island, and a Habitat Management Plan would be implemented for much of the undeveloped portions of Yerba Buena Island. Geotechnical stabilization would be the same as the Proposed Project. The Reduced Parking Alternative would include the same base transit service, new bicycle, transit, and pedestrian facilities, and a new Ferry Terminal and intermodal Transit Hub on Treasure Island.

The same Tidelands Trust Exchange Agreement as described for the Proposed Project would be necessary to implement the Reduced Parking Alternative. As for the Proposed Project, the *San Francisco General Plan* and the San Francisco Planning Code would be amended, and an Area Plan/SUD and *Design for Development* would be adopted. All other approvals required for the Proposed Project would be necessary to implement this alternative.

Impact AE-4 in Table S.3: Comparison of Project and Alternative Impacts starting on EIR p. S.59 is revised as follows:

<b>PROPOSED PROJECT</b>	<b>ALTERNATIVES CONSIDERED</b>			
<b>Topic / Impact</b>	<b>No Project Alternative</b>	<b>Reduced Development Alternative</b>	<b>No Ferry Service Alternative</b>	<b><u>Reduced Parking Alternative</u></b>
<b>Impact AE-4:</b> Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area, and would affect nighttime views of the Bay from public areas, and would increase potential sources of glare. (Less than Significant)	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

**CHAPTER I, INTRODUCTION**

The first sentence of the second paragraph on p. I.3 is revised as follows:

The U.S. Coast Guard also requested approximately ~~3948~~ acres plus water area for facilities on Yerba Buena Island, and received authorization from the Navy for property transfer effective March 3, 1998, and November 27, 2002.

**CHAPTER II, PROJECT DESCRIPTION**

The last sentence of the first paragraph on p. II.1 is revised as follows:

The Islands also include a U.S. Coast Guard Station and Sector Facility, a U.S. Department of Labor Job Corps campus, and Federal Highway Administration (“FHWA”) land occupied by the San Francisco-Oakland Bay Bridge (“Bay Bridge”) and tunnel structures.

The second sentence of the first paragraph on EIR p. II.6 is revised as follows:

Treasure Island contains approximately 404 acres of land, and Yerba Buena Island, approximately ~~150~~160 acres.

The third sentence of the last paragraph on EIR p. II.6 is revised as follows:

The Navy has transferred approximately 37 acres in the center of Treasure Island to the U.S. Department of Labor for the Job Corps facility, approximately ~~3948~~ acres of land on Yerba Buena Island to the U.S. Coast Guard, and approximately 18 acres of land on Yerba Buena Island to the Federal Highway Administration.

The following text is added after the fifth sentence of the first full paragraph on p. II.9 of Chapter II, Project Description:

Although the Navy has temporarily restricted access to portions of the northern shoreline for remediation activities, interim access to the perimeter pedestrian path and the boat launch is allowed for launching recreational watercraft, e.g. boardsailing and kayaks.

The third sentence of the first full paragraph on EIR p. II.9 is revised as follows:

Current non-residential uses include offices, a small restaurant, a convenience store, several event venues, a guard shack, warehouse/storage/manufacturing facilities, a childcare center, a fire station and fire training academy, a wastewater treatment plant, a gymnasium, film production facilities, a chapel, and a yacht club.

The first sentence of the last paragraph on p. II.10 is revised as follows to note that the Coast Guard has been present on Yerba Buena Island, along with other military services, since 1840:

Yerba Buena Island is a natural island that has been used by private parties and by the U.S. Army, ~~and Navy~~ and Coast Guard since the 1840s.

The third full paragraph on EIR p. II.11 is revised as follows:

U.S. Coast Guard facilities occupy approximately ~~3948~~ acres of land on Yerba Buena Island adjacent to the Project Area. The U.S. Coast Guard Station and Sector Facility, on the southeast side of Yerba Buena Island, includes housing, administrative facilities, open storage and docks, buoy maintenance facilities, and a lighthouse built in 1872. Coast Guard facilities also include a vehicle tracking system facility on the northwestern part of Yerba Buena Island and Navigation Light No. 6 on the northern end of Treasure Island. The Coast Guard facilities are expected to remain in use in their present location for the foreseeable future.

The fourth sentence in the last paragraph on p. II.11 is corrected to read as follows:

A water supply pipeline (used only in emergencies) extends under the east span of the Bay Bridge and is supplied by the East Bay Municipal ~~Utilities~~ Utility District (“EBMUD”).

The second sentence in the second paragraph on EIR p. II.14 is revised to delete reference to the 2 acres on Yerba Buena Island:

These areas include all of Treasure Island, ~~approximately 2 acres of land on Yerba Buena Island,~~ and all of the tidal and submerged lands within the Project Area.

The following new bulleted item is added to the listing under the heading “E. Development Plan Characteristics” on EIR p. II.16, to follow the sixth item (“Rehabilitation of the historic buildings on Yerba Buena Island”):

- Retention and continued use of the existing chapel in its existing location for general assembly and non-denominational religious activities;

The first paragraph under the heading “Island Center District” on EIR p. II.21 is revised as follows:

The Island Center District would occupy the southern portion of Treasure Island and would abut the southern/southeastern boundary of the Jobs Corps campus. This new neighborhood would include a dense mix of retail, restaurant, office, hotel, residential, transit, and community services uses. The Ferry Terminal and intermodal Transit Hub would be located in the Island Center at the southwestern shore of Treasure Island. A pedestrian link is planned between the Ferry Terminal and Clipper Cove, with pedestrian paths around and connecting to corridors through Buildings 1, 2 and 3, the historic structures (see Figure II.10: Proposed Street System, p. II.41). Buildings 1, 2, and 3 would be adaptively reused for commercial and recreation/entertainment uses. As part of the adaptive reuse, Building 111, which is an addition to Building 3, would be demolished. The existing chapel would be retained in its current location and used for general assembly and non-denominational religious activities.

Footnote 18 on EIR p. II.24 is revised as follows:

<sup>18</sup> Family-sized units are those with two or more bedrooms. ~~While 20 percent of the units is the minimum proposed number of family-sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family-sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one-bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family-sized units.~~

Figure II.6a: Treasure Island Maximum Height Limit Plan, on EIR p. II.25, is revised, as shown in Section 2.1, Project Description, of this Comments and Responses document on p. 2.1.9.

The second bullet on p. II.28 is revised as follows to clarify the total number of stand-alone affordable housing units proposed:

- - Stand-alone Affordable Housing. Up to 1,684 units (which could be a mix of rental and for-sale units) would be in stand-alone, affordable buildings, of which up to around 1,249 units would be developed by developers selected by TIDA or its designee. Up to 1,685 units would be in stand-alone, completely affordable buildings implemented by TIDA or others.—The TIDA units would likely include a mix of rental and for-sale units and would target very-low-, low-, and moderate-income households.

The following text is added to the second bulleted item on p. II.31, to provide more detail on the amounts of dredge and fill material:

- The existing Sailing Center near Pier 1 would be improved with new vessel launch and retrieval facilities. The improvements would include a new pier on pilings to accommodate two vessel launch and retrieval cranes, entry landings and gangways, and floating docks. The waterside facilities would require dredging about 1,500 to

3,700 cubic yards, and would result in about 0.25 to 0.4 acre of pile-supported fill and 0.4 to 0.45 acre of floating fill in the Bay. Landside facilities would include restrooms, laundry facilities, and other improvements to serve the tenants of the Sailing Center (as well as future tenants of the separate Marina Project, if approved).

The last bulleted item on EIR p. II.31 is revised as follows:

- A 3-acre Cultural Park adjacent to Building 1. The park would include a future building site for a cultural institution, such as a museum, of up to 75,000 sq. ft. The existing chapel would be retained in its current location.

The paragraph under the heading “Institutional and Public Services” on EIR p. II.33 is revised as follows:

The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and childcare also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1. The existing chapel, on the site of the proposed Cultural Park, would be retained in its current location and used for general assembly and non-denominational religious activities. The existing public grammar school on Treasure Island, now closed, would be improved or rebuilt as a K-8 public school in coordination with the San Francisco Unified School District. The existing wastewater treatment plant would be replaced by the SFPUC (as discussed below in “Proposed Utilities”). A recycling program would be established, and a recycling center/corporation yard would be provided. A joint police/fire station would be provided on Treasure Island. The existing Job Corps facility would remain in use in its current location on Treasure Island, under the jurisdiction of the U.S. Department of Labor.

The project description in the second paragraph on EIR p. II.35 is revised as follows to indicate that consultation with SFMTA, AC Transit and the Water Emergency Transit Authority (WETA) would be included in the Proposed Project:

Bus stops and facilities for East Bay and San Francisco bus service providers, shuttle service stops, bicycle parking, a pool of shared bicycles (“Bicycle Library”), a car share pool, and administration/office space for the new Treasure Island Transportation Management Agency (“TITMA”) would be located at or near the Transit Hub (see “Encouraging Use of Transit and Discouraging Automobile Use,” EIR p. II.51, for a discussion of TITMA’s responsibilities.) TIDA and TICD would prepare the designs for transit facilities in consultation with SFMTA, AC Transit, and WETA.

Figure II.9: Proposed Shuttle Routes, on EIR p. II.40, is revised, as shown in on p. 2.1.14 of this Comments and Responses document.

Figure II.10: Proposed Street System, on EIR p. II.41, is revised, as shown in Section 2.7, Transportation, of this Comments and Responses document on p. 2.7.12.

Figure II.12: Proposed Bicycle Routes, on EIR p. II.46, is revised, as shown on p. 2.7.75 of this Comments and Responses document.

Figure II.13: Walking Times to Transit Hub, on EIR p. II.47, is revised, as shown on p. 2.7.96 of this Comments and Responses document.

The second sentence in the first full paragraph on p. II.48 is revised as follows:

Class I mixed bicycle and pedestrian paths are proposed around the perimeter of Treasure Island, connecting to Class I bicycle-only bicycle paths in the open space areas. A Class I mixed-use, two-way bicycle/pedestrian path along the south side of Macalla Road would ~~also~~ connect to the east span of the Bay Bridge on Yerba Buena Island. A Class II bicycle lane also would be provided on the north side of Macalla Road for cyclists heading downhill (with traffic) from the Bay Bridge.

At the end of the next-to-last bullet on p. II.48, “paths” is changed to “routes”, as follows:

The walkways and bicycle routes would be designed to allow for possible future connections to other pedestrian and bicycle ~~paths~~ routes.

A new sentence is added at the end of the first full paragraph on p. II.48:

A Class I mixed-use, two-way bicycle pedestrian path would be provided west of and parallel to Treasure Island Road south of the causeway, leading to a scenic overlook to be provided about 500 feet south of the intersection with Macalla Road.

The text in the last full paragraph and following paragraph on p. II.52, continuing to p. II.53, is corrected to read as follows:

The Proposed Project would continue to use the existing primary water supply. Water is provided by the SFPUC through a 10-inch-diameter steel pipe attached to the west span of the Bay Bridge. Water is pumped across the bridge by a pumping station located on Spear Street in San Francisco. The maximum output of the pumping station is ~~1,800~~ 1,500 gpm. The SFPUC chloraminates the water prior to transmission, and the water does not require additional treatment on Treasure Island. A ~~standby-booster~~ chlorine station is available at the water line entry point to Treasure Island for emergencies.

The ~~supplemental~~ (emergency)-water supply would continue to be provided by EBMUD, through a new 12-inch water main that is being constructed by Caltrans as part of the new east span of the Bay Bridge. Capacity of the ~~The~~ new service will be equivalent to the ~~current service~~ in-place 12-inch main on the existing east span of the Bay Bridge. A new 12-inch pipe would be constructed along North Gate Drive on Yerba Buena Island to connect the replacement ~~supplemental~~ emergency water supply line to the proposed new storage tanks (described below). The system has been designed to deliver approximately ~~1,800~~ 1,500 gpm during emergency situations, with a typical average annual flow of ~~61~~ 35 gpm, in keeping with current operations. The water would continue to be chloraminated by EBMUD prior to delivery. The system would only be used in emergencies when the water supply from San Francisco to the Islands is disrupted and for operational flows to maintain water quality.

The second full paragraph on p. II.61 is revised and a new footnote is added, as follows (deleted text is shown in strike through and new text is underlined):

The California Department of Housing and Community Development allows the use of grey gray water (water from sinks, showers, and similar sources, captured for local reuse) under certain circumstances.<sup>38</sup> ~~is not currently allowed. If changes are made in applicable State and local laws and regulations, individual residential buildings may be constructed with the necessary capture facilities and piping systems for grey water.~~ Use of gray water is not part of the Proposed Project at this time. Any future proposed use of grey gray water would conform to all applicable State and local requirements. Because it is not known where or whether these grey gray water sources would be used, they are not evaluated further in this EIR.

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>38</sup> California Code of Regulations, Title 24, Part 5, Chapter 16A. See footnote regarding gray water on p. IV.K.19 in Section IV.K, Utilities and Service Systems.

The number of projects in the Climate Positive Development Program on EIR p. II.79 is corrected in the first sentence on the page, as follows:

In May 2009, the Proposed Project was selected as one of a total of 17 48 projects worldwide to join the Climate Positive Development Program, a joint initiative of the Clinton Climate Initiative, a project of the William J. Clinton Foundation, and the U.S. Green Building Council.

The fifth and seventh bulleted items under the heading “Phase 4 (Building Construction and Associated Infrastructure)” on EIR p. II.82 are revised as follows (the sixth bulleted item is shown for context):

- Development of the Cultural Park ~~and museum~~ around the existing Navy chapel, which would be retained;
- Renovation of Building 3 on Treasure Island;
- Development of the Senior Officers’ Quarters Historic District and landscaping improvements on Yerba Buena Island;

On EIR p. II.84, the tenth bullet is revised to read as follows (new text is underlined):

- Permits for fill and dredging in San Francisco Bay and improvements within the 100-foot shoreline band (San Francisco Bay Conservation and Development Commission), which may include consultation with the California Department of Fish and Game or other agencies as directed by BCDC.

### CHAPTER III, PLANS AND POLICIES

The last partial paragraph at the bottom of EIR p. III.12 is revised to delete references to the 2 acres on Yerba Buena Island and to correct the total acreage of Yerba Buena Island:

Treasure Island is composed of landfill placed on former tidelands and submerged lands. Upon conveyance to TIDA by the Navy,<sup>12</sup> all 367 acres of conveyed land on Treasure Island (excluding the Job Corps campus), ~~along with approximately 2 acres of tidelands on Yerba Buena Island,~~ and all of the other tidal and submerged lands within the Project Area will be subject to the Tidelands Trust Doctrine and the statutory trust created by the Treasure Island Conversion Act of 1996 (the “Conversion Act”) The statutory trust created by the Conversion Act and Tidelands Trust Doctrine are collectively referred to as the “Tidelands Trust.” The approximately 37-acre Job Corps campus would not be subject to the Tidelands Trust so long as it remains in Federal ownership. ~~Except for the approximately 2 acres of existing tidelands on Yerba Buena Island, n~~None of the ~~150~~160 acres of land above the mean high tide line on Yerba Buena Island is subject to the Tidelands Trust.

There is no change to Footnote 12, cited in the text above.

The following revisions are made to the second sentence in the paragraph under the heading “Bay Trail Plan” on p. III.12:

The Bay Trail is a planned multi-purpose recreational trail that, when complete, would encircle San Francisco Bay and San Pablo Bay with a continuous ~~500~~400-mile network of bicycling and hiking trails; to date, ~~300~~290 miles of the alignment have been completed.<sup>11</sup>

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>11</sup> Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail Project, letter communication, September 10, 2010.

The last sentence of the first paragraph on p. III.13 is revised as follows:

~~Except for the approximately 2 acres of existing tidelands on Yerba Buena Island,~~Currently, none of the ~~150~~160 acres of land on Yerba Buena Island is subject to the Tidelands Trust.

The last sentence of the second full paragraph on EIR p. III.14 is revised as follows:

The Tidelands Trust lands subject to the Exchange Agreement affect about 367 acres on Treasure Island and about 94 acres on Yerba Buena Island within the Development Plan Area and excludes the Jobs Corps campus on Treasure Island and the Coast Guard Station and Sector Facility and Caltrans properties on Yerba Buena Island.

## CHAPTER IV, ENVIRONMENTAL SETTING AND IMPACTS

### General

In the mitigation measures presented in Chapter IV, “project sponsor” is changed to “project sponsors” for consistency.

### Section IV.A, Land Use and Land Use Planning

The third full paragraph on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active ~~station~~ Station and Sector Facility that covers approximately ~~3948~~ acres on the southeast side of Yerba Buena Island.<sup>13</sup> This ~~station~~ Station and Sector Facility includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse that was built by the U.S. Army. ~~The station~~ The Station and Sector Facility is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.

The paragraph under the heading “Adjacent Land Uses” on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active station that covers approximately 39 acres on the southeast side of Yerba Buena Island. This station includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse ~~that was built by the U.S. Army~~. The station is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.

Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island, on EIR p. IV.A.8, is revised as shown on the following page.

The paragraph under the heading “Community and Institutional Uses” on EIR p. IV.A.8 is revised as follows:

Community and institutional uses on Treasure Island include educational, religious, public service, and public works facilities. Educational facilities consist of a former elementary school, a portion of which is occupied by the Glide Foundation's YouthBuild Program, the San Francisco Sheriff's Five Keys Charter School, and the San Francisco Police Department's motorcycle training unit. Other educational facilities include the Life Learning Academy, the Treasure Island Clubhouse of the Boys and Girls Clubs of San Francisco, and a child development center. There is an existing chapel on the north side of California Avenue, in the southwest quadrant of the island. Public service facilities include a fire station, fire training academy, a police station, and a post office. The educational and public service facilities are concentrated in the interior of the island in the northwest quadrant. Existing public works facilities include two emergency power generators, steam plant substations, a wastewater treatment plant, and one water storage tank for both domestic and firefighting use.

**(Revised) Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island**

<b>Land Use</b>	<b>Treasure Island<sup>1</sup> (Units or Acres<sup>2</sup>)</b>	<b>Yerba Buena Island (Units or Acres)</b>	<b>Total (Units or Acres)</b>
Residential	908 units <sup>3</sup> / 110 acres	97 units <sup>4</sup> / 19 acres	1,005 units <sup>5</sup>
Community and Institutional	30	—	30
Office and Retail	20	—	20
Industrial	20	—	20
Open Space and Recreation Facilities	90	80	170
Other <sup>6</sup>	37	<u>5766</u>	<u>94103</u>

*Notes:*

<sup>1</sup> Total acreage on Treasure Island equals approximately 404 acres; totals shown above are rounded.

<sup>2</sup> Does not include approximately 95 acres dedicated to parking and roads.

<sup>3</sup> Approximately 725 units are available for occupancy.

<sup>4</sup> Approximately 80 units are available for occupancy.

<sup>5</sup> Approximately 805 total units are available for occupancy.

<sup>6</sup> Includes the 37-acre Job Corps campus on Treasure Island, approximately 18 acres occupied by the California Department of Transportation, and ~~39~~approximately 48 acres occupied by the U.S. Coast Guard ~~station~~Station and Sector Facility on Yerba Buena Island.

*Source:* San Francisco Planning Department, 2005; Treasure Island Development Authority, 2010; and the U.S. Coast Guard, 2010.

The second sentence in the last paragraph on p. IV.A.9 is revised as follows:

TIHDI occupies the fitness center, and the YMCA operates the gymnasium.

The last paragraph on EIR p. IV.A.10 is revised as follows:

Unlike Treasure Island, Yerba Buena Island is a natural island that features steep slopes and dense vegetation. The island has been used by private parties and by the U.S. Army, ~~and Navy, and U.S. Coast Guard~~ since the 1840s. Land uses on the island include residential, open space, and a portion of the Bay Bridge structure (see Figure IV.A.1).

The second full paragraph on EIR p. IV.A.12 is revised to delete the reference to the 2 acres on Yerba Buena Island:

The Conversion Act designates TIDA as the agency responsible for administering Tidelands Trust property on the Islands once the property is transferred to it by the Navy.<sup>18</sup> Upon transfer, about 367 of the approximately 404 acres of land on Treasure Island would become subject to the Tidelands Trust; the 37 acres of land remaining under Federal jurisdiction on the Job Corps campus would not be subject to the Tidelands Trust.<sup>19</sup> ~~Except for approximately 2 acres of existing tidelands,~~The land on Yerba Buena Island transferred from the Navy to TIDA would not be subject to the Tidelands Trust upon transfer.

There is no change to Footnotes 18 and 19, cited in the text above.

The second paragraph on EIR p. IV.A.15 is revised as follows:

The Proposed Project, which includes Treasure Island and Yerba Buena Island, consists of a total of up to 8,000 dwelling units, up to 140,000 sq. ft. of new commercial retail space, up to 100,000 sq. ft. of new office space, and up to 500 hotel rooms (see Table IV.A.2). Buildings 1, 2, and 3 on Treasure Island would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space. The existing chapel would be retained in its current location and continue to be used for general assembly and non-denominational religious activities. In addition, the Proposed Project would include approximately 300 acres of open space in the form of athletic fields, bicycle and pedestrian paths, parks, playgrounds, plazas, shoreline trails, stormwater wetlands, an approximately 20-acre Urban Agricultural Park, and wildlife habitat. Approximately 220 acres of open space would be on Treasure Island, and the remaining 80 acres would be on Yerba Buena Island.

The third full paragraph on EIR p. IV.A.21 is revised as follows:

The U.S. Coast Guard ~~station~~Station and Sector Facility on the southern portion of Yerba Buena Island is an adjacent land use that is outside of the Project Area. The physical topography and separation of the U.S. Coast Guard ~~station~~Station and Sector Facility would limit potential construction impacts on this facility. Construction activities would not result in the physical disruption or division of the U.S. Coast Guard ~~facilities~~Station and Sector Facility.

The sixth sentence of the first paragraph under Impact LU-3 on EIR p. IV.A.24 is revised as follows:

Existing buildings to be retained and reused as part of the Proposed Project include Historic Buildings 1, 2, and 3 and the existing chapel would be retained and adaptively reused as part of the Proposed Project, thus maintaining some of the existing land use character of the vicinity.

The first sentence of the third full paragraph on EIR p. IV.A.25 is revised as follows:

The only uses near the proposed Development Plan Area on Yerba Buena Island are the existing U.S. Coast Guard ~~station~~Station and Sector Facility and the Bay Bridge span and structure on the southern portion of Yerba Buena Island.

The first sentence of the first paragraph under the subheading “Yerba Buena Island” on EIR p. IV.A.26 is revised as follows:

~~Currently, only approximately 2~~None of the ~~150~~160 acres on Yerba Buena Island would be subject to the Tidelands Trust upon transfer.

The first full sentence at the top of EIR p. IV.A.28 is revised as follows:

The U.S. Coast Guard ~~station~~Station and Sector Facility, which is outside of the Project Area, is expected to remain and continue to operate at its existing site on Yerba Buena Island.

## **Section IV.B, Aesthetics**

The responses in Chapter 2 of this Comments and Responses document include revised and new figures for EIR Section IV.B, Aesthetics. These figures are listed below, along with the page number on which the figure may be found in this Comments and Responses document:

- Figure IV.B.1: Viewpoint Locations, on p. EIR IV.B.3 – see the revised figure in Section 2.4, Aesthetics, p. 2.4.41.
- Figure IV.B.2a: Viewpoint Aa – View from Pier 7 – see the new figure on p. 2.4.14.
- Figure IV.B.6a: Viewpoint Ea – View from the Berkeley Hills – see the new figure on p. 2.4.17.
- Figure IV.B.10: Proposed Representative Massing Diagram, on p. EIR IV.B.20 – see the revised figure in Section 2.6, Historic Resources, on p. 2.6.9.
- Figure IV.B.11: Representative Rendering of the Ferry Terminal – see the new figure on p. 2.4.21.
- Figure IV.B.12: Representative Rendering of Marina Plaza – see the new figure on p. 2.4.22.
- Figure IV.B.13: Representative View of Clipper Cove Promenade – see the new figure on p. 2.4.23.
- Figure IV.B.14: Representative Rendering of Cityside Avenue and Shoreline Park – see the new figure on p. 2.4.24.
- Figure IV.B.15: Representative Rendering of Eastside Commons – see the new figure on p. 2.4.25.
- Figure IV.B.16: Representative Rendering of Typical Garden Street – see the new figure on p. 2.4.26.
- Figure IV.B.17: Island Center District Isometric View – see the new figure on p. 2.4.4.
- Figure IV.B.18: Cityside District Isometric View – see the new figure on p. 2.4.5.
- Figure IV.B.19: Eastside District Isometric View – see the new figure on p. 2.4.6.
- Figure IV.B.20: Nighttime View from Calhoun Terrace on Telegraph Hill – see the new figure on p. 2.4.32.
- Figure IV.B.21: Nighttime View from the Berkeley Marina – see the new figure on p. 2.4.33.

The first full paragraph on EIR p. IV.B.4 is revised as follows to introduce a new figure entitled “Figure IV.B.2a: Viewpoint Aa – View from Pier 7”:

San Francisco’s eastern waterfront affords panoramic vistas of the Bay, the Bay Bridge, and the East Bay Hills rising in the distance. See Figure IV.B.2: Viewpoint A – View from The Embarcadero at Rincon Park (Existing). In this view, the lawn of Rincon Park occupies the foreground. In the middleground are Herb Caen Way and the Bay water

beyond. At the far left in the photograph is the Port of San Francisco's pedestrian-access Pier 14. See also Figure IV.B.2a: Viewpoint Aa – View from Pier 7 (Existing). In this view, the railing at the eastern end of Pier 7 occupies the foreground.

The Bay Bridge bounds views to the southeast, directing views to the western slopes of Yerba Buena Island rising prominently in the distance (about 1.6 miles). The western and southern shoreline of Treasure Island is visible as a flat expanse to the north of Yerba Buena Island (left in this view). Because of their size, prominent location, and light color, Buildings 1 and 2 are recognizable in the distance. The East Bay Hills rise in the distant background (about 10 miles away). ~~At the far left in the photograph is the Port of San Francisco's pedestrian-access Pier 14.~~

As listed above, new Figure IV.B.2a is shown in this Comments and Responses document on p. 2.4.14.

EIR p. IV.B.9 is revised to insert a new discussion entitled “Views from the East Bay Hills” immediately after the discussion “Views from the East Bay Shoreline” after the second paragraph and to introduce a new figure entitled “Figure IV.B.6a: Viewpoint Ea – View from the Berkeley Hills Along Grizzly Peak Boulevard.

#### Views from the East Bay Hills

The scenic turnout along Grizzly Peak Boulevard is a popular public viewpoint in the Berkeley Hills, with panoramic distant vistas of the northern Bay Area region unobstructed by vegetation and structures. See Figure IV.B.6a: Viewpoint Ea – View from the Berkeley Hills (Existing). The foreground in this view is occupied by undeveloped foothills, and the East Bay flatlands beyond. The Bay is visible in the distance (about 4.8 miles away) as well as familiar features of the Bay including the Bay Bridge, Yerba Buena Island, and Treasure Island (about 8.5 miles away). On the opposite shore of the Bay rises the San Francisco skyline (about 11 miles away) and the hills of San Francisco. The Golden Gate Bridge (about 14.5 miles away) links San Francisco to the hills of Marin County. From this elevated vantage point, Bay water is visible separating Yerba Buena Island and Treasure Island from the San Francisco peninsula (unlike water-level East Bay shoreline locations, in which Treasure Island and Yerba Buena Island are not clearly discernible as features distinct from San Francisco).

As listed above, new Figure IV.B.6a is shown in this Comments and Responses document on p. 2.4.17.

The last sentence of the second paragraph on EIR p. IV.B.19 is revised as follows to delete the term “neighborhood marker” as redundant and unnecessary:

Within two residential districts, the Cityside and Eastside Districts, individual blocks would consist primarily of a dense, low-rise podium (up to 70 feet) punctuated by mid-rise buildings (between 70 and 130 feet) and neighborhood high-rise towers (up to 240 feet) ~~servicing as neighborhood markers.~~

The third paragraph on EIR p. IV.B.21 is revised as follows:

Proposed new construction on Treasure Island would adversely alter scenic vistas of San Francisco Bay from the eastern waterfront of San Francisco (see Figure IV.B.2: Viewpoint A – View from The Embarcadero at Rincon Park (Proposed), and Figure IV.B.2a: Viewpoint Aa – View from Pier 7 (Proposed)), and from Telegraph Hill (see Figure IV.B.3: View Point B – View from Telegraph Hill at Pioneer Park (Proposed)). From these vantage points new construction on Treasure Island would be a prominent new visual presence within scenic vistas of San Francisco Bay, occupying a wide expanse of an individual’s field of view.

The last paragraph on EIR p. IV.B.21 is revised as follows:

New construction on Treasure Island would not have a substantial adverse impact on scenic vistas from more distant off-site locations. From Twin Peaks, the proposed new construction on Treasure Island would not be prominent, if discernible at all. (See Figure IV.B.4: View Point C – View from Twin Peaks (Proposed).) It would be largely obscured beyond dense, high-rise development of Downtown San Francisco. From the hills of Marin, the proposed new construction on Treasure Island would not be a dominant visual presence in the context of panoramic scenic vistas of the Bay that include the San Francisco skyline, the Golden Gate Bridge, the Bay Bridge, Yerba Buena Island, and the East Bay Hills. (See Figure IV.B.5: View Point D – View from the Marin Headlands at Vista Point (Proposed).) Similarly, from the East Bay Hills the proposed new construction on Treasure Island would not be a dominant visual presence in the context of panoramic scenic vistas of the Bay that include the East Bay flatland and shoreline, the San Francisco skyline, the Golden Gate Bridge, the Bay Bridge, Yerba Buena Island, and the hills of Marin County. (See Figure IV.B.6a: View Point Ea – View from the Berkeley Hills (Proposed).) From this elevated location, Treasure Island would continue to be visibly discernible as a feature distinct from San Francisco.

The second full paragraph on EIR p. IV.B.24 is revised as follows to refer to (New) Figure IV.B.2a: Viewpoint Aa – View from Pier 7:

As described above and in Chapter II, Project Description, “Yerba Buena Island District,” p. II.22, new construction on Yerba Buena Island would be placed primarily on the sites of existing buildings and would be predominantly low-rise, stepping down hillsides. See (New) Figure IV.B.2a: Viewpoint Aa – View from Pier 7, on EIR p. IV.B.5a. Existing residential buildings that are now visible on Yerba Buena Island from San Francisco would be replaced by new residential buildings of comparable scale (some new buildings would be 1-2 stories taller than the existing buildings). A mid-rise building would be permitted in zone 4Y stepping down the north slope of the island facing Clipper Cove. Building height and placement limitations established by the *Design for Development* (see Figure II.5: Yerba Buena View Corridors, p. II.23, and Figure II.6b: Yerba Buena Island Maximum Height Limit Plan, p. II.27 in Chapter II, Project Description) would ensure that development would not rise above the ridgeline of Yerba Buena Island to substantially alter the existing visual character of the Yerba Buena Island landform as a scenic resource of San Francisco Bay. Proposed new development on Yerba Buena Island would not be substantially more prominent than existing development when viewed from locations around the Bay, if discernible at all.

A new paragraph is added after the third paragraph on EIR p. IV.B.25 to introduce perspective architectural renderings to present streetscape perspective renderings reproduced from the proposed *Design for Development*, to assist the reader in understanding the urban design intent for Treasure Island (new text is underlined):

Figure IV.B.9 (Proposed) shows the view toward Building 1 from the open area west of Building 1. Low, 20-foot-tall retail pavilions in the foreground would symmetrically flank this view of Building 1. High-rise towers would rise from beyond Building 1. Its low horizontal form, curved façade, and distinctive architectural features would contrast with nearby new construction.

Presented below are representative perspective renderings of proposed development on Treasure Island, reproduced from the proposed *Design for Development*. These figures illustrate the urban design intent for Treasure Island as viewed from key public gathering spaces on Treasure Island. See Figure IV.B.11: Representative Rendering of the Ferry Terminal; Figure IV.B.12: Representative Rendering of Marina Plaza; Figure IV.B.13: Representative Rendering of Clipper Cove Promenade; Figure IV.B.14: Representative Rendering of Cityside Avenue and Shoreline Park; Figure IV.B.15: Representative Rendering of Eastside Commons; and Figure IV.B.16: Representative Rendering of Typical Garden Street.

As part of the Proposed Project, a *Design for Development* would be adopted and implemented. The *Design for Development* is a regulatory document that would establish design standards and guidelines that would direct future development of the Project Area...

As listed above, new Figures IV.B.11, IV.B.12, IV.B.13, IV.B.14, IV.B.15 and IV.B.16 are shown in this Comments and Responses document on pp. 2.4.21, 2.4.22, 2.4.23, 2.4.24, 2.4.25, and 2.4.26, respectively.

The second full paragraph of EIR p. IV.B.26 is revised as follows to present new representative isometric images reproduced from the proposed *Design for Development*:

As a regulatory document, the proposed *Design for Development* is intended to ensure the enhancement of visual quality within the Project Area. It would inform the design and review of specific development projects within the Project Area. If the proposed *Design for Development* is adopted by the decision-makers, it would reflect the City's long-term vision for the visual character and quality of the Project Area. Presented below for illustrative purposes are representative isometric renderings, reproduced from the proposed *Design for Development*. These figures illustrate the intent of the proposed *Design for Development* that buildings be sculpted and articulated to contribute visual interest, texture and variety to the public realm. See Figure IV.B.17: Island Center District Isometric View; Figure IV.B.18: Cityside District Isometric View; and Figure IV.B.19: Eastside District Isometric View. Note however, that they do not illustrate any particular building design or specific placement. New construction within the Project Area would be subject to design review by TIDA for conformity with the *Design for Development* as specific designs are proposed in the future.

As listed above, new Figures IV.B.17, IV.B.18, and IV.B.19 are shown in this Comments and Responses document on pp. 2.4.4, 2.4.5, and 2.4.6, respectively.

The discussion of Impact AE-4, on EIR p. IV.B.27, is revised as follows to introduce and discuss two new figures entitled “Figure IV.B.20: Nighttime View from Calhoun Terrace on Telegraph Hill” and “Figure IV.B.21: Nighttime View from the Berkeley Marina:

**Impact AE-4: Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area, and would affect nighttime views of the Bay from public areas, and would increase potential sources of glare. (*Less than Significant*)**

Current levels of nighttime lighting within the Development Plan Area are relatively low, consistent with the relatively low intensity of existing land uses within the Development Plan Area. Current sources of nighttime light include exterior security lighting of buildings, yards, streets, parking lots, and light emitted from within occupied residential buildings. Given the distances to mainland locations around the Bay, the low-rise stature of buildings within the Development Plan Area, and a cover of vegetation, the Development Plan Area is not a prominent visual presence within nighttime views of the Bay from mainland locations around the Bay.

Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area. Lighting for the Proposed Project would include exterior lighting of streets, sidewalks, parking areas, public spaces, and building entrances. Light would also be emitted from the interiors of residential and non-residential buildings. The Proposed Project would also include a Sports Park located immediately north of the Eastside neighborhood. The Sports Park would include a range of sports facilities (e.g., for baseball, soccer, football, basketball, tennis, etc.). Nighttime use of the Sports Park would require elevated high-intensity outdoor lighting to illuminate the playing fields, creating the potential for spillover of intrusive amounts of light into nearby residential areas. The particular program and layout of the facility, the particular location and characteristics of Sports Park lighting, and of landscape screening around the facility have not been determined at this time.

New sources of nighttime lighting on Treasure Island and Yerba Buena Island would affect nighttime views of the Bay as seen from various public locations around the Bay. Figure IV.B.20: Nighttime View from Calhoun Terrace on Telegraph Hill, and Figure IV.B.21: Nighttime View from the Berkeley Marina, are representative renderings of nighttime views of Proposed Project within the Bay from San Francisco and the East Bay, prepared by an independent visual simulation consultant, Steelblue LLC.

The existing character of nighttime lighting as a feature of views of the Bay from these locations is consistent with the role of the central Bay as a regional center of population, commerce, industry and transportation. In nighttime views from San Francisco, the most prominent existing illuminated features include street lights and lighted buildings on Treasure Island, the Bay Bridge West Span, transportation infrastructure along the opposite shoreline, commercial and industrial activities in the East Bay flatlands including the Port of Oakland, and residences in the East Bay Hills. In nighttime views of the Bay from the East Bay, the most prominent illuminated features of the Bay include Treasure Island, the Bay Bridge East Span, the San Francisco skyline, and the Golden

Gate Bridge. Unlike daytime scenic views of this portion of the Bay (as described on EIR pp. IV.B.1-IV.B.11) in which dramatic topographic features around the Bay combine with recognizable built features, water, and sky to create readable and memorable scenic compositions characterized by spatial and geographic clarity, nighttime views of the Bay are not characterized by such clarity. Unlit features recede in prominence, while the prominence of illuminated features is elevated. As such, the character and enjoyment of nighttime views of the Bay are largely based on the visual effect of light sources and the play of light on water.

The proposed development on Treasure Island would be a prominent new illuminated presence within nighttime views of the Bay, rising from the Bay water and reflected in the Bay water adjacent to Treasure Island, particularly when viewed from San Francisco. However, viewed from the East Bay shoreline at the Berkeley Marina, against the background of San Francisco's downtown skyline, the visual change from existing nighttime conditions would be less discernible. The perception of this change is largely subjective. Some viewers who have grown accustomed to existing nighttime visual conditions of the Bay may experience the change as an undesirable consequence of the Proposed Project. Other viewers may perceive the nighttime lighting of Proposed Project as a new visual resource of the Bay. Light originating from the Proposed Project and visible from mainland locations would not contribute substantially to existing ambient light conditions on the mainland that could affect human comfort or disrupt sleep. The impact of Project lighting on mainland locations and on nighttime views of the Bay would therefore be considered less than significant.

The potential for project impacts from nighttime lighting would be greatest for the existing residential uses that would remain (like the Job Corps site), and the new residential uses that would be constructed under the Proposed Project. . . .

As listed above, new Figures IV.B.20 and IV.B.21 are shown in this Comments and Responses document on pp. 2.4.32 and 2.4.33, respectively.

The second complete paragraph on EIR p. IV.B.28 is revised as follows to augment the discussion of potential impacts related to glare:

The Proposed Project would not result in excessive glare that could substantially affect human comfort. The effect of glare, resulting from sunlight reflected off of building surfaces and reaching the eye of a viewer is a transitory phenomenon that changes with the position of the sun and the position of the viewer, time of year and atmospheric conditions. As such, the quality and intensity of reflected sunlight is always in flux. The perception of this phenomenon is largely subjective. Some viewers who have grown accustomed to reflected sunlight from buildings located in the East Bay Hills as seen from San Francisco, or viewers who have grown accustomed to reflections of sunlight from buildings located in San Francisco as seen from the East Bay, the North Bay or other parts of San Francisco, may experience the change in sunlight reflected off building surfaces within the Proposed Project area as an undesirable consequence of the Proposed Project. Other viewers may perceive the same change as a new visual resource of the Bay. Implementation of the Proposed Project could create excessive daytime glare if new buildings include highly reflective materials. The potential for excessive daytime glare would be greatest for receptors within the Development Plan Area and travelers on the Bay Bridge. The intensity of reflected daytime glare on mainland locations around

the Bay would be diffused by distance. The proposed Design for Development prohibits the use of reflective or mirrored glass in new construction. (Please see Guidelines T5.4.27 and T5.4.33 in Section T5.4, Pedestrian Scale, on p. 186, of the March 5, 2010 draft Design for Development. The guideline numbers and the page number cited above could change as part of an update to the proposed Design for Development.) New buildings within the Project Area would thus include transparent or lightly tinted glass rather than reflective glass, to minimize reflection of sunlight. Conformity with the *Design for Development* would ensure that the potential for daytime glare from project buildings would be less than significant.

#### **Section IV.D, Cultural and Paleontological Resources**

The last sentence of the first paragraph under the heading “Army Period” on EIR p. IV.D.6 is revised as follows:

In ~~1875~~1872, the Army Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse, lighthouse keeper’s residence and support buildings; these are still present at the southern end of the island outside of the Development Plan Area.

The second sentence of the last paragraph on EIR p. IV.D.27 is revised as follows:

Although the Navy has managed the portion of Yerba Buena Island under its control and Treasure Island (collectively, Naval Station Treasure Island, or “NSTI”) as a single facility since 1940, the two islands have different histories. Yerba Buena Island is a natural island that has been used by private parties and by the Army, ~~and Navy, and Coast Guard~~ since the 1840s. Treasure Island is an artificial island, constructed in 1936-1937 in the rocky shoals north of Yerba Buena Island.

The second sentence of the first paragraph on p. IV.D.28 is revised as follows:

Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard Station and Sector Facility.

The third sentence of the first paragraph on EIR p. IV.D.28 is revised as follows:

The context for historic architectural resources on Yerba Buena Island begins with the Army’s occupation of the island in 1867, when the Army asserted a claim and took possession of the island. Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard Station. In ~~1875~~1872, the Army Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse and lighthouse keeper’s residence at the southern end of the island (these buildings still stand, but they are outside of the Development Plan Area)...

Table IV.D.1: NRHP Listed Properties in the Development Plan Area, on EIR p. IV.D.31, is revised as follows:

**(Revised) Table IV.D.1: NRHP Listed Properties in the Development Plan Area**

Resource Number	Resource Name	Year Constructed
<u>Yerba Buena Island</u>		
1, 2-7, 83, 205, 230	Senior Officers' Quarters Historic District: The Nimitz House (Quarters 1); six other senior officers' quarters (Quarters 2-7), associated garages (Building 205, Building 230), family quarters (Building 83), and formal landscaping elements of the area.	1900 - 1905
1	Nimitz House (individually listed and a contributor to district)	1900
10/267	Quarters 10 and its contributing garage (individually listed)	1948
262	Torpedo Assembly Building (individually listed)	1891
<u>Treasure Island</u>		
1	Administration Building, Building 1 (individually listed)	1939
2	Hall of Transportation, Building 2 (individually listed)	1939
3	Palace of Fine and Decorative Arts, Building 3 (individually listed, Building 111 is identified as a component of Building 3)	1939

*Note:* This table excludes Yerba Buena Island buildings that are south of the Bay Bridge. They are currently located on the U.S. Coast Guard Station and Sector Facility. They are not within the Development Plan Area and are not subject to study in this EIR Section.

*Source:* San Francisco Planning Department, 2005 EIR.

Figure IV.D.6: Height Plan Near Buildings 1, 2, and 3, on p. IV.D.59, is revised, as shown in Section 2.6, Historic Resources, of this Comments and Responses document on p. 2.6.19.

### Section IV.E, Transportation

The second full paragraph on EIR p. IV.E.19 is revised as follows:

The **Golden Gate Bridge, Highway, and Transportation District (“GGBHTD”)** provides bus and ferry service between the North Bay (Marin and Sonoma Counties) and San Francisco. Within San Francisco, Golden Gate Transit bus lines 2, 4, 8, 18, 24, 26, 27, 38, 44, 54, 56, 58, 72, 73, 74, 76, 97, 10, 70, 80 and 101 operate on surface streets, with stops adjacent to the Transbay Terminal offering service to Marin and Sonoma Counties. Golden Gate Transit also operates ferry service between the Larkspur and Sausalito Ferry Terminals in Marin County and the San Francisco Ferry Building.

The last sentence of the third full paragraph on EIR p. IV.E.23 is revised as follows:

A temporary terminal, located on the block bounded by Main, Folsom, Beale and Howard Streets, opened in August spring 2010, and serves commuters during demolition and construction of the new Transit Center.

The following new text is added and the following existing text is revised at the beginning of the Regulatory Framework subsection on EIR p. IV.E.25:

**Federal, State, Regional**

There are no Federal, ~~State, or regional~~ transportation regulations applicable to the Proposed Project.

**State**

Treasure Island Transportation Management Act

AB 981, enacted in 2008, authorized the San Francisco Board of Supervisors to designate a board or agency to act as the transportation management agency for Treasure Island and Yerba Buena Island. The Treasure Island Transportation Management Agency (“TITMA”) is the name of the agency designated in AB 981. AB 981 also authorizes the Board of Supervisors and the San Francisco County Transportation Authority, by a two-thirds majority of each body, to adopt a congestion pricing program for Treasure Island and Yerba Buena Island and to set an initial congestion pricing fee structure based on recommendation by TITMA. AB 981 also authorizes TITMA, among other things, to establish parking fees, fines, and other parking-related revenues, to establish a transit pass fee structure and program, and to adopt amendments to the congestion pricing fee structure.

**Regional**

San Francisco Bay Trail Plan

Refer to Chapter III, Plans and Policies, for a description of the San Francisco Bay Plan and its application to the Proposed Project. The following information about the San Francisco Bay Plan is related to the Transportation analysis.

The 2005 Gap Analysis Study, prepared by ABAG for the entire Bay Trail area, attempted to identify the remaining gaps in the Bay Trail system; classify the gaps by phase, county, and benefit ranking; develop cost estimates for individual gap completion; identify strategies and actions to overcome gaps; and present an overall cost and timeframe for completion of the Bay Trail system. In the vicinity of the Project site, the 2005 Gap Analysis Study proposes to connect existing Bay Trail segments in downtown San Francisco with the trail on the eastern span of the Bay Bridge. The proposed trail would then connect to the existing trails in Oakland.

Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31, is revised, as shown in Section 2.7, Transportation, of this Comments and Responses document on p. 2.7.13.

The first paragraph under the bulleted paragraph “Major Arterials” on p. IV.E.32 is revised as follows:

- On Treasure Island Road, a bicycle lane would be provided in the south and east-bound directions only (i.e., from Treasure Island towards the Bay Bridge only), with the exception that a Class II bicycle lane would be provided for a short segment in

the northbound direction from Macalla Road to Treasure Island, connecting the proposed bicycle lane in the downhill direction on Macalla Road with Treasure Island. A short section on Treasure Island Road near the existing Bay Bridge westbound on-ramp would have a 14-foot wide travel lane and a Class III bicycle route instead of a Class II bicycle lane.<sup>10</sup> There would be ~~sidewalks~~ 10-foot Class I shared bicycle/pedestrian facilities provided on both sides of Treasure Island Road between Treasure Island and Macalla Road. In addition, the 10-foot Class I shared bicycle/pedestrian facility proposed on the west side of Treasure Island Road would extend from the Transit Hub on Treasure Island to the proposed lookout point south of the Macalla Road intersection. Otherwise, ~~No~~ sidewalks would be provided on the section of Treasure Island Road between Macalla Road and the Bay Bridge.

There is no change to footnote 10, cited in this text change.

The last dashed paragraph on p. IV.E.32, which continues at the top of p. IV.E.33, is revised as follows:

- Macalla Road would be reconfigured to provide (from south to north) a 16-foot two-way Class I shared bicycle/pedestrian path, an 11-foot travel lane allowing one-way vehicular traffic only, from the Bay Bridge northwesterly towards Treasure Island Road, a 2- to 3-foot buffer, and a 5- to 9-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction could use the Class I facility. Pedestrians traveling in either direction could use the Class I facility on the south side of Macalla Road. This street would provide one 11-foot wide travel lane, a five-foot Class II bicycle lane on the right hand side, and a 6-foot wide contra-flow bicycle lane on the left hand side. A 5-foot wide sidewalk would also be provided on the left hand side.

Figure IV.E.9: Proposed Transit Circulation Plan, on EIR p. IV.E.34, is revised, as shown in Section 2.1, Project Description, on p. 2.1.15 of this Comments and Responses document.

Figure IV.E.10: Conceptual Yerba Buena Island Pedestrian Circulation Plan, on EIR p. IV.E.37, is revised, as shown on p. 2.7.94 of this Comments and Responses document.

Figure IV.E.11: Proposed Bicycle Circulation Plan, on EIR p. IV.E.38, is revised, as shown on p. 2.7.75 of this Comments and Responses document.

The first sentence in the first full paragraph on EIR p. IV.E.39 is revised as follows (deleted text is shown in ~~strike through~~, new text is underlined):

On Yerba Buena Island, the bicycle circulation network would consist of a two-way shared bicycle/pedestrian path west of Treasure Island Road leading to a scenic overlook about 500 feet south of the intersection with Macalla Road, and a one-way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the planned bicycle/pedestrian path on the new Bay Bridge east span.

The second full paragraph on EIR p. IV.E.39 is revised as follows:

In addition, a ~~contra-flow~~ 16-foot two-way, shared Class II bicycle/pedestrian path lane would be provided on Macalla Road. The Macalla Road bicycle ~~lane-path~~ would provide a shorter, yet steeper, alternative route from Treasure Island to the Bay Bridge. A 10-foot two-way shared Class I bicycle/pedestrian path would also be constructed on the west side of Treasure Island Road between Treasure Island and the new lookout point just south of the Macalla Road intersection, as well as on the east side of Treasure Island Road between Treasure Island and Macalla Road. Other streets on Yerba Buena Island would allow shared bicycle/auto use, but no exclusive bicycle right-of-way would be provided.

The last two sentences in the second bulleted paragraph on EIR p. IV.E.39 are revised as follows:

~~On the north side of this intersection, the shared path would continue on the south side of Macalla Road to its terminus at Treasure Island Road. end, and bicyclists destined for Treasure Island would need to cross Macalla Road at a new crosswalk. North of this crossing, Macalla Road would provide one travel lane northbound (toward Treasure Island) and would have a Class II bicycle lane in each direction, one being a contra-flow lane.~~

Figure IV.E.12: Proposed Hillcrest Road at South Gate Road Intersection Configuration, on EIR p. IV.E.40, is revised, as shown on p. 2.7.91 of this Comments and Responses document.

Figure IV.E.13: Proposed Macalla Road at Bay Bridge Westbound On-ramp Intersection, on p. EIR IV.E.41, is revised, as shown on p. 2.7.78 of this Comments and Responses document.

Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration, on EIR p. IV.E.42, is revised, as shown on p. 2.7.79 of this Comments and Responses document.

The text in first bulleted paragraph at the top of EIR p. IV.E.43 is revised as follows:

**Treasure Island Road at Macalla Road** – The proposed bicycle treatments at this intersection are shown on Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration. Bicyclists using Treasure Island Road to access the Class I two-way shared bike/pedestrian path ~~contra-flow bicycle lane~~ on Macalla Road from Treasure Island would need to turn left across the opposing direction of traffic on Treasure Island Road to access Macalla Road. The Proposed Project would provide a new five-foot wide bicycle-only left-turn lane from Treasure Island Road to Macalla Road adjacent to an 112-foot wide travel lane on Treasure Island Road and separated from oncoming traffic by an 115-foot median. The bicycle-only turn lane and ~~wide~~ median would facilitate the left turn maneuver, and provide a clear and safe route to access Macalla Road from Treasure Island Road

The second and third bulleted items on the bottom of EIR p. IV.E.43 are revised as follows:

- Macalla Road ~~contra-flow~~ Class II downhill bicycle lane at intersecting cross-streets; and

- Treasure Island Road/Macalla Road intersection.
  - Bicycle-only left-turn lane from Treasure Island Road to the ~~contra-flow~~ Class I bicycle lane path on Macalla Road; and
  - Bicycle-only section of median on Treasure Island Road at Macalla Road.

Figure IV.E.15: Proposed Treasure Island Road at Bay Bridge Westbound On-ramp (West Side) Intersection Configuration, on p. IV.E.44, is revised, as shown on p. 2.7.80 of this Comments and Responses document.

The following new sentence is added to the paragraph regarding “Congestion Pricing” on EIR p. IV.E.45:

Visitors to the Islands, high-occupancy vehicles, and Coast Guard-related vehicles would not be charged a congestion pricing fee.

Footnote 4 in Table IV.E.5: Person Trip Generation by Mode on EIR p. IV.E.60 is revised as follows:

- <sup>4</sup> Based on counts of peak hour vehicle traffic on the Islands and assumes that the existing trip generation of the Job Corps center on Treasure Island and at the Coast Guard Station and Sector Facility on Yerba Buena Island would remain the same.

In Mitigation Measure M-TR-1, Construction Traffic Management Plan, the following text is added to the first sentence of the last paragraph on EIR p. IV.E.69, continuing on p. IV.E.70:

The Plan shall disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation on the Islands is maintained to the extent possible, with particular focus on ensuring pedestrian, transit, and bicycle connectivity and access to the Bay and to recreational uses to the extent feasible.

The following item is added to the end of the bulleted list on p. IV.E.70 as an item required as part of M-TR-1: Construction Traffic Management Plan:

- Require contractors to notify vendors that STAA trucks larger than 65 feet exiting from the eastbound direction of the Bay Bridge may only use the off-ramp on the east side of Yerba Buena Island.

The second sentence of the first full paragraph on p. IV.E.81 is revised as follows:

Primary access between the Coast Guard ~~station~~ Station and Sector Facility and the eastbound on-ramp is via South Gate Road (which connects with North Gate Road).

The last sentence of the last paragraph on EIR p. IV.E.81 is revised as follows:

In addition, the longest potential queue the Coast Guard vehicles would have to wait in would be about one-tenth of a mile, based on the distance between the places such vehicles access the main YBI circulation route and the Bay Bridge. Accordingly, the

Proposed Project would not be expected to substantially affect access to the Coast Guard ~~station~~ Station and Sector Facility.

The second paragraph on EIR p. IV.E.100 is revised as follows to clarify that SFMTA is the implementing agency of Mitigation Measure M-TR-24:

Implementation of Mitigation Measure M-TR-24 would only be triggered if the extent of actual vehicle queuing impacts the proposed Muni line 108 Treasure Island on Treasure Island Road and creates delays for Muni buses accessing the westbound transit-only on-ramp. As such, throughout the life of the project, the TITMA, in consultation with SFMTA and using SFMTA's methodology, shall monitor the length and duration of potential queues on Treasure Island Road and the associated delays to Muni service. If the queues between First Street and the westbound on-ramp on the west side of Yerba Buena Island result in an operational delay to Muni service equal to or greater than the prevailing headway during the AM, PM or Saturday peak periods, SFMTA, in consultation with TITMA, shall implement a southbound transit-only lane between First Street on Treasure Island and the transit and emergency vehicle-only westbound Bay Bridge on-ramp. The implementation of a transit-only lane would be triggered if impacts are observed over the course of six months at least 50 percent of the time during the AM, PM, or Saturday peak periods.

The second bulleted item on the bottom of EIR p. IV.E.100 is revised as follows:

- Elimination of the proposed southbound Class II bicycle lane on Treasure Island Road and a small portion of Hillcrest Road south of the intersection with Macalla Road. The Class I facility on Treasure Island Road connecting Treasure Island and the proposed new lookout point, just south of the Macalla Road intersection, would remain. Bicyclists who use the Class I path to the lookout point and continue on Treasure Island Road toward Hillcrest Road would have to share the lane with traffic, similar to other roadways where bicycle lanes are not provided. Bicyclists would still be able to use Class I bicycle paths and Class II bicycle lanes proposed on Macalla Road to connect between the Islands and the bicycle path on the new east span of the Bay Bridge.

The second paragraph in Impact TR-33 on EIR p. IV.E.108 is revised as follows:

On Yerba Buena Island, a one-way Class II bicycle lane would be provided on Treasure Island Road and Hillcrest Road, which would continue as a loop around South Gate Road and Macalla Road, back to Treasure Island Road. ~~Although Macalla Road is one-way northbound for vehicles, a contra-flow Class II bicycle lane~~ two-way Class I shared bicycle/pedestrian facility would also be provided from Treasure Island Road to South Gate Road, continuing on South Gate Road to its intersection with Hillcrest Road, and the Class I path connecting to the new Bay Bridge eastern span path, although portions of this facility near the bridge and ramps connections are proposed to be constructed separately by the Ramps Project and the Bay Bridge eastern span replacement project, separated from traffic by a two-foot buffer with painted chevrons. As a result, Macalla Road would provide a Class II bicycle lanes path in each direction connecting Treasure Island Road and the Bay Bridge for bicycle traffic in each direction, as well as a Class II bicycle lane specifically for bicycle traffic traveling in the downhill direction from the Bay Bridge toward Treasure Island.

The last paragraph on p. IV.E.108, which continues on to p. IV.E.109, is revised as follows:

There would be one primary bicycle route from the Bay Bridge to Treasure Island, on Macalla Road, either via the Class I or Class II facilities provided on that roadway. There would be two primary routes from Treasure Island to the Bay Bridge. The Class I facility on Macalla Road would be the most direct (although steeper) route to the Bay Bridge from Treasure Island. Bicyclists who opt for a longer, but less steep route from Treasure Island to the Bay Bridge would use the one-way Class II bicycle lane on Treasure Island Road and Hillcrest Road. At the intersection of Hillcrest Road and South Gate Road, bicyclists would be able to enter the Bay Bridge bicycle/pedestrian path providing access to the East Bay. Bicyclists traveling on Macalla Road to access the Bay Bridge bicycle path would use the Class II bicycle ~~lanes~~path on Macalla Road, and South Gate Road between Treasure Island and the Bay Bridge westbound/eastbound ramps intersection at Hillcrest Road and South Gate Road, where the Class I facility would intersect the Bay Bridge eastern span facility. ~~Between that intersection and the Bay Bridge bicycle path, which begins at the intersection of Hillcrest Road and South Gate Road, bicycles and pedestrians would use a 10-foot shared pathway on the west side of the street, which would continue along South Gate Road and loop around onto the bridge.~~

The third sentence in the first full paragraph on EIR p. IV.E.109 is revised as follows:

At Macalla Road and the Bay Bridge westbound ramps, treatments would include a Class II bicycle-only lanes in each the downhill direction between the Bay Bridge westbound ramps and Treasure Island Road.

The first full sentence in the first partial paragraph on p. IV.E.110 is revised as follows:

Cyclists would continue to have a Class II ~~contra flow~~ facility connecting Treasure Island and the Bay Bridge, via Treasure Island Road (eastern side) and Macalla Road.

The first paragraph on EIR p. IV.E.112 is revised to add mention of the new pedestrian connection to the new overlook viewing area, as follows:

On Yerba Buena Island, sidewalks would be built on most public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way along roadways and a pedestrian path would be constructed as part of a two-way, mixed-use bike/pedestrian facility along Treasure Island Road to a scenic overlook about 500 feet south of the intersection with Macalla Road. In addition to sidewalks, several trails through the open spaces and development areas would be constructed on Yerba Buena Island.

A new sentence is added at the end of the first paragraph on p. IV.E.112:

A new Class I shared bicycle/pedestrian facility would also be constructed on Macalla Road and South Gate Road providing pedestrian connections between Treasure Island and the Bay Bridge eastern span bicycle/pedestrian facility.

The first paragraph on EIR p. IV.E.139 is revised as follows:

...Some centralized off-street parking is proposed as part of the Project and is likely to be built even if individual buildings do not provide parking.<sup>37</sup> Market analysis conducted for TICD indicated that providing less than one parking space per residential unit could affect the financeability of the development program, the marketability of the homes, and livability of the Islands, and make the project economically infeasible. In addition, parking fees for non-residential uses would be a substantial portion of the funding supporting transit facilities and other features of the Proposed Project's TDM Plan. With no off-street commercial parking, there would not be sufficient funds to support the entire TDM Plan and transit services, and the Proposed Project would be infeasible.

There is no change to footnote 37, cited in the text above.

#### **Section IV.F, Noise**

Figure IV.F.1: Noise Measurement Locations, on p. IV.F.5, is revised, as shown in Section 2.7, Transportation, of this Comments and Responses document on p. 2.7.11.

The references to impacts to residents on the Coast Guard property in the third and fourth full paragraphs on EIR p. IV.F.21 are deleted and other revisions to these paragraphs are made, as shown below:

Although these significant traffic noise level increases would not expose existing or future residents to noise levels in excess of compatibility standards (discussed in Impact NO-6), they would affect future residential receptors in the Cityside District, the Island Center District, and the Yerba Buena Island District, particularly, future residents of early phases ~~that~~ who would not have been exposed to the full extent of the operational noise environment prior to full buildout. The traffic noise level increases would also affect students at the Job Corps campus and Life Learning Academy, ~~and residents on the Coast Guard property~~ who would have been exposed to the pre-operational noise environment. Therefore, permanent increases in ambient noise levels are considered to be potentially significant due to noise created by project-generated traffic.

Measures available to address significant traffic noise increases in the Job Corps campus, ~~and Life Learning Academy, and Coast Guard~~ areas or the future residential areas are limited. For example, the construction of continuous noise barriers at curbside along the entire length of the identified roadways would not be feasible because such a barrier would block vehicle access to properties and conflict with the aesthetic character of the neighborhoods. All proposed new dwelling units would be multi-family structures. Multi-family structures and hotels proposed as part of the Project would be required to design interior dwelling spaces to achieve an interior noise standard of 45 dBA as required by Title 24. Noise-reducing building techniques to attain these standards could include use of increased insulation and installation of building materials and windows with a high sound transmission class. Consequently, this impact would primarily result in a significant noise increase to exterior areas only (e.g., balconies, and public gathering areas).

The following text is added to EIR p. IV.F.21 as a new second paragraph, to provide a discussion of traffic noise impacts at the Coast Guard residences:

To examine the potential impacts from traffic noise increases to Yerba Buena Island receptors near eastbound Bay Bridge on- and off-ramps, a noise modeling analysis was conducted. It is estimated that the roadway center of the eastbound ramps is as close as 200 feet from the Hillcrest Road residences, taking into account elevation changes. While roadside noise levels would increase by 7.1 dBA (from 52.7 dBA to 59.8 dBA) from increased eastbound on- and off-ramp traffic with the Proposed Project, the full impact of this increase would not be realized by local receptors because of the existing contribution of traffic noise from the Bay Bridge (66 dBA). Addition of the existing (66 dBA) noise level plus the future noise level from the eastbound ramps with the Proposed Project (59.8 dBA) results in an increase of 0.9 dBA. This is considered a less-than-significant noise impact on residences on Hillcrest Road. This impact would be reduced in the Enhanced Transit Scenario and the Reduced Development Alternatives because ramp volumes would be reduced compared to the Proposed Project.

#### **Section IV.G, Air Quality**

Mitigation Measures M-AQ-2, on EIR pp. IV.G.29-IV.G.30, and M-AQ-3 on p. IV.G.36, are revised as indicated below. These changes have been made in accordance with recommendations in the BAAQMD comment letter. The text changes do not alter the findings of significance for Impacts AQ-2 or AQ-3, either prior to or after mitigation.

##### Mitigation Measure M-AQ-2: Construction Exhaust Emissions

TIDA shall require project sponsors to implement combustion emission reduction measures, during construction activities, including the following measures:

- The contractor shall keep all off-road equipment well-tuned and regularly serviced to minimize exhaust emissions, and shall establish a regular and frequent check-up and service/maintenance program for equipment.
- Off-road diesel equipment operators shall be required to shut down their engines rather than idle for more than five minutes, unless such idling is necessary for proper operation of the equipment.<sup>39</sup> Clear signage shall be provided for construction workers at all access points.

TIDA shall require that, ~~to the extent feasible,~~ project sponsors also engage in early implementation of the following combustion emission reduction measures, during construction activities:

- ~~To the extent feasible,~~ the project shall utilize EPA Tier 3 engine standards or better at the start of construction for all off-road equipment, or utilize Retrofit Emission Control Devices which consist of diesel oxidation catalysts, diesel particulate filters or similar retrofit equipment control technology verified by the California Air Resources Board (“CARB”) (<http://www.arb.ca.gov/diesel/verdev/verdev.htm>), to the extent that EPA Tier 3 equipment or similar retrofit equipment control technology is commercially available.

- ~~To the extent feasible, the project applicant shall utilize EPA Tier 4 engine standards or better for 50 percent of the fleet at construction initiation, increasing to 75 percent by 2015, and 100 percent by 2020~~2018, to the extent that EPA Tier 4 equipment is commercially available.
- ~~To the extent feasible, the project applicant shall utilize 2010~~2007 or newer model-year haul trucks, to the extent that they are commercially available.
- Diesel-powered generators for construction activity shall be prohibited as a condition of construction contracts for each Major Phase, unless TIDA has made a finding in writing in connection with the Major Phase that there are no other commercially available alternatives to providing localized power.

[There is no change to footnote 39 on EIR p. IV.G.29, cited in the above text.]

#### Mitigation Measure M-AQ-3

At the submission of any Major Phase application, TIDA shall require that an Air Quality consultant review the proposed development in that Major Phase along with existing uses and uses approved in prior Major Phases to determine whether the actual project phasing deviates materially from the representative phasing plan. If the Air Quality consultant determines the possible impact of the actual phasing could result in a significant impact on any group of receptors, then TIDA shall require that the applicant implement in connection with that Major Phase best management practices to the extent that TIDA determines feasible to reduce construction emissions in accordance with Mitigation Measures M-AQ-1, M-AQ-2, and M-AQ-4. TIDA shall also determine whether Tier 3 or Tier 4 engines, non-diesel powered generators, or year 2010 or newer haul trucks are commercially available for that phase and, if so, require the use of such engines or haul trucks.

Mitigation Measure M-AQ-5, on EIR p. IV.G.42, is revised as indicated below to address compliance of proposed ferries with State emissions regulations. These text changes do not alter the findings of significance for Impact AQ-5, either prior to or after mitigation.

#### Mitigation Measure M-AQ-5: Ferry Particulate Emissions

All ferries providing service between Treasure Island and San Francisco shall meet applicable California Air Resources Board regulations. Additionally, all ferries shall be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions. If diesel particulate filters are operated at the proper temperatures, they are reported to achieve up to 90 percent reduction in particulate emissions. However, because the Water Emergency Transit Authority would operate the ferry service, implementation of this measure is outside the jurisdiction of the City and is not assured.

The Proposed Project already includes substantial Transportation Demand Measures. Public transit improvements and further measures to reduce motor vehicle emissions, which alone would be significant, are not available. ROG emissions would result primarily from use of consumer products and architectural coating applications by future residents (non-construction) which could not feasibly be mitigated. Consequently,

regional emissions of ROG, NOx and PM10 would be significant and unavoidable under the applicable 1999 BAAQMD Guideline thresholds. Additionally, emissions of PM2.5 would be significant and unavoidable under the 2010 BAAQMD thresholds.

**VOLUME 2**

**CHAPTER IV, ENVIRONMENTAL SETTING AND IMPACTS (continued)**

**Section IV.J, Recreation**

The first sentence of the first full paragraph on p. IV.J.5 is revised as follows:

Yerba Buena Island is an approximately ~~450~~160-acre island in the middle of San Francisco Bay.<sup>16</sup>

Footnote 16 on EIR p. IV.J.5 is revised as follows:

<sup>16</sup> The Caltrans right-of-way for the Bay Bridge takes up about 18 acres of land area. The U.S. Coast Guard owns and operates a ~~3948~~-acre facility south of the Bay Bridge. The Coast Guard Property is not included in the Project Area.

Item No. 9 in Table IV.J.1: Proposed Parks and Open Space, on EIR p. IV.J.13, is revised as follows:

**(Revised) Table IV.J.1: Proposed Parks and Open Space**

Parks and Open Space	Description of Use	Acres (approximate) <sup>a</sup>
<i>Treasure Island</i>		
9. Cultural Park	Plaza designed to connect the Cityside District with the Transit Hub and Clipper Cove; includes potential site for a museum or other cultural institution <u>and the existing chapel, which would be retained</u>	3

In the seventh line from the top on p. IV.J.16, “paths” is changed to “facilities”, as follows:

Pedestrian and bicycle ~~paths~~ facilities would continue on Yerba Buena Island to connect to the new pedestrian and bicycle path on the new east span of the Bay Bridge.

The first paragraph under Impact RE-1 on EIR pp. IV.J.16-IV.J.17, is revised as follows:

Development of the parks and recreational facilities would require construction activities, which could vary depending on the location and type of work. Existing structures on identified park sites would require demolition, except for the existing chapel on the site of the proposed Cultural Park. The chapel would be retained in its current location. Sites would be cleared and graded, and utilities (electrical, water, sanitary sewer, and storm drainage), hardscape (e.g., concrete, asphalt, stone, walls, sport-court and play area surfacing, decking/boardwalks), and site furnishings (e.g., benches, picnic tables, drinking fountains, play equipment, fencing, artwork, lighting) would be installed. New structures (e.g., restrooms, picnic/shade shelters, kiosks, pavilions, overlooks, piers)

would be constructed or existing structures would be renovated. If sites are proposed to include cultural or educational institutions or other buildings, such as a museum or an environmental education center, developable pads would be constructed. Site planting would include installation of irrigation systems and would focus on re-vegetation and restoration of native plant communities, where possible. The natural open space on Yerba Buena Island would be managed under a Habitat Management Plan (“HMP”), and construction activities in these areas would generally be limited to those for revegetation, creation of trails, removal of invasive species, and other low-impact activities.

#### **Section IV.K, Utilities and Service Systems**

The second sentence of the last paragraph on p. IV.K.1 is revised as follows:

The eastern side of the island, including the Coast Guard ~~station~~ Station and Sector Facility, has a gravity sewer system that drains to a pump station under the Bay Bridge at the eastern tip of Yerba Buena Island.

The following text is added after the third paragraph (which discusses solids processing) on EIR p. IV.K.2 under the heading, “Existing Wastewater Treatment”:

By about May 2011, the SFPUC plans to replace the anaerobic digestion process for solids with a stabilization process using lime (i.e., calcium carbonate).<sup>5</sup> The lime will be added as a slurry (i.e., lime and water mixture). Typically, lime is added to untreated biosolids to raise the pH to 12 or higher, with the dosage dependent on type and concentration. The lime stops or reduces the microbial reactions that can lead to odor production. Lime can also inactivate pathogens, and may be less expensive than traditional anaerobic digestion. The lime slurry will discharge into and out of a double-walled, high-density, polyethylene, chemical tank with a capacity of approximately 5,000 gallons. Transport off site would be by truck, similar to existing solids transport off the Islands.

The new footnote for this text change, to be added at the bottom of p. IV.K.2, is shown below, and subsequent footnotes in this section will be renumbered accordingly:

<sup>5</sup> Email between Michael Marten, SFPUC, and Michael Tymoff, Mayor’s Office of Economic and Workforce Development, forwarded to Turnstone Consulting on November 30, 2010.

The following new sentences are added at the end of the second full paragraph on p. IV.K.9, regarding the *proposed* wastewater system:

Utility service to the Coast Guard Station and Sector Facility would be maintained throughout buildout of the Proposed Project. Certain modifications to the piping connecting to the proposed replacement pump station could be necessary. Details would be worked out during the design process.

The third paragraph on p. IV.K.19 is revised and a new footnote is added, as follows:

The California Department of Housing and Community Development allows the use of grey gray water (water from sinks, showers, and similar sources, captured for local reuse) in residential buildings under certain circumstances.<sup>45</sup> ~~is not currently allowed. If changes are made in applicable State and local laws and regulations, individual residential buildings may construct the necessary capture facilities and piping systems for grey water. Use of gray water is not part of the Proposed Project at this time. Any future proposed use of grey gray water would conform to all applicable state and local requirements. Because it is not known where or whether these grey gray water sources would be used, they are not evaluated further in this EIR.~~

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>45</sup> California Code of Regulations, Title 24, Part 5, Chapter 16A, available via Oasis Design (web site), “California Graywater Standard: Chapter 16A Nonpotable Water Reuse Systems,” (with link to PDF of official text), available at <http://www.oasisdesign.net/greywater/law/california/currentcode/>, accessed Nov. 7, 2010. A few highlights are: (1) A gray water system limited to reuse of clothes washer water does not require a permit. Section 1603A.1.1. (2) “Simple systems” with a discharge of 250 gallons per day or less require a construction permit, unless exempted by the local enforcing agency. Section 1603A.1.2. (3) “Complex systems” are all other systems and may have more restrictions on them than the first two types of systems. Section 1603A.1.3.

The second paragraph on EIR p. IV.K.47 is revised as follows:

Treasure Island and Yerba Buena Island have two sources of water. The primary supply is provided by the SFPUC’s water distribution system in San Francisco. An emergency back-up supply for emergency use is provided by EBMUD.

The third paragraph on EIR p. IV.K.47 is revised as follows (note that a few additional technical edits are included):

Water from the SFPUC system is delivered to Treasure Island / Yerba Buena Island through a 10-inch-diameter steel pipe attached to the west span of the Bay Bridge. Water is pumped across the bridge by a pumping station located on Spear Street in San Francisco. The station contains four pumps, each rated at 900 gallons per minute (“gpm”). The station can run a maximum of two pumps at a time for a maximum output of 1,800 gpm. The SFPUC chloraminates this water prior to transmission; additional treatment on Treasure Island is not required. A standby booster chlorine station is available for emergencies where the pipeline touches down on Yerba Buena Island. The SFPUC provides water for the Job Corps campus and the Coast Guard Station and Sector Facility.

The first and fifth sentences in the fourth paragraph on EIR p. IV.K.47 are revised to read as follows (the first five sentences are provided here for context):

The ~~back-up~~ emergency water supply is provided by EBMUD through a 12-inch-diameter, ductile iron, main pipeline connected to an EBMUD water meter at Beach Street in ~~Emeryville~~ Oakland. From the water meter, the 12-inch main is owned and maintained by the Navy. The main delivers water to a pump station located below the eastern end of the existing Bay Bridge in Oakland. Water is then pumped through a 12-inch-diameter steel pipe attached to the east span of the Bay Bridge. This water supply charges the fire hydrants on the Bridge and is connected to the existing water tanks on Yerba Buena Island for an emergency ~~back-up~~ supply.

The first sentence in the last partial paragraph on EIR p. IV.K.47 is revised as follows:

As described above, SFPUC ~~and EBMUD~~ furnishes potable water to existing water tanks on Yerba Buena Island.

The last three sentences in the last paragraph on EIR p. IV.K.51 and the first two sentences in the first paragraph on EIR p. IV.K.52 are revised as follows:

~~The back-up~~ An emergency water supply to Treasure Island / Yerba Buena Island would be provided by a new 12-inch-diameter pipeline on the new east span of the Bay Bridge, connected to a new SFPUC pump station near the eastern base of the Bridge. The new system would be capable of delivering up to 1,800 gpm of potable water ~~to~~ from the EBMUD connection point on Beach Street in Oakland. The water would be chloraminated by EBMUD prior to delivery, as with the existing ~~back-up~~ emergency supply.

The ~~redundant~~ water source from EBMUD provides ~~a back-up~~ an emergency water source to the Project Area. If ~~either~~ the SFPUC ~~or EBMUD~~ system were to be taken off-line for maintenance, power interruptions, or damage due to an earthquake, ~~the other source~~ EBMUD would ~~continue to be capable of supplying~~ 1,800 gpm to meet peak demands for the Proposed Development Project on an emergency basis.

The following text is added to EIR p. IV.K.52 as a new third paragraph:

Water service to the Coast Guard Station and Sector Facility would be maintained throughout the buildout of the Proposed Project. Certain modifications to the piping for connections of the water pipes would be necessary. Details would be worked out during the design process. TIDA and the Coast Guard have agreed that they would enter into a Memorandum of Understanding (MOU). The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that modifications for increased utility demand can be coordinated. Among other things, the MOU would also address construction coordination to ensure uninterrupted utility delivery and service.

Footnote 97 on p. IV.K.52 is revised as follows:

<sup>97</sup> EBMUD currently provides 220 mgd of water to approximately 1.3 million people as well as industrial, commercial, and institutional customers in its 331-square-mile service area. The existing and proposed water demand for the Redevelopment Plan Project Area is small in relation to EBMUD's total delivery. EBMUD is not the water supply purveyor for the Proposed Project.

The fifth paragraph on EIR p. IV.K.71 is expanded as follows:

The submarine cable from Treasure Island to Yerba Buena Island terminates at the Yerba Buena Island Main Substation. From here, power is distributed to Yerba Buena Island via a combination of poles and underground facilities. The Coast Guard Station and Sector Facility obtains its electrical power from a tie-in to the power delivered to Yerba Buena Island by this submarine cable.

The following sentence is added to the last full paragraph on p. IV.K.72:

The Coast Guard Station and Sector Facility obtains its wired (land-based) telecommunications services from the same connections to the mainland.

The second heading on p. IV.K.76 is changed as follows:

*Distribution System on Treasure Island and Yerba Buena Island*

The following new text is inserted as new third and fourth paragraphs at the top of p. IV.K.78, above the heading "Electricity Supply":

Electrical service to the property line of the Coast Guard Station and Sector Facility would be maintained during buildout of the Proposed Project. Certain modifications to the connections may be necessary. Details would be worked out during the design process.

TIDA and the Coast Guard have agreed that they would enter into a construction coordination Memorandum of Understanding (MOU).<sup>147</sup> The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that utility-demand modifications can be coordinated. Regarding future electrical demand, the Coast Guard has no details for its future expansion or modernization plans at this time. Modernization plans may be more energy intensive, since new technology often requires more power than older equipment. However, because no modernization projects are currently defined, it is too speculative to estimate a future increase in electricity use for the Coast Guard.

The new footnote for this text change, to be added at the bottom of p. IV.K.78, is shown below, and subsequent footnotes in this section will be renumbered accordingly:

<sup>147</sup> This information is based on the results of a meeting between TIDA, TICD, and U.S. Coast Guard representatives held on October 29, 2010.

The following sentence is added after the fifth full paragraph on p. IV.K.79, at the end of the discussion in the subsection entitled “Proposed Natural Gas Infrastructure”:

The Coast Guard does not currently have natural gas service, so the Proposed Project would not need to maintain service during construction. The Proposed Project would continue to provide natural gas service to Yerba Buena Island to serve the new development. If in the future, the U.S. Coast Guard wishes to add natural gas service for the Coast Guard facilities on Yerba Buena Island, the service could tie in to the supply lines on Yerba Buena Island.

The following is inserted after the first partial paragraph on p. IV.K.80, above the heading “Project Impacts”:

The Coast Guard Station and Sector Facility is updating its telecommunications and computer systems. Land-based telecommunications services to the property line of the Coast Guard Station and Sector Facility would be maintained during buildout of the Proposed Project. Certain modifications to the connections may be necessary. Details would be worked out during the design process. As discussed above on p. IV.K.78, TIDA and the Coast Guard have agreed that they would enter into a construction coordination Memorandum of Understanding (MOU). The MOU would include (among other things) a process for the Coast Guard to notify TIDA when it is considering modernization projects, so that utility-demand modifications can be coordinated.

#### **Section IV.L, Public Services**

The last sentence on p. IV.L.25 and the paragraph at the top of p. IV.L.26 are revised as follows:

The new school would likely serve pre-kindergarten (preschool), elementary, and middle school students;<sup>25</sup> high school students would most likely continue to attend schools in other parts of San Francisco.<sup>26</sup> For planning purposes, about 48 preschool aged children were estimated.<sup>27</sup> The remaining 1,647 1,695 students were distributed evenly by grade. ~~Currently, a~~ As shown in Table IV.L.1, a total of approximately 1,695 school-age children would live on the Islands following full build-out of the Project. As of 2009, approximately 320 students live on the Islands.<sup>28</sup>

The new footnote for this text change, to be added to p. IV.L.26, is shown below, and subsequent footnotes in the section will be renumbered accordingly. There are no other changes to the footnotes on this page.

<sup>27</sup> Factor is based on the 2010 SFUSD Child Development Center (CDC) enrollment of 1,559 students, or about 2.86 percent of total 2010 SFUSD student enrollment. (1,695 students x 0.0286 = about 48 preschool aged students.)

Table IV.L.1: Public School Enrollment at Project Buildout Compared to SFUSD Capacity, on p. IV.L.27, is revised, as shown on the following page.

**(Revised) Table IV.L.1: Public School Enrollment at Project Buildout Compared to SFUSD Capacity**

Area	<u>Preschool / Elementary School (Grades Preschool-5 K- 5)</u>	Middle School (Grades 6-8)	High School (Grades 9-12)	Total
Project Area (estimated)	<u>808 785</u>	<u>380 390</u>	<u>507 520</u>	1,695
2030 Citywide Enrollment <sup>1</sup>	33,036	16,518	22,024	71,573
2009 SFUSD Capacity	29,260	11,700	17,575	63,835 <sup>2</sup>
2030 Projected Shortfall	3,776	4,818	4,449	7,738
New Treasure Island School Capacity <sup>3</sup>	1,200	800	0	2,000

*Notes:*

<sup>1</sup> Categories may not add up to total due to rounding.

<sup>2</sup> Total includes capacity for 5,300 students in varying grade levels in alternative schools and public charter schools.

<sup>3</sup> Based on combined average size of elementary and middle schools within SFUSD. See Comparison of Number of Students Living in Each SF City Planning Neighborhood with Elementary and Middle School Capacity, found at <http://portal.sfusd.edu/data/epc/Comparison%20of%20Number%20of%20Students%20Living%20in%20Each%20SF%20City%20Planning%20Nhood.pdf>, accessed June 20, 2010.

*Source:* ABAG Projections, 2007; Turnstone Consulting, 2009.

**Section IV.M, Biological Resources**

The following text is added to the second full paragraph on EIR p. IV.M.2:

The San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. The estuary's populations of fish and wildlife have changed markedly in the past 150 years, with losses due to over-harvest, habitat loss and degradation, introduced species, pollutants, and the modification of freshwater flows. It encompasses 479 square miles, including shallow mudflats. San Francisco Bay is divided into four main basins: South Bay, Central Bay, San Pablo or North Bay, and Suisun Bay. This assessment focuses on the Central Bay, which is located between the San Francisco-Oakland Bay Bridge ("Bay Bridge") and the Richmond-San Rafael Bridge and connects to the Pacific Ocean through the Golden Gate. The regional setting for purposes of this evaluation includes both the shallow water habitats around San Francisco Bay – the "baylands"<sup>3</sup> and the waters of the Bay itself.

Footnote 15 on EIR p. IV.M.4 is clarified as follows to provide a more specific citation:

<sup>15</sup> San Francisco Planning Department, 2005, *op.cit.*, Section 3.8, Biological Resources, and specifically pp. 3-94.

The second full paragraph on EIR p. IV.M.11 is clarified to read:

The most common large mobile invertebrate organisms in the Central Bay include blackspotted shrimp (*Crangon nigromaculata*), California bay shrimp (~~*Crangon franciscorum*~~ smooth shrimp (*Lissocrangon stylirostris*), Dungeness crab (*Metacarcinus magister*), and the slender rock crab (*Cancer gracilis*). Although other species of shrimp are present in the Central Bay, their numbers are substantially lower when compared to the number of California smooth bay and blackspotted shrimps present.<sup>29, 30</sup>

New footnote 30 is added to this page, as follows, and subsequent footnotes will be renumbered accordingly:

<sup>30</sup> Baxter et al. 1999. Baxter, R., K. Hieb, S. DeLeon, K. Fleming, and J. Orsi. 1999. Pleuronectiformes. In: Orsi, James J. editor, Report on the 1980-1995 Fish, Shrimp, and Crab Sampling in the San Francisco Estuary, California, pp. 77-133. Prepared by The Interagency Ecological Program for the Sacramento-San Joaquin Estuary.

The third full paragraph on EIR p. IV.M.11 is revised as follows:

The bottom, or demersal, fish community reported to inhabit the area surrounding Treasure Island comprises more than ~~6545~~ species. The ~~bay pipefish (*Syngnathus leptorhynchus*), bay goby (*Lepidogobius lepidus*), spiny dogfish shark (*Squalus acanthias*), eulachon (*Thaleichthys pacificus*), speckled sanddab (*Citharichthys stigmaeus*), prickly sculpin (*Cottus asper*), shokhaze goby (*Tridentiger barbatus*), shiner perch (*Cymatogaster aggregata*), white seaperch (*Phanerodon furcatus*), plainfin midshipmen (*Porichthys notatus*), minnows, Chinook salmon (*Oncorhynchus tshawytscha*), and brown smoothhound (*Mustelus henei*)~~ English sole (*Parophrys vetulus*), plainfin midshipman (*Porichthys notatus*), Pacific staghorn sculpin (*Leptocottus armatus*), shiner perch (*Cymatogaster aggregata*), white croaker (*Genyonemus lineatus*), longfin smelt (*Spirinchus thaleichthys*), cheekspot goby (*Ilypnus gilberti*), and brown rockfish (*Sebastes auriculatus*) are the dominant taxa of this community, accounting for approximately ~~9496~~ percent of the fish present (see Table IV.M.1).

Table IV.M.1 on page IV.M.12-IV.M.13 is revised as shown on the following three pages.

The following text is added to the partial paragraph at the top of p. IV.M.15, before the last sentence in the paragraph:

The waters of San Francisco Bay, including those surrounding Treasure Island, are typically characterized as being turbid because of local watershed runoff, inflow from the Sacramento and San Joaquin Rivers, and constant resuspension of bottom sediments from tidal and wind action.<sup>44</sup> As a result, light penetration is greatly affected by turbidity levels and as a result is generally limited to the upper meter of water.<sup>45</sup> As a consequence, plankton abundance and productivity is typically lower than nearby coastal waters and less turbid estuaries and embayments. Unlike the North and South Bays, the Central Bay is the least affected by introduced exotic species.

**(Revised) Table IV.M.1: Benthic Fish Community Composition and Abundance Indices for Combined Shallow and Deep Water Sites near Treasure Island,<sup>1</sup> Based on Otter Trawl Data, 2000–2008 (fish per hectare)**

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Syngnathus leptorhynchus</i>	bay pipefish	634	797	213	97	326	155	996	272	429	435	20.1%
<i>Lepidogobius lepidus</i>	bay goby											29.1%
<i>Lepidogobius lepidus</i>	bay goby	552	772	207	86	301	146	923	199	391	397	18.3%
<i>Squalus acanthias</i>	spiny dogfish	801	334	253	107	86	171	174	471	567	329	15.2%
<i>Thaleichthys pacificus</i>	eulachon	182	400	221	84	13	254	516	179	98	217	10.0%
<i>Citharichthys stigmaeus</i>	speckled sanddab	478	235	172	78	54	104	75	299	425	213	9.8%
<i>Cottus asper</i>	prickly sculpin	801	334	253	107	86	171	174	471	567	329	22.0%
<i>Cottus asper</i>	prickly sculpin	263	95	258	110	238	335	357	96	166	213	9.8%
<i>Tridentiger barbatus</i>	shokihaze goby	122	70	92	78	44	80	46	38	66	71	3.3%
<i>Parophrys vetulus</i>	English sole	182	400	221	84	31	254	516	179	98	217	14.5%
<i>Porichthys notatus</i>	plainfin midshipman	263	95	258	110	238	335	357	96	166	213	14.2%
<i>Leptocottus armatus</i>	Pacific staghorn sculpin	204	87	50	13	10	69	138	47	155	86	5.7%
<i>Cymatogaster aggregata</i>	shiner perch	52	37	43	56	30	65	29	18	29	40	1.8%
<i>Cymatogaster aggregata</i>	shiner perch	122	70	92	78	44	80	46	38	66	71	4.7%
<i>Phanerodon furcatus</i>	white seaperch	31	26	30	12	9	17	3	95	45	30	1.4%
<i>Porichthys notatus</i>	plainfin midshipman	70	18	13	16	17	72	26	23	5	29	1.3%
	unidentified minnow	50	19	5	19	18	8	23	34	4	20	0.9%
<i>Oncorhynchus tshawytscha</i>	Chinook salmon	20	11	13	23	31	42	19	9	6	19	0.9%
<i>Mustelus henlei</i>	brown smoothhound	54	60	38	12	1	0	0	4	0	19	0.9%
<i>Leptocottus armatus</i>	Pacific staghorn sculpin	27	23	15	4	6	7	26	14	27	16	0.8%
<i>Sebastes auriculatus</i>	brown rockfish	20	57	37	12	1	0	0	3	0	14	0.7%

(continued)

**(Revised) Table IV.M.1 (continued)**

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Genyonemus lineatus</i>	white croaker	26 <u>31</u>	13 <u>26</u>	13 <u>30</u>	8 <u>12</u>	9	16 <u>17</u>	3	32 <u>95</u>	10 <u>45</u>	14 <u>30</u>	0.7% <u>2.0%</u>
<i>Artemius fenestralis</i>	padded sculpin	14	23	41	24	2	0	2	6	3	13	0.6%
(cont.)												
<i>Parophrys vetulus</i>	English sole	9	21	21	4	2	2	20	5	21	12	0.5%
<i>Spirinchus thaleichthys</i>	longfin smelt	<u>50</u>	<u>19</u>	<u>5</u>	<u>19</u>	<u>18</u>	<u>8</u>	<u>23</u>	<u>34</u>	<u>4</u>	<u>20</u>	<u>1.3%</u>
<i>Ilypnus gilberti</i>	cheekspot goby	<u>20</u>	<u>11</u>	<u>13</u>	<u>23</u>	<u>31</u>	<u>42</u>	<u>19</u>	<u>9</u>	<u>6</u>	<u>19</u>	<u>1.3%</u>
<i>Sebastes auriculatus</i>	brown rockfish	<u>54</u>	<u>60</u>	<u>38</u>	12	1	0	0	<u>4</u>	0	<u>19</u>	<u>1.3%</u>
<i>Microgadus proximus</i>	Pacific tomcod	<u>5</u> <u>14</u>	<u>11</u> <u>23</u>	<u>28</u> <u>41</u>	<u>22</u> <u>24</u>	2	0	<u>1</u> <u>2</u>	<u>2</u> <u>6</u>	<u>2</u> <u>3</u>	<u>8</u> <u>13</u>	<u>0.4%</u> <u>0.8%</u>
<i>Percina macrolepida</i>	bigscale logperch	9	3	8	5	3	3	16	3	14	7	0.3%
<i>Ilypnus gilberti</i>	cheekspot goby	2	0	0	2	1	19	29	2	0	6	0.3%
<i>Alosa sapidissima</i>	American shad	5	5	5	5	5	5	5	5	5	5	0.2%
<i>Sardinops sagax</i>	Pacific sardine	1	1	0	13	16	8	0	1	0	4	0.2%
<i>Lampetra tridentata</i>	Pacific lamprey	3	10	2	4	0	2	5	2	1	3	0.2%
<i>Psettichthys melanostictus</i>	sand sole	5	6	2	1	0	4	11	1	0	3	0.1%
<i>Ameiurus nebulosus</i>	brown bullhead	5	3	3	4	1	6	5	1	1	3	0.1%
<i>Ictalurus punctatus</i>	channel catfish	1	0	1	15	0	9	1	1	0	3	0.1%
<i>Spirinchus thaleichthys</i>	longfin smelt	2	10	3	1	1	4	1	3	3	3	0.1%
<i>Synodus lucioceps</i>	California lizardfish	1	1	1	5	6	5	2	3	3	3	0.1%
<i>Syngnathus leptorhynchus</i>	bay pipefish	9	3	8	5	3	3	16	3	14	7	0.5%
<i>Tridentiger trigonocephalus</i>	chameleon goby	<u>2</u>	<u>0</u>	<u>0</u>	<u>2</u>	<u>1</u>	<u>19</u>	<u>29</u>	<u>2</u>	<u>0</u>	<u>6</u>	<u>0.4%</u>
<i>Citharichthys sordidus</i>	Pacific sandab	1	1	0	<u>13</u>	<u>16</u>	<u>8</u>	0	1	0	4	0.3%
<i>Clupea pallasii</i>	Pacific herring	<u>3</u>	<u>10</u>	<u>2</u>	<u>4</u>	<u>0</u>	<u>2</u>	<u>5</u>	<u>2</u>	<u>1</u>	<u>3</u>	<u>0.2%</u>

(continued)

**(Revised) Table IV.M.1 (continued)**

Species <sup>2</sup>	Common Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	Mean	% Comp.
<i>Pholis ornate</i>	saddleback gunnel	5	6	2	1	0	4	11	1	0	3	0.2
<i>Arteidius notospilotus</i>	bonyhead sculpin	5	3	3	4	1	6	5	1	1	3	0.2%
<i>Symphurus atricaudus</i>	California tonguefish	1	0	1	15	0	9	1	1	0	3	0.2%
<i>Paralichthys californicus</i>	California halibut	1	1	1	4 5	6	5	2	3	3	3	0.1% 0.2%
<i>Hyperprosopon ellipticum</i>	silver surfperch	4	0	4	0	0	0	7	8	0	2	0.1%
<i>Iparis pulchellus</i>	showy snailfish	4	0	1	0	0	0	7	8	0	2	0.2%
<i>Mustelus henlei</i>	brown smoothhound	4	1	1	2	2	1	1	2	1	2	0.1%

*Notes:*

<sup>1</sup> CDFG/IEP trawl data, Stations 109, 110, 211, 212, and 214.

<sup>2</sup> Additional fish species that occurred in trawls at less than significant numbers include: walleye surfperch, big skate, broadnose sevengill shark, western brook lamprey, black bullhead, yellowtail rockfish, yellowfin goby, white seaperch, seabass, longjaw mudsucker, black rockfish, starry flounder, sealyhead sculpin, queenfish, Pacific sand lance, lingcod, black perch, sand sole, pygmy poacher, Pacific sardine, leopard shark, whitebait smelt, topsmelt, American shad, white sturgeon, unidentified rockfish, yellowtail rockfish, diamond turbot, curlfin sole, buffalo sculpin, barred surfperch, slipskin snailfish, hornyhead turbot, vermilion rockfish, tubesnout, California tonguefish, arrow goby, yellow snake eel, Dover sole, delta smelt, barred surfperch, cabezon, Sacramento pikeminnow, bat ray, snake prickleback, hybrid sole, wakasagi, Pacific lamprey, pompano, unidentified river lamprey, rubberlip seaperch, kelp greenling, unidentified snailfish, pile perch, dwarf perch, threadfin shad, spiny dogfish, night smelt, spotfin surfperch, threespine stickleback, onepoint fringehead, striped bass, striped seaperch, bonyhead sculpin, Pacific sanddab, threadfin shad, and green sunfish, bocaccio, Pacific pompano, thornback, brown Irish lord, green sturgeon, shimofuri goby.

*Source:* CDFG 2000–2008. Unpublished data of California Department of Fish and Game (CDFG Interagency Ecological Program for San Francisco Estuary. Monthly Mid-water and Otter-Trawl Survey Data for San Francisco Estuary. Available by contacting DCFG at khieb@dfg.ca.gov).

New footnotes 44 and 45, shown below, are added to the bottom of p. IV.M.15, and subsequent footnotes will be renumbered accordingly:

<sup>44</sup> NOAA. 2007. *Ibid.*

<sup>45</sup> May, C. L., J. R. Kosefi, L. V. Luca., J. E. Cloern, and D. H. Schoellhamer. 2003. Effects of spatial and temporal variability of turbidity on phytoplankton blooms. *Mar. Ecol. Prog. Ser* 254: 111.128.

The first sentence in the first full paragraph on EIR p. IV.M.15 is revised to correct one Latin species name:

Central Bay meroplankton, including macrozooplankton and micronekton, is dominated by the ctenophore *Pleruobrachia bachei*, the isopod *Synidotea laticauda*, the shrimps (*Palaemon macrodactylus*, *Crangon franciscorum*, and *C. ~~N~~nigricauda*), the mysid *Neomysis kadiakensis*, and the medusa *Polyorchis* spp.<sup>45</sup>

A second note is added to Table IV.M.2 on EIR p. IV.M.16, with the note designation added to “Species” at the head of the first column in the table. The new note reads as follows:

<sup>2</sup> Additional fish species that were present in the trawls at less than significant numbers include: white croaker, longfin smelt, American shad, Chinook salmon, white seaperch, plainfin midshipman, bay goby, whitebait smelt, bat ray, threadfin shad, California halibut, Pacific staghorn sculpin, Pacific tomcod, big skate, speckled sanddab, English sole, surf smelt, brown smoothhound, Pacific electric ray, barred surfperch, threespine stickleback, diamond turbot, leopard shark, river lamprey, yellowfin goby, striped bass, starry flounder, cheekspot goby, bay pipefish, queenfish, lingcod, white seabass, pile perch, unidentified rockfish, kelp greenling, black perch, and redbait surfperch.

The following text is added to EIR p. IV.M.18, after the list of species known or presumed to nest on Treasure Island:

In addition, the San Francisco Breeding Bird Atlas lists 22 species as confirmed or probable breeding birds on Treasure Island.

- Double-crested cormorant
- Pelagic cormorant
- Brandt’s cormorant
- Black-crowned night-heron
- Killdeer
- Western gull
- Mourning dove
- Anna’s hummingbird
- Allen’s hummingbird
- Common raven
- Chestnut-backed chickadee
- Bushtit
- American robin
- *Sitta canadensis*, Red-breasted nuthatch
- European starling
- White-crowned sparrow
- Song sparrow
- Red-winged blackbird
- Brewer’s Blackbird
- House finch
- American goldfinch
- House Sparrow

The last sentence in the second full paragraph on p. IV.M.19 is revised as follows:

Harbor seals forage throughout the Bay-Delta and in nearshore coastal waters feeding on schooling fish such as smelt, anchovies, and herring, rockfish, sculpin, perch, and midshipmen, along with squid and mysid shrimp, all most of which are present common inhabitants in the waters surrounding the Islands.

As noted in a comment, footnote 69 on p. IV.M.23 incorrectly cites USFWS 1987 and should instead cite Herbold, B. and P.B. Moyle, 1989. Footnote 69 is revised as follows:

<sup>69</sup> USFWS. 1987. *Birds of San Francisco Bay and San Pablo Bay National Wildlife Refuges*. U.S. Fish and Wildlife Refuge. Unpaginated. Jamestown, ND: Northern Prairie Wildlife Research Center Online. <http://www.npwrc.usgs.gov/sfbay.htm>.  
Herbold, B. and P.B. Moyle. 1989. *Ibid.*

The special status designations in the EIR on p. IV.M.24, in the second column of Table IV.M.3, are revised to delete ~~SC/SC~~ and changed to read “T/C” for green sturgeon and “-/T” for longfin smelt to reflect current protected species status.

The last bullet item on EIR p. IV.M.33 is revised to read:

Green Sturgeon, ~~September 8, 2008~~ October 9, 2009.

A new sentence is added to the partial paragraph at the top of EIR p. IV.M.44 and a new footnote is added:

...Island sediment from reaching Bay waters and causing significant effects on resident offshore biological resources. Additionally, strict adherence to the dredging work windows established by the USACE Long Term Management Strategy (“LTMS”)<sup>103</sup> would be required.

New footnote 103 is added to that page, and subsequent footnotes will be renumbered accordingly:

<sup>103</sup> U.S. Army Corps of Engineers, LTMS Environmental Work Windows Informal Consultation Preparation Packet, February 2004.  
<http://www.spn.usae.army.mil/conops/informal.pdf>. Accessed January 2010.

The text of the Mitigation Measure M-BI-1c on p. IV.M.46 is clarified as follows:

Removal of trees or demolition of buildings showing evidence of bat activity shall occur during the period least likely to impact the bats as determined by a qualified bat biologist (generally between February 15 and October 15 for winter hibernacula<sup>1</sup> and between August 15 and April 15 for maternity roosts). If active day or night roosts are found, the bat biologist shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. A reduced buffer could be provided for on a case-by-case basis by the bat biologist, at a distance to be determined in consultation with CDFG and based on site-specific conditions. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would be necessary.

The first paragraph of EIR Mitigation Measure M-BI-1d on p. IV.M.46 is revised as follows:

To avoid conflicts with wildlife on Yerba Buena Island and the remaining natural habitats on Yerba Buena Island, the Islands’ Covenants, Conditions and Restrictions, TIDA Rules and Regulations, and/or other similar enforceable instruments or regulations, shall prohibit off-leash dogs outside of designated, enclosed, off-leash dog parks on Yerba Buena Island and the feeding of feral cats on both islands. Building tenants shall be

provided with educational materials regarding these restrictions, rules, and/or regulations. Non-resident pet owners and the public using the Islands shall be alerted to these restrictions, rules, and/or regulations through appropriate signage in public areas.

The first sentence of the last paragraph on EIR p. IV.M.48 is revised as follows

As discussed above, conformance to new stormwater control regulations and the application of routine construction and deconstruction Best Management Practices (BMPs), such as filter berms, silt fences, straw bales, storm drain inlet protection and vegetated buffers, methods are expected to constrain any additional sedimentation and movement of potentially contaminated materials through existing and future storm drains; thus, impacts on SAV beds would be less than significant.

To following text is added to Mitigation Measure M-BI-2c on EIR p. IV.M.49:

~~Prior to~~ Within three to six months of the initiation of construction activities that might affect SAV beds, and not less frequently than biennially (every two years) thereafter, all eelgrass beds shall be surveyed or otherwise identified, including their proximity and potential impact from ongoing or pending onshore or offshore construction activities identified,– All TIDA staff in charge of overseeing construction for the Proposed Project, and all construction contractors and subcontractors involved in Project construction activities in Bay waters that are within a quarter mile of Treasure Island and Yerba Buena Island, along Treasure Island’s shoreline, or involved in transporting materials and supplies by water to either Island shall be required to undergo thorough initial environmental training. that This training shall present information on the locations of all eelgrass beds, the kinds of construction and vessel transit activities that can impact eelgrass beds, all mitigation measures that contractors must adhere to so that they any disturbance or damage to eelgrass beds may be avoided and the beds protected and who to notify in the event of any disturbance. Any work barges or vessels engaged in construction activities shall avoid minimize-transiting through and avoid anchoring in any eelgrass beds located around Treasure Island. TIDA personnel responsible for overseeing Project contractors, as well as all Project contractor and subcontractor management personnel, shall ensure that all boat operators and work crews are aware of eelgrass bed locations and the requirement to avoid disturbing them.

The first sentence in the second paragraph under the heading “Offshore” on EIR p. IV.M.56 is revised as follows:

The proposed Development Program on Treasure Island and portions of Yerba Buena Island, as outlined in Chapter II, Project Description, has the potential to adversely alter intertidal and subtidal marine habitat (including designated Essential Fish Habitat) located along Treasure Island’s shoreline and nearshore regions of the Bay as well as Bay waters.

The last sentence in the first full paragraph on EIR p. IV.M.59 is revised to read:

Green sturgeons are known to feed upon opossum shrimps (*Neomysis mercedis* and *N. awatchensis*), the amphipod *Corophium*, ~~the~~ annelid worms, ~~the bay shrimp~~ *Crango Crangon franciscorum*, the isopod *Synidota liticsud*, the Asian clam *Corbula amurensis*, and the gastropod *Olivella baetica*.

Footnote 159 on p. IV.M.63 is revised to read as follows:

<sup>159</sup> Water Emergency Transportation Authority, *Final Program Environmental Impact Report Expansion of Ferry Transit Service in the San Francisco Bay Area*, June 2003, pp. 3.4–10 to 3.4-22. This information is incorporated by reference and summarized in the text above.

#### **Section IV.N, Geology and Soils**

Figure IV.N.2: Areas of Proposed Geotechnical Improvements, on EIR p. IV.N.26, is revised, as shown in Section 2.6, Historic Resources, of this Comments and Responses document on p. 2.6.10.

To clarify that the improvements and ferry service would provide for both access to and egress from the Islands, the fifth and sixth sentences in the first paragraph in Impact GE-6 on EIR p. IV.N.31 are revised as follows:

In addition, Macalla Road, which is not a viaduct, could become temporarily two-way to be more available for emergency access and egress purposes. If the viaduct were to become unusable due to a major earthquake, ~~access to~~ transportation to and from Treasure Island would be available via ferry service, included as part of the Proposed Project.

#### **Section IV.O, Hydrology and Water Quality**

The second sentence of the first full paragraph on p. IV.O.4 is revised as follows:

One small area of Yerba Buena Island near the Coast Guard ~~station~~ Station and Sector Facility, on the eastern side of the island, contains sediments that hold groundwater.

The following text is inserted on EIR p. IV.O.20, immediately prior to the heading, “Local”:

##### **Regional**

##### **San Francisco Bay Plan**

The San Francisco Bay Conservation and Development Commission has promulgated the *San Francisco Bay Plan* in order to support environmental protection of San Francisco Bay in consideration of the Bay as a valuable natural asset (see Chapter III, Plans and Policies, pp. III.9-III.12). The following policies contained in the *Bay Plan* are relevant to water quality:

**Water Quality Policy 1: Bay water pollution should be prevented to the greatest extent feasible. The Bay’s tidal marshes, tidal flats, and water surface area and volume should be conserved and, whenever possible, restored and increased to protect and improve water quality. Fresh water inflow into the Bay should be maintained at a level adequate to protect Bay resources and beneficial uses.**

**Water Quality Policy 2:** Water quality in all parts of the Bay should be maintained at a level that will support and promote the beneficial uses of the Bay as identified in the San Francisco Bay Regional Water Quality Control Board’s Water Quality Control Plan, San Francisco Bay Basin and should be protected from all harmful or potentially harmful pollutants. The policies, recommendations, decisions, advice and authority of the State Water Resources Control Board and the Regional Board, should be the basis for carrying out the Commission’s water quality responsibilities.

**Water Quality Policy 3:** New projects should be sited, designed, constructed and maintained to prevent or, if prevention is infeasible, to minimize the discharge of pollutants into the Bay by: (a) controlling pollutant sources at the project site; (b) using construction materials that contain nonpolluting materials; and (c) applying appropriate, accepted and effective best management practices, especially where water dispersion is poor and near shellfish beds and other significant biotic resources.

**Water Quality Policy 6:** To protect the Bay and its tributaries from the water quality impacts of nonpoint source pollution, new development should be sited and designed consistent with standards in municipal stormwater permits and state and regional stormwater management guidelines, where applicable, and with the protection of Bay resources. To offset impacts from increased impervious areas and land disturbances, vegetated swales, permeable pavement materials, preservation of existing trees and vegetation, planting native vegetation and other appropriate measures should be evaluated and implemented where appropriate.

The first sentence of the first paragraph on EIR p. IV.O.38 is revised as follows:

Near-surface groundwater is located in many portions of the Development Plan Area, including all of Treasure Island and low-lying portions of Yerba Buena Island (e.g., near the Coast Guard ~~station~~ Station and Sector Facility).

The last sentence of the last paragraph on EIR p. IV.O.48 is revised as follows:

Because the Proposed Project encompasses many low-lying areas, in particular all of Treasure Island and some low-lying areas along the western flank of Yerba Buena Island near the existing U.S. Coast Guard Station and Sector Facility, a substantial portion of the Project Area, at current elevations and without future improvements, could potentially be at risk of inundation due to future potential sea level rise.

The second sentence of the first paragraph on EIR p. IV.O.49 is revised as follows:

For instance, if no action were taken, under a 55-inch sea level rise scenario, shorefront areas along the existing Treasure Island perimeter would be inundated during a mean higher high water (“MHHW”) tidal event, and areas surrounding the U.S. Coast Guard Station and Sector Facility on Yerba Buena Island could also become inundated.

#### **Section IV.R, Agricultural Uses and Forest Land**

The sixth sentence of the first paragraph on p. IV.R.1 is revised as follows:

Yerba Buena Island has a U.S. Coast Guard ~~facility~~ Station and Sector Facility (about ~~3948~~ acres) and a portion of the San Francisco-Oakland Bay Bridge (about 18 acres).

#### **CHAPTER VII, ALTERNATIVES TO THE PROPOSED PROJECT**

The third sentence of the first paragraph on p. VII.5 is revised as follows:

The U.S. Coast Guard also requested approximately ~~3948~~ acres plus water area and the Federal Highway Administration (“FHWA”) requested approximately 18 acres for facilities on Yerba Buena Island.

The last sentence of the second full paragraph on EIR p. VII.6 is revised as follows:

The U.S. Coast Guard would continue to occupy ~~3948~~ acres on the south and east sides of Yerba Buena Island.

The second paragraph on EIR p.VII.57 is revised as follows:

Similar to the Proposed Project, under conditions without and with the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island would impact Muni line 108-Treasure Island and AC Transit bus operations. ~~Under conditions with the Ramps Project, queues would impact AC Transit bus operations; however, queues would not significantly impact Muni line 108-Treasure Island bus operations.~~ With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) identified in Section IV.E, Transportation, for the Proposed Project (p. IV.E.100), the impact on Muni line 108-Treasure Island operations under conditions without the Ramps Project would be reduced to a less-than-significant level.

As a result of the revisions and expansion of the reduced parking alternative, the following new alternative is added to Chapter VII, Alternatives, as Alternative D, Reduced Parking Alternative, beginning on EIR p. VII.72. Section VII.D, Alternatives Considered But Rejected, is redesignated E, and subsections D.1 and D.2 are redesignated E.1 and E.2. Subsection D.3, Reduced Parking Alternative, on pp. VII.75 – VII-76, is deleted, as it is replaced with the new alternative presented on pp. 3.50-3.77, and subsections D.4 and D.5 are redesignated E.3 and E.4. Section E, Environmentally Superior Alternative, is redesignated F. Other minor revisions are made in the text of the Alternatives Chapter to reflect the addition of this alternative. The new text for Alternative D is not underlined to make it easier to read.

**[New text for Chapter VII]****D.3 — REDUCED PARKING ALTERNATIVE**

~~During the public scoping process for EIR preparation, the Planning Department received comments on the Notice of Preparation of an EIR suggesting that the maximum amount of off-street parking for the Proposed Project be reduced. Comments included suggestions to analyze a range of parking spaces lower than one space per residential unit, ranging from 0.75 to 0.25 spaces per unit.~~

~~The Reduced Parking Alternative would reduce the maximum amount of off-street parking that could be provided on the Islands. As described on p. II.50 of the Project Description in “Parking,” the Proposed Project would permit up to approximately 10,120 off-street parking spaces to serve the proposed residential, commercial, and recreational uses. This would consist of one parking space per dwelling unit, roughly 2 spaces per 1,000 sq. ft. of commercial space, and 0.8 space per hotel room, with additional parking to serve the proposed open space and Clipper Cove Marina. The approximately 10,120 off-street parking spaces would be the maximum amount of parking permitted by the proposed *Redevelopment Plan*; individual developers could choose to provide less parking on any given parcel.~~

~~Based on the suggestions received during public comment on the Notice of Preparation, a Reduced Parking Alternative was developed, with a maximum amount of parking for the Proposed Project reduced to 0.75 parking space per residential unit, 0.2 space per 1,000 sq. ft. of commercial space, 0.3 spaces per marina slip, and 0.1 space per hotel room. If the amount of parking for open space and recreational uses were to remain unchanged at 700 spaces, this Reduced Parking Alternative would reduce the maximum overall amount of off-street parking by about 3,850 spaces, for a total of 6,270 off-street spaces. Other commenters suggested providing 0.5 parking spaces or 0.25 spaces per residential unit. These suggestions would reduce the maximum amount of overall parking by 4,000 and 6,000 spaces respectively if commercial, marina and hotel parking ratios were to remain as in the Proposed Project, and by more if the non-residential parking were also reduced.~~

~~The Reduced Parking Alternative was not considered for further study in the EIR because TIDA and the City and County of San Francisco concluded that it could exacerbate significant traffic impacts and would be financially infeasible.~~

~~Fees from commercial parking in the Proposed Project would be used to fund the proposed transit improvements and service. Removing or reducing this source of revenue planned to be used to support construction of the ferry quay and subsidize the on-island shuttles and off-island ferry and bus transit service would make the proposed level of transit service economically infeasible. Adequate and easily accessible transit is necessary to encourage residents to forgo automobile~~

~~usage; if reductions in funding based on reduced commercial parking were to lead to reductions in transit service, some residents may shift to automobile use, making more severe the significant traffic and air quality impacts identified for the Proposed Project. Without funding for the proposed transit improvements and service this alternative would not meet key objectives of the project sponsors, such as implementing a land use program with high density, compact residential and commercial development located within walking distance of a Transit Hub to maximize use of public transit, and emphasizing transit-oriented development while discouraging automobile use through a comprehensive transportation demand management program.~~

~~In addition, less than one parking space per residential unit could adversely affect the marketability of the units, thus further reducing the financial feasibility of the alternative. While the Proposed Project would provide a robust system of public transportation, this service is proposed to be focused on two or three primary destinations: downtown Oakland, downtown San Francisco, and potentially the San Francisco Civic Center area. Some prospective residents would not be able to easily reach their place of employment via public transit either because their workplace would not be located near transit or because reaching the workplace would be considered inconvenient and time-consuming due to the need for multiple transfers. Others may find that the lack of transportation flexibility would make it difficult to carry out typical living activities besides journey to work, such as shopping for desired goods not available on the Islands or engaging in off-island activities that end when frequent transit service is no longer available, or other leisure activities. If a meaningful number of prospective residents are discouraged from considering living on the Islands due to the reasons above, the overall demand for homes on the Islands would be depressed leading to lower sale prices. This loss of revenue would likely render the Reduced Parking Alternative financially infeasible.~~

## **D. REDUCED PARKING ALTERNATIVE**

### **DESCRIPTION**

The Reduced Parking Alternative would reduce the maximum total amount of off-street parking that could be provided on the Islands. The alternative would provide a maximum of 0.5 parking spaces per residential unit, for a total of 4,000 parking spaces available to residents on an Islands-wide basis. It would provide a maximum of 1 parking space per 1,000 sq. ft. of commercial/flex space in Buildings 1, 2, and 3 and for office uses, and a maximum of 0.4 parking spaces per hotel room. Retail parking would continue to be provided at a maximum of 2 spaces per 1,000 sq. ft., as in the Proposed Project. The amount of parking for open space uses and the marina and Sailing Center would also remain as in the Proposed Project. On-street parking, all of which would continue to be metered spaces, would remain at 1,035 spaces because the on-street parking supply is a function of the layout of the street network, which was not assumed to change. On-street parking spaces represent less than 10 percent of the overall supply. Taken together, the

- reduction in parking ratios for the above listed land uses in the Reduced Parking Alternative would reduce the total number of off-street parking spaces by about 4,030, from about 9,646 in the Proposed Project to about 5,616 spaces.

As with the Proposed Project, the parking supply discussed within this section refers to the Islands-wide maximums for individual uses, and as with the Proposed Project, there are no parking minimums for individual uses. Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use, compares, by land use, the amount of parking in the Proposed Project with the Reduced Parking Alternative. The Reduced Parking Alternative's parking supply would be about one-half of that generally required by the City's Planning Code for similar land uses. However, there are some areas of San Francisco, such as Downtown (e.g., the Rincon Hill and South of Market areas), the Eastern Neighborhoods, North Beach, and the Market/Octavia neighborhood, among others, where other public and private on-street and off-street parking facilities supplement parking provided by individual developments; these neighborhoods have parking maximums lower than required generally in other parts of the City. For comparison purposes, Table VII.20 summarizes a variety of different parking requirements from the City's Planning Code, both generally for the City and for neighborhoods with unique requirements. However, it is important to note that supplemental parking facilities would not be permitted on Treasure Island under the proposed *Design for Development*, because the 1:1 residential parking ratio represents an Islands-wide cap, unlike the other San Francisco neighborhoods noted above.

Land uses would remain the same as in the Proposed Project, except that fewer parking spaces would be permitted to be constructed for residential and hotel uses and less parking would be permitted to be constructed for certain commercial uses. The numbers, types, and sizes of buildings would not change substantially with the alternative; some buildings might have fewer basement levels for parking, and some buildings that might have included above-ground parking wrapped by residential or commercial uses might not include parking. As in the Proposed Project, stand-alone parking garages with no other uses included were not proposed for off-street parking; any above-ground parking garages in residential or mixed-use buildings would be required to be wrapped by active commercial or residential uses, and parking would not be visible from public rights-of-way.<sup>1</sup> Also as in the Proposed Project, parking would not be required to be included in buildings; therefore, while more buildings might be constructed with no parking in the Reduced Parking Alternative, some also might be constructed with no parking in the Proposed Project, as there are no parking minimums on either a building or Islands-wide basis.

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<sup>1</sup> *Treasure Island + Yerba Buena Island Design For Development*, Draft dated March 5, 2010, Section 6.1.2, p. 204.

● **(New) Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use**

Land Use	Size	Proposed Project		Reduced Parking Alternative	
		Ratio	Supply	Ratio	Supply
Residential	8,000 d.u.	1 space/d.u. <sup>2</sup>	8,000	0.5 space/d.u.	4,000
Hotel (Treasure Island)	450 Rooms	0.4 spaces/room <sup>3</sup>	180	0.4 spaces/room	180
Hotel (Yerba Buena Island)	50 Rooms	0.8 spaces/room <sup>3</sup>	40	0.4 spaces/room	20
Retail	207,000 square feet	2/1,000 square feet <sup>4</sup>	414	2/1,000 square feet <sup>9</sup>	414
Open Space (Athletic Fields)	40 acres	5.1/acre <sup>5</sup>	204	5.1/acre	204
Open Space (Other)	260 acres	1/acre <sup>5</sup>	260	1/acre	260
Marina	400 slips	0.59/slip <sup>5</sup>	236	0.59/slip	236
Flex <sup>1</sup>	202,000 square feet <sup>1</sup>	1/1,000 square feet <sup>6</sup>	202	1/1,000 square feet	202
Office	100,000 square feet	1/1,000 square feet <sup>6</sup>	100	1/1,000 square feet	100
Police/Fire	30,000 square feet	None <sup>7</sup>	N/A	None	N/A
School	105,000 square feet	None <sup>7</sup>	N/A	None	N/A
Community Center	48,500 square feet	Street parking <sup>8</sup>	N/A	Street parking	N/A
Cultural Park/Museum	75,000 square feet	Street parking <sup>8</sup>	<u>N/A</u>	Street parking	<u>N/A</u>
<b>Off-Street Parking Subtotal</b>			9,646		5,616
General On-Street Parking	N/A	N/A	<u>1,035</u>	N/A	<u>1,035</u>
<b>Total</b>			<b>10,681</b>		<b>6,651</b>

*Notes:*

General note: Land uses where parking rates differ from the Proposed Project are shaded in gray.

<sup>1</sup> Includes 22 ksf food production/industrial/manufacturing, 150 ksf entertainment, and 30 ksf community/office uses.

<sup>2</sup> Consistent with *San Francisco Planning Code* for neighborhoods in San Francisco without specific and unique requirements except that Treasure Island parking requirements are a maximum and thus, not required, whereas *Planning Code* requirements are a minimum. See (New) Table VII.20 for comparison of parking requirements for various land uses in several districts in San Francisco.

<sup>3</sup> Hotel rate is the same as or less than the rate for hotels in Neighborhood Commercial District, *San Francisco Planning Code*.

<sup>4</sup> Lower than permitted in *San Francisco Planning Code* for comparable neighborhoods, which permits up to 2 spaces per 1,000 square feet and up to 4 spaces per 1,000 square feet above 20,000 square feet. (Retail parking rates were not adjusted between the Proposed Project and the Reduced Parking Alternative, as explained in footnote 9).

<sup>5</sup> Consistent with *Parking Generation*, Third Edition, Institute of Transportation Engineers. As somewhat unique land uses compared to retail, hotel, housing, and office uses, parking rates for the open space and marina uses were not adjusted from standard rates.

<sup>6</sup> Consistent with *San Francisco Planning Code* rate for Office uses, although for flex space, in addition to office space, uses could include entertainment and some production, distribution, and repair uses, some of which have higher and some of which have lower parking rates than included in the *San Francisco Planning Code*.

<sup>7</sup> Parking for police/fire and school facilities expected to be provided separately within the respective sites. Neither parking demand nor supply for these uses is included in this analysis.

<sup>8</sup> These uses would share from the available pool of 1,035 on-street parking listed under the general on-street parking.

<sup>9</sup> Although requested by some commenters, the retail rate was not adjusted in the Reduced Parking Alternative because the rate included in the Proposed Project is already 50 percent lower than what is permitted by the *San Francisco Planning Code*. Under both the Proposed Project and the Reduced Parking Alternative, the proposed retail parking rates do represent a reduction from the *Planning Code* – see footnote 4 above. In addition, parking for retail uses (414 spaces) represents a relatively small percentage (under 4 percent) of the overall supply of parking for the Proposed Project.

Source: TIGD, 2009; Fehr & Peers, 2010

**(New) Table VII.20: San Francisco Off-Street Parking Required or Permitted as Accessory for Select Districts and Uses**

Land Use	Permitted or Required Parking <sup>1</sup>	Parking Permitted with Planning Commission Approval	Parking Maximum
<b><u>Citywide Parking (except as below)</u></b>			
Dwelling Units	1 space / unit		
Office <sup>2</sup>	2.0 spaces/1,000 square feet		
Retail (<5,000 square feet)	None required		
Retail (between 5,000 and 20,000 square feet)	2.0 spaces/1,000 square feet		
Retail (for each 1,000 square feet in excess of 20,000)	4.0 spaces/1,000 square feet		
Retail devoted to handling bulky merchandise (>5,000 square feet)	1.0 space/1,000 square feet		
Restaurant, bar, nightclub, pool hall, dance hall, bowling alley, or other similar enterprise (>5,000 square feet)	5.0 spaces/1,000 square feet		
<b><u>Commercial Districts (C-3)</u></b>			
Dwelling Units	.25 space/unit	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	.25 space/unit	1.0 space/unit	1.0 space/unit
Non-residential uses	None required		7 Percent of Gross Floor Area
<b><u>Van Ness and Market DTR Special Use District</u></b>			
Dwelling Units	.25 space/unit	.50 space/unit	.50 space/unit
<b><u>Neighborhood Commercial Transit (NCT)</u></b>			
Dwelling Units	.5 space/unit	.75 space/unit	.75 space/unit
Non-Residential	None required		1.0 space / 1,500 square feet
<b><u>Residential Transit-Oriented (RTO)</u></b>			
Dwelling Units	.75 space/unit	1 space/unit	1 space/unit
Non-Residential	None permitted	None permitted	None permitted
<b><u>Rincon Hill DTR District</u></b>			
Dwelling Units	.50 space/unit	1.0 space/unit	1.0 space/unit
<b><u>Eastern Neighborhoods: Mixed Use General, Mixed Use Office, and Mixed Use Residential</u></b>			
Dwelling Units	.25 space/unit	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	.25 space/unit	1.0 space/unit	1.0 space/unit

(continued)

**Table VII.20 (cont.)**

Office	None required	7 Percent of Gross Floor Area
Retail (where any portion of the parcel is less than ¼ mile from Market, Mission, Third, and Fourth Streets, except grocery stores >20,000 gross square feet)	1.0 space / 1,500 square feet	1.0 space / 1,500 square feet
<b><u>Eastern Neighborhoods: Urban Mixed Use</u></b>		
Dwelling Units	.75 space/unit	.75 space/unit
Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)	1.0 space/unit	1.0 space/unit
Office	1.0 space/1,000 square feet	1.0 space/1,000 square feet
Office (where the entire parcel is greater than ¼ mile from Market, Mission, Third, or Fourth Streets)	2.0 spaces/1,000 square feet	2.0 spaces/1,000 square feet

*Notes:*

- <sup>1</sup> Parking rates shown for “Citywide” are minimum parking requirements. Parking rates shown for other special districts are parking maximums.
- <sup>2</sup> Section 151 of the Planning Code makes a distinction between several different types of office. The rate presented here is for the “Other Business Office” category and is intended to illustrate the rate that is most commonly applied. Please refer to Planning Code Sections 151 and 151.1 for details or rates for other types of office use.
- <sup>3</sup> Retail grocery stores with over 20,000 square feet of occupied floor area are permitted 1 space/500 square feet and can receive Planning Commission Authorization for up to 1 space/250 square feet.

*Source: San Francisco Planning Code*

The Reduced Parking Alternative would provide the same base transit service, with the Muni line 108 - Treasure Island bus service at existing headways, new bus service to the East Bay at approximately 10 minute peak headways, and ferry service to San Francisco at approximately 50 minute headways. Fare-free shuttle service throughout the Islands would be provided and would be available to residents and visitors as described for the Proposed Project. Bicycle and pedestrian networks on the Islands would remain the same as in the Proposed Project. Utilities and infrastructure included in the Proposed Project would be the same in the Reduced Parking Alternative. Geotechnical stabilization would occur in the same manner and in the same locations as in the Proposed Project. The Reduced Parking Alternative would require all of the same approval actions as those listed for the Proposed Project on pp. II.83 – II.84.

The Proposed Project’s basic objectives include: a) to implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles; b) to provide high-density, mixed-income housing consistent with transit-oriented development; c) to create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation; d) to create a development that is financially

feasible, that allows for the delivery of infrastructure, public benefits, and affordable housing subsidies; and that is able to fund the Proposed Project’s capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site; and e) construct a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment.

The Reduced Parking Alternative would not meet some of these basic project objectives. In particular, the project sponsors believe that the Reduced Parking Alternative would not “create a development that is financially feasible, that allows for the delivery of infrastructure, public benefits, and affordable housing subsidies; and that is able to fund the Proposed Project’s capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site.” In addition, the project sponsors believe that the Reduced Parking Alternative would not result in “a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment.” The alternative would not “minimize the...impacts of private automobiles” more than would the Proposed Project, as significant traffic impacts identified for the Proposed Project would not be substantially reduced. Therefore the alternative would not be more effective at meeting this basic project objective than would the Proposed Project.

## ENVIRONMENTAL ANALYSIS

### Transportation

The Reduced Parking Alternative would include the same transportation improvements as the Proposed Project, as described in Section IV.E, Transportation, beginning on p. IV.E.30, with the exception of the reduced parking program as described above. The Reduced Parking Alternative would include the same roadway network as the Proposed Project, and the developed area would be on the same footprint. With the Reduced Parking Alternative, the total number of off-street parking spaces would be up to about 5,615 compared with up to about 9,646 spaces included in the Proposed Project. Both alternatives would include 1,035 on-street parking spaces. All other uses would be the same as those for the Proposed Project.

### Methodology

A number of comments requested a Reduced Parking Alternative be analyzed and suggested that such an alternative would likely reduce transportation impacts by reducing automobile trips. This section summarizes the available methodologies for assessing the effects of reduced parking supplies on peak hour vehicle trip generation based on a literature review conducted by the EIR preparers. Additional discussion of the travel demand methodology for the Reduced Parking Alternative is included in the memorandum titled *Supplemental Transportation Analysis for*

*Reduced Parking Alternative Treasure Island/Yerba Buena Island EIR*, February 25, 2011 (“*Supplemental Transportation Analysis memorandum*”).<sup>2</sup>

Comments suggested reductions to both residential and non-residential parking supply. As the effects of residential and non-residential parking supply on travel demand are somewhat independent with respect to the Proposed Project, each is discussed separately below.

#### *Residential Parking Supply*

As part of the transportation analysis effort for the Proposed Project, a literature review was conducted on the effects that parking supply has on trip generation (documented in Fehr & Peers letter to Planning Department dated February 15, 2010) to determine whether independent research has established a direct correlation between parking supply and vehicle trip generation. Although reducing parking supplies may be an effective land use strategy, particularly in areas well-served by transit like Downtown or the Market/Octavia area of San Francisco, where public and private on-street and off-street parking facilities supplement parking provided by individual uses, there is inadequate data to accurately predict and quantify reductions in vehicle trip generation associated with the individual effect of reduced parking supply.<sup>3</sup>

One of the reports included in the literature review, published by the Transit Cooperative Research Program (“TCRP”), a cooperative effort of the Federal Transit Administration, the Transportation Research Board, and the Transit Development Corporation, Inc., *TCRP Report 128 – Effects of TOD on Housing, Parking, and Travel* (“*TCRP Report*”),<sup>4</sup> did identify relationships between residential parking supply and peak hour trip generation, although the identified relationships are statistically very weak. In fact, it is precisely because these relationships are very weak that transportation engineers and planners who study them do not commonly use them in forecasting travel demand. Because of the weak linkages in the study, caution should be exercised in using them to make major land use or policy decisions. However, in light of the public comments received on the Draft EIR, the City elected to analyze the potential effects of a reduced parking supply on trip generation based on the data available from the TCRP Report, even though the limitations of that study and generally low confidence in the data are acknowledged.

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<sup>2</sup> Fehr & Peers, February 25, 2011, Letter to San Francisco Planning Department, *Supplemental Transportation Analysis for Reduced Parking Alternative: Treasure Island / Yerba Buena Island Redevelopment Plan EIR* (hereinafter cited as “*Supplemental Transportation Analysis memorandum, 2/25/11*”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

<sup>3</sup> *Supplemental Transportation Analysis memorandum, 2/25/11.*

<sup>4</sup> *TCRP Report 128 – Effects of TOD on Housing, Parking, and Travel*; Arrington, G.B., and Cervero, R.; Transportation Research Board, Washington, D.C., 2008). A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

The equations in the TCRP Report predict some reduction in peak hour vehicle trip generation based on reductions in residential parking supply. Generally, as residential parking supply ratios decrease from 1 space per dwelling unit to 0.5 spaces per dwelling unit, the TCRP Report's equations predict a vehicle trip reduction for residential uses of 24 percent daily, 30 percent in the AM peak hour, and 16 percent in the PM peak hour. Although the TCRP report does not include data regarding Saturday peak hour travel demand, Fehr & Peers derived relationships and applied the weekday data from the TCRP Report to Saturday peak hour travel demand. The result of this analysis suggests a 10 percent reduction in Saturday peak hour residential travel demand associated with the reduced residential parking.

However, the City does not believe it would be appropriate to rely on the TCRP Report's predictive equations to quantify trip reductions for a number of reasons outlined in the *Supplemental Transportation Analysis* memorandum. Specific reasons described in the memorandum are:

- The relationships are described in the TCRP report itself as “fairly weak;”
- The relationships are derived primarily from areas with parking supplies higher than what is proposed in the Reduced Parking Alternative, which may mean that the TCRP data is not entirely applicable to the Reduced Parking Alternative; and
- The sites that were surveyed to derive the relationships were not consistent with respect to density, land use diversity, and other variables that may have a greater effect on trip generation, which suggests that other factors may be affecting the relationships and not exclusively parking supply.

Thus, for the reasons stated above, the City has concluded that it would not be appropriate to assume that the trip reductions predicted by the TCRP Report's equation would materialize, and therefore, the Reduced Parking Alternative could not be relied upon to reduce traffic impacts. The trip generation assumptions for the Proposed Project included in the EIR already account for many of the more influential factors noted in the TCRP Report, such as the project's density, development scale, diversity of uses, and design of its street network (collectively referred to as the 4D's<sup>5</sup> throughout the EIR).

However, the City also acknowledges that despite the lack of conclusive data demonstrating a link between parking supply and trip generation, it is possible that such a link could exist for the Proposed Project. The Proposed Project is unique in a number of respects from other projects. The Proposed Project is located on two islands and isolated from other peripheral parking lots and garages. The Proposed Project uses an Islands-wide cap on parking supply, rather than the building-by-building parking limits that are more commonly found in parking codes that seek to restrict parking supply. (All of the parking ratios in the current San Francisco Planning Code that

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<sup>5</sup> Refer to the *Transportation Impact Study* in Appendix C of the EIR for additional discussion of the 4Ds.

are summarized in (New) Table VII.20 are applied on a building-by-building basis.) Together, these factors mean that parking supply restrictions on the Islands may produce different results from those in many downtown San Francisco projects. In downtown San Francisco, for example, individual buildings have limitations on parking supply, but there are other nearby free-standing parking facilities, surface lots, or street parking that can serve the building occupants, allowing some residents who do not have parking in their building to secure parking in another location. This would not be possible on the Islands, as constructing any additional reservoirs of parking exceeding the Islands-wide maximums would not be permitted, no additional parking would be available on the periphery or in an adjacent neighborhood, and all on-street parking would be priced for short-term usage by both residents and visitors. While the City acknowledges it is possible that the unique conditions of the Proposed Project might make it more likely that the reductions in parking supply would influence vehicle trip generation, the City does not have data to support this conclusion. Further, there are not adequate examples in the United States of neighborhoods located on islands with the mix of land uses, proximity to transit supply, and regional connectivity characteristics similar to the Proposed Project from which additional studies could be performed or data could be obtained.

While the City is not able to rely on trip reductions in its impact analysis, the analysis of the Reduced Parking Alternative includes a discussion as to how the reduced parking supply might affect the travel behavior and resulting impacts discussed in the EIR. The quantification of potential reductions associated with the Reduced Parking Alternative included in the discussion below is not meant to suggest a confident forecast of travel behavior changes that may be expected due to a reduced parking supply, nor does the City intend to use the quantification for the purposes of evaluating travel demand for future projects. Rather, the purpose of the discussion is meant to illustrate how reductions in trip generation might affect the impacts concluded for the Proposed Project, if in fact, they were to materialize, despite limited empirical evidence.

In the absence of other independent, verifiable data, the City relied on the TCRP Report's predicted traffic generation reductions as the basis for this discussion.

#### *Non-Residential Parking Supply*

Comments also requested that the Reduced Parking Alternative examine the effects of reduced parking supply for non-residential uses. In response, as discussed earlier in this section, the Reduced Parking Alternative includes reductions to maximum parking supply rates for Flex, Hotel, and Office uses compared to the rates in the Proposed Project. No adjustments to the Retail parking rate are proposed as part of the Reduced Parking Alternative, because unlike other uses, the rate proposed as part of the Proposed Project is already 50 percent lower than the minimum generally required by the *San Francisco Planning Code* for buildings greater than

20,000 square feet. As a result, the Reduced Parking Alternative includes maximum parking supply rates for Residential, Hotel, Retail, Flex, and Office uses that are approximately 50 percent lower than the minimum generally required by the *San Francisco Planning Code*.

As shown in Appendix D2 to the Project's *Transportation Impact Study*, the Flex, Hotel, and Office components of the Proposed Project generate relatively small amounts of vehicle trips, compared to the Proposed Project as a whole. Combined, these uses generate 15 percent of the project's total vehicle trip generation in the AM peak hour and 11 percent in the PM peak hour. Therefore, even if reductions to parking supplies for these non-residential uses were to result in a reduction in peak hour vehicle trip generation, the overall effect to the number of vehicle trips generated onto and off of the Islands would be relatively small.

However, in response to numerous comments on the subject, the literature review conducted for the Proposed Project also looked for studies that examine the links between non-residential parking supply and vehicle trip generation. No studies were found that identified such links specifically and exclusively for non-residential parking supply. However, a few more comprehensive studies were found that identified the total vehicle trip reductions that have been observed associated with a number of different travel demand management strategies (including parking supply reductions) individually and combined. These studies suggest that there are limits as to how much total vehicle trip reduction can be achieved, and that the Reduced Parking Alternative, including vehicle trip reductions associated with residential parking reductions, would meet or exceed those limits, even without accounting for non-residential parking reductions.

One of the more exhaustive studies on the effectiveness of various strategies at reducing vehicle trip generation was a report prepared by Fehr & Peers for the California Air Pollution Control Officers Association ("CAPCOA"), *Quantifying Greenhouse Gas Mitigation Measures – A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*. The CAPCOA report summarized a number of other studies, including one conducted by Nelson\Nygaard Consulting Associates that specifically discussed the general relationship between parking supply and vehicle trip generation. Although not specific to non-residential parking supply, the Nelson\Nygaard study could be applied to the non-residential uses for purposes of assessing the effects on vehicle trip generation of the Reduced Parking Alternative. The Nelson\Nygaard study developed a model that uses the ITE *Parking Generation* handbook as the baseline figure for parking supply.<sup>6</sup> The Nelson\Nygaard study assumes data in the ITE research to represent unconstrained demand (or, the parking demand in a typical, auto-oriented, suburban setting), since ITE parking rates are based on suburban development and have tended to

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<sup>6</sup> Nelson\Nygaard, 2005. *Crediting Low-Traffic Developments* (p. 16)  
<http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf>

overestimate the demand for parking in more urbanized areas. However, the literature suggests no reductions to trip generation associated with reductions in parking supply should be taken once trip generation forecasts are below 50 percent of typical rates as suggested by ITE. That is, once the forecast of trip generation rates has been reduced by 50 percent by virtue of the high-density, mixed-use, or transit-oriented characteristics of the project, as compared to standard ITE trip generation rates, no data supports further reductions beyond 50 percent by virtue of constraining the parking supply available to the project.

In the case of both the Reduced Parking Alternative and the Proposed Project, the reductions already taken to account for the Proposed Project's characteristics (density, diversity of uses, robust transit supply, and reductions to residential parking supply exceed 50 percent of the unadjusted ITE trip generation forecasts. For example, as shown in Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58 of the EIR, in the PM peak hour the combined effect of adjustments made for the projects' density, diversity of uses, etc. (collectively, the 4D's) is 39 percent. As shown on Table IV.E.5: Person-Trip Generation by Mode, on p. IV.E.60 of the EIR, 25 percent of the trips coming to or leaving the Islands would be by transit. This represents 15 percent of total trips (internal and external) generated during the PM peak hour. The combined effect of the 4D's and the reduction associated with transit is 54 percent (39 percent associated with the 4D's and 15 percent associated with transit use). Therefore, since the analysis has already included reductions of more than 50 percent due to other features of the Proposed Project, the data suggests additional trip reductions should not be taken as a result of non-residential parking supply reductions; and, as noted earlier, even if reductions to vehicle trip generation were to materialize, the effect would be relatively small since the affected uses generate a relatively small portion of overall vehicle trips associated with the Proposed Project. In summary, although the Reduced Parking Alternative includes reductions to the parking supply for the flex, hotel, and office uses, no associated reductions were made to the trip generation associated with these uses.

#### *Travel Demand*

As described above, the potential changes to trip generation associated with the reduction in parking supply included in the Reduced Parking Alternative have been quantified. Overall, except for the accounting for reduced parking supply as described above, the methodology for assessing travel demand of the Reduced Parking Alternative was the same as that used for the Proposed Project. Table VII.21 summarizes the project travel demand for the Proposed Project and the Reduced Parking Alternative that would occur if the reduction in vehicle trips associated with the reduced parking supply implied by the TCRP Report data presented above were to materialize. The TCRP Report does not quantify whether the reduced automobile trip generation would result from a net decrease in total person-trips or whether all of the trips that would no longer be made by auto would still be made during the peak hours, but via different mode. To be

**(New) Table VII.21: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative**

Peak hour	Person-Trip Generation <sup>1</sup>				Total Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Proposed Project					
AM	641	621	3,391	3,296	1,613
PM	817	898	5,124	4,850	2,462
Saturday	473	595	5,913	5,743	2,861
Reduced Parking Alternative					
AM	948	991	2,714	3,296	1,277
PM	1,003	1,125	4,711	4,850	2,255
Saturday	580	754	5,647	5,743	2,728

**Notes:**

<sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

<sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

<sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

Source: Fehr & Peers 2010

conservative, this analysis assumes the total person trip-generation would not change; instead there would be a shift from auto use to bus and ferry use, resulting in a decrease in vehicle trips but an increase in transit trips. The allocation of those new transit trips between buses and ferries was done using the same methodology as that of the Proposed Project, based on the type of land use generating the trips (in this case, residential) and the type of trips generated by that land use during the peak hours (50 percent work and 50 percent non-work). In this case, all of the additional peak-hour transit trips were residential, which are more likely to be work trips than the average trip generated by the project. Because work and non-work trips have different propensities to choose buses or ferries, the ferry and bus ridership did not increase proportionally to the ferry and bus ridership of the Proposed Project. The data presented in Table VII.21 are for the same base transit service proposed by the Project, without expanded transit service as proposed in Mitigation Measure M-TR-2<sup>7</sup>. Table VII.22 compares the same information under conditions with Mitigation Measure M-TR-2 in place. The percentage reduction in vehicle trips

<sup>7</sup> Mitigation Measure M-TR-2 would increase peak period ferry service from 50 minute frequencies to as much as 15-minute frequencies. It would increase peak period frequencies on the 108-Treasure Island bus route from 15 minutes to between 5 and 7 minutes. It would also create a new bus route to another location in San Francisco, such as the Civic Center area, with frequencies as low as 12-minutes during peak periods. Bus service to the East Bay would not be affected.

**(New) Table VII.22: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative (With Implementation of Mitigation Measure M-TR-2)**

Peak hour	Person-Trip Generation <sup>1</sup>				Total Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Proposed Project (With M-TR-2)					
AM	958	1,075	2,619	3,296	1,228
PM	1,235	1,567	4,175	4,850	1,983
Saturday	718	1,078	5,043	5,743	2,437
Reduced Parking Alternative (With M-TR-2)					
AM	1,186	1,365	2,101	3,296	961
PM	1,369	1,746	3,862	4,850	1,827
Saturday	807	1,223	4,809	5,743	2,319

*Notes:*

<sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

<sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

<sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

*Source:* Fehr & Peers 2010

associated with congestion pricing has not been re-analyzed because the change would be very small. Instead, the trip generation forecasts assume the same percentage reduction to total vehicle trip generation associated with congestion pricing for the Proposed Project would apply to the Reduced Parking Alternative.

For conditions without Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 336 fewer vehicle trips during the weekday AM peak hour (a reduction of 21 percent), 207 fewer vehicles during the PM peak hour (a reduction of 8 percent), and 133 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 677 more person-trips by ferry or bus during the AM peak hour, 413 more ferry/bus trips during the PM peak hour, and 266 more ferry/bus trips during the Saturday peak hour. Although the number of internal trips is expected to be the same between the Proposed Project and the Reduced Parking Alternative, the increased transit ridership in the Reduced Parking Alternative may result in an increased number of bicycle and pedestrian trips on the Islands.

For conditions with Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 312 fewer vehicle trips during the weekday AM peak hour (a reduction of 25 percent), 156

fewer vehicles during the PM peak hour (a reduction of 8 percent), and 118 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 518 more person-trips by transit during the AM peak hour, 313 more ferry/bus trips during the PM peak hour, and 234 more ferry/bus trips during the Saturday peak hour.

#### Construction Impacts

Construction activities associated with the Reduced Parking Alternative would be similar and only somewhat reduced due to the slightly lesser amount of overall construction as compared to the Proposed Project. Mitigation Measure M-TR-1, a Construction Management Program, described in Section IV.E, Transportation, beginning on p. IV.E.69, would minimize the alternative's contribution to construction-related traffic impacts. However, some disruption and increased delays could still occur even with implementation of M-TR-1, and, as with the Proposed Project, construction-related traffic impacts would remain significant and unavoidable (Impact TR-1).<sup>8</sup>

#### Operational Impacts

##### Traffic

During the peak study periods, the Reduced Parking Alternative would reduce peak hour vehicle trips by approximately 336 trips in the AM peak hour (from 1,613 to 1,277), 207 trips in the PM peak hour (from 2,462 to 2,255), and 133 trips in the Saturday peak hour (from 2,861 to 2,728). Because the analysis assumes that these reductions would be to residential trip generation, they would most likely occur in the peak direction of travel during each peak hour, since travel associated with the Proposed Project would be highly influenced by the residential component.

The Draft EIR included an analysis of the traffic impacts of the Reduced Development Alternative. The person trip generation under the Reduced Development Alternative and under the Reduced Parking Alternative is summarized in Table VII.23, below. As this table shows, the vehicle trip generation for the Reduced Parking Alternative is predicted to be very similar to that of the Reduced Development Alternative, described in Chapter VII, Alternatives as Alternative B, Reduced Development Alternative, beginning on EIR p. VI.15. Further analysis was performed to confirm that the overall geographic distribution of these vehicle trips would also be very similar.<sup>9</sup>

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<sup>8</sup> The identification of an impact number (i.e., Impact TR-1) refers to the enumeration of impacts in the EIR associated with the Proposed Project. It is provided to facilitate the comparison of impacts of the Reduced Parking Alternative to the Proposed Project. However, the traffic impacts of the Reduced Parking Alternative would be most similar to the impacts of the Reduced Development Alternative.

<sup>9</sup> *Supplemental Transportation Analysis* memorandum, 2/25/11.

**(New) Table VII.23: Person-Trip Generation by Mode – Reduced Development Alternative and Reduced Parking Alternative (Without Implementation of M-TR-2)**

Peak hour	Person-Trip Generation <sup>1</sup>				Vehicle-Trips <sup>2</sup>
	External		Internal		
	Ferry	Bus	Auto	Other <sup>3</sup>	
Reduced Development Alternative					
AM	522	486	2,748	2,745	1,294
PM	696	766	4,652	4,240	2,218
Saturday	426	527	5,321	5,164	2,565
Reduced Parking Alternative					
AM	948	991	2,714	3,296	1,277
PM	1,003	1,125	4,711	4,850	2,255
Saturday	580	754	5,647	5,743	2,728

*Notes:*

- <sup>1</sup> This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.
- <sup>2</sup> Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.
- <sup>3</sup> Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

*Source:* Fehr & Peers 2010

Due to the similarity in vehicle trip generation between the Reduced Development Alternative and the Reduced Parking Alternative, it is possible to use the traffic impact analysis from the Reduced Development Alternative to understand the possible impacts for the Reduced Parking Alternative. Accordingly, if the trip reductions associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to those described in the Reduced Development Alternative. Thus, for comparison purposes, the discussion below summarizes the results of the transportation impact analysis conducted for the Reduced Development Alternative, as presented on pp. VII.20 – VII.33, above.

The Reduced Parking Alternative could result in similar significant and unavoidable impacts related to extensive queues and vehicle delays as the Reduced Development Alternative (summarized in Tables VII.4: Ramp Junction Analysis – Existing, Existing plus Proposed Project, and Existing plus Reduced Development Alternative, and Table VII.5: Maximum On-Ramp Queues and Average Delays – Existing plus Project and Existing plus Reduced Development Alternative Conditions, on pp. VII.23 and VII.24), at the following study ramp locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island during the PM peak hour (Impact TR-2);

- Under conditions without the Ramps Project, at the two westbound on-ramps during the AM, PM and Saturday peak hours (Impact TR-3); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp on the east side of Yerba Buena Island during the AM and PM peak hours (Impact TR-4).

Similar to both the Proposed Project and the Reduced Development Alternative, under conditions without and with the Ramps Project, the Reduced Parking Alternative would result in less-than-significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-5). Similarly, under conditions without and with the Ramps Project, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM peak hour (Impact TR-6), and on San Francisco streets approaching the Bay Bridge during the PM peak hour (Impact TR-7).

Table VII.6: Intersection Levels of Service – Existing and 2030 Cumulative Conditions, on pp. VII.25 – VII.26, presents the comparison of intersection Levels of Service (“LOS”) for Existing plus Project and Existing plus Reduced Development Alternative conditions. Since the Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of traffic impacts, similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in significant impacts at eight study intersections (compared with nine for the Proposed Project).<sup>10</sup>

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-8 through TR-13).
- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at four signalized study intersections that operate at LOS E or LOS F under Existing conditions and that would continue to operate at LOS E or LOS F under Existing plus Project conditions (First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, The Embarcadero/Harrison, and Second/Folsom) (Impacts TR-14 and TR-15).
- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at five signalized study intersections that would operate at LOS D or better under Existing plus Project conditions (Impact TR-16).

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<sup>10</sup> The project-specific impact at Second/Folsom would be less-than-significant under the Reduced Development Alternative and, therefore, under the Reduced Parking Alternative.

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would contribute considerably to two uncontrolled study intersections that operate poorly under Existing conditions, resulting in a project-specific impact (Folsom/Essex and Bryant/Sterling) (Impacts TR-17 and TR-18).

As with the Proposed Project and the Reduced Development Alternative, the traffic impacts at ramps and intersections would be minimized but not eliminated with implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) as discussed in Section IV.E, Transportation, pp. IV.E.74 – IV.E.75. This mitigation measure would reduce vehicle trip generation and would reinforce the proposed TDM practices included as part of the Reduced Parking Alternative, including ramp metering, congestion pricing, etc. As with the Proposed Project and the Reduced Development Alternative, because of uncertainties regarding sources for full funding to implement M-TR-2, its feasibility is uncertain and the impacts that could be mitigated by implementation of M-TR-2 are assumed to remain significant and unavoidable. Aside from increasing the availability of transit service, as proposed by Mitigation Measure M-TR-2, there do not appear to be other proven and/or feasible techniques that are not already part of the Proposed Project that would achieve a substantial increase in transit ridership.

In sum, the Reduced Parking Alternative could potentially have traffic impacts similar to the Reduced Development Alternative, which would be similar to those of the Proposed Project except for one intersection, Second/Folsom (Impact TR-14). That intersection would experience a significant and unavoidable impact with mitigation under the Proposed Project, but the impact could be less-than-significant without mitigation under the Reduced Development Alternative and the Reduced Parking Alternative. However, as noted above, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that reductions in impacts would occur.

#### Transit Impacts

The Reduced Parking Alternative transit conditions assume implementation of Project-related transit improvements as described in Section IV.E., Transportation, p. IV.E.94. If travel demand characteristics of the Reduced Parking Alternative shown in Table VII.23 were to materialize, transit ridership in the Reduced Parking Alternative would exceed what was projected for the Proposed Project. Table VII.24 presents the transit ridership and capacity utilization information for the Reduced Parking Alternative (with the base level of transit). As shown in Table VII.24, similar to the Proposed Project, the Reduced Parking Alternative would have a significant impact on transit capacity for Muni service between the Islands and San Francisco because Muni's transit capacity utilization standard of 85 percent would be exceeded. This was also identified as a significant impact associated with the Proposed Project (Impact TR-19, p. IV.E.95). However, the impact would be exacerbated with the Reduced Parking Alternative, since transit demand

**(New) Table VII.24: Transit Ridership and Capacity Utilization – Existing plus Project and Existing plus Reduced Parking Alternative (Prior to Implementation of M-TR-2)**

Route	Existing plus Project			Existing plus Reduced Parking Alternative		
	Capacity	Rider-ship	% Utilization <sup>1</sup>	Capacity	Rider-ship	% Utilization <sup>1</sup>
<b><i>AM Peak Hour</i></b>						
AC Transit EB <sup>2</sup>	324	107	33%	324	155	48%
AC Transit WB <sup>2</sup>	324	67	21%	324	97	30%
Muni EB Bus Service from SF <sup>3</sup>	<b>252</b>	<b>261</b>	<b>104%</b>	<b>252</b>	<b>367</b>	<b>146%</b>
Muni WB Bus Service to SF <sup>3</sup>	<b>252</b>	<b>384</b>	<b>152%</b>	<b>252</b>	<b>571</b>	<b>227%</b>
Ferry EB 4	839	238	28%	839	352	42%
Ferry WB 4	839	403	48%	839	596	71%
<b><i>PM Peak Hour</i></b>						
AC Transit EB	324	96	30%	324	116	36%
AC Transit WB	324	134	41%	324	162	50%
Muni EB Bus Service from SF	<b>252</b>	<b>515</b>	<b>204%</b>	<b>252</b>	<b>612</b>	<b>243%</b>
Muni WB Bus Service to SF	<b>252</b>	<b>431</b>	<b>171%</b>	<b>252</b>	<b>513</b>	<b>203%</b>
<b>Ferry EB</b>	839	479	57%	839	584	70%
Ferry WB	839	343	41%	839	419	50%
<b><i>Saturday Peak Hour</i></b>						
AC Transit EB	324	79	24%	324	94	39%
AC Transit WB	324	90	28%	324	108	33%
Muni EB Bus Service from SF	<b>189</b>	<b>328</b>	<b>174%</b>	<b>189</b>	<b>391</b>	<b>207%</b>
Muni WB Bus Service to SF	<b>189</b>	<b>320</b>	<b>169%</b>	<b>189</b>	<b>383</b>	<b>203%</b>
Ferry EB	839	221	26%	839	271	32%
Ferry WB	839	252	30%	839	309	37%

*Notes:*

N/A = Not Applicable

<sup>1</sup> **Bold** indicates capacity utilization exceeds the 85 percent capacity utilization standard for Muni line 108-Treasure Island, and the 100 percent capacity utilization standard for new ferry and AC Transit service. Exceedance of the capacity utilization standard is considered a significant impact. Implementation of Mitigation Measure M-TR-2 would result in adequate transit capacity reducing the impacts to less than significant levels.

<sup>2</sup> New AC Transit bus service between the Islands and downtown Oakland at 10-minute peak headways.

<sup>3</sup> Muni line 108-Treasure Island service at 15-minute headways during peak periods.

<sup>4</sup> New ferry service between Treasure Island and San Francisco at 50-minute peak headways.

Source: Fehr & Peers 2010

would increase. Similar to the Proposed Project, implementation of Mitigation Measure M-TR-2 would increase transit capacity and ridership; however, the capacity increases would be far greater than the ridership increases, and with implementation of Mitigation Measure M-TR-2, the capacity would be adequate to serve projected demand. However, as explained in Section IV.E, Transportation, implementation of M-TR-2 is uncertain, and therefore, the impacts to Muni capacity utilization would remain significant and unavoidable.

Similar to the Proposed Project, impacts on the new AC Transit bus service and ferry serving the Islands, and impacts on other AC Transit, BART, Golden Gate Transit, SamTrans and other ferry lines would be less than significant (Impacts TR-20, TR-21, and TR-23). As presented in Table IV.E.18 on p. IV.E.98, the Muni downtown San Francisco screenlines are not expected to operate near their capacity utilization threshold of 85 percent under conditions with the Proposed Project. The additional transit riders that would occur with the Reduced Parking Alternative would not be enough to cause the downtown screenlines to exceed capacity utilization thresholds and therefore, the Reduced Parking Alternative's impacts to the downtown screenlines would be less than significant (Impact TR-22).

As with the Proposed Project and Reduced Development Alternative, some transit impacts would result from increased traffic congestion at the approaches to the Bay Bridge on-ramps at Yerba Buena Island (Impacts TR-24, TR-25, TR-26, and TR-27). As noted earlier, if reductions in vehicle trip generation associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to the Reduced Development Alternative. Thus, similar to the Proposed Project and the Reduced Development Alternative, under conditions with and without the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island may impact Muni line 108-Treasure Island and AC Transit bus operations during the AM, PM and Saturday peak hours, causing delays to bus service. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) described in Section IV.E, Transportation, on p. IV.E.100, the impact on Muni operations would be reduced to a less-than-significant level (Impacts TR-24 and TR-26). Implementation of Mitigation Measure M-TR-24 would improve operations for AC Transit buses destined for the eastbound on-ramp. However, because this improvement would extend only to the transit and emergency vehicle-only westbound on-ramp on the west side of Yerba Buena Island, and because sufficient right-of-way is not available to extend a transit-only lane beyond the transit and emergency vehicle-only westbound on-ramp, AC Transit vehicles would continue to experience congestion between the transit and emergency vehicle-only westbound on-ramp and the eastbound on-ramp. Therefore, similar to the Proposed Project and the Reduced Development Alternative, the impact on AC Transit operations would remain significant and unavoidable (Impacts TR-25 and TR-27).

Similar to the Proposed Project, implementation of the Reduced Parking Alternative would result in less-than-significant impacts to the existing and proposed ferry services on the San Francisco Bay (Impact TR-28).

As with the Proposed Project and the Reduced Development Alternative, transit impacts would occur from traffic congestion delay in downtown San Francisco with the Reduced Parking Alternative. The transit delay conditions with the Reduced Parking Alternative would affect the same lines as the Proposed Project and the Reduced Development Alternative (27-Bryant, 30X-Marina Express, and 47-Van Ness), resulting in significant and unavoidable impacts (Impacts TR-29 through TR-31). As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would not adversely affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-32).

Implementation of Mitigation Measure M-TR-2 would reduce, but not eliminate, traffic impacts at the study intersections, and therefore, the transit delay impacts of the Reduced Parking Alternative on the Muni lines would remain significant and unavoidable.

In summary, the Reduced Parking Alternative would have the same number of significant transit-related impacts as the Proposed Project, although the severity of the impacts may be somewhat different. If automobile trip generation reductions associated with reduced parking supply were to materialize, the significant impacts due to transit ridership increases would be more severe than the Proposed Project and the significant impacts due to traffic congestion would be less severe than the Proposed Project (and comparable to those of the Reduced Development Alternative). However, as noted earlier in the discussion of traffic impacts, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that differences in the severity of impacts would occur.

### Bicycles

The Reduced Parking Alternative bicycle trips would be accommodated within the proposed street network on the Islands and on mainland San Francisco, and similar to the Proposed Project, impacts related to bicycle accessibility would be less than significant, and no mitigation measures are required (Impacts TR-33 and TR-34). Also, as with the Proposed Project, implementation of Mitigation Measure M-TR-24 would result in the removal of the proposed bicycle lane on a portion of Treasure Island and Hillcrest Roads to accommodate a transit-only lane (Mitigation Measure M-TR-24 would only be implemented if queues on Treasure Island Road materialize and substantially affect transit operations); however, cyclists would continue to have a continuous Class I shared bicycle and pedestrian facility connecting Treasure Island and the Class I shared bicycle and pedestrian facility currently under construction on the Bay Bridge east span, from the

intermodal transit hub to Treasure Island Road across the causeway and continuing along Macalla Road on Yerba Buena Island.

As discussed in the methodology section above and presented in Table VII.20, the analysis assumes that the reduction in vehicle traffic would manifest itself entirely in a mode shift to transit. It is possible that a small portion of the mode shift would be to bicycle instead of to transit; however, given the lack of a bicycle connection to San Francisco, the only travelers this mode shift would affect would be those traveling between the Proposed Project and the East Bay. Further, it is likely that an increase in bicycling would not be so substantial as to affect the analysis of other modes.

#### Pedestrians

The pedestrian network and improvements would not change materially between the Proposed Project and the Reduced Parking Alternative. Generally, similar to the Proposed Project, the pedestrian environment would be improved compared to existing conditions. As such, the Reduced Parking Alternative would not create potentially hazardous conditions for pedestrians (Impact TR-35). Although the data is uncertain, if the travel characteristics of the Reduced Parking Alternative materialized as summarized in Table VII.21, the Reduced Parking Alternative would result in more pedestrian trips near the Ferry Building in San Francisco than the Proposed Project because there would be increased ferry ridership.

Further, the increased transit ridership may result in an increase in bicycle and pedestrian trips on the Islands. However, the on-island bicycle and pedestrian circulation network would remain adequate to serve expected demands.

Compared to the Proposed Project, the Reduced Parking Alternative would result in 307 more ferry trips during the AM peak hour, 181 more ferry trips during the PM peak hour, and 107 more ferry trips during the Saturday peak hour. With implementation of Mitigation Measure M-TR-2 there would be even more pedestrian trips since the increased transit service would attract more riders.

As shown in Table VII.25, these pedestrians would be accommodated at the crosswalks in the vicinity of the Ferry Building, most of which were projected to operate at LOS C or better under the Proposed Project. Under the Reduced Parking Alternative, the crosswalk at Market Street across from the Ferry Building is projected to operate at LOS D, which is still considered acceptable. Therefore, impacts related to pedestrians would be less than significant, and no mitigation measures are required (Impact TR-36).

**(New) Table VII.25: Pedestrian Crosswalk Levels of Service – Existing plus Project and Existing plus Reduced Parking Alternative**

Crosswalk <sup>1</sup>	Existing plus Project			Existing plus Reduced Parking Alternative		
	Project Trips	Density <sup>3</sup>	LOS	Project Trips	Density <sup>3</sup>	LOS
<b><i>AM Peak Hour</i></b>						
Washington Street <sup>1</sup>	26	27.4	A	39	25.2	A
Ferry Bldg (North)	87	6.6	C	129	6.1	C
Market Street	427	6.7	C	631	6.2	C
Don Chee Way	29	17.3	A	43	15.9	A
Mission Street <sup>1</sup>	72	9.9	C	107	9.1	C
<b><i>PM Peak Hour</i></b>						
Washington Street <sup>1</sup>	46	13.0	A	57	12.6	B
Ferry Bldg (North)	67	7.2	C	82	7.0	C
Market Street	614	3.9	D	749	3.8	D
Don Chee Way	33	12.9	B	40	12.5	B
Mission Street <sup>1</sup>	61	9.9	C	75	9.5	C
<b><i>Saturday Peak Hour<sup>2</sup></i></b>						
Market Street	334	4.0	D	410	3.9	D
Don Chee Way	28	6.9	C	34	6.8	C

*Notes:*

<sup>1</sup> Since the intersections of The Embarcadero with Washington Street and Mission Street each have two crosswalks, the north and south legs of each intersection were averaged.

<sup>2</sup> The Ferry Building hosts a farmers market on Saturdays.

<sup>3</sup> Density measured in square feet per pedestrian

*Source:* Fehr & Peers 2011

**Loading**

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to the freight loading space requirements to accommodate the loading demand, and would be designed to minimize impacts on autos, transit, bicyclists and pedestrians and to ensure that loading activities do not result in hazardous conditions. The Reduced Parking Alternative impacts related to loading operations would be less than significant, and no mitigation measures are required (Impact TR-37).

### Emergency Access

The Reduced Parking Alternative impacts on emergency access would be the same as for the Proposed Project. Local police and fire facilities would provide first response to incidents on the Islands, and existing emergency routes would be maintained in their existing locations or rerouted as necessary. Similar to the Proposed Project, impacts to emergency access would be less than significant and no mitigation measures are required (Impact TR-38).

### Cumulative Conditions

The Reduced Parking Alternative would result in similar construction activities to that of the Proposed Project. As with the Proposed Project, given the overall magnitude of development, the project's prolonged construction period, and the lack of certainty of timing of other construction projects on the Islands, the Reduced Parking Alternative would also result in significant contributions to cumulative construction-related traffic impacts (Impact TR-39).

Overall, if vehicle trip generation reductions associated with the Reduced Parking Alternative were to materialize as described in this section, 2030 Cumulative Conditions traffic operational impacts would be nearly identical to those described for the Reduced Development Alternative. In those circumstances, under 2030 Cumulative conditions, as with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would contribute to significant cumulative traffic impacts at the following locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island (Impact TR-40);
- Under conditions without the Ramps Project, at the two westbound on-ramps (Impact TR-41); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp at the east side of Yerba Buena Island (Impact TR-42).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would result in less-than-significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-43).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM and PM peak hours, and on San Francisco streets approaching the Bay Bridge during the weekday AM and PM and Saturday peak hours (Impacts TR-44 and TR-45).

Table VII.6, on pp. VII.25 – VII.26, includes the comparison of intersection LOS for 2030 Cumulative plus Proposed Project and 2030 Cumulative plus Reduced Development Alternative

conditions. The Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of vehicular trip generation and therefore, would result in the same significant impacts at study intersections as the Reduced Development Alternative and the Proposed Project. Although the Reduced Development Alternative had one fewer project-related impacts than the Proposed Project, the Reduced Development Alternative, and therefore the Reduced Parking Alternative, would have the same number of cumulative impacts as the Proposed Project.

- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions. Because the Reduced Parking Alternative would result in significant project-related impacts at these intersections, it would also result in cumulative impacts at these six intersections (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-46 through TR-51).
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to critical movements at one study intersection that would operate at LOS E or LOS F under 2030 Cumulative plus Reduced Parking Alternative conditions, resulting in a project impact (Second/Folsom). (Impact TR-52)
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would have less-than-significant contributions at seven study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions (Fremont/Howard, Fremont/Folsom, Fremont/I-80 Westbound Off-Ramp/Harrison, First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, Second/Bryant, and The Embarcadero/Harrison). (Impact TR-53).
- Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to significant cumulative impacts at two uncontrolled study intersections (Folsom/Essex and Bryant/Sterling) (Impacts TR-54 and TR-55).

As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative's contribution to cumulative traffic impacts at ramps and intersections would be lessened, but not eliminated, with implementation of Mitigation Measure M-TR-2.

Under 2030 Cumulative conditions, implementation of the Reduced Parking Alternative would have transit impacts similar to those of the Proposed Project, although transit ridership would be higher than under conditions with the Proposed Project. Similar to the Proposed Project, ridership under this alternative would also exceed the capacity of the Muni screenline between the Islands and Downtown San Francisco. Impacts to this screenline would be the same as identified for Existing plus Reduced Parking Alternative conditions, and summarized in Table VII.21. The

Reduced Parking Alternative would also add more transit trips to the standard Muni downtown San Francisco screenlines than the Proposed Project; however, the increase is not expected to be severe enough such that ridership demand would exceed capacity, and cumulative impacts on the standard downtown San Francisco screenlines would be less than significant (Impact TR-56). The Reduced Parking Alternative's contributions to cumulative transit trips on AC Transit, BART, Golden Gate Transit, SamTrans, Caltrain, and other ferry routes would not increase demand in excess of available capacity (Impact TR-57). Transit impacts would result from traffic congestion delay in downtown San Francisco and would affect the same lines as the Proposed Project and Reduced Development Alternative would (10-Townsend, 27-Bryant, 30X-Marina Express, and 47-Van Ness) (Impacts TR-58 through TR-61). While implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) would somewhat reduce delays at the downtown study intersections, the impact on transit would remain significant and unavoidable. Increased traffic congestion delay in downtown San Francisco would not affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-62).

#### Parking Information

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to parking space maximums; however, those maximums would be substantially lower than the Proposed Project. As summarized in Table VII.19, the Reduced Parking Alternative would include 6,651 parking spaces, including 4,000 off-street spaces for residential uses, 1,616 off-street spaces for non-residential uses, and 1,035 on-street parking spaces. If travel behavior materialized as summarized in Table VII.21, although the overall demand for spaces would be less than the Proposed Project, parking shortfalls associated with the Reduced Parking Alternative would likely exceed those projected for the Proposed Project.<sup>11</sup>

As with the Proposed Project, implementation of the reduced parking supply maximums would result in secondary physical impacts caused by increased traffic congestion and a mode shift to transit that would exacerbate the degree to which capacity utilization standards were exceeded on Muni line 108-Treasure Island. As with the Proposed Project, impacts on the transit capacity utilization would be less than significant with implementation of Mitigation Measure M-TR-2. However, because implementation of Mitigation Measure M-TR-2 is uncertain, impacts would remain significant and unavoidable.

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<sup>11</sup> Since parking supply is reduced for residential units by 50 percent, there would also have to be a reduction in residential trip generation of 50 percent to maintain the same parking shortfall. Since trip generation is not expected to decrease by as much as the parking supply is decreasing, the shortfall under the Reduced Parking Alternative would be greater than under the Proposed Project.

### **Aesthetics**

Off-street parking facilities constructed in mixed-use or residential buildings as part of development in the Reduced Parking Alternative would continue to be wrapped by residential or commercial uses and not be readily visible from public rights-of-way, as with the Proposed Project. Land uses would be the same as the Proposed Project, and heights and densities would also be the same. The numbers, types, and sizes of buildings would not change substantially with the alternative. Therefore, the visual impacts identified for the Proposed Project in Section IV.B, Aesthetics, would not change with the Reduced Parking Alternative.

### **Noise**

As discussed under “Transportation” above, the City has very low confidence that traffic would be substantially reduced if less parking were provided on the Islands. If there were a reduction in vehicle trips as a result of reducing the amount of parking provided, there would be a slight reduction in traffic noise compared to operational traffic noise levels estimated for the Proposed Project in Section IV.F, Noise, in Impact NO-3. The reduction in daily vehicle traffic would not be more than approximately 10 percent. A reduction in traffic volumes of about 10 percent would not reduce the significant noise impacts identified in Impact NO-3 to less-than-significant levels, because the change in noise levels would continue to be 5 dBA or greater (see Table IV.F.6 on p. IV.F.23). Other operational noise impacts would remain the same as those identified for the Proposed Project. Construction noise impacts would not change with the Reduced Parking Alternative, and would remain significant and unavoidable. Mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

### **Air Quality**

As discussed under “Transportation,” the City has very low confidence that traffic would be substantially reduced if less parking were provided. If there were a reduction in vehicle trips as a result of reducing the amount of parking available, there would be a slight reduction in emissions of criteria pollutants compared to emissions from motor vehicles in the Proposed Project. Reducing motor vehicle emissions by approximately 10 percent would not reduce any of the significant air quality impacts identified in Impact AQ-5 and shown in Table IV.G.5 on p. IV.G.41, as the emissions from other sources would continue to be the same as for the Proposed Project. A reduction of over 50 percent in motor vehicle emissions would be required to reduce the significant impacts of PM 2.5 emissions to less-than-significant levels, and substantially greater reductions in motor vehicle emissions would be necessary to reduce the other significant air quality impacts to less-than-significant levels. A reduction of 50 percent in motor vehicle emissions would not be achieved under the Reduced Parking Alternative. The possible reduction in vehicle trips with reduced parking would not substantially change the amount of diesel

particulate emissions, as few of the trips removed would be in diesel-fueled vehicles. Construction air emissions would not change substantially with the Reduced Parking Alternative. Therefore, the air quality impacts identified as significant and unavoidable in the analysis of the Proposed Project would continue to be significant and unavoidable with the Reduced Parking Alternative, and mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

### **Greenhouse Gases**

As described for noise and air emissions, greenhouse gas (“GHG”) emissions might be reduced somewhat with the Reduced Parking Alternative if the alternative were to result in reductions in vehicle trips. Motor vehicle emissions are the largest single source of CO<sub>2</sub>e during operation of the Proposed Project (see Tables IV.H.3 and IV.H.4 on pp. IV.H.36 and IV.H.37); however, reductions of 10 percent in motor vehicle emissions would not make a substantial difference in the overall amount of annual CO<sub>2</sub>e emissions and therefore would not substantially change the emissions per year per service population presented on p. IV.H.45. The Proposed Project would have a less-than-significant impact on GHG emission, as discussed in Impact GHG-1 on pp. IV.H.44 and IV.H.45. Therefore the Reduced Parking Alternative, if it were to result in fewer vehicle trips, would not cause a significant impact to be reduced to less-than-significant levels.

### **Other Topics**

The Reduced Parking Alternative would have essentially the same impacts as the Proposed Project in the areas of Land Use, Population and Housing, Cultural Resources, Wind and Shadow, Recreation, Utilities, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Agricultural Resources, and Minerals and Energy Resources. Any mitigation measures identified in the subsections of Chapter IV covering these topics would be applicable to the Reduced Parking Alternative.

### **Conclusion**

Overall, the Reduced Parking Alternative would have the same significant impacts as those identified for the Proposed Project except for a possible reduction in one significant traffic impact from significant and unavoidable with mitigation to less-than-significant. In addition, the project sponsors believe that the reduction in parking would undermine the market acceptance of the alternative, yielding a reduced rate of return that is commercially infeasible and a reduction in funding available to support transit services that make this alternative infeasible.

**[End of new text for Chapter VII]**

## 3.2 STAFF-INITIATED CHANGES

### VOLUME 1

#### SUMMARY

The last sentence of the first full paragraph on p. S.4 is revised as follows:

A transitional housing program would be established to assist qualifying households in residence at the time the DDA is executed who continuously remain residents of the Islands to have the opportunity to continue living on the Islands if they choose.

The third sentence of the paragraph under the heading “General Plan and Planning Code Amendments” on EIR p. S.5 is revised to clarify *General Plan* and Planning Code amendments proposed for the Project as follows:

The *General Plan* would be amended by ~~adding a new Area Plan for the Redevelopment Plan Project Area and would~~ to reference the plans, policies, land use controls, and design standards set forth in the Area Plan and the *Design for Development*;

The second sentence under Mitigation Measure M-CP-1 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.7 is revised as follows:

The project sponsors shall retain the services of ~~a qualified an~~ an archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist having expertise in California prehistoric and urban historical archaeology.

Text is added to the fourth sentence of the first paragraph under “Archaeological Testing Program” (Mitigation Measure M-CP-1) in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.8 as follows:

The purpose of the archaeological testing program will be to determine, to the extent possible, the presence or absence of previously undiscovered archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

Text is added to the second indented item after the second paragraph under “Archaeological Testing Program” (Mitigation Measure M-CP-1) in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.8 as follows:

(B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible, in which case interpretive reuse shall be required.

The first paragraph under “Archaeological Data Recovery Program” (Mitigation Measure M-CP-1) in Table S.1: Summary of Impacts and Mitigation Measures starting on EIR p. S.9 is revised as follows:

The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (“ADRP”). The archaeological consultant, project sponsors, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ERO shall review the draft ADRP to ensure adherence to this mitigation measure and the standards and requirements set forth in the ADRP. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the resource ~~historical property~~ that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if non-destructive methods are practical.

The following correction is made to the last sentence of Mitigation Measure M-CP-6, which starts on p. S.12:

TIDA shall not approve ~~the~~ a design proposal for Building 1 unless it makes a finding that any such alterations, when taken together with the alterations and additions to Building 1 itself, comply with the Secretary’s Standards.

The following correction is made to the last sentence of Mitigation Measure M-CP-7 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.13:

TIDA shall not approve ~~the~~ a design proposal for Building 1 unless it makes a finding that any such new construction, when taken together with the alterations and additions to Building 1 itself, comply with the Secretary’s Standards.

The second bulleted item under Mitigation Measure M-NO-1a in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.24 is revised as follows:

- Use construction equipment with lower noise emission ratings whenever ~~possible~~ feasible, particularly for air compressors;

Mitigation Measure M-BI-2b in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.37 is revised as follows:

**Mitigation Measure M-BI-2b: Seasonal Limitations on Construction Work.**  
Construction work on the Islands’ shoreline shall be conducted between ~~the months of~~ March 1 and November 30 to avoid any disturbance to herring spawning occurring in SAV surrounding Treasure Island.

In Table S-1: Summary of Significant Impacts and Mitigation Measures, Mitigation Measure M-BI-4b is corrected to add a missing page reference in the first complete sentence at the top of p. S.40:

Mitigation Measure M-TR-2, p. IV.E. ~~X~~74, would reduce this impact to less-than-significant levels; however, as stated in Section IV.E, because full funding for the measure is not assured, the impact would remain significant and unavoidable.

Mitigation Measure M-GE-5 in Table S.1: Summary of Impacts and Mitigation Measures on EIR p. S.41 is revised as follows:

**Mitigation Measure M-GE-5: Slope Stability.** New improvements proposed for Yerba Buena Island shall be located at a minimum of 100 feet from the top of the existing slope along Macalla Road unless a site-specific geotechnical evaluation of slope stability indicates a static factor of safety of at least 1.5 and a seismic factor or safety of 1.1 ~~are is~~ present or established geotechnical stabilization measures are implemented to provide that level of safety. Any geotechnical recommendations regarding slope stability made in site specific geotechnical investigations for the site shall be incorporated into the specifications for building on that site.

Mitigation Measure M-HZ-1 in Table S.1: Summary of Impacts and Mitigation Measures starting on EIR p. S.42 is revised as follows:

**Mitigation Measure M-HZ-1: Soil and Groundwater Management Plan**

Prior to issuance of a building or grading permit for any one or more parcels, ~~there shall be regulatory approval by DTSC or RWQCB for the proposed land use~~ the applicant shall demonstrate that its ~~Construction specifications for each parcel shall include~~ implementation of a Soil and Groundwater Management Plan (“SGMP”) prepared by a qualified environmental consulting firm and reviewed and agreed to by DTSC and RWQCB. For parcels transferred from the Navy under a Lease in Furtherance of Conveyance (LIFOC), or Early Transfer (FOSET) or parcels where conditionally recommended transferred by under a FOST which specifies that additional remediation of petroleum contamination is necessary or additional remediation is necessary to meet the proposed land use, all additional or remaining remediation on those parcels shall be completed as directed by the responsible agency, DTSC or RWQCB, prior to commencement of construction activities unless (i) those construction activities are conducted in accordance with the requirements of any applicable land use covenant, lease restriction or deed restriction and in accordance with the Site Health and Safety requirements of the SGMP, or (ii) those construction activities are otherwise given written approval by either DTSC or RWQCB, ~~in cases such as constructing infrastructure improvements. Parcels transferred under a Lease in Furtherance of Conveyance, shall not change site occupancy or usage until all remediation is completed as determined by DTSC or RWQCB. Where necessary, additional remediation shall be accomplished by the project sponsors prior to issuance of any building or grading permits in accordance with any requirements set by the overseeing agency, either DTSC or RWQCB. The SGMP shall be present on site at all times and readily available to site workers.~~

Mitigation Measure M-HZ-10 in Table S.1: Summary of Impacts and Mitigation Measures starting on EIR p. S.45 is revised as follows:

**Mitigation Measure M-HZ-10: Soil Vapor Barriers.** ~~Proposed building plans on parcels with~~ Prior to obtaining a building permit for an enclosed structure within IR Sites 21 or 24 or within any area where the FOST or site closure documentation specifies that vapor barriers are necessary or that additional sampling must be conducted to determine if vapor barriers are necessary due to the presence of residual contamination that have has volatile components (such as chlorinated solvents (PCE and TCE) or certain petroleum hydrocarbons), the applicant shall demonstrate either that the building plans shall include DTSC-approved vapor barriers to be installed beneath the foundation for the prevention of soil vapor intrusion, or that DTSC has determined that installation of vapor barriers is not necessary. ~~Specifically, building plans coinciding with IR Sites 21 and 24 shall contain vapor barriers that are reviewed and approved by DTSC prior to issuance of building permit.~~

The last sentence in the first paragraph under “D. Wastewater Wetlands Variants” on EIR p. S.51 is revised as follows:

Effluent that is not recycled would be disinfected ~~with ultraviolet light~~ after tertiary treatment in the wetland, and then discharged through the existing outfall.

The first sentence in the second paragraph under “D. Wastewater Wetlands Variants” on EIR p. S.51 is revised as follows:

Under Wastewater Wetland Variant D2, effluent would undergo microfiltration and ~~ultraviolet light~~ disinfection.

The first paragraph under “Summary of Project Alternatives” on EIR p. S.53 is revised as follows:

~~Three~~ Four alternatives are evaluated in this EIR: A. No Project Alternative; B. Reduced Development Alternative, ~~and~~ C. No Ferry Service Alternative, and D. Reduced Parking Alternative. Table S.3, p. S.58, shows a comparison of the potential environmental impacts that may result from the alternatives to those of the Proposed Project.

Table S.3: Comparison of Project and Alternative Impacts, starting on EIR p. S.58, is revised to include the new Reduced Parking Alternative as follows:

**(Revised) Table S.3: Comparison of Project and Alternative Impacts**

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>IV.A. Land Use and Land Use Planning</b>				
<b>Impact LU-1:</b> Construction of the Proposed Project would not physically divide an established community or have a substantial adverse impact on the character of the vicinity. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact LU-2:</b> Operation of the Proposed Project would not physically divide an established community. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact LU-3:</b> Implementation of the Proposed Project would not have a substantial adverse impact on the character of the vicinity. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact LU-4:</b> Operation of the Proposed Project would not have a substantial adverse impact on the character of land uses subject to the Tidelands Trust Doctrine. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact LU-5:</b> The Proposed Project, when combined with other cumulative projects, would not disrupt or divide an existing community or substantially change the land use character in the vicinity. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.B. Aesthetics</b>				
<b>Impact AE-1:</b> Development under the Proposed Project would adversely alter scenic vistas of San Francisco and San Francisco Bay from public vantage points along the eastern shoreline of San Francisco, Telegraph Hill, the East Bay shoreline, and from the Bay Bridge east span. <i>(Significant and Unavoidable)</i>	No Impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact AE-2:</b> The Proposed Project would affect existing features that are considered scenic resources on Treasure Island and Yerba Buena Island. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact AE-3:</b> New construction on Treasure Island would alter the existing visual character and visual quality of the Project Area. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact AE-4:</b> Implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area, and would affect nighttime views of the Bay from public areas, and would increase potential sources of glare. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact AE-5:</b> The Proposed Project would not contribute cumulatively to impacts related to aesthetics when considered with nearby projects. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.C. Population and Housing</b>				
<b>Impact PH-1:</b> The Proposed Project would induce substantial direct temporary population growth during project construction. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PH-2:</b> The Proposed Project would not displace substantial numbers of people and/or existing housing units or create demand for additional housing, necessitating the construction of replacement housing. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PH-3:</b> The Proposed Project would not induce substantial growth in an area either directly or indirectly. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PH-4:</b> The Proposed Project would not induce substantial cumulative growth in an area either directly or indirectly. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.D. Cultural and Paleontological Resources</b>				
<b>Impact CP-1:</b> Project construction activities could disturb significant archaeological resources, if such resources are present within the Project Area. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact CP-2:</b> Project construction activities could disturb human remains, if such resources are present within the Project Area. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact CP-3:</b> Project construction activities could disturb paleontological resources. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact CP-4:</b> Disturbance of archaeological and paleontological resources, if encountered during construction of the Proposed Project, could contribute to a cumulative loss of significant historic and scientific information. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact CP-5:</b> Reuse and rehabilitation of historical resources under the Proposed Project could impair the significance of those historical resources. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact CP-6:</b> Alterations to the contributing landscape areas of Buildings 1, 2, and 3 could impair the significance of those historical resources. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact CP-7:</b> New construction within the contributing landscapes of Buildings 1, 2, and 3 could impair the significance of those historical resources. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact CP-8:</b> Demolition of Building 111, a component of Building 3, would not impair the significance of the Building 3 historical resource. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact CP-9:</b> Demolition of the Damage Control Trainer would impair the significance of an historical resource. <i>(Significant and Unavoidable)</i>	No Impact	Significant and Unavoidable	Less than Significant	<u>Significant and Unavoidable</u>
<b>Impact CP-10:</b> Demolition of NSTI resources on Treasure Island and Yerba Buena Island could impair the significance of historical resources. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact CP-11:</b> Proposed new construction outside of the contributing sites of Buildings 1, 2, and 3 could impair the significance of those historical resources. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact CP-12:</b> Proposed new construction within and adjacent to the Senior Officers' Quarters Historic District could impair the significance of historical resources. ( <i>Less than Significant</i> )	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact CP-13:</b> The Proposed Project would not contribute cumulatively to impacts on historic architectural resources when considered with nearby projects. ( <i>Less than Significant</i> )	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.E. Transportation – Construction</b>				
<b>Impact TR-1:</b> Construction of the Proposed Project would occur over a long period of time, and would result in significant impacts on the transportation and circulation network. ( <i>Significant and Unavoidable with Mitigation</i> )	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>IV.E. Transportation – Traffic</b>				
<b>Impact TR-2:</b> Implementation of the Proposed Project would contribute to existing LOS E operating conditions during the weekday PM peak hour, and result in significant impacts during the Saturday peak hour at the eastbound off-ramp (west side of Yerba Buena Island). ( <i>Significant and Unavoidable with Mitigation</i> )	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-3:</b> Under conditions without the Ramps Project, implementation of the Proposed Project would result in significant impacts at the two westbound on-ramps. ( <i>Significant and Unavoidable with Mitigation</i> )	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-4:</b> Under conditions with the Ramps Project, implementation of the Proposed Project would result in a significant impact during the AM and PM peak hours at the ramp meter at the westbound on-ramp (east side of Yerba Buena Island). ( <i>Significant and Unavoidable with Mitigation</i> )	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-5:</b> Under conditions without and with the Ramps Project, implementation of the Proposed Project would result in less than significant impacts at three ramp locations. ( <i>Less than Significant</i> )	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact TR-6:</b> Implementation of the Proposed Project would result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM peak hour, with and without the Ramps Project. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-7:</b> Implementation of the Proposed Project would result in a significant impact on queuing on San Francisco streets approaching Bay Bridge during the weekday PM peak hour, under conditions with and without the Ramps Project. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-8:</b> Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Market. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-9:</b> Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Mission. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-10:</b> Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Folsom. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-11:</b> Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Harrison/I-80 Eastbound On-Ramp. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-12:</b> Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of Bryant/Fifth/I-80 Eastbound On-Ramp. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-13:</b> Implementation of the Proposed Project would result in significant project impacts at the signalized intersection of Fifth/Harrison/I-80 Westbound Off-Ramp. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact TR-14:</b> Implementation of the Proposed Project would contribute substantially to existing LOS E conditions at the signalized intersection of Second/Folsom, resulting in a project impact. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Less than Significant	Significant and Unavoidable with Mitigation	<u>Less than Significant</u>
<b>Impact TR-15:</b> Implementation of the Proposed Project would have less than significant impacts at three signalized study intersections that operate at LOS E or LOS F under Existing Conditions. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-16:</b> Implementation of the Proposed Project would have less than significant impacts at five signalized study intersections that would operate at LOS D or better under Existing plus Project Conditions. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-17:</b> Implementation of the Proposed Project would result in significant impacts at the uncontrolled study intersection of Folsom/Essex. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-18:</b> Implementation of the Proposed Project would result in a significant impact at the uncontrolled study intersection of Bryant/Sterling. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>IV.E. Transportation – Transit</b>				
<b>Impact TR-19:</b> Implementation of the Proposed Project would exceed the available transit capacity of Muni’s 108-Treasure Island bus line serving the Islands. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Less than Significant	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-20:</b> Implementation of the Proposed Project would not exceed the transit capacity of the proposed new AC Transit bus line serving the Islands. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-21:</b> Implementation of the Proposed Project would not exceed the transit capacity of the proposed new ferry line serving Treasure Island. <i>(Less than Significant)</i>	No Impact	Less than Significant	No Impact	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact TR-22:</b> Implementation of the Proposed Project would add transit trips to the San Francisco downtown screenlines; however, this would not increase demand in excess of available capacity. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-23:</b> Implementation of the Proposed Project would add transit trips to AC Transit, BART, Golden Gate Transit, SamTrans, Caltrain and other ferry lines; however, this would not increase demand in excess of available capacity. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-24:</b> Implementation of the Proposed Project without the Ramps Project would result in queues extending from the westbound Bay Bridge at Yerba Buena Island on-ramps which would impact Muni line 108-Treasure Island operations. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact TR-25:</b> Implementation of the Proposed Project without the Ramps Project would impact AC Transit operations on Hillcrest Road between Treasure Island and the eastbound on-ramp to the Bay Bridge. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-26:</b> Implementation of the Proposed Project with the Ramps Project would result in significant impacts to Muni line 108-Treasure Island operations. <i>(Less than Significant with Mitigation)</i>	No Impact	Less than Significant with Mitigation	Less than Significant	<u>Less than Significant with Mitigation</u>
<b>Impact TR-27:</b> Implementation of the Proposed Project with the Ramps Project would impact AC Transit operations on Treasure Island Road and Hillcrest Road between Treasure Island and the eastbound on-ramp to the Bay Bridge. <i>(Significant and Unavoidable with Mitigation)</i>	No Impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-28:</b> Implementation of the Proposed Project would not impact operations of the existing or proposed ferry services on San Francisco Bay. <i>(Less than Significant)</i>	No Impact	Less than Significant	No Impact	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact TR-29:</b> The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 27-Bryant bus line. <i>(Significant and Unavoidable)</i>	No Impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-30:</b> The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 30X-Marina Express bus line. <i>(Significant and Unavoidable)</i>	No Impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-31:</b> The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 47-Van Ness bus line. <i>(Significant and Unavoidable)</i>	No Impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-32:</b> The Proposed Project would increase congestion in downtown San Francisco during the PM peak hour; however, it would not impact operations of Golden Gate Transit or SamTrans bus lines. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.E. Transportation – Bicycles</b>				
<b>Impact TR-33:</b> The Proposed Project would not create potentially hazardous conditions for bicyclists on the Islands and would provide more bicycle accessibility to the site than currently exists. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-34:</b> Implementation of the Proposed Project would not create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility on mainland San Francisco. <i>(Less than Significant)</i>	No Impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.E. Transportation – Pedestrians</b>				
<b>Impact TR-35:</b> The Proposed Project would not create potentially hazardous conditions for pedestrians and would provide better pedestrian accessibility to the site than currently exists. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact TR-36:</b> Implementation of the Proposed Project would not result in substantial overcrowding of public crosswalks near the Ferry Building, and pedestrian facilities would continue to operate at acceptable levels. <i>(Less than Significant)</i>	No impact	Less than Significant	No Impact	<u>Less than Significant</u>
<b>IV.E. Transportation – Loading</b>				
<b>Impact TR-37:</b> The Proposed Project would not result in a loading demand during the peak hour of loading activities that could not be accommodated within the proposed on-site loading supply or within on-street loading zones. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.E. Transportation – Emergency Access</b>				
<b>Impact TR-38:</b> Implementation of the Proposed Project would not result in significant emergency access impacts. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.E. Transportation – Cumulative Impacts</b>				
<b>Impact TR-39:</b> Construction of the Proposed Project would occur over a long period of time, and would contribute to cumulative construction impacts in the Project vicinity. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-40:</b> Implementation of the Proposed Project would contribute to significant cumulative traffic impacts at the eastbound off-ramp (west side of Yerba Buena Island). <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-41:</b> Under conditions without the Ramps Project, implementation of the Proposed Project would contribute to significant cumulative impacts at the two westbound on-ramps. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-42:</b> Under conditions with the Ramps Project, implementation of the Proposed Project would result in a significant cumulative impacts during the AM and PM peak hours at the ramp meter at the westbound on-ramp (east side of Yerba Buena Island). <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact TR-43:</b> Under 2030 Cumulative plus Project conditions without and with the Ramps Project, implementation of the Proposed Project would result in less than significant impacts at three ramp locations. ( <i>Less than Significant</i> )	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-44:</b> Implementation of the Proposed Project would contribute to significant cumulative queuing impacts at the Bay Bridge toll plaza during the AM and PM peak hours, whether or not the Ramps Project are implemented. ( <i>Significant and Unavoidable with Mitigation</i> )	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-45:</b> Implementation of the Proposed Project would contribute to significant cumulative queuing impacts on San Francisco streets approaching the Bay Bridge during the weekday AM and PM and Saturday peak hours, whether or not the Ramps Project was implemented. ( <i>Significant and Unavoidable with Mitigation</i> )	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-46:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Market. ( <i>Significant and Unavoidable</i> )	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-47:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Mission. ( <i>Significant and Unavoidable</i> )	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-48:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Folsom. ( <i>Significant and Unavoidable</i> )	No impact	<del>Less than Significant</del> <u>Significant and Unavoidable</u>	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-49:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Harrison/I-80 Eastbound On-Ramp. ( <i>Significant and Unavoidable</i> )	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact TR-50:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of Bryant/Fifth/I-80 Eastbound On-Ramp. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-51:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of Harrison/Fifth/I-80 Westbound Off-Ramp. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-52:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of Second/Folsom. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-53:</b> Implementation of the Project would have less than significant impacts at seven study intersections that would operate at LOS E or LOS F under 2030 Cumulative Plus Project conditions. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-54:</b> Implementation of the Proposed Project would contribute to significant cumulative impacts at the uncontrolled study intersection of Folsom/Essex. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact TR-55:</b> Implementation of the Proposed Project would contribute to significant cumulative impacts at the uncontrolled study intersection of Bryant/Sterling. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-56:</b> The Proposed Project's contribution to cumulative transit trips to the downtown screenlines would not increase demands in excess of available capacity. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-57:</b> The Proposed Project's contributions to cumulative transit trips on AC Transit, BART, Golden Gate Transit, SamTrans, Caltrain and other ferry lines would not increase demands in excess of available capacity. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact TR-58:</b> The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 27-Bryant bus line. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-59:</b> The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 30X-Marina Express bus line. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-60:</b> The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 47-Van Ness bus line. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-61:</b> The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 10-Townsend bus line. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact TR-62:</b> The Proposed Project would contribute to cumulative congestion in downtown San Francisco during the PM peak hour, however would not impact operations of Golden Gate Transit or SamTrans bus lines. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact TR-63:</b> Implementation of the Proposed Project parking supply maximums would exacerbate the exceedance of the capacity utilization standard on Muni's 108-Treasure Island bus line serving the Islands. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Less than Significant	<u>Significant and Unavoidable with Mitigation</u>
<b>IV.F. Noise</b>				
<b>Impact NO-1:</b> Project-related construction activities would increase noise levels above existing ambient conditions. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact NO-2:</b> Construction activities could expose persons and structures to excessive ground-borne vibration or ground-borne noise levels. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact NO-3:</b> Project-related traffic would result in a substantial permanent increase in ambient noise levels in the project vicinity above existing ambient noise levels. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact NO-4:</b> Project-related ferry noise levels would result in a substantial permanent increase in ambient noise levels in the project vicinity above existing ambient conditions. <i>(Less than Significant with Mitigation; Significant and Unavoidable if Mitigation Not Implemented by WETA)</i>	No impact	Less than Significant with Mitigation; Significant and Unavoidable if Mitigation Not Implemented by WETA	No impact	<u>Less than Significant with Mitigation; Significant and Unavoidable if Mitigation Not Implemented by WETA</u>
<b>Impact NO-5:</b> Proposed residences and other sensitive uses would be located in incompatible noise environments. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact NO-6:</b> Operation of stationary sources at the proposed public utility facilities (e.g., water distribution systems, wastewater collection and treatment facilities, electric substation facilities, etc.) would increase existing noise levels, potentially exceeding noise level standards. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact NO-7:</b> Project-related construction activities in combination with construction activities of other cumulative development would increase noise levels above existing ambient conditions. <i>(Significant and Unavoidable with Mitigation)</i>	No impact	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	<u>Significant and Unavoidable with Mitigation</u>
<b>Impact NO-8:</b> Increases in traffic from the project in combination with other development would result in cumulative noise increases. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>IV.G. Air Quality</b>				
<b>Impact AQ-1:</b> Construction of the Proposed Project would result in localized construction dust-related air quality impacts. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact AQ-2:</b> Construction of the Proposed Project could violate an air quality standard or contribute significantly to an existing or projected air quality violation. <i>(Less than Significant under Applicable 1999 Guidelines; Significant and Unavoidable with Mitigation under 2010 Guidelines)</i>	No impact	Less than Significant under Applicable 1999 Guideline; Significant and Unavoidable with Mitigation under 2010 BAAQMD CEQA Guidelines	Less than Significant under Applicable 1999 Guideline; Significant and Unavoidable with Mitigation under 2010 BAAQMD CEQA Guidelines	<u>Less than Significant under Applicable 1999 Guideline; Significant and Unavoidable with Mitigation under 2010 BAAQMD CEQA Guidelines</u>
<b>Impact AQ-3:</b> Construction of the Proposed Project could expose sensitive receptors to substantial levels of toxic air contaminants which may lead to adverse health effects. <i>(Potentially Significant and Unavoidable for both 1999 and 2010 BAAQMD thresholds in Phase 2)</i>	No impact	Potentially Significant and Unavoidable for both 1999 and 2010 BAAQMD thresholds in Phase 2	Potentially Significant and Unavoidable for both 1999 and 2010 BAAQMD thresholds in Phase 2	<u>Potentially Significant and Unavoidable for both 1999 and 2010 BAAQMD thresholds in Phase 2</u>
<b>Impact AQ-4:</b> Construction of the Proposed Project would expose sensitive receptors to substantial levels of PM2.5 which may lead to adverse health effects. <i>(Not Applicable to 1999 BAAQMD Thresholds, Significant and Unavoidable with Mitigation for 2010 BAAQMD thresholds)</i>	No impact	(Not Applicable to 1999 BAAQMD Thresholds, Significant and Unavoidable with Mitigation for 2010 BAAQMD Thresholds)	(Not Applicable to 1999 BAAQMD Thresholds, Significant and Unavoidable with Mitigation for 2010 BAAQMD Thresholds)	<u>(Not Applicable to 1999 BAAQMD Thresholds, Significant and Unavoidable with Mitigation for 2010 BAAQMD Thresholds)</u>
<b>Impact AQ-5:</b> The Proposed Project’s operations would violate an air quality standard or contribute substantially to an existing or projected air quality violation. <i>(Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds)</i>	No impact	Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds	Less than Significant	<u>Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact AQ-6:</b> Operation of the proposed project could expose sensitive receptors to substantial pollutant concentrations. <i>(Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds)</i>	No impact	Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds	Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds	<u>Significant and Unavoidable with Mitigation for both 1999 and 2010 BAAQMD thresholds</u>
<b>Impact AQ-7:</b> The Proposed Project could generate odors. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact AQ-8:</b> The Proposed Project could conflict with adopted plans related to air quality. <i>(Significant for the Proposed Project and Less than Significant for Expanded Transit Service)</i>	No impact	Significant for Reduced Development Alternative and for Expanded Transit Service	Significant and Unavoidable	<u>Significant for Reduced Development Alternative and for Expanded Transit Service</u>
<b>Impact AQ-9:</b> The Proposed Project could result in significant cumulative air quality impacts. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>IV.F. Greenhouse Gases</b>				
<b>Impact GHG-1:</b> The Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact GHG-2:</b> The Proposed Project would not conflict with applicable plans, policies or regulations of an agency with jurisdiction over the Proposed Project adopted for the purpose of reducing the emissions of GHGs. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.I. Wind and Shadow</b>				
<b>Impact WS-1:</b> Shadows from the Proposed Project would reach both existing and proposed parks, open spaces, and recreation areas on the Islands and could substantially affect their usability. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact WS-2:</b> The Proposed Project, when combined with other cumulative projects, would not adversely affect the use of any park or open space under the jurisdiction of the Recreation and Park Commission or substantially affect the usability of other existing publicly accessible open space or outdoor recreation facilities or other public areas. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact WS-3:</b> The phased development of the Proposed Project could temporarily result in the creation of a Section 148 wind hazard, an increase in the number of hours that the wind hazard criterion is exceeded or an increase in the area that is subjected to wind hazards. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact WS-4:</b> Section 148 wind hazards would occur at publicly accessible locations in the Development Plan Area. These wind hazards would represent a general reduction in the number of existing wind hazards and the overall duration of the wind hazards. Changes in building design, height, location, and orientation, as well as changes in the overall configuration of the Project could result in wind hazards that differ from those found for the representative design Project. The wind hazards could occur in different locations, could increase the number of hours that any wind hazard would occur, and/or could increase the area that would be subjected to wind hazards. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>
<b>Impact WS-5:</b> The Proposed Project, when combined with other cumulative projects, could result in wind hazards that differ from those found for the representative design Project, either in the location of the hazard, in an increase in the number of hours that Section 148 wind hazards would occur or, in an increase in the area that is subjected to wind hazards. <i>(Significant and Unavoidable)</i>	No impact	Significant and Unavoidable	Significant and Unavoidable	<u>Significant and Unavoidable</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>IV.J Recreation</b>				
<b>Impact RE-1:</b> Construction of about 300 acres of parks, recreation facilities, and open space proposed by the Area Plan/SUD would result in temporary physical effects on the environment. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact RE-2:</b> The Proposed Project would result in an increase in on-site population that could result in the deterioration of existing recreational facilities. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact RE-3:</b> The Proposed Project may include synthetic turf fields which could have an adverse physical effect on the environment. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact RE-4:</b> Construction of the Proposed Project would not significantly contribute to cumulative impacts on the recreational use of existing parks, recreation facilities, and open space. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.K. Utilities and Service Systems</b>				
<b>Impact UT-1:</b> Construction activities associated with wastewater infrastructure for the Proposed Project could result in air quality, noise, water quality, transportation, hazardous materials, and biological impacts, as further evaluated under construction subsections in those EIR topics. <i>(See significance determinations in other topics.)</i>	No impact	See significance determinations in other topics	See significance determinations in other topics	<u>See significance determinations in other topics</u>
<b>Impact UT-2:</b> Wastewater collection system blockages or lift/pump station failures could result in sanitary sewer overflows. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact UT-3:</b> Construction and operation of the Proposed Project would not significantly contribute to cumulative infrastructure deficits or result in the exceedance of wastewater discharge requirements. <i>(No Impact)</i>	Existing infrastructure deficits would remain	No impact	No impact	<u>No impact</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact UT-4:</b> Construction activities associated with the Proposed Project’s recycled water infrastructure could result in air quality, noise, water quality, transportation, hazardous materials, and biological impacts, as further evaluated under those EIR topics. <i>(See significance determinations in other topics.)</i>	No impact	See significance determinations in other topics	See significance determinations in other topics	<u>See significance determinations in other topics</u>
<b>Impact UT-5:</b> New recycled wastewater treatment and collection facilities would provide recycled water to reduce the Proposed Project’s water demand in conformance with City policies. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact UT-6:</b> Construction and operation of the Proposed Project including the recycled water plant would not significantly contribute to any cumulative impacts. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact UT-7:</b> Construction activities associated with the Proposed Project’s stormwater infrastructure could result in air quality, noise, water quality, transportation, hazardous materials, and biological impacts, as further evaluated under those EIR topics. <i>(See significance determinations in other topics.)</i>	No impact	See significance determinations in other topics	See significance determinations in other topics	<u>See significance determinations in other topics</u>
<b>Impact UT-8:</b> Construction and operation of the Proposed Project would not significantly contribute to cumulative infrastructure deficits or result in the exceedance of stormwater discharge requirements. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact UT-9:</b> Construction activities associated with water infrastructure of the Proposed Project could result in air quality, noise, water quality, transportation, hazardous materials, and biological impacts, as further evaluated under those EIR topics. <i>(See significance determinations in other topics.)</i>	No impact	See significance determinations in other topics	See significance determinations in other topics	<u>See significance determinations in other topics</u>
<b>Impact UT-10:</b> There would be sufficient water supply available to serve the Proposed Project from existing entitlements and resources, and no new or expanded water supply resources or entitlements would be needed. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact UT-11:</b> Implementation of the Proposed Project would not result in a cumulatively considerable impact on existing entitlements and resources, and no new or expanded water supply resources or entitlements would be needed. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact UT-12:</b> The Proposed Project would be served by a landfill with sufficient capacity to accommodate the Proposed Project's solid waste disposal needs. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact UT-13:</b> The project would not fail to comply with Federal, State, and local statutes and regulations related to solid waste. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact UT-14:</b> Construction and operation of the Proposed Project would not result in a cumulatively considerable contribution to regional impacts on landfill capacity. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact UT-15:</b> Construction activities associated with energy and telecommunication infrastructure of the Proposed Project could result in air quality, noise, water quality, transportation, hazardous materials, cultural resources, and biological impacts, as further evaluated under those EIR topics. <i>(See Significance Determinations in other topics.)</i>	No impact	See significance determinations in other topics	See significance determinations in other topics	<u>See significance determinations in other topics</u>
<b>Impact UT-16:</b> Construction and operation of the Proposed Project would not result in cumulative impacts on energy and telecommunication infrastructure. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>IV.L. Public Services</b>				
<b>Impact PS-1:</b> Project construction activities could result in adverse physical impacts or in the need for new or physically altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact PS-2:</b> Implementation of the Proposed Project would increase demand for police services that would result in the need to construct new police facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the San Francisco Police Department. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PS-3:</b> The Proposed Project's contribution to cumulative projects would not affect police department response times or performance objectives, nor would it contribute to the need to construct new police facilities. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PS-4:</b> Project construction activities could result in adverse physical impacts or in the need for new or physically altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation
<b>Impact PS-5:</b> Implementation of the Proposed Project would increase demand for fire services, which would result in the need to construct new fire service facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the San Francisco Fire Department. <i>(No Impact)</i>	No impact	No impact	No impact	No impact
<b>Impact PS-6:</b> The Proposed Project's contribution to cumulative impacts would not affect fire department response times or performance objectives, nor would it contribute to the need to construct new fire station facilities. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	Less than Significant
<b>Impact PS-7:</b> Project construction activities would not result in adverse physical impacts or in the need to construct new or physically altered facilities in order to maintain acceptable staffing ratios, prevent overcrowding, or to meet other performance objectives for school services. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	Less than Significant

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact PS-8:</b> Implementation of the Proposed Project would increase demand for school services that would result in the need to construct new school facilities in order to maintain acceptable service ratios or other performance objectives of the San Francisco Unified School District. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	Less than Significant
<b>Impact PS-9:</b> The Proposed Project cumulative contribution would not result in additional demand for educational facilities. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	Less than Significant
<b>Impact PS-10:</b> Project construction would not result in adverse physical impacts or in the need to construct new or physically altered facilities in order to maintain adequate staffing levels, acceptable morbidity and mortality rates, or other performance objectives for hospital services. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PS-11:</b> Implementation of the Proposed Project would not increase demand for hospital services that would result in the need to construct new hospital facilities in order to maintain adequate staffing levels, acceptable morbidity and mortality rates, or other performance objectives of the San Francisco Public Health Department. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact PS-12:</b> The Proposed Project's cumulative contribution would not increase demand for hospital services that would result in the need to construct new hospital facilities in order to maintain adequate staffing levels, acceptable morbidity and mortality rates, or other performance objectives of the San Francisco Public Health Department. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact PS-13:</b> Project construction would not result in adverse physical impacts or in the need to construct new or physically altered facilities in order to maintain acceptable service objectives for library services. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact PS-14:</b> Implementation of the Proposed Project would not increase demand for library services to a level that would result in the need to construct new library facilities in order to maintain acceptable levels of service, or other performance objectives of the San Francisco Public Library system. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact PS-15:</b> The Proposed Project's cumulative contribution would not increase demand for library services that would result in the need to construct new library facilities in order to maintain acceptable levels of service, performance objectives, or need to construct new or physically altered facilities in order to maintain acceptable service objectives. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>IV.M. Biological Resources</b>				
<b>Impact BI-1:</b> The Proposed Project may adversely affect dune gilia and locally significant plants, special status animals, and protected or special-status marine species, such as marine mammals, salmon, steelhead, green sturgeon, longfin smelt, harbor seals and California sea lions. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact BI-2:</b> The project may adversely affect Central Coast Riparian Scrub (riparian habitat), California Buckeye, or SAV/eelgrass beds (other sensitive natural communities). <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation for migratory birds; No impact on rafting waterfowl or fish passage	<u>Less than Significant with Mitigation</u>
<b>Impact BI-3:</b> The project may adversely affect biological resources regulated by the Clean Water Act or the Rivers and Harbors Act. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact BI-4:</b> The project may adversely affect the movement of migratory birds, rafting waterfowl, and/or fish passage. <i>(Less than Significant with Mitigation for migratory birds and fish passage; Significant and Unavoidable for rafting waterfowl)</i>	No impact	Less than Significant with Mitigation for migratory birds and fish passage; Significant and Unavoidable for rafting waterfowl	Less than Significant with Mitigation for migratory birds; No impact on rafting waterfowl and fish passage	<u>Less than Significant with Mitigation for migratory birds and fish passage; Significant and Unavoidable for rafting waterfowl</u>
<b>Impact BI-5:</b> The Proposed Project may conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact BI-6:</b> The Proposed Project may result in adverse effects on intertidal and subtidal marine habitat and biota located along Treasure Island's shoreline and nearshore regions of the Bay as well as Bay waters. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact BI-7:</b> The development planned as part of the Proposed Project, when combined with past, present, and other reasonably foreseeable development in the vicinity, could result in significant cumulative impacts to biological resources. <i>(Cumulative Impact: Significant and Unavoidable for rafting waterfowl; Less than Significant for other sensitive plants, animals and habitats)</i>	No impact	Significant and Unavoidable for rafting waterfowl Less than Significant for sensitive plants, animals, and habitats	Less than Significant with Mitigation	<u>Significant and Unavoidable for rafting waterfowl Less than Significant for sensitive plants, animals, and habitats</u>
<b>IV.N. Geology and Soils</b>				
<b>Impact GE.1:</b> Construction activities within the Development Plan Area could loosen and expose surface soils. If this were to occur over the long term, exposed soils could erode by wind or rain, increasing the sediment load to San Francisco Bay. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact GE-2:</b> In the event of a major earthquake in the region, seismic ground shaking could potentially injure people and cause collapse or structural damage to proposed structures or the perimeter berm. <i>(Less than Significant)</i>	Less than Significant	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact GE-3:</b> In the event of a major earthquake in the region, seismic ground shaking could potentially expose people and property to liquefaction and earthquake-induced settlement. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact GE.4:</b> Development in the Development Plan Area could be subject to settlement over time from static forces. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact GE.5:</b> Development of the Proposed Project could result in potential damage or injury as a result of slope failures including the perimeter rock berms. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact GE.6:</b> In the event of a major earthquake in the region, structural damage to viaduct structures or the ferry quay could hinder emergency rescue efforts. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact GE.7:</b> The development proposed as part of the Proposed Project, when combined with past, present and other reasonably foreseeable development in the vicinity, would not result in significant cumulative impacts with respect to geology, soils or seismicity. <i>(Cumulative Impact: Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.O. Hydrology and Water Quality</b>				
<b>Impact HY-1:</b> The Proposed Project would not violate a water quality standard or a waste discharge requirement, or otherwise substantially degrade water quality. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-2:</b> The Proposed Project could require disposal of dewatered groundwater during construction. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HY-3:</b> The Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge during construction. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact HY-4:</b> The Proposed Project would not alter the existing drainage patterns on the Islands, and would not result in substantial erosion or siltation or localized flooding. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-5:</b> The Proposed Project would not result in construction of housing within a 100-year flood hazard area if one is designated by FEMA. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-6:</b> The Proposed Project would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-7:</b> The Proposed Project would not result in the exposure of people or structures to loss due to flooding associated with levee or dam failure. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact HY-8:</b> Operation of the Proposed Project would not result in degradation of water quality. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-9:</b> The Proposed Project would not result in depletion of groundwater or reduction of groundwater levels during operation. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-10:</b> The Proposed Project would not create impervious surfaces that would collect pollutants that could cause water quality impacts from rainwater runoff. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-11:</b> The Proposed Project would not be susceptible to inundation by seiche, tsunami, mudflow, or wind waves. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-12:</b> The Proposed Project would not expose people or structures to increased risk of flooding due to climate-induced sea level rise. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HY-13:</b> The Project would not result in cumulative impacts related to hydrology and water quality. <i>(Not Cumulatively Considerable)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>IV.P. Hazards and Hazardous Materials</b>				
<b>Impact HZ-1:</b> Construction of the Proposed Project could expose construction workers to unacceptable levels of known or newly discovered hazardous materials as a result of disturbance of subsurface soils and/or groundwater with contaminants from historic uses. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-2:</b> Construction activities associated with the Proposed Project could expose the public, including existing and future residents as well as visitors and employees, to unacceptable levels of known or newly discovered hazardous materials as a result of disturbance of soil and/or groundwater with contaminants from historic uses. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-3:</b> Construction of the Proposed Project could expose the environment to unacceptable levels of known or newly discovered hazardous materials as a result of disturbance of soil and/or groundwater with contaminants from historic uses. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-4:</b> Construction of the Proposed Project could expose construction workers, the public or the environment to unacceptable levels of hazardous materials as a result of dewatering activities that extract contaminated groundwater from historic uses. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-5:</b> Construction activities associated with the Proposed Project could expose construction workers, the public or the environment to unacceptable levels of hazardous materials associated with encountering previously unidentified underground storage tanks. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact HZ-6:</b> Dredging activities associated with the Proposed Project would not expose construction workers, the public or the environment to unacceptable levels of known or previously unidentified hazardous materials as a result of disturbance of submerged sediments. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HZ-7:</b> Disturbance and release of hazardous structural and building components (i.e. asbestos, lead, PCBs) during the demolition phase of the Proposed Project, or transportation of these materials could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HZ-8:</b> Hazardous materials used on site during construction activities (e.g. solvents) could be released to the environment through improper handling or storage. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-9:</b> Temporary dewatering activities during construction would not affect or alter groundwater flow directions that would bring contaminated groundwater toward areas outside of the Development Plan Area including the Job Corps campus. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HZ-10:</b> Migration of residual contamination could expose existing and future residents, employees, or the general public to hazardous materials causing acute or chronic health effects. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HZ-11:</b> Project operations would not result in a significant impact involving the handling of general commercial/retail and household hazardous waste. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact HZ-12:</b> The Proposed Project would include operation of a new or upgraded wastewater treatment plant. Water treatment chemicals would be necessary for standard operations and if not stored or handled appropriately could be released to the environment. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

PROPOSED PROJECT	ALTERNATIVES CONSIDERED			
Topic / Impact	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	<u>Reduced Parking Alternative</u>
<b>Impact HZ-13:</b> The Proposed Project includes developing the existing school site into a K-8 school. The existing school is located in the vicinity of Site 12 where hazardous materials have been released to the subsurface. If not remediated appropriately, students, workers, or the public could be exposed to adverse conditions related to hazardous materials emissions. <i>(Less than Significant with Mitigation)</i>	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation	<u>Less than Significant with Mitigation</u>
<b>Impact HZ-14:</b> Development of the Proposed Project, when combined with other past, present, and foreseeable development in the vicinity, would not result in cumulative hazardous materials impacts. <i>(Cumulative Impact: Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.Q. Mineral and Energy Resources</b>				
<b>Impact ME-1:</b> Construction activities associated with the Proposed Project would not result in the use of large amounts of energy, or use energy in a wasteful manner. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>Impact ME-2:</b> During operation, the Proposed Project would not result in the use of large amounts of energy, or use energy in a wasteful manner. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>
<b>IV.R. Agricultural and Forest Land</b>				
<b>Impact AG-1:</b> The Proposed Project would not convert designated farmland under the Farmland Mapping and Monitoring Program, nor would it conflict with any existing agricultural zoning or a Williamson Act contract, nor would it involve any changes to the environment that would result in the conversion of designated farmland. <i>(No Impact)</i>	No impact	No impact	No impact	<u>No impact</u>
<b>Impact AG-2:</b> The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberlands, or timberland zoned as Timberland Production, nor would it result in the loss of or conversion of forest land to non-forest uses. <i>(Less than Significant)</i>	No impact	Less than Significant	Less than Significant	<u>Less than Significant</u>

The impact under the Reduce Development Alternative for Impact TR-48 in Table S.3 on EIR p. S.68 is revised as follows:

PROPOSED PROJECT  Topic / Impact	ALTERNATIVES CONSIDERED			
	No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Impact TR-48:</b> Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Folsom. ( <i>Significant and Unavoidable</i> )	No impact	<del>Less than Significant</del> <u>Significant and Unavoidable</u>	Significant and Unavoidable	<u>Significant and Unavoidable</u>

## CHAPTER I, INTRODUCTION

The third sentence of the second paragraph under “Conveyance of Treasure Island and Yerba Buena Island” on p. 1.2 is revised as follows:

Under the agreement, the Treasure Island Homeless Development Initiative (“TIHDI”), a coalition of approximately ~~40~~ nine non-profit social service and homeless service organizations, manages approximately 250 units of the existing housing stock on Treasure Island for formerly homeless (extremely low income) families.

The third sentence in the last paragraph on p. 1.6 is revised as follows:

As a result, ~~TIDA~~, an *Update to the Development Plan and Term Sheet* (“Development Plan Update”) was endorsed by the TIDA Board and CAB in April 2010, and by the Board of Supervisors in May 2010, in which the proposed development was revised to increase housing up to 8,000 units, and an additional 100,000 sq. ft. of office space with planning elements similar to those proposed in the 2006 Term Sheet.

The following revision is made to the second sentence of the full paragraph on p. 1.8:

The Proposed Project also includes a number of proposed plans and programs that would guide implementation of the Development Program, such as a Transportation Plan, Sustainability Plan, and transitional ~~housing~~ housing program.

## CHAPTER II, PROJECT DESCRIPTION

The third full paragraph on p. II.12 is revised as follows (footnotes are not changed and have been omitted here):

Electric service to the Islands is provided by the SFPUC. Electrical service for the Islands comes from a PG&E substation in Oakland and is routed through a substation located at Seventh Street and Maritime Street on Port of Oakland property operated by the Port and leased to the Navy. From the substation, a Navy-owned 12-kV overhead line ~~routes-conveys~~ power to a location near the Bay Bridge, where two recently installed submarine transmission cables on the Bay bottom connect to Treasure Island. Currently, one of the two submarine cables is capped at both ends and needs underground switches

at both ends to be operational. A submarine cable from Treasure Island under Clipper Cove provides electricity to Yerba Buena Island. Natural gas, ~~is provided by PG&E~~ the SFPUC through a contract with the State of California Department of General Services (DGS). The contract with DGS provides for the transmission of natural gas through PG&E transmission lines in the East Bay to, ~~is supplied through~~ a submarine pipeline from Oakland. Portions of this gas pipeline have been replaced as part of the new Bay Bridge East Span project now underway.

Figure II.5: Yerba Buena View Corridors, on p. II.23, is amended by adding or correcting the numbers of the development blocks, adding development blocks, and correcting the boundaries of the development blocks on the key plan in the upper right corner of the figure. The revised figure is shown on the next page.

Figure II.6b: Yerba Buena Island Maximum Height Limit Plan, on p. II.27, is amended by changing the legend to show a maximum height of 35 feet in the “Low-rise YBI” height zone. The revised figure is shown on p. 3.113.

The following change is made to the heading “Transitional Housing Program” on p. II.28:

#### ~~Transitional~~ Housing Program

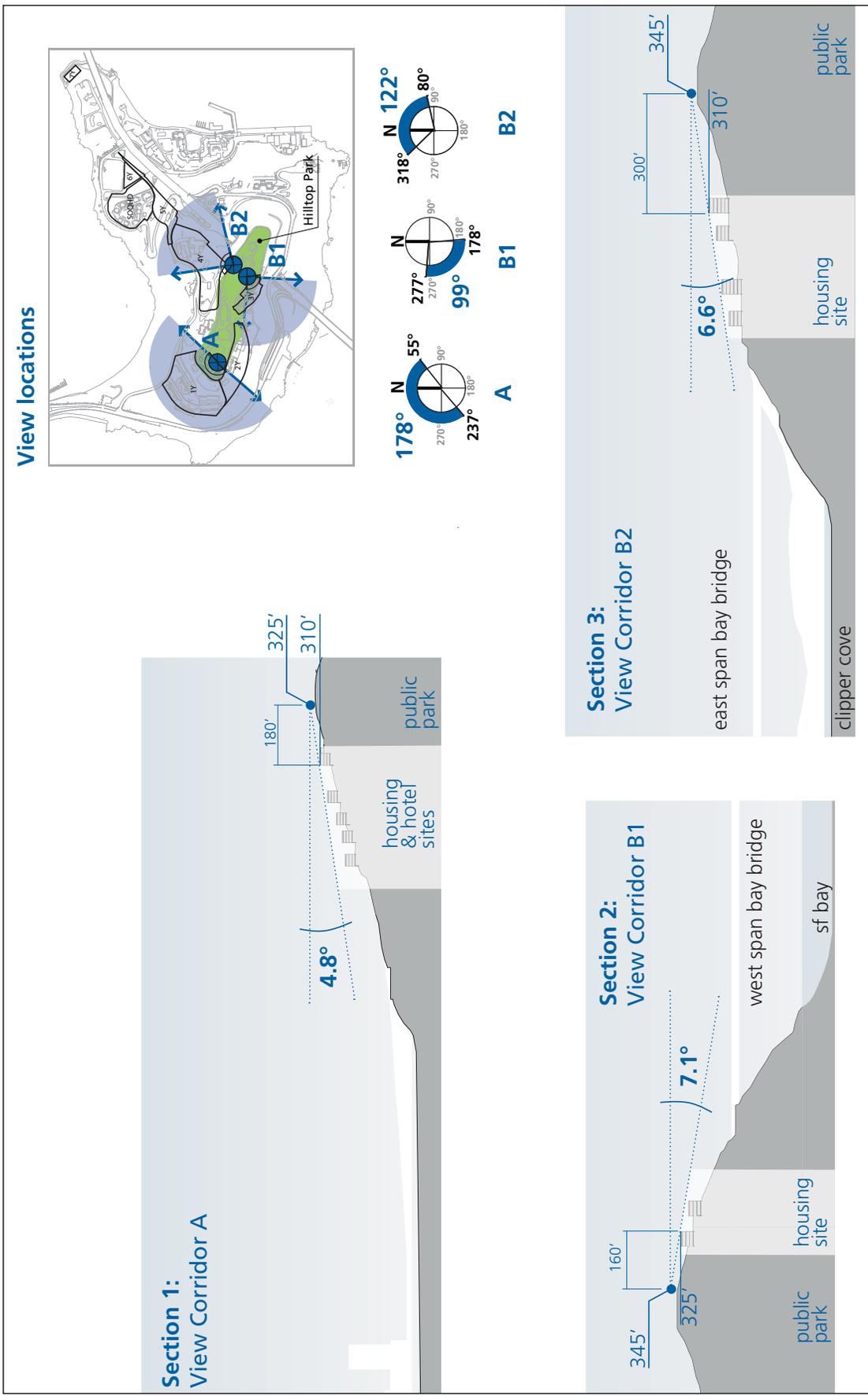
The last sentence on p. II.28, which continues on p. II.29, is revised as follows:

A ~~transitional~~ housing program would be established before existing residential units are deconstructed, to ensure that existing qualifying households have the opportunity to continue living on the Islands if they choose.

Figure II.7: Proposed Open Space, on p. II.30, is amended by adding the areas designated for SFPUC facilities and the wastewater treatment plant in the northeast corner of Treasure Island, labeling the Job Corps campus, and revising the scale. The revised figure is shown on p. 3.114.

Text is revised in the second and third paragraphs of EIR p. II.34 to clarify *General Plan* and Planning Code amendments proposed for the Project as follows:

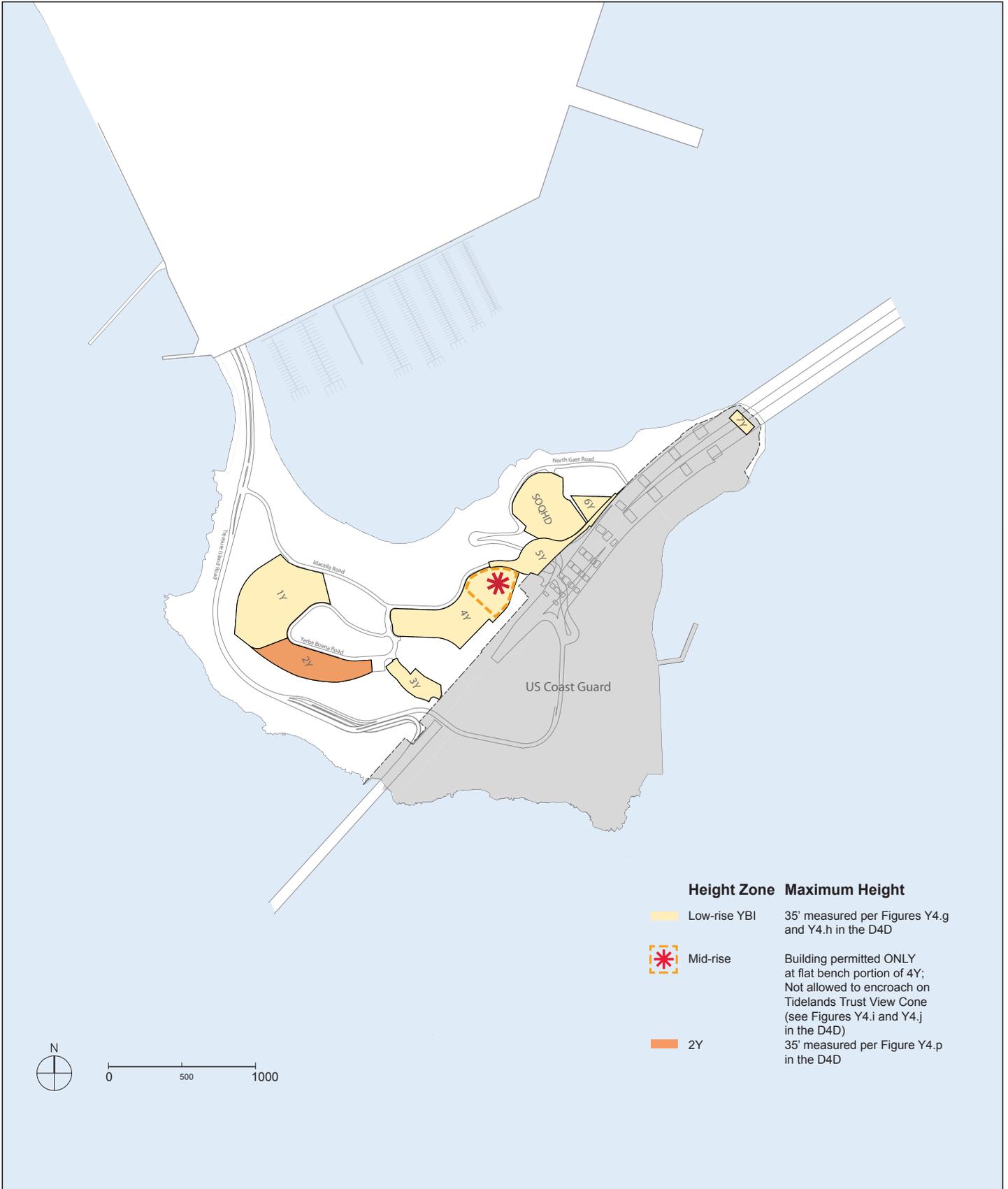
- The Proposed Project includes amendments to the *General Plan* and Planning Code that would identify the geographic and physical boundaries of Treasure Island and Yerba Buena Island. The Planning Code amendments would add a new Treasure Island / Yerba Buena Island Special Use District (“SUD”) that establishes the land use controls for Treasure Island and Yerba Buena Island and incorporates by reference the land use controls and design standards and guidelines specified in the *Design for Development*. The *General Plan* would be amended by adding a new Treasure Island / Yerba Buena Island Area Plan for the Redevelopment Plan Project Area that would ~~include~~ reference the new neighborhoods on Treasure Island and Yerba Buena Island and ~~would reference~~ define City objectives and policies related to redevelopment of the Islands.
- ~~In connection with adoption of the proposed *Redevelopment Plan*,~~ The City would consider adopting amendments to the Planning Code that would establish the SUD, incorporating by reference the consistent with the *Redevelopment Plan Design for Development*. The Planning Code text amendments would also modify the provisions of Section 105(f) by removing the portion that currently imposes a height limit of 40 feet on all of Treasure Island and Yerba Buena Island pursuant to the Planning



SOURCE: Perkins+Wili

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

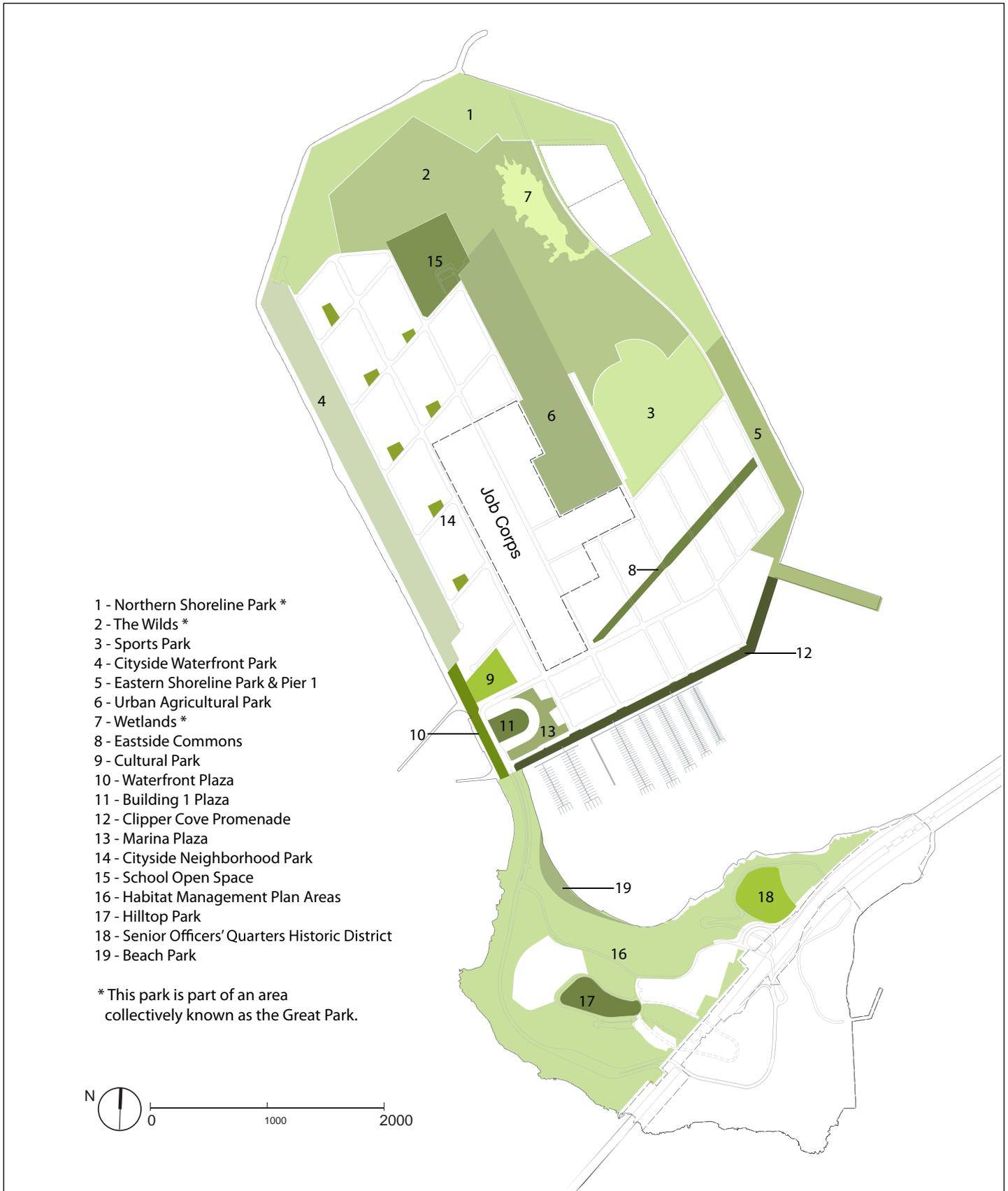
(REVISED) FIGURE II.5: YERBA BUENA VIEW CORRIDORS



SOURCE: Perkins+Will

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE II.6b: YERBA BUENA ISLAND  
MAXIMUM HEIGHT LIMIT PLAN**



SOURCE: CMG, TICD

Code amendment process provided in Section 302; and would amend Section 201 to reference the new classes of land use districts on Treasure island and Yerba Buena Island created by the SUD. The Planning Code would also be amended to establish a Treasure Island/Yerba Buena Island “TI Height and Bulk District” that would reference the permitted height and bulk standards from the SUD and *Design for Development*. Zoning Map amendments would add new Sheet ZN14 to change the zoning designation within the Development Plan Area from “Public” to the Treasure Island /Yerba Buena Island SUD, a Redevelopment Agency—Treasure Island /Yerba Buena Island District that references the designations contained in the *Redevelopment Plan*. Areas remaining under the jurisdiction of the Job Corps, FJWA and Caltrans would remain as “P” districts within a 40-X height and bulk district. Zoning map amendments would also add new Sheet HT14 to change the height and bulk district within the Development Plan Area from 40-X to the TI Height and Bulk District, which would refer to include the designations contained in the SUD. Zoning Map amendments would also add a new Sectional Map Sheet SU14 to establish the Treasure Island / Yerba Buena Island SUD.

The following page reference is added to Footnote 25 on p. II.38:

<sup>25</sup> See Section IV.E, Transportation, “Transit Improvements,” beginning on p. IV.E.~~X33~~, for more detail about proposed bus service.

The following page reference is added to the first sentence of Footnote 29 on p. II.45:

<sup>29</sup> Mitigation Measure M-TR-24, identified in Section IV.E, Transportation, p. IV.E.~~X100~~, could create a transit-only lane and remove the bicycle lane on Treasure Island Road if congestion on Treasure Island Road adversely affects transit operations.

The first paragraph under the heading “Water” on p. II.52 is revised as follows:

The following discussion summarizes the preliminary design for proposed water supply, storage, and distribution. The preliminary design is based on an estimated average daily demand for potable water of ~~1.32~~ 1.21 million gallons per day (“mgd”) if recycled water is able to be used for toilet flushing in residential units, or 1.32 mgd if recycled water cannot be used in residential units, or approximately 920 gallons per minute (“gpm”), and an estimated maximum daily demand of approximately 1,105 gpm.<sup>32</sup>— These estimates are for full project buildout, and include demand from the Coast Guard and Job Corps facilities that will remain. (The Proposed Project would also include the use of recycled water, described in “Recycled Water,” p. II.60.)

Footnote 32 on p. II.52 is also revised as part of this text change, as shown below:

<sup>32</sup> ~~Treasure Island Infrastructure Update, Section 7, Water System, Table 7.2, October 8, 2009. This potable water demand estimate is less than total water demand because of the production and use of recycled water. See Section IV.K, Utilities and Service Systems, pp. IV.K.17, IV.K.18, IV.K.55, and IV.K.60, for further explanation.~~

The second sentence under “Proposed Water Storage” on p. II.53 is amended as follows, and footnote 34 on p. II.55 is copied to this location as new footnote 33 (prior footnote 33 becomes footnote 34):

Proposed water storage is based on an estimated need for 4.0 million gallons of operational<sup>33</sup> storage.<sup>34</sup>

The footnote for this text change is shown below:

<sup>34</sup> <sup>33</sup> “Operational storage” refers to the amount of recycled water that could be drawn from the storage tank at any one time. In addition to this operational storage, in any water storage tank there is a small amount of “dead storage,” which is water that cannot be accessed. The dead storage volume is typically small in relation to the overall tank volume.

The fifth sentence of the first paragraph under “Proposed Wastewater Treatment” on p. II.58 is revised as follows:

The new or upgraded treatment plant would be financed, built, owned, and operated by the SFPUC.

The second paragraph under “Proposed Wastewater Treatment” on p. II.58 is revised as follows:

The treatment process would start with primary and secondary treatment. The primary treatment process would remove settleable solids in a primary sedimentation tank. Solids would be dewatered and processed in a digester. The secondary treatment process would use trickling filters and solids contact tanks to remove suspended solids. Up to 0.42 mgd of the effluent would undergo further treatment by microfiltration and, to the extent required, reverse osmosis for use as recycled water in appropriate plumbing fixtures in commercial buildings and residential buildings to the extent permitted by regulations in effect at the time each building is constructed, and for irrigation (see “Recycled Water” on p. II.60). These additional processes remove solids and salts. Either ~~Ultraviolet light~~ or chlorination would be used to disinfect both the treated water to be recycled and the remaining secondary-treated effluent prior to discharge through the existing outfall from the existing treatment plant to the Bay. If chlorination were selected, the treatment plant would use sodium hypochlorite to disinfect, and then sodium bisulfite to dechlorinate the effluent. Solids generated in the primary and secondary treatment processes would be digested and dewatered, and the resulting biosolids would be trucked to an off-island landfill for disposal, as with the existing treatment system.

The last sentence of the first paragraph on p. II.59 is revised as follows:

Effluent that is not recycled would be disinfected ~~with ultraviolet light~~ after tertiary treatment in the wetland, and then discharged through the existing outfall.

The second paragraph on p. II.59 is revised as follows:

Under Wastewater Wetland Variant D2, effluent would undergo microfiltration and ~~ultraviolet light~~ disinfection, and then the wetlands would further reduce pollutants such as nitrogen, phosphorus, and trace metals for most of the treated effluent, which would be discharged through the outfall. Recycled water, however, would not pass through the wetlands. About ~~0.25~~0.27 mgd would be diverted from the treatment plant and treated with reverse osmosis; this water would be used for landscape irrigation. An additional approximately 0.15 mgd would be diverted from the treatment plant and used for commercial and residential toilet flushing. The remainder of the ~~ultraviolet light~~ disinfecting effluent from the treatment plant (about 0.9 mgd) would be directed to the wetlands. The wetlands would be smaller than the Variant D1 wetlands, occupying about

2 to 4 acres of land. These wetlands would be suitable to serve as wildlife habitat. Public access to the constructed wetlands in Wastewater Wetlands Variant D2 would not be restricted because the wetlands water would be disinfected. The impacts of these variants are discussed briefly in Chapter VI, Project Variants, “D, Wastewater Wetlands Variants.”

The last sentence on p. II.59, which continues on p. II.60, is revised as follows:

This facility would use digester gas to generate electricity for a portion ~~much or all~~ of the wastewater treatment plant’s needs.

The second complete paragraph on page II.60 is amended as follows:

As noted elsewhere, the Proposed Project includes supplying 5 percent of the project’s ~~energy peak electrical demand~~ from on-site renewable sources. This can be met by means of rooftop solar photovoltaic facilities; thus, the Proposed Project would not depend on development of the 4- to 6-acre site to meet the 5 percent objective.

The following page reference is added to Footnote 37 on p. II.60:

<sup>37</sup> This tank may be reduced in size if either of the Supplemental Firefighting Water System Variants is implemented, as described on pp. ~~II.X.55-II.56~~, and in Chapter VI, Project Variants.

The next-to-last bulleted item in the list on p. II.78 is revised as follows:

- Affordable housing, including a transitional ~~housing~~ component; and

The following change is made to the third paragraph on p. II.79:

To ensure that existing households are accommodated in the proposed redevelopment, the Proposed Project would include a transitional ~~housing~~ program for all eligible residents of the Islands at the time of the execution of the DDA who continuously remain Island residents in good standing during project development.

The following bulleted item is added before the bulleted item “Approval of operating agreement for supplemental (emergency) water supply line from Oakland (EBMUD);” in the list of approvals on p. II.84:

- Approval of permits (such as Authority to Construct and Permit to Operate) if a new wastewater treatment plant is constructed (Bay Area Air Quality Management District);

## CHAPTER IV, ENVIRONMENTAL SETTING AND IMPACTS

### Section IV.A, Land Use

Footnote 19 on EIR p. IV.A.12 is revised as follows:

<sup>19</sup> Perkins+Will, Treasure and Yerba Buena Island Land Use Plan, Draft December 9, 2009; and BKF, Treasure Island Redevelopment - Treasure Island and Yerba Buena Island Land Areas Exhibits, January 15, 2009, and Treasure Island Redevelopment - Yerba Buena Island Land Areas Exhibit, January 28, 2011.

The third sentence of the first paragraph under Impact LU-2 on p. IV.A.23 is revised as follows:

Although the existing dwelling units in the Development Plan Area would be demolished, the Proposed Project would include a transitional housing program for current residents of Treasure Island and Yerba Buena Island who are in good standing at the time the Disposition and Development Agreement (“DDA”) is signed between TIDA and TICD and who choose to continue living on Treasure Island or Yerba Buena Island until new housing is made available (refer to Chapter II, Project Description, p. II.28, for a discussion of the transitional housing program).

### Section IV.C, Population and Housing

The first paragraph under Impact PH-2 on pp. IV.C.13-IV.C.14 and the first sentence of the first full paragraph on p. IV.C.14 are revised as follows:

There are approximately 805 households currently residing within the Development Plan Area. To ensure that the households occupying these units have the opportunity to continue living within the Project Area if they choose, the Proposed Project would include a transitional housing program detailed in the Disposition and Development Agreement (“DDA”). The DDA would require that all existing residents of the Islands who reside on the Islands as of the date of the DDA approval and who continuously remain residents in good standing during project construction and development be given an opportunity to move into new housing built during phased construction of the Proposed Project. The express intent of the transitional housing program is to avoid displacement of existing residents. The new housing would be leased to the existing residents eligible for transitional housing at a price no greater than their rent at the time of DDA approval, plus annual adjustments for inflation. Depending upon the income of the household, the housing may be leased at rents lower than the household’s rent at the time of DDA approval, plus annual adjustments for inflation. Transitioning households would also receive moving assistance to cover the costs associated with their move to the new units. Finally, the transitional housing program would include down payment assistance for eligible transitioning households who wish to purchase a home on the island, as long as they can qualify to do so.

Thus, the transitional housing program included in the Proposed Project would ensure that the Project would not result in the displacement of existing residents, which would necessitate the construction of new housing elsewhere or generate demand for new housing, beyond the number of units already provided as part of the Proposed Project...

#### Section IV.D, Cultural and Paleontological Resources

The second sentence of paragraph under the heading “Mitigation Measure M-CP-1: Archaeological Testing, Monitoring, Data Recovery and Reporting” on p. IV.D.18 is revised as follows:

The project sponsors shall retain the services of ~~a qualified an~~ an archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist having expertise in California prehistoric and urban historical archaeology.

The last sentence of the first paragraph under the heading “Archaeological Testing Program” on p. IV.D.19 is revised as follows:

The purpose of the archaeological testing program will be to determine, to the extent possible, the presence or absence of previously undiscovered archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

Item “(B)” on p. IV.D.19 is revised as follows:

(B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible, in which case interpretive reuse shall be required.

The following changes are made to the first paragraph under the heading “Archaeological Data Recovery Program” on p. IV.D.20:

The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (“ADRP”). The archaeological consultant, project sponsors, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ERO shall review the draft ARDP to ensure adherence to this mitigation measure and the standards and requirements set forth in the ARDTP. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the ~~resource historical property~~ that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if non-destructive methods are practical.

**Section IV.E, Transportation**

Table IV.E.19, on p. IV.E.113, is revised to reflect changes to the “Project Trips” and “Density” columns for the Existing plus Project conditions.

**(Revised) Table IV.E.19: Pedestrian Crosswalk Levels of Service, Existing and Existing plus Project Conditions**

Crosswalk <sup>1</sup>	Existing			Existing plus Project		
	Pedestrian Volumes <sup>2</sup>	Density <sup>4</sup>	LOS	Project Trips	Density <sup>4</sup>	LOS
<i>AM Peak Hour</i>						
Washington Street <sup>1</sup>	120	33.3	A	<del>25</del> <u>26</u>	<del>27.6</del> <u>27.4</u>	A
Ferry Bldg (North)	400	8.0	C	<del>82</del> <u>87</u>	6.6	C
Market Street	1,964	8.2	C	<del>403</del> <u>427</u>	<del>6.8</del> <u>7</u>	C
Don Chee Way	133	21.1	A	<del>27</del> <u>29</u>	<del>17.5</del> <u>17.3</u>	A
Mission Street <sup>1</sup>	333	12.0	B	<del>68</del> <u>72</u>	<del>10.0</del> <u>9.9</u>	C
<i>PM Peak Hour</i>						
Washington Street <sup>1</sup>	261	15.3	A	<del>44</del> <u>46</u>	<del>13.4</del> <u>13</u>	A
Ferry Bldg (North)	378	8.5	C	<del>64</del> <u>67</u>	7.2	C
Market Street	3,452	4.6	D	<del>588</del> <u>614</u>	<del>4.0</del> <u>3.9</u>	D
Don Chee Way	184	15.2	A	<del>31</del> <u>33</u>	<del>13.0</del> <u>12.9</u>	<del>A</del> <u>B</u>
Mission Street <sup>1</sup>	345	11.6	B	<del>59</del> <u>61</u>	9.9	C
<i>Saturday Peak Hour<sup>3</sup></i>						
Market Street	3,718	4.3	D	334	4.0	D
Don Chee Way	380	7.4	C	28	6.9	C

*Notes:*

<sup>1</sup> Since the intersections of The Embarcadero with Washington Street and Mission Street each have two crosswalks, the north and south legs of each intersection were averaged.

<sup>2</sup> Pedestrian counts provided by the City of San Francisco, taken from the Regional Signal Timing Program study conducted by Katz, Okitsu & Associates in 2006 and 2007.

<sup>3</sup> The Ferry Building hosts a farmers market on Saturdays.

<sup>4</sup> Density measured in square feet per pedestrian.

Source: Fehr & Peers, 2010.

**Section IV.F, Noise**

The following revision is made to the second bullet in Noise Mitigation Measure M-NO-1a on p. IV.F.16 (deleted text is shown in strike through and new text is underlined):

- Use construction equipment with lower noise emission ratings whenever ~~possible~~ feasible, particularly for air compressors;

### **Section IV.G, Air Quality**

In Table IV.G.5, p. IV.G.41, the following typographical error is corrected in the “ROG” column for “Motor Vehicles” listed under “Expanded Transit Service (2030)”:

~~403~~ 115

The second sentence in the first paragraph in Mitigation Measure M-AQ-5 on p. IV.G.42 is revised as follows:

If diesel particulate filters are operated at the proper temperatures, they are reported to achieve up to ~~90~~85 percent reduction in particulate emissions.

## **VOLUME 2**

### **CHAPTER IV, ENVIRONMENTAL SETTING AND IMPACTS (Continued)**

#### **Section IV.I, Wind and Shadow**

The eight figures listed below are amended by adding a scale and correcting the configuration of the ferry terminal breakwaters.

- Figure IV.I.1: Shadows on March 21 at 9 AM, on p. IV.I.7
- Figure IV.I.3: Shadows on March 21 at 3 PM, on p. IV.I.9
- Figure IV.I.4: Shadows on June 21 at 9 AM, on p. IV.I.10
- Figure IV.I.6: Shadows on June 21 at 3 PM, on p. IV.I.12
- Figure IV.I.7: Shadows on September 21 at 9 AM, on p. IV.I.13
- Figure IV.I.9: Shadows on September 21 at 3 PM, on p. IV.I.15
- Figure IV.I.10: Shadows on December 21 at 9 AM, on p. IV.I.16
- Figure IV.I.12: Shadows on December 21 at 3 PM, on p. IV.I.18

The revised figures are shown on pp.3.122-3.129.

#### **Section IV.J, Recreation**

Figure IV.J.1: Proposed Open Space, on p. IV.J.15, is amended by adding the areas designated for SFPUC facilities and the wastewater treatment plant in the northeast corner of Treasure Island, labeling the Job Corps campus, and revising the scale. The revised figure is shown on p. 3.130.



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.1: SHADOWS ON MARCH 21 AT 9AM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.3: SHADOWS ON MARCH 21 AT 3PM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.4: SHADOWS ON JUNE 21 AT 9AM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.6: SHADOWS ON JUNE 21 AT 3PM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.7: SHADOWS ON SEPTEMBER 21 AT 9AM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.9: SHADOWS ON SEPTEMBER 21 AT 3PM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

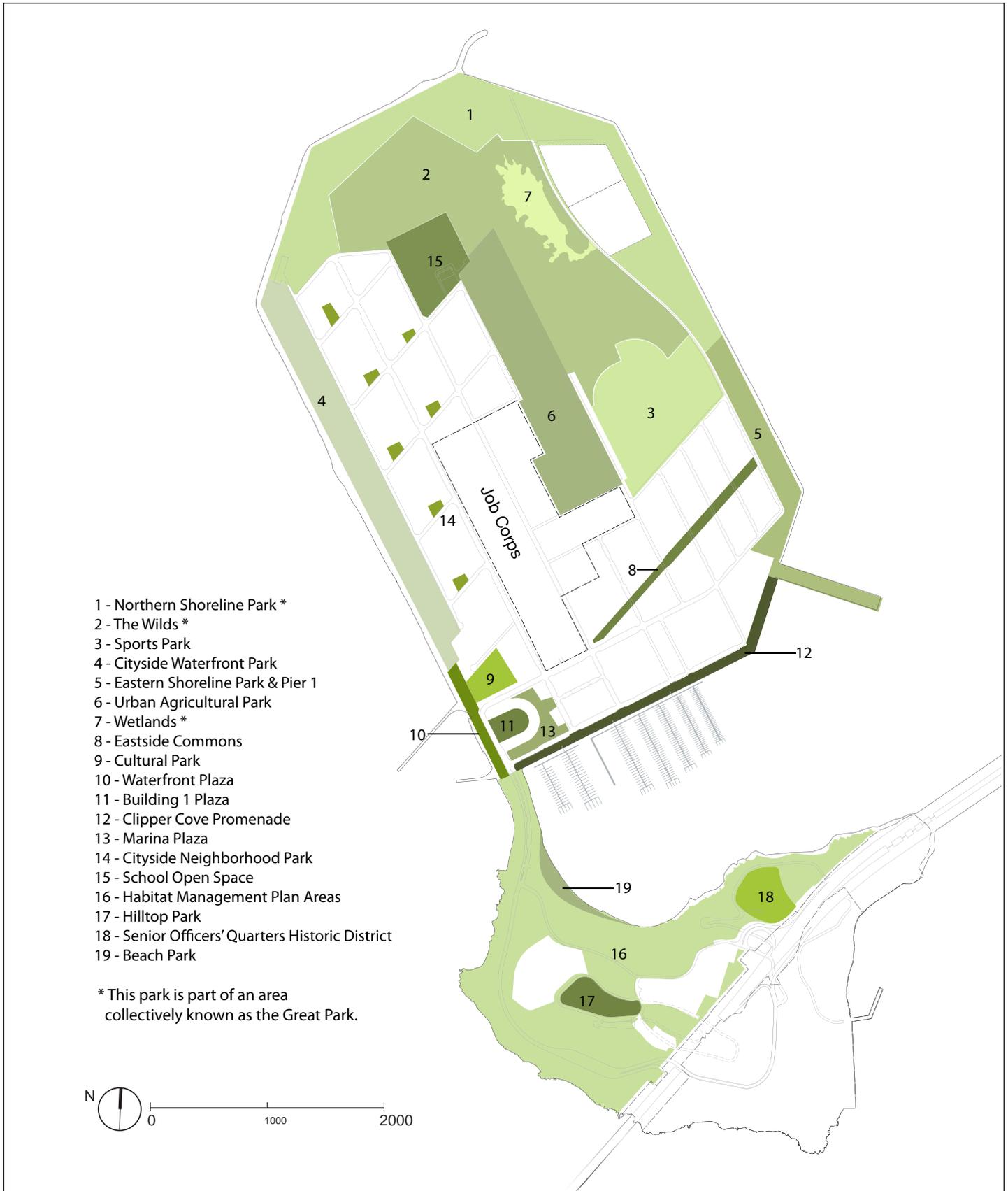
(REVISED) FIGURE IV.I.10: SHADOWS ON DECEMBER 21 AT 9AM



SOURCE: ESA, TICD, Turnstone Consulting

TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.I.12: SHADOWS ON DECEMBER 21 AT 3PM



SOURCE: CMG, TICD

## Section IV.K, Utilities and Service Systems

Footnote 2 on p. IV.K.2, regarding chemical use for chlorination in the existing wastewater treatment plant, is revised as follows:

<sup>2</sup> Sodium hypochlorite and sodium bisulfite are used for disinfection. In fiscal year ~~2006-2007~~ 2009-2010, the total annual usage was ~~32,000~~ 21,000 dry pounds of sodium hypochlorite and ~~65,000~~ 50,000 dry pounds of sodium bisulfite.

The last sentence on p. IV.K.5, which continues on p. IV.K.6, is revised as follows:

(Under the Proposed Project, the SFPUC would continue to operate and maintain the wastewater treatment plant, ~~and either the SFPUC or TIDA would become~~ be the permit holder, until such time as the wastewater treatment plant and wastewater collection system ~~would be upgraded or rebuilt, and would be~~ are accepted into SFPUC's system, ~~at which point SFPUC would become the permit holder.~~)

The following changes are made to the twelfth sentence of the first full paragraph on p. IV.K.6:

Regarding other NPDES permit limits, coliform bacteria would be killed through ultraviolet light, a disinfection method that has become commonly used instead of chlorine, or by chlorination, which is the current disinfection method ~~reducing the use of potentially toxic chemicals.~~

Footnote 17 on p. IV.K.8 is revised as follows to provide a more up-to-date source and to correct the statement that irrigation would use potable water, as the analysis actually assumes recycled water would be used for irrigation:

<sup>17</sup> ~~Brown and Caldwell, *Evaluation of Wastewater and Recycled Water Treatment Alternatives for the Proposed Treasure Island Development (Revised Draft)*, August 13, 2006, p. 3, Appendix F in *Infrastructure Update*. This assumes that residential irrigation would use potable water, and that irrigation in open space and commercial areas would use recycled water. *Infrastructure Update*, Chapter 8, Section 8.4, July 2010.~~

The date in footnote 22 on p. IV.K.8 is corrected as follows:

<sup>22</sup> *Infrastructure Update*, Chapter 8, Section 8.3 (~~December 1, 2008~~) (July 2010).

References to the "Jobs Corps" are corrected to "Job Corps" in the following locations in Section IV.K:

- p. IV.K.9, first and second lines in first full paragraph
- p. IV.K.28, last line on page
- p. IV.K.29 second line on the page
- p. IV.K.52, first and second lines in second full paragraph
- p. IV.K.78, first and second lines in second full paragraph

- p. IV.K.79, first and second lines in fifth full paragraph
- p. IV.K.80, first and second lines on the page.

The second full paragraph on p. IV.K.9, regarding the proposed wastewater system, is revised as follows:

The eastern side of Yerba Buena Island would be served by gravity flow to the east, to an existing pump station under the east span of the Bay Bridge that would replace an existing pump station. The existing pump station would be repaired or replaced as necessary. This pump station would pump wastewater to the top of the island, where it would flow by gravity to the causeway pump station. The causeway pump station would send the flow, along with wastewater from the west side of the island, to the Treasure Island wastewater collection system over to the Treasure Island wastewater collection system through one of two routes: 1) the pump station would deliver wastewater back up to the top of Yerba Buena Island, from which point it would flow by gravity to the Treasure Island system; or 2) the pump station would deliver wastewater to the existing submarine force main that currently serves the eastern side of Yerba Buena Island and connects to the Treasure Island system.<sup>23</sup>

The first sentence of the first paragraph under “Proposed Wastewater Treatment System” on p. IV.K.10 is revised as follows:

The proposed wastewater treatment system consists of: 1) primary treatment using headworks and primary sedimentation, 2) secondary treatment using trickling filter and solids contact, 3) tertiary treatment with microfiltration and reverse osmosis for a portion of the flow to be used as recycled water (discussed in Section K.2, below), and 4) ultraviolet light disinfection either by ultraviolet light or chlorination.

The second sentence of the fourth paragraph on p. IV.K.10 is revised as follows:

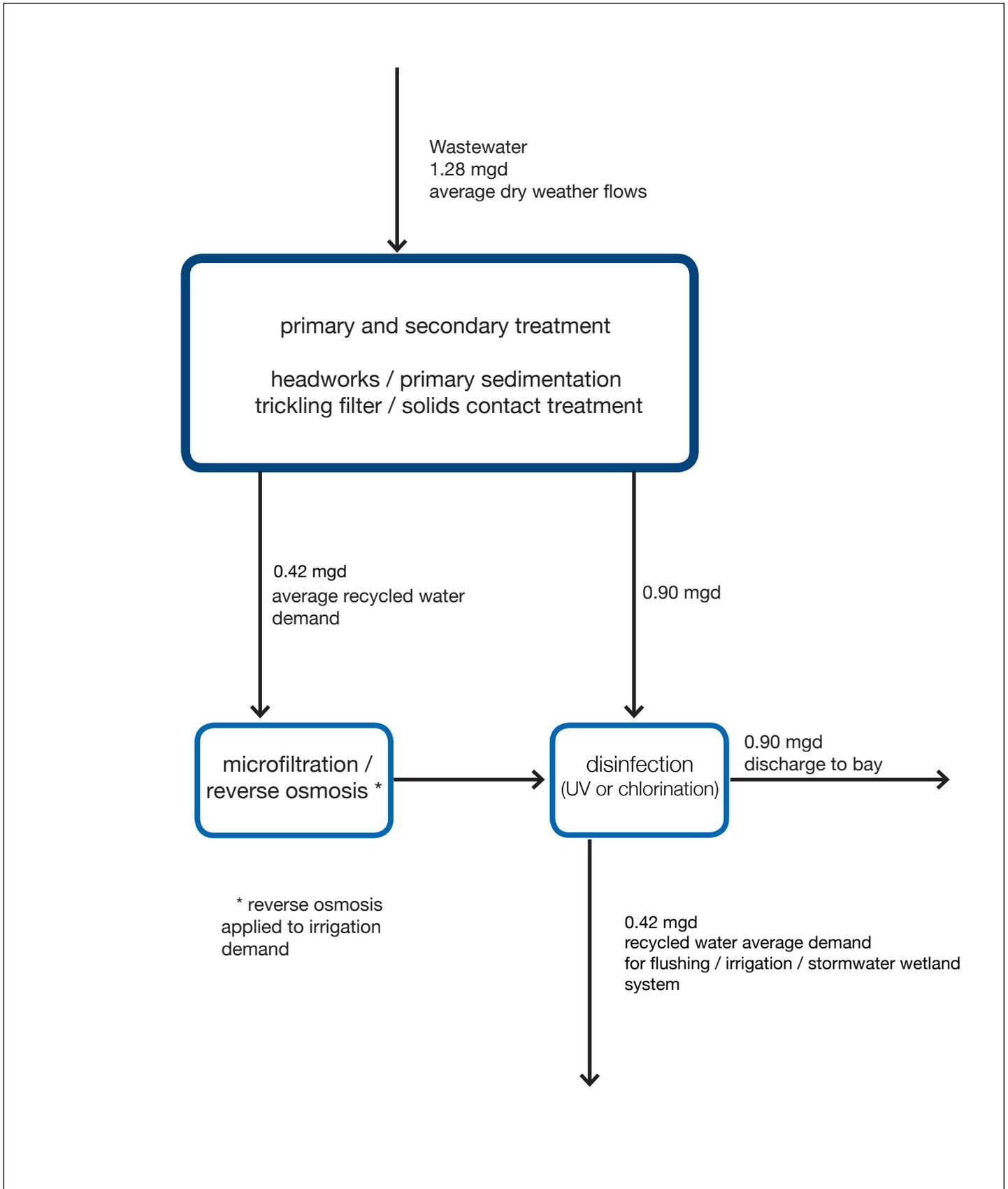
The resulting solids would be dewatered and then land-applied in Solano County, or disposed of through similar, appropriate, reuse means.

Figure IV.K.1, Proposed Wastewater Treatment System, on p. IV.K.11, is amended by changing the words in the box on the lower right as follows. The revised figure is shown on the following page.

UV dDisinfection (UV or chlorination)

The first paragraph on p. IV.K.12 is revised as follows:

The remaining effluent would be disinfected with ultraviolet light or by chlorination and discharged through the existing outfall to the Bay. If chlorination were selected, the treatment plant would use sodium hypochlorite to disinfect, and then sodium bisulfite to dechlorinate the effluent.<sup>25</sup>



SOURCE: Brown & Caldwell

The new footnote for this text change, to be added at the bottom of p. IV.K.12, is shown below, and subsequent footnotes in this section will be renumbered accordingly:

<sup>25</sup> To treat the estimated 1.3 mgd of dry weather flow, about 70,000 dry pounds of sodium hypochlorite and 166,000 dry pounds of sodium bisulfite would be used annually.

The first full paragraph on p. IV.K.18 is revised as follows:

As described in “Proposed Wastewater Treatment System,” on p. IV.K.10, the entire sanitary sewage flow would undergo primary and secondary treatment and ~~UV~~ disinfection at the wastewater treatment facility. The portion of the secondary effluent that would be used for recycled water would go through an additional (“tertiary”) treatment step at the facility’s recycled water plant. This step would involve microfiltration and, to the extent required, reverse osmosis. This effluent would meet California standards for recycled water.

The following change is made to the last sentence of the third full paragraph on p. IV.K.18:

Ultraviolet light or chlorination would be used to disinfect the recycled water.

The paragraph at the top of p. IV.K.28 is revised as follows:

The proposed stormwater drainage collection system would be a combination of gravity lines, lift stations, pump stations, and outfalls to the Bay. The stormwater drainage collection system would be designed to meet the following criteria:

The last two sentences in the third paragraph on p. IV.K.47 are revised as follows:

The SFPUC ~~chlorinates~~ chloraminates this water prior to transmission; additional treatment on Treasure Island is not required. A standby ~~chlorine~~ booster station is available for emergencies where the pipeline touches down on Yerba Buena Island.

The fourth sentence of the paragraph under “Recycled Water Supply” on p. IV.K.55 is revised as follows:

Wastewater effluent would be treated with microfiltration, reverse osmosis (to the extent required), and disinfection to meet California standards for recycled water.

The following corrections are made to Footnote 100, on p. IV.K.57:

<sup>100</sup> The Proposed Project would either comply with the San Francisco Green Building Ordinance or with a set of equivalent or superior requirements adopted by TIDA as part of the Proposed Project’s Green Building specifications.

Two new sentences are added at the beginning of the first paragraph under “Existing Natural Gas System” on p. IV.K.72, and the existing first sentence is deleted, as follows:

Natural gas on the Islands is provided by the SFPUC through a contract with the State of California Department of General Services (DGS). The contract with DGS provides for the transmission of natural gas through PG&E transmission lines in the East Bay to a submarine pipeline from Oakland to Treasure Island. Transmission from the PG&E natural gas system begins in Oakland.

The last sentence of the partial paragraph at the top of p. IV.K.80 is revised as follows:

Details would be worked out during the design process for each ~~M~~major ~~P~~phase.

#### **Section IV.M, Biological Resources**

Mitigation Measure M-BI-2b, on p. IV.M.49, is clarified as follows:

##### Mitigation Measure M-BI-2b: Seasonal Limitations on Construction Work

Construction work on the Islands’ shoreline shall be conducted between ~~the months of~~ March 1 and November 30 to avoid any disturbance to herring spawning occurring in SAV surrounding Treasure Island.

#### **Section IV.N, Geology and Soils**

The following change is made to the last sentence of the partial paragraph at the top of p. IV.N.29:

These geotechnical engineering controls are proven ~~mitigations against~~ techniques to reduce the hazards identified at the Development Plan Area.

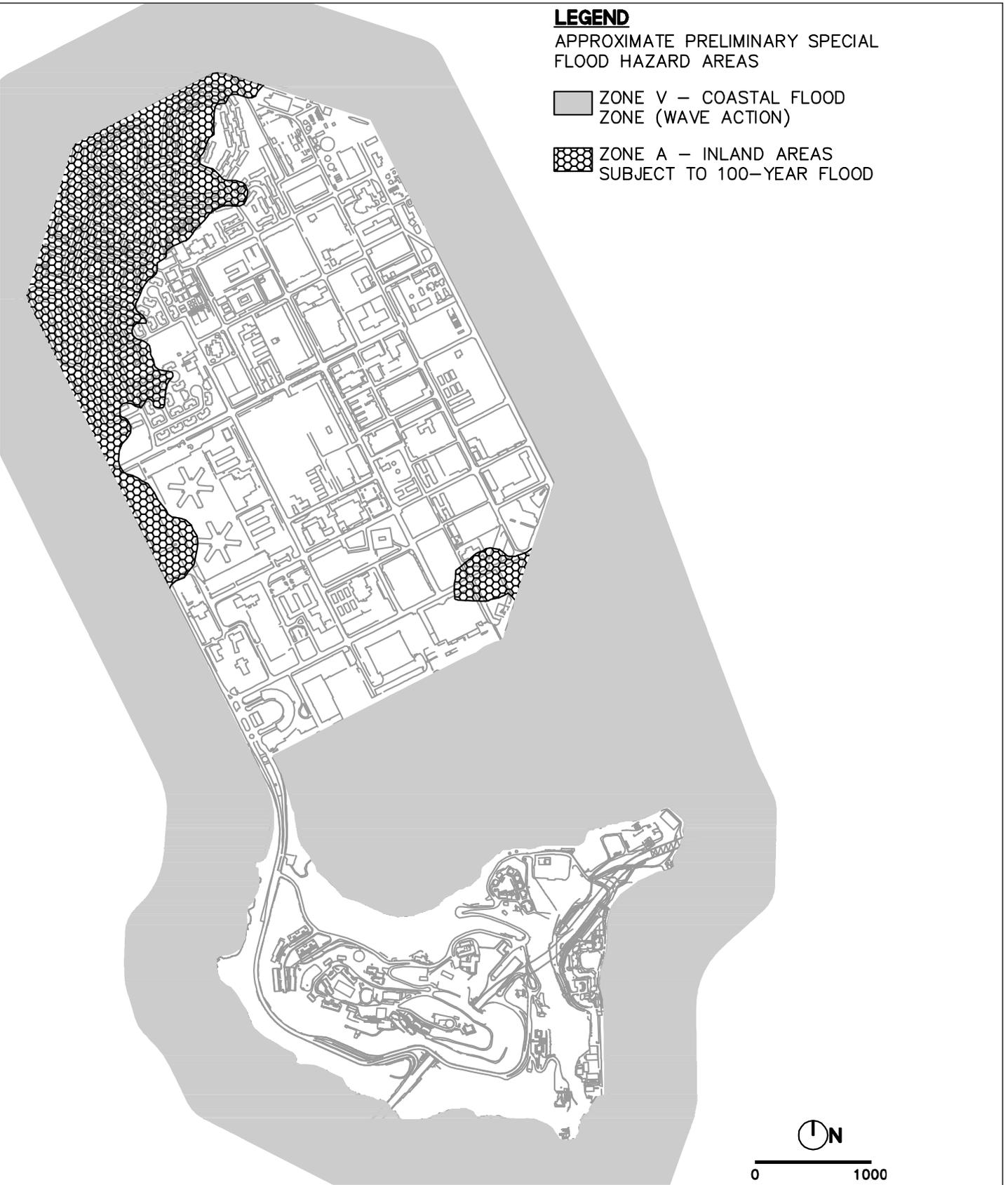
The following clarification is made to the text of Mitigation Measure M-GE-5 on p. IV.N.31:

##### Mitigation Measure M-GE-5: Slope Stability

New improvements proposed for Yerba Buena Island shall be located at a minimum of 100 feet from the top of the existing slope along Macalla Road unless a site-specific geotechnical evaluation of slope stability indicates a static factor of safety of at least 1.5 and a seismic factor of safety of 1.1 ~~are~~ is present or established geotechnical stabilization measures are implemented to provide that level of safety. Any geotechnical recommendations regarding slope stability made in site-specific geotechnical investigations for the site shall be incorporated into the specifications for building on that site.

#### **Section IV.O, Hydrology and Water Quality**

Figure IV.O.1: Proposed FEMA Flood Zone, on p. IV.O.8, is amended to be more legible. The information in the figure has not changed. The revised figure is shown on the following page.



SOURCE: BKF

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(REVISED) FIGURE IV.O.1: PROPOSED FEMA FLOOD ZONE

The first subhead on p. IV.O.22 is revised as follows:

Stormwater ~~Control~~ Management Ordinance and Stormwater Design Guidelines

The last sentence in the first paragraph under “Residential Areas” on p. IV.O.26 is revised as follows:

For areas farther away from the treatment wetland, stormwater would be pumped to the wetland via force mains, or would be treated locally, as discussed in the next paragraph.

The third sentence in the last paragraph on p. IV.O.36 is revised as follows:

Specific BMPs would be implemented based on final construction drawings and are subject to review and approval by the RWQCB and the SFPUC.

The following typographical error is corrected in the sixth sentence of the paragraph at the top of p. IV.O.37:

The following permits would be required for the construction of the Ferry Terminal and construction of the Sailing Center launch facilities: BCDC Dredging Permit; U.S. Army Corps of Engineers Permit for dredging; and Clean Water Act ~~ion~~ Section 401 Water Quality Certification issued by the RWQCB, as managed via the DMMO and individual permitting agencies.

The fourth and fifth sentences in the last paragraph on p. IV.O.45 are revised as follows (note that the Stormwater Management Ordinance has been adopted and is discussed on p. IV.O.22):

This system would be designed to treat stormwater to the maximum extent practicable in accordance with RWQCB standards. ~~Assuming the Stormwater Control Ordinance is adopted soon by the Board of Supervisors, the Proposed Project would have to comply with the ordinance, and where applicable, with the SFPUC Stormwater Design Guidelines.~~

The beginning of the third sentence in the first paragraph on p. IV.O.46 is revised as follows (the list that makes up the remainder of the sentence is not changed):

Typical BMPs to ~~manage~~ treat urban runoff can include, but are not limited to, the following:

The first sentence in the second paragraph on p. IV.O.46 is revised as follows:

With implementation of the proposed stormwater treatment system and adherence to the proposed Stormwater Control Plan (as developed pursuant to the Stormwater ~~Control~~ Management Ordinance and Stormwater Design Guidelines), urban runoff from the Proposed Project would not result in water quality degradation.

The second to last sentence in the paragraph under Impact HY-10 on p. IV.O.47 is revised as follows:

This system would be designed to treat stormwater to the maximum extent practicable in accordance with RWQCB standards, and, where applicable, the SFPUC Stormwater Design Guidelines.

#### **Section IV.P, Hazards and Hazardous Materials**

A reference mark for a new footnote is added to the end of the first complete sentence of the paragraph at the top of p. IV.P.4:

It is generally accepted that detections of chemicals at concentrations below their applicable screening levels means that the chemicals pose no significant, long-term threat to human health or the environment.<sup>7</sup>

The text of new footnote 7, to be added to the bottom of p. IV.P.4, is as follows, and subsequent footnotes in the section will be renumbered accordingly.

<sup>7</sup> The soil screening levels at Treasure Island also consider the existing ambient or background concentrations for metals.

The fourth bullet on p. IV.P.5 is revised as follows:

- Prepare an RI that includes findings of each phase of investigation and a Human Health Risk Assessment and Ecological Risk Assessment, if applicable. The Human Health Risk Assessment and Ecological Risk Assessment determines human health-based and ecological-based remediation goals for a site based on calculated risk management factors according to established risk assessment protocols.

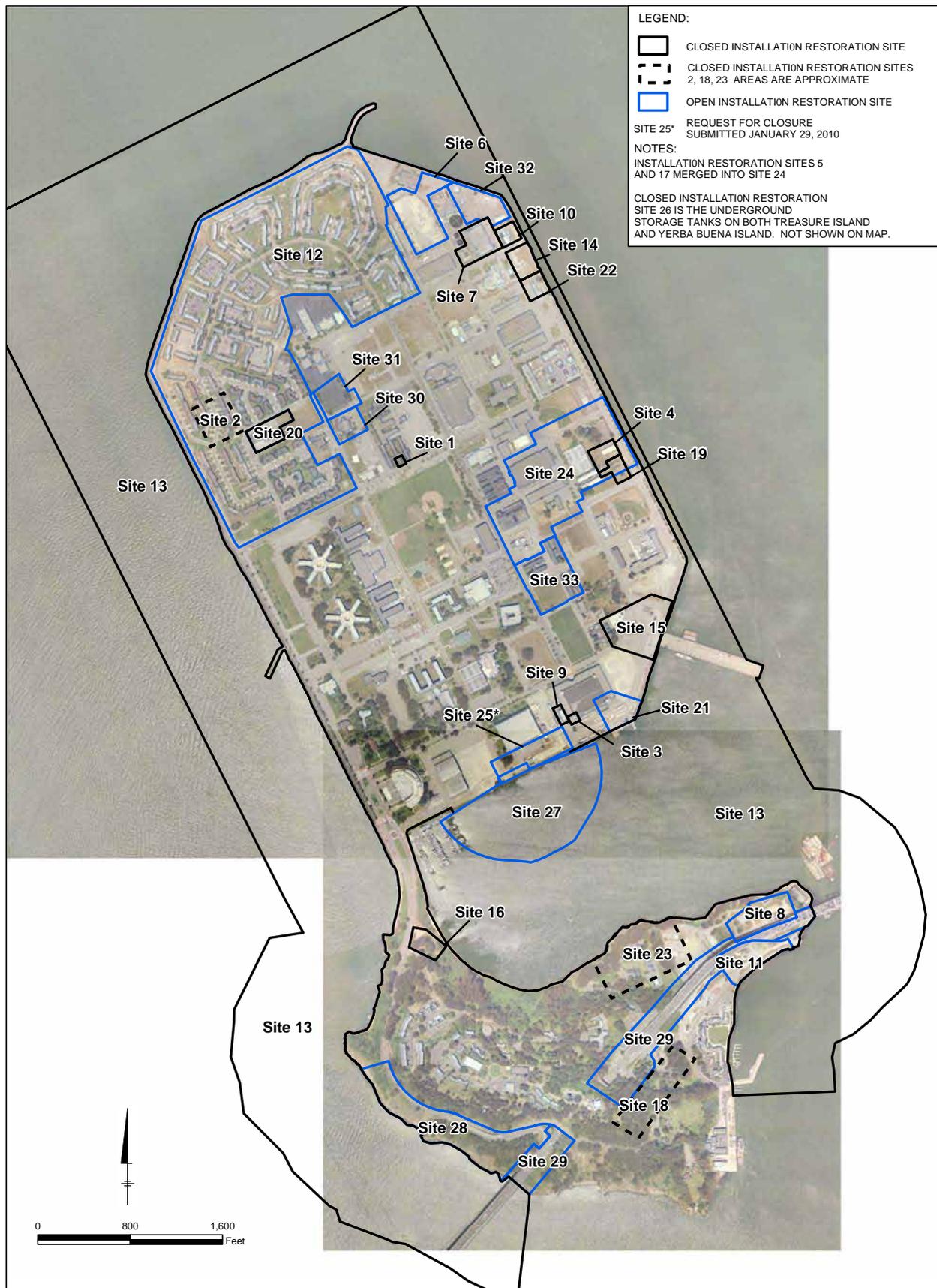
The fourth sentence under the heading “Overview,” under “Current Conditions,” on p. IV.P.9 is revised as follows:

All investigation and cleanup requirements for the sites are overseen by the ~~California~~ EPA, DTSC, and/or the RWQCB.

Figure IV.P.1: Installation Restoration Site Inventory, on p. IV.P.10, is amended to show Site 27 with a blue boundary, indicating that it is an open installation restoration site. The revised figure is shown on the following page.

Table IV.P.1: Treasure Island Installation Restoration Site Inventory, on pp. IV.P.12-IV.P.13, is revised as follows:

- For Site 11, in the “Status” column: **Open.** ~~Interim-Final RI is being finalized~~ submitted on January 21, 2010.
- For Site 12, in the “Status” column: **Active.** RI report being prepared. Soil/debris removal action is ongoing.



**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

**(REVISED) FIGURE IV.P.1: INSTALLATION RESTORATION SITE INVENTORY**

- For Site 27, in the “Status” column: **Open.** Revised FS report, inclusive of the sediment investigation results, ~~is being~~ was finalized on August 13, 2010.
- For Site 28, in the “Status” column: **Open.** RI Report was submitted in February 2009. ~~NFA PP and Final ROD was completed in November 2010~~ are being prepared.

Under the Notes at bottom of table, two definitions of abbreviations used in the table are added: PP – Proposed Plan, added after “PA/SI – Preliminary Assessment/Site Investigation,” and FS – Feasibility Study, added after “FFS – Focused Feasibility Study.”

The second sentence of the paragraph at the top of p. IV.P.14 is revised as follows:

All investigation and cleanup requirements for the sites are overseen by the ~~California~~ EPA, DTSC, and the RWQCB.

The second sentence of the paragraph under the heading “Inactive Fuel Pipeline Sites” on p. IV.P.14 is revised as follows:

Six main fuel lines were installed on ~~FF~~ Treasure Island as early as the 1940s and transported gasoline, diesel, bunker C fuel, and other petroleum products.

The second sentence in the third paragraph under the heading “Radiological Assessment Program” on p. IV.P.15 is revised as follows:

~~Since preparation of that report~~ However, the Navy has conducted, or has plans for additional screenings ~~additional investigations~~ at these sites. To date, the existing data that indicated that the only known remaining low-level radiological material contamination at the Naval base is isolated to small portions of Site 12 and Building 233.

The paragraph under the heading “Polychlorinated Biphenyls Program” on p. IV.P.16 is revised as shown below, and a new footnote is added:

The Navy performed investigations of all known former PCB-containing equipment across both Treasure Island and Yerba Buena Island ~~within the FOST and non-FOST area~~ in 2004 and 2006, including transformers and fluid-filled electrical equipment. PCB abatement was performed at some locations in 2008 and a removal action was completed at Site 32 under the Toxic Substances Control Act (“TSCA”) PCB remediation program in early 2010. IR Sites 3, 7, 9, 10, 11, 12, 21, 24, 31, and 32 have been investigated under CERCLA for PCBs along with other contaminants.<sup>23</sup>

New footnote 23, to be added to the bottom of p. IV.P.16, is shown below, and subsequent footnotes in the section will be renumbered accordingly.

<sup>23</sup> Tetra Tech, Inc., Draft 2010 Site Management Plan, Naval Station Treasure Island, San Francisco, CA. April 19, 2010 (hereinafter referred to as “Draft 2010 Site Management Plan, NSTI”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

The two paragraphs under the heading “Residential Lead-Based Paint Program” on p. IV.P.16 are revised as follows:

The Residential Lead-Based Paint Hazard Reduction Act of 1992, Title X of the Housing and Community Development Act (Public Law No. 102-550), applies at NSTI. To date, lead-based paint at all pre-1978 housing on Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ has been assessed and either abated or covered with encapsulating paint. Re-evaluation surveys are conducted every two years. Housing on both Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ will be re-evaluated again in 2011 or within 1 year of transfer, whichever comes first.

Soil samples of planter boxes, drip line and mid-yard areas at representative Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ residential buildings were also taken and, based on analytical results, soil abatement was conducted in accordance with Title X, Department Housing and Urban Development and Navy Policy. Any future disturbance of the grasses, concrete or asphalt over soil on these building sites (located at Quarters 1 through 7, 10, and Buildings 62, 83, 205, and 230 on Yerba Buena Island) will require further soil evaluation for lead. The Navy will either abate or require the transferee to abate lead-based paint hazards found in existing residential facilities within 1 year of being transferred. If an existing residential facility is scheduled for demolition or nonresidential use, it will not be inspected or abated for lead-based paint.

The paragraph under the heading “Asbestos-Containing Material Program” on p. IV.P.17 is revised as follows:

Beginning in 1995, surveys ~~have been~~ were completed at NSTI to identify the presence of asbestos-containing material (“ACM”). All ~~known~~ damaged, friable or accessible ACM has been that was known about at that time was abated within the Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ FOST areas, and remaining ACM does not currently pose a threat to human health. Buildings with remaining ACM are subject to ~~N~~notices and restrictions, related to asbestos were identified in the FOST for both Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ dated February 15, 2006 and March 23, 2006, and all remaining ACM are periodically re-evaluated. ~~A~~Re-evaluations of the remaining ACM occurred in 2008 ~~and another is planned in 2011 or within one year of transfer, whichever occurs first.~~ The 2009 re-evaluation identified additional damaged, friable, or accessible ACM in some buildings. The Navy’s deed transferring the property is expected to contain a restriction requiring that TIDA prohibit occupancy and use of the buildings and structures, or portions thereof, containing known asbestos hazards before abatement of such hazards.

Footnote 24 on p. IV.P.17 is revised as follows:

*Tetra Tech, Inc., Draft 2010 Site Management Plan, Naval Station Treasure Island, San Francisco, CA, April 19, 2010 (hereinafter referred to as “Draft 2010 Site Management Plan, NSTI”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.*

The last sentence of the second complete paragraph on p. IV.P.18 is revised as follows:

The Navy will conduct a multi-agency radiation survey (Final Status Survey using MARSSIM method) and site investigation at Site 6 (following completion of IR site 12 radiological clean up) prior to final transfer of Site 6.<sup>32</sup>

The text of footnote 28 on p. IV.P.18 is revised as follows:

Historically, IR Site 12 was used as a waste disposal site that included disposal of radiological materials. As a result, some low level radiological waste was encountered in near-surface soils up to five feet below ground surface.

The fourth sentence of the second complete paragraph on p. IV.P.19 is revised as follows:

All items found in the excavated soil located at these three areas ~~have been~~ are being removed and disposed of in accordance with regulatory requirements.

The last paragraph on p. IV.P.19 is revised as follows:

In certain areas, the shallow groundwater on a small portion of Site 12 has been contaminated with petroleum hydrocarbons, arsenic, and ~~copper-manganese~~. The Navy is currently monitoring ~~seven nine~~ groundwater monitoring wells at Site 12 in the area of Buildings 1311 and 1313 for the presence of total petroleum hydrocarbons, arsenic, and other metals-manganese. In 2009, the Navy conducted some additional investigation for the arsenic pilot study at the Building 1321 area of Site 12 where free floating petroleum hydrocarbons were found on the water table.

The last sentence of the first paragraph on p. IV.P.20 is revised as follows:

Confirmation soil sampling associated with the removal actions in the areas was also completed in 2009; removal actions included radiological surveys.

The third sentence of the second paragraph on p. IV.P.20 is revised as follows:

The FS ~~RI~~ will use all the collected data from the RI and the risk assessment ~~two assessments~~ to guide the selection of appropriate remediation alternatives.

The following typographical error is corrected in the second sentence of the paragraph under the heading “Site 27 – Clipper Cove Skeet Range (Treasure Island and Yerba Buena Island) on p. IV.P.22:

Site 27 encompasses approximately 19 off-shore acres in the ~~cover~~ area, as well as approximately 1 acre of onshore land on Treasure Island.

The next-to-last sentence of the same paragraph is revised as follows:

The final An-FS report is being finalized that will be published on August 13, 2010 and includes these sediment investigation results.<sup>38</sup>

There is no change to footnote 38 on EIR p. IV.P.22, cited in the above text.

The third complete sentence of the partial paragraph at the top of p. IV.P.23 is revised as follows:

The RI was finalized in 2009 and the Navy has just recently issued the Final ROD Draft Proposed Remedial Action Plan in November 2010.

The last two sentences of the first paragraph under the heading “Site 30 – Daycare Center (Treasure Island) on p. IV.P.23 are revised as follows:

Since then, a subsequent radiological screening for health and safety of workers survey has been conducted for Site 31, which is immediately adjacent to Site 30, and negative results for this screening survey indicated no potential radiological contamination was present.<sup>43</sup> Additional radiological screening will be included in the upcoming soil removal workplan amendment for the site.

There are no changes to footnote 43 on EIR p. IV.P.23, cited in the above text.

The last paragraph on p. IV.P.24, which continues on p. IV.P.25, is revised as follows:

The COPCs at the site include petroleum hydrocarbons, PCBs, dioxins, PAHs, metals and pesticides in the soil. Several metals including arsenic, copper, lead, mercury, nickel, silver, and zinc have been detected in the groundwater. Numerous site investigations have been performed at the site. Most recently, the Navy has completed a significant excavation to address PCB and petroleum contaminated soils as well as dioxin, pesticides and metals, primarily arsenic. The majority of the site has been excavated and backfilled.<sup>49</sup> As a result of this work and other findings, the Navy intends to update the RI and HHRA to reflect this removal of source material; in the meantime, the recent soil PCB-removal was completed in March 2010.<sup>50</sup> The final site closure has been estimated for September 2014.<sup>51</sup>

There are no changes to footnotes 49, 50, and 51 on EIR p. IV.P.25, cited in the above text.

The fifth sentence of the second paragraph under the heading “Site 33 – Water Line Replacement Area (Treasure Island) on p. IV.P.25 and footnote 53, cited in that sentence, are deleted, as follows:

~~In addition, radiological screening conducted at neighboring Site 32, was negative.<sup>53</sup>~~

~~<sup>53</sup> *Review of Current Conditions, 2010.*~~

The seventh sentence of that paragraph is revised as follows:

Remediation will most likely involve excavation and removal of the debris ~~unless shown to present no adverse effects to human health or the environment as~~ overseen and approved ~~determined~~ by the DTSC.

The third sentence of the second paragraph under the heading “Ongoing Asbestos Containing Materials Activities” on p. IV.P.26 is revised as follows:

To date, all known damaged, friable, or accessible ACM has been abated within the Treasure Island ~~TI~~ and Yerba Buena Island ~~YBI~~ FOST areas, and remaining ACM does not pose a threat to human health.

The sixth complete sentence at the top of p. IV.P.39 is revised as follows:

The existing Emergency Response Plan for the City and County of San Francisco consists of a description of the City's actions during a response to an emergency, the role of the Emergency Operations Center (EOC), and the coordination between the EOC and City departments and agencies.

A date is corrected in footnote 66 on p. IV.P.39, as follows:

<sup>66</sup> Jack Sylvan, Treasure Island Redevelopment Project Director, Mayor's Office of Economic and Workforce Development, memorandum to Gary Massetani, Deputy Chief of Administration, San Francisco Fire Department, ~~March 4~~ June 29, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

The second paragraph on p. IV.P.40 is revised as follows:

Since first identified for base closure, a substantial amount of work has been performed by the Navy regarding the identification and cleanup of subsurface contamination. A FOST has been completed for approximately 170 acres of the former naval base. The anticipated transfer terms between the Navy and TIDA state that the Navy will continue to complete cleanup requirements and prepare a FOST for the remaining areas, including the IR sites that are still active prior to conveyance. If a FOST is not completed either a FOSET or LIFOC would be prepared for the site that would similarly disclose the history of investigations and remaining contamination, if any. The two parties are also cooperatively working to align the Navy's cleanup schedule for the remaining remediation responsibilities with the proposed phasing of redevelopment activities. In general, the Proposed Project would not commence construction on any one parcel until a FOST, FOSET, or LIFOC has been completed for that area. In some cases, the resultant FOST or ROD may ~~include~~ require additional cleanup ~~requirements~~ for any proposed land uses that vary from the 1996 Reuse Plan. In those limited instances, TIDA or TICD would assume responsibility for additional remediation actions as overseen by the responsible agency (likely the DTSC but also potentially the RWQCB) prior to redevelopment. TIDA or TICD may also assume responsibility for remediation for any parcels that are transferred under Early Transfer (also known as a FOSET). At this time, it is not known whether affected areas will be transferred to TIDA by means of a FOSET, or whether additional clean-up obligations will accompany such transfer. Regardless, any additional remediation required would be performed either by TICD or each parcel developer on behalf of TIDA under the oversight of the responsible agency, either DTSC or RWQCB.

The first full paragraph on p. IV.P.41 is revised as follows:

As stated above in "Regulatory Framework," p. IV.P.30, Cal OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. At sites known to be contaminated, a Site Health and Safety Plan must be

prepared to protect workers. With implementation of Mitigation Measure M-HZ-1, Soil and Groundwater Management Plan (“SGMP”), construction activities would require development of a SGMP that would contain ~~all the~~ worker safety requirements ~~found that~~ must be included in a Site Health and Safety Plan prepared in accordance with Cal OSHA requirements for working at a site with contaminants that have been detected at Treasure Island. The SGMP would require evaluation of soil contamination data for existing soils prior to ground disturbance, if not already analyzed under the Navy program. If unexpected contaminated soils or unexpected USTs were encountered, protocols for appropriate disposal would be included in the SGMP. The SGMP would include notification and response protocols for any suspect soils or groundwater encountered during construction.

The first paragraph of Mitigation Measure M-HZ-1: Soil and Groundwater Management Plan, on pp. IV.P.41-IV.P.42, is revised as follows:

Prior to issuance of a building or grading permit for any one or more parcels, ~~there shall be regulatory approval by DTSC or RWQCB for the proposed land use.~~ the applicant shall demonstrate that its ~~Construction~~ specifications for each parcel shall include implementation of a Soil and Groundwater Management Plan (“SGMP”) prepared by a qualified environmental consulting firm and reviewed and agreed to by DTSC and RWQCB. For parcels transferred from the Navy under a Lease in Furtherance of Conveyance (LIFOC), or Early Transfer (FOSET) or parcels ~~where conditionally recommended transferred by~~ under a FOST which specifies that additional remediation of petroleum contamination is necessary or additional remediation is necessary to meet the proposed land use, all additional or remaining remediation on those parcels shall be completed as directed by the responsible agency, DTSC or RWQCB, prior to commencement of construction activities, unless (i) those construction activities are conducted in accordance with the requirements of any applicable land use covenant, lease restriction or deed restriction and in accordance with the Site Health and Safety requirements of the SGMP, or (ii) those construction activities are otherwise given written approval by either DTSC or RWQCB, in cases such as constructing infrastructure improvements. Parcels transferred under a Lease in Furtherance of Conveyance, shall not change site occupancy or usage until all remediation is completed as determined by DTSC or RWQCB. Where necessary, additional remediation shall be accomplished by the project sponsors prior to issuance of any building or grading permits in accordance with any requirements set by the overseeing agency, either DTSC or RWQCB. The SGMP shall be present on site at all times and readily available to site workers.

The last sentence of the second paragraph under Impact HZ-6 on p. IV.P.46 is revised as follows:

Disposal could occur off site or the sediments could potentially be reused on site as fill material in a non-structural location (e.g., parks, open space, etc.) with regulatory agency approval.

The second sentence of the third paragraph under Impact HZ-6 on p. IV.P.46 is revised as follows:

An FS report ~~was is being finalized~~ on August 13, 2010 which ~~will~~ includes the latest sediment investigation results.

The fourth sentence of the paragraph under Impact HZ-9 on p. IV.P.51 is revised as follows:

There are two main areas in the vicinity of the Job Corps campus on the island where groundwater is contaminated: IR Sites 21 and 24.

The following typographical error is corrected in the last sentence on p. IV.P.51, which continues on p. IV.P.52:

As part of the ongoing regulatory process for these sites, contamination of soil and groundwater will be remediated in accordance with DTSC and RWQCB requirements that assure each IR site is protective of human health and the environment, whether or not the Proposed Project is implemented.

The sixth complete sentence in the partial paragraph at the top of p. IV.P.52 is revised as follows:

~~Neither Ssite closure would not be approved by the overseeing regulatory agency unless the data clearly indicate that no significant risks to human health or the environment remain. The Navy would not recommend a site for transfer via a FOST nor a FOST, FOSET, or LIFOC would be approved by the overseeing regulatory agency unless the data clearly indicate that no significant risks to human health or the environment remains.~~

Mitigation Measure M-HZ-10: Soil Vapor Barriers, on p. IV.P.52, is revised as follows:

~~Proposed building plans on parcels with~~ Prior to obtaining a building permit for an enclosed structure within IR Sites 21 or 24 or within any area where the FOST or site closure documentation specifies that vapor barriers are necessary or that additional sampling must be conducted to determine if vapor barriers are necessary due to the presence of residual contamination that have has volatile components (such as chlorinated solvents (PCE and TCE) or certain petroleum hydrocarbons), the applicant shall demonstrate either that the building plans shall include DTSC-approved vapor barriers to be installed beneath the foundation for the prevention of soil vapor intrusion, or that DTSC has determined that installation of vapor barriers is not necessary. Specifically, building plans coinciding with IR Sites 21 and 24 shall contain vapor barriers that are reviewed and approved by DTSC prior to issuance of building permit.

#### **Section IV.Q, Mineral and Energy Resources**

The last sentence on p. IV.Q.3, which continues on p. IV.Q.4, is revised as follows:

Within the SFPUC, the Power Enterprise focuses on providing adequate and reliable supplies of electric power to meet the municipal requirements of the City and County of San Francisco and the non-municipal requirements of Hunters Point Shipyard and Treasure Island/Yerba Buena Island.<sup>11</sup>

The last sentence of the first full paragraph on p. IV.Q.6 is revised, and a new sentence and footnote are added, as follows:

For example, in 2008, PG&E served 11.9 percent of its retail electricity sales with renewable power.<sup>23</sup> SFPUC obtains a majority of its electricity from Hetch Hetchy hydroelectric sources, which are renewable resources (although only hydroelectric

facilities smaller than 30 MW are included within the Renewable Portfolio Standard's definition of "renewable"<sup>24</sup>).

The new footnote for this text change is shown below, and subsequent footnotes in the section will be renumbered accordingly:

<sup>24</sup> California Public Resources Code § 25741(b)(1); see also California Energy Commission, "Hydroelectric Power in California," available at <http://www.energy.ca.gov/hydroelectric/index.html>, accessed October 27, 2010.

## **CHAPTER V, OTHER CEQA CONSIDERATIONS**

The following new paragraphs are added on EIR p. V.3, at the end of Section V.A, Growth Inducing Impacts:

The America's Cup sailing races are expected to be held in San Francisco Bay in the summer and fall in 2012 and again in the summer and fall in 2013. No special facilities for these races are proposed to be constructed on Treasure Island or Yerba Buena Island. It is expected that interested spectators would use Treasure Island as a viewing area for some of these races, as would many other shoreline locations in San Francisco, such as Herb Caen Way along The Embarcadero, the Marina Green, and shoreline sites in the Golden Gate National Recreation Area.

The spectator activities likely to occur on Treasure Island would be short term, similar to the special events that occur there now, such as the annual Treasure Island Music Festival. For those events, a special transportation demand management ("TDM") program is used to coordinate access to and egress from the Islands. Therefore, a mechanism is already in place to address any temporary transportation issues that might arise during the six- to eight-week period that the America's Cup races would occur. It is not likely that regular ferry service would have been initiated by the time that the America's Cup races were held; therefore, the existing TDM program would likely be used.

Based on the information about phasing of the Proposed Project (see Chapter II, Project Description, Section K, Project Phasing and Construction , p. II.79 – II.82), it is not likely that substantial amounts of new housing or commercial space would have been constructed and be available for occupancy by 2012 – 2013 when the America's Cup races would occur. Therefore, it is not expected that spectator activities would result in substantial impacts on new businesses or new residents of the Islands. Spectator activity at Treasure Island during the America's Cup races would not be a long term or permanent activity. Therefore, it would not result in growth-inducing impacts on Treasure Island.

There is likely to be new development on the mainland along the San Francisco waterfront to support the America's Cup. Specifics of that development are currently being developed, and environmental review of that development has been initiated by the San Francisco Planning Department.<sup>2</sup> It is possible that some of the temporary waterfront development for the race activities would block pedestrian views of Treasure Island and Yerba Buena Island from The Embarcadero and Herb Caen Way. Impacts will be

identified in detail in the EIR that is now in preparation for that project. Permanent improvements to Piers 30-32, 26 and 28, 19 and 19-1/2, and 27-29 and 29-1/2 have not been designed in detail. The improvements known at this time mainly include seismic upgrades and repairs and improving the pier structures and aprons. These and other improvements along the mainland shoreline would not directly affect Treasure Island or Yerba Buena Island.

A new footnote is added on p. V.3:

<sup>2</sup> San Francisco Planning Department, Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping, Case No. 2010.0493E, February 9, 2011, available at [www.sfmea/planning.org/2010.0493E\\_NOP.pdf](http://www.sfmea/planning.org/2010.0493E_NOP.pdf), accessed February 15, 2011.

## **CHAPTER VI, PROJECT VARIANTS**

The first three sentences of the last paragraph on p. VI.39 are revised as follows:

Wastewater Wetlands Variant D2 would use wetlands to polish the majority of the treated wastewater effluent to be discharged through the outfall, after microfiltration and ~~UV~~ disinfection. In this process, recycled water would not pass through the wetlands; about 0.42 mgd would be diverted from the treatment plant and further treated, to the extent necessary, with reverse osmosis for use in landscape irrigation and appropriate plumbing fixtures in commercial and residential buildings. Wastewater Wetlands Variant D2 would receive the remainder of the ~~UV~~-disinfected effluent from the treatment plant (about 0.9 mgd).

## **CHAPTER VII, ALTERNATIVES TO THE PROPOSED PROJECT**

The following addition is made to the list of alternatives on p. VII.2:

- A. No Project Alternative;
- B. Reduced Development Alternative; ~~and~~
- C. No Ferry Service Alternative; ~~and~~
- D. Reduced Parking Alternative.

The second complete paragraph on p. VII.2 is revised as follows:

The differences between the Proposed Project and the development programs for Alternative B, Reduced Development Alternative, ~~and~~ Alternative C, No Ferry Service Alternative, and Alternative D, Reduced Parking Alternative, are shown in Table VII.1.

Table VII.1, on p. VII.3, is revised to add the Reduced Parking Alternative. The revised table is shown on the following page.

● (Revised) Table VII.1: Comparison of Alternatives to the Proposed Project

Topic	Proposed Project	Alternatives Considered			
		No Project Alternative	Reduced Development Alternative	No Ferry Service Alternative	Reduced Parking Alternative
<b>Land Uses</b>					
Residential	8,000 units	No change from existing 1,005 units	6,000 units	5,100 units	<u>8,000 units</u>
Retail	207,000 sq. ft.	No change from existing conditions	207,000 <sup>1</sup> sq. ft.	207,000 sq. ft.	<u>207,000 sq. ft.</u>
Commercial office	100,000 sq. ft.	No change from existing conditions	No office space	100,000 sq. ft.	<u>100,000 sq. ft.</u>
Hotel	500 hotel rooms	No hotel rooms	500 hotel rooms	500 hotel rooms	<u>500 hotel rooms</u>
Parking	<del>11,155</del> 10,675 spaces	No change from existing conditions	8,955 <sup>2</sup> spaces	8,255 <sup>3</sup> spaces	<u>6,651<sup>6</sup> spaces</u>
Parks and public open space	300 acres	No change from existing 170 acres	300 acres	306 <sup>4</sup> acres	<u>300 acres</u>
New/Upgraded public services, infrastructure and utilities	Yes	No	Yes	Yes	<u>Yes</u>
<b>Historic Resources</b>					
Rehabilitation and adaptive reuse of historic structures <sup>5</sup>	Yes	No	Yes	Yes	<u>Yes</u>
Preservation of Historic Resource ( <i>U.S.S. Buttercup</i> )	No	Yes	No	Yes	<u>No</u>
<b>Transportation</b>					
New ferry service	Yes	No	Yes	No	<u>Yes</u>
Improved bus transit service	Yes	No	Yes	Yes	<u>Yes</u>
New bicycle and pedestrian facilities	Yes	No	Yes	Yes	<u>Yes</u>
Subject to Tidelands Trust Exchange Agreement	Yes	No	Yes	Yes	<u>Yes</u>
Geotechnical Stabilization of TI and YBI causeway	Yes	No	Yes	Yes	<u>Yes</u>
Development of Non-Renewable Resources Infrastructure	Yes	No	Yes	Yes	<u>Yes</u>
Implementation of Sustainability Plan	Yes	No	Yes	Yes	<u>Yes</u>
Implementation of Habitat Management Plan for YBI	Yes	No	Yes	Yes	<u>Yes</u>

*Notes:*

<sup>1</sup> Compared to the Proposed Project, the Reduced Development Alternative would likely include less neighborhood-serving retail uses (25 percent less) and more regional-serving retail uses.

<sup>2</sup> This total is based on a reduced number of residential units, no new commercial office space, and a smaller proportion of neighborhood-serving retail uses.

<sup>3</sup> This total is based on a reduced number of residential units.

<sup>4</sup> This total includes the 6 acres on Blocks E5 and E7, the site of the Damage Control Trainer (*U.S.S. Buttercup*), which would be retained in the No Ferry Service Alternative.

<sup>5</sup> Historic rehabilitation and adaptive reuse of Buildings 1, 2, and 3 on Treasure Island; and the Nimitz House, Senior Officers' Quarters Historic District, Quarters 10, Building 267, and Torpedo Assembly Building on Yerba Buena Island.

<sup>6</sup> This total is based on providing 0.5 space for each residential unit and reduced parking ratios for the hotel, office, and adaptively reused space in historic buildings.

Source: Turnstone Consulting, June 2010



The second sentence of the paragraph at the top of p. VII.4 is revised as follows:

These include a No Tidelands Trust Exchange Alternative; a 2,800 Housing Unit Alternative with an Amusement Park; ~~a Reduced Parking Alternative~~; an Off-Site Location Alternative; and an alternative with Measures to Reduce Automobile Ownership.

The following change is made to the second paragraph on p. VII.18:

The Reduced Development Alternative was included to evaluate if ~~a reduced~~ reducing the number of residential units on Treasure Island would avoid or substantially lessen traffic (and related air quality and noise) impacts, as well as reduce an aesthetic impact on scenic vistas of the Proposed Project.

Table VII.9, on p. VII.30, is revised to reflect changes to the “Project Trips” and “Density” columns for the Existing plus Project conditions. The revised table is shown on the next page.

The following new paragraph is added after the third paragraph under the heading “Cumulative Conditions” on p. VII.31:

Similar to the Proposed Project, the Reduced Development Alternative would result in less-than-significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island.

The following revisions are made to first and third items in the bulleted list at the top of p. VII.32:

- The Reduced Development Alternative would result in project-specific impacts at six study intersections that would operate at LOS D or better and deteriorate to LOS E or LOS F, or that would operate at LOS E and deteriorate to LOS F under Existing plus Project conditions (listed on p. VII.22). Because the Reduced Development Alternative would result in significant project-specific impacts at these intersections, it would also result in cumulative impacts at these ~~five~~ six intersections (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp).
- The Reduced Development Alternative would contribute considerably to critical movements at one study intersection that would operate at LOS E or LOS F under 2030 Cumulative plus Reduced Development Alternative conditions, resulting in a project impact (Second/Folsom).
- The Reduced Development Alternative would have less-than-significant contributions at ~~eight~~ seven study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions (Fremont/Howard, Fremont/Folsom, Fremont/I-80 Westbound Off-Ramp/Harrison, First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, Second/Bryant, and The Embarcadero/Harrison ~~and First/Folsom~~).
- The Reduced Development Alternative would contribute considerably to significant cumulative impacts at two uncontrolled study intersections (Folsom/Essex and Bryant/Sterling).

**(Revised) Table VII.9: Pedestrian Crosswalk Levels of Service – Existing plus Project and Existing plus Reduced Development Alternative**

Crosswalk <sup>1</sup>	Existing plus Project			Existing plus Reduced Development Alternative		
	Project Trips	Density <sup>3</sup>	LOS	Project Trips	Density <sup>3</sup>	LOS
<b>AM Peak Hour</b>						
Washington Street <sup>1</sup>	<del>25</del> <u>26</u>	<del>27.64</del>	A	20	28.6	A
Ferry Bldg (North)	<del>82</del> <u>87</u>	6.6	C	67	6.9	C
Market Street	<del>403</del> <u>427</u>	<del>6.87</del>	C	330	7.0	C
Don Chee Way	<del>27</del> <u>29</u>	<del>17.53</del>	A	22	18.1	A
Mission Street <sup>1</sup>	<del>68</del> <u>72</u>	<del>10.0</del> <u>9.9</u>	C	56	10.3	B
<b>PM Peak Hour</b>						
Washington Street <sup>1</sup>	44 <u>46</u>	13.4 <u>0</u>	A	38	13.4	A
Ferry Bldg (North)	<del>64</del> <u>67</u>	7.2	C	55	7.4	C
Market Street	<del>588</del> <u>614</u>	<del>4.0</del> <u>3.9</u>	D	501	4.1	D
Don Chee Way	<del>31</del> <u>33</u>	<del>13.0</del> <u>12.9</u>	<del>A</del> <u>B</u>	27	13.3	A
Mission Street <sup>1</sup>	<del>59</del> <u>61</u>	9.9	C	50	10.1	B
<b>Saturday Peak Hour<sup>2</sup></b>						
Market Street	334	4.0	D	301	4.0	D
Don Chee Way	28	6.9	C	25	6.9	C

*Notes:*

- <sup>1</sup> Since the intersections of The Embarcadero with Washington Street and Mission Street each have two crosswalks, the north and south legs of each intersection were averaged.  
<sup>2</sup> The Ferry Building hosts a farmers market on Saturdays.  
<sup>3</sup> Density measured in square feet per pedestrian.

*Source:* Fehr & Peers 2010

The second sentence of the paragraph under “Biological Resources” on p. VII.46 is revised as follows:

The reduced footprint and lower number of residents would proportionately lessen the human-induced wildlife disturbance such as foot and vehicle traffic, off-leash dogs and feral cats.

The first complete sentence of the partial paragraph at the top of p. VII.47 is revised as follows:

The Reduced Development Alternative would include implementation of ~~installation of~~ stormwater Best Management Practices (“BMPs”) and adherence to water discharge and other permit conditions during construction, as described for the Proposed Project in Impacts HY-1 and HY-2 on pp. IV.O.35-IV.O.38, and an adaptive management strategy

to protect Treasure Island from potential flooding due to sea level rise as described for the Proposed Project on pp. IV.O.32-IV.O.35.

The following changes are made to the last sentence of the first paragraph on p. VII.51:

This facility is identified as an historical resource for the purposes of CEQA; thus, the No Ferry Alternative would preserve~~ing~~ the structure identified as historically important that would be demolished with the Proposed Project.

The heading “D. Alternatives Considered but Rejected” on p. VII.73 and the paragraph that follows it are revised as follows:

~~D~~E. ALTERNATIVES CONSIDERED BUT REJECTED

This section discusses ~~three~~ four alternatives that were considered by the project sponsors, but are not analyzed further in this Chapter of the EIR because they either would not achieve most of the project sponsors’ objectives, would not reduce significant environmental project impacts, would result in greater impacts than the Proposed Project, and/or do not represent feasible alternatives for other economic, social or environmental reasons. These considered and rejected alternatives include the No Public Trust Exchange Agreement; and the Maximum Development Alternative proposed in the *2005 Transfer and Reuse of Naval Station Treasure Island Final EIR*; ~~and the Reduced Parking Alternative~~. An off-site location; and an alternative including measures to reduce automobile ownership are also briefly discussed.

Heading D.1 on p. VII.73 is revised as follows:

~~D~~E.1 NO PUBLIC TRUST EXCHANGE AGREEMENT

Heading D.2 on p. VII.74 is revised as follows:

~~D~~E.2 2800 HOUSING UNIT ALTERNATIVE WITH AN AMUSEMENT PARK

Heading D.4 on p. VII.77 is revised as follows:

~~D-4~~E.3 OFF-SITE LOCATION

Heading D.5 on p. VII.77 is revised as follows:

~~D-5~~E.4 MEASURES TO REDUCE AUTOMOBILE OWNERSHIP

The third sentence of the paragraph under heading D.5, Measures to Reduce Automobile Ownership, is revised as follows:

A reduced parking alternative is discussed above in Section ~~IV.D.3~~VII.D, ~~and reasons why this alternative was not analyzed for this EIR are presented there.~~

A typographical error is corrected in the last sentence on p. VII.77, which continues on the top of p. VII.78:

Other fine-grained measures such as grocery delivery services could be implemented as appropriate by the Treasure Island Transportation Management Agency (“TITMA”).

Heading E on p. VII.78 is revised as follows:

EE. ENVIRONMENTALLY SUPERIOR ALTERNATIVE