San Francisco Planning

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Community Plan Evaluation Appeal

2300 Harrison Street

DATE: August 10, 2020
TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Lisa Gibson, Environmental Review Officer – (415) 575-9032
Ryan Shum, Environmental Planner – (415) 575-9021
RE: Board File Number 200809, Planning Case Nos. 2016-010589ENV and 2016-010589APL
Appeal of Community Plan Evaluation for 2300 Harrison Street Project
HEARING DATE: August 18, 2020
ATTACHMENT(S): A – Fehr & Peers, *Eastern Neighborhoods / Mission District Transportation and Demographic Trends,* January 12, 2017 and *Updated Eastern Neighborhood Traffic Counts,* April 17, 2017
B – Fehr & Peers, *2918 Mission Analysis Memorandum,* June 4, 2018

PROJECT SPONSOR: Tuija Catalano, Reuben, Junius, & Rose, LLP, (415) 567-9000
APPELLANT(S): Carlos Bocanegra, (760) 822-9677

DEPARTMENT'S RECOMMENDATION: Uphold the community plan evaluation determination and reject the appeal.

INTRODUCTION

This memorandum and the attached documents are a response to the letter of appeal to the board of supervisors (the board) regarding the Planning Department's (the department) issuance of a community plan evaluation (CPE) for the proposed 2300 Harrison Street project under the Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report in compliance with the California Environmental Quality Act.

As described below, the CPE conforms to the requirements of CEQA for a community plan evaluation pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183. Accordingly, based upon its review of the information presented by the appellant, the planning department recommends that the board of supervisors uphold the department's determination for the CPE and reject the appeal.

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

project on February 20, 2020. Under the circumstances, CEQA limits the city's review to consideration of the environmental effects of the proposed project that:

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

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

Accordingly, the department conducted project-specific analysis to evaluate whether the project would result in new significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the PEIR. As part of this process, site-specific technical analysis was conducted based on the project site's location and context. This included updating the cumulative analysis with respect to physical effects of the project that have the potential to combine with or contribute to effects of other projects. Based on this analysis, the department determined that the project is exempt from further environmental review beyond what was conducted in the CPE initial study and the Eastern Neighborhoods PEIR in accordance with CEQA section 21083.3 and CEQA Guidelines section 15183.

This analysis is presented in the project-specific CPE initial study and is supported by substantial evidence in the record. In summary, the CPE initial study found that the proposed project would result in significant impacts to archeological resources, construction noise, construction air quality, and hazardous building materials. These significant impacts were found to be less than significant with application of mitigation measures identified in the Eastern Neighborhoods PEIR. All other environmental impacts from the project were found to be less than significant.

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

SITE DESCRIPTION AND EXISTING USE

The approximately 38,676-square-foot project site is located on the west side of Harrison Street, on the southwest corner of the intersection of Harrison and 19th streets in the Mission neighborhood. The project site is bounded by 19th Street to the north, Harrison Street to the east, Mistral Street to the south, and Treat Avenue to the west. The site is currently occupied by a 42-foot-tall, three-story, 68,538-square-foot office building that was constructed in 1913. The site also includes a 14,000-square-foot surface parking lot with 61 parking spaces, and five additional on-site parking spaces along the Harrison Street exterior of the

existing office building for a total of 66 off-street vehicle parking spaces. The existing office building provides a bicycle room with 48 class 1 bicycle spaces and two showers, and a locker room with bicycle racks for 27 bicycles. There are nine class 2 bicycle parking spaces in the existing parking lot.[1] Adjacent to the project site, there are an additional 14 class 2 bicycle parking spaces on the east side of Treat Avenue.

Within one-quarter mile of the project site, the San Francisco Municipal Railway (Muni) operates the following bus lines: 12-Folsom/Pacific and 27-Bryant. In addition, the 14/14R-Mission, 22-Filmore, 33-Ashbury/18th Street, 49-Van Ness/Mission, and 55-16th Street bus routes are within 0.35 miles of the project site along 16th Street. These Muni bus routes also provide service to the 16th Street and 24th Street Mission BART stations.

The area surrounding the project site is characterized by commercial, residential, and production, distribution, and repair (PDR) buildings and institutional uses in buildings ranging from one- to four-stories in height. The immediately surrounding parcels are either within the Urban Mixed Use, Production Distribution and Repair, or Public zoning districts. The closest existing residential uses are directly across Harrison Street south of 19th Street. North of 19th Street is a mix of PDR, mixed-use with and without residential use, recreation, and office uses. Further to the southwest, south of 20th Street and west of Harrison Street, the zoning includes Residential-House, Two Family (RH-2), Residential-House, Three Family (RH-3), and Residential-Mixed, Low Density (RM-1). South of 20th Street, the land uses are largely residential, with some commercial and institutional/educational uses. In addition, there are office uses within a 0.5 mile of the project site. Height and bulk districts within a one-block radius of the project site include 45-X, 58-X, 65-X, and 68-X.

PROJECT DESCRIPTION

The proposed project includes a vertical and horizontal addition to the existing building that would replace the surface parking lot with new construction of a 75-foot-tall (up to 85-foot-tall for the elevator penthouse), six-story-over-basement, 77,365-square-foot mixed-use building. The new building would connect to the existing building at the second and third levels to expand the existing office uses on those floors. Other than for the connections at the second and third levels to expand the office use, no changes are proposed to the existing building.

The proposed addition would replace the existing 25-space surface parking lot to construct 12,331 square feet of below-grade parking for the office use, a new bike room with seven class 1 bicycle spaces, 12 lockers and two showers for office employees at the site[2]; 1,117 square feet of arts activity or retail uses, 2,483 square feet of retail, and 5,183 square feet of parking for the residential use at the ground floor; 27,017 square feet of office use on floors 2 and 3; and 29,234 square feet of residential use on floors 4, 5, and 6. The project would include 24 dwelling units consisting of 14 one-bedroom and 10 two-bedroom units.

Upon completion of the proposed project, the site would consist of 95,555 square feet of office use, 29,234 square feet of residential use, 1,117 square feet of ground floor arts activity or retail uses, 2,483 square feet of retail, 17,514 square feet of parking (41 parking spaces consisting of 10 spaces for residential use and 31

[1] Class 1 bicycle parking spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage. Class 2 bicycle parking spaces are spaces located in a publicly accessible, highly visible location intended for transient or short-term use. Each Class 2 rack serves two bicycles.

[2] For compliance with Planning Code sections 155.1-155.4, Bicycle Parking, Showers, and Lockers in New and Expanded Buildings.

spaces for office use), and 6,176 square feet of open space. The proposed project also includes new street trees, five class 2 bicycle parking spaces on the sidewalk, 14 new street trees, curb cut changes, sidewalk widening and improvements, and color curb changes, including commercial and passenger loading zones and no-parking zones.

The project would use the state density bonus law (California Government Code sections 65915-65918), which allows waivers, concessions, and modifications from local development standards for projects. Under the state density bonus law, the project seeks modifications and concessions for active ground floor uses, narrow street height limit, ground floor height, and rear yard setback. The project also seeks a waiver for one additional floor above the existing height limit of 68 feet.

BACKGROUND

On December 20, 2017, Tuija Catalano, Reuben, Junius, & Rose, LLP (hereinafter project sponsor) on behalf of 562 Mission Street, LLC filed an environmental application with the planning department for a CEQA determination. On April 30, 2019, the department issued a CPE certificate and initial study, based on the following determinations:

1. The proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Rezoning and Area Plan;
2. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Eastern Neighborhoods PEIR;
3. The proposed project would not result in potentially significant off-site or cumulative impacts that were not identified in the Eastern Neighborhoods PEIR;
4. The proposed project would not result in significant effects, which, as a result of substantial new information that was not known at the time the Eastern Neighborhoods PEIR was certified, would be more severe than were already analyzed and disclosed in the PEIR; and
5. The project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant impacts.

The planning commission considered the project on December 12, 2019. On that date, the planning commission adopted the CPE, made CEQA findings, and approved with conditions the (1) Office Development Authorization and (2) Large Project Authorization for the project (planning commission resolution numbers 20595 and 20596), which constituted the approval action under Chapter 31 of the Administrative Code.

On January 13, 2020, Carlos Bocanegra (hereinafter appellant) filed an appeal of the CPE determination. The project approval actions, which include the CEQA findings, were appealed to the Board of Appeals and were scheduled to be heard on March 4, 2020, but this hearing did not occur and has been rescheduled as indicated below. However, on February 7, 2020, the Department of Public Health issued an update to the city's Air Pollutant Exposure Zone map. As a result of this update, the project site is now within the Air Pollutant Exposure Zone, which was not the case in 2019 when the CPE determination was issued. Based on this information, the Planning Department determined that the PEIR construction air quality mitigation measure is applicable to the project. The CPE was rescinded, and the initial CPE appeal was moot. The project's construction air quality analysis was revised to include the construction air quality mitigation

measure. The CPE was reissued on February 19, 2020, initiating a new appeal period. The appellant subsequently refiled their appeal on March 20, 2020. The appeal hearing is scheduled for August 18, 2020. In addition, the Large Project Authorization and Office Allocation project approvals are currently scheduled to be heard by the Board of Appeals on August 26, 2020.

The CEQA findings are part of the approval actions, and therefore, they are not addressed in the CPE appeal response. Nonetheless, any concerns regarding the CEQA findings related to the physical environmental effects of the project are addressed in this response.[3]

CEQA GUIDELINES

Community Plan Evaluations

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

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

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

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

Significant Environmental Effects

CEQA Guidelines section 15064(f) provides that the determination of whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines 15604(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

SAN FRANCISCO ADMINISTRATIVE CODE

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

[3] The appellant does not specify the basis for an appeal of the CEQA Findings other than to indicate that his assertion that the department's use of a community plan evaluation based on the Eastern Neighborhoods EIR is improper.

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

PLANNING DEPARTMENT RESPONSES

The concerns raised in appellant's March 20, 2020 appeal letter are addressed in the responses below. The appellant filed a supplemental letter on Friday, August 7, 2020. The department is currently reviewing the letter and may supplement these responses in writing, if determined necessary.

RESPONSE 1: **CEQA Guidelines section 15183 mandates that projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review unless there are significant effects peculiar to the project or its site that were not disclosed as significant effects in the prior EIR. The department has conducted a thorough project-specific and cumulative environmental analysis of the proposed project and determined that the project would not result in new or more severe adverse impacts than disclosed in the Eastern Neighborhoods PEIR. The department's determination is based on substantial evidence; the appellant has not demonstrated otherwise.**

The appellant states that the proposed project does not qualify for a CPE under CEQA Guidelines section 15183 because the approval is based on an out-of-date 2008 EIR prepared for the Eastern Neighborhoods Area Plan and the ElR's analysis and determination can no longer be relied upon to support the claimed exemption in the areas of direct, indirect, and cumulative impacts to: land use, consistency with area plans and policies, traffic and circulation, and transit and transportation.

For the CPE initial study process, the department analyzed whether or not the project would result in any significant impacts not identified in the programmatic EIR for the area plan that are either peculiar to the project site or project or are due to substantial new information. As a point of clarification, the department follows the same technical analysis regardless of whether the project qualifies for a CPE or some other environmental document. As a result, the mitigation measures identified for the project in the CPE initial study to reduce environmental impacts to less than significant are the same as those that would have resulted if the department had reviewed the project without a CPE. For each topic area, the department follows the same evaluation procedures and applies the same screening, analysis methodologies, and significance thresholds regardless of the type of environmental document prepared. For projects whose significant impacts may be mitigated to less than significant, the outcome of the environmental analysis (in terms of measures applied to the project to provide environmental protection) is the same under a CPE as it would have been if a mitigated negative declaration were issued.

The conclusions of the CPE initial study with respect to significant environmental impacts that can be mitigated to less than significant would not change had environmental review been conducted under an initial study process that concluded with issuance of a mitigated negative declaration. A difference occurs when the project would result in a significant and unavoidable project-specific impact. In that case, the question to address is whether or not the PEIR identified the significant and unavoidable impact and whether the project would result in a significant and unavoidable impact that is more severe than identified

in the PEIR. That was not the case for this project where all significant environmental impacts that were identified are able to be mitigated to less than significant.

Furthermore, as discussed in the CEQA Guidelines section above, the Eastern Neighborhoods PEIR need not reexamine the environmental effects disclosed in the PEIR unless a subsequent discretionary approval is required for the Plan. However, for subsequent projects being evaluated under a CPE, CEQA Guidelines section 15183 requires additional analysis if there is new information presented which was not known at the time of the certification of the PEIR that indicates the subsequently proposed project would result in a new or more severe adverse impact than was discussed in the Eastern Neighborhoods PEIR. The CPE initial study for the 2300 Harrison project contains a comprehensive project-specific and cumulative analysis for each environmental topic addressed under CEQA. The cumulative horizon year in the CPE analyses is 2040. As noted above, the CPE initial study found that the proposed project would result in significant impacts to archeological resources, construction noise, construction air quality, and hazardous building materials. These significant impacts were found to be less than significant with application of mitigation measures identified in the Eastern Neighborhoods PEIR. All other environmental impacts from the project were found to be less than significant based upon project-specific analyses.

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

Eastern Neighborhoods PEIR Housing Projections

The appellant alleges the department's determination to issue a CPE for the project is invalid because the amount of residential development that has been constructed, entitled, or is in the development pipeline has exceeded the residential development assumptions upon which the cumulative analyses of the PEIR are based on. This is a claim that has been made in previous appeals of the Eastern Neighborhoods PEIR for residential projects in the Mission District, including the following projects: 344 14th Street (Board file no. 190891), 2750 19th Street (Board file no. 180975), 901 16th Street/1200 17th Street (Board file no. 160684), 1296 Shotwell Street (Board file no. 170025), and 2918 Mission Street (Board file no. 180718). In each of these cases, the board of supervisors found that the PEIR was, in fact, adequate and that the use of a CPE relying on the Eastern Neighborhoods PEIR was appropriate. Moreover, that claim was made and expressly rejected by the First District Court of Appeal in litigation challenging the department's determination regarding 901 16th Street/1200 17th Street.[4]

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

[4] Save the Hill et al. v. City and County of San Francisco et al., Court of Appeals case A153549, (2019)

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

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

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

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

The appellant provides no information about how the claim of residential growth exceeding the PEIR projections has or would result in direct, indirect, and/or cumulative significant environmental impacts not already disclosed in the PEIR. Further, the appellant has provided no evidence that the 2300 Harrison Street project, with its 24 dwelling units, addition of 27,017 square feet of office, 1,117square feet of arts activity and retail uses, and 2,483 square feet of retail, would have a considerable contribution to a significant cumulative environmental impact not disclosed in the PEIR.

Transportation Analysis: Traffic and circulation including transit, TNCs, reverse commutes, deliveries, and shuttle buses

The appellant asserts that the transportation analysis is inadequate. In particular, the appellant asserts that the prevalence of shuttle buses and transportation network companies (TNCs), which includes on-demand delivery services, and the popularity of e-commerce has resulted in increased traffic conditions, and that these conditions were not considered in the Eastern Neighborhoods PEIR. However, the appellant does not demonstrate what is significantly different from the transportation circumstances disclosed in the PEIR.

At the time that the Eastern Neighborhoods PEIR was certified in 2008, the department used the level of service (LOS) metric to assess traffic congestion, which at the time was considered a physical environmental effect under CEQA. However, as discussed on page 7 of the CPE Initial Study, automobile delay, as described solely by LOS or similar measures of traffic congestion, is no longer considered a significant

impact on the environment under CEQA in accordance with CEQA section 21099 and Planning Commission Resolution 19579. Instead, the CPE evaluates whether the proposed project would result in significant impacts with regards to vehicle miles traveled (VMT). Accordingly, based on the project site location and the characteristics of the proposed project, the CPE found that the proposed project would not have significant impacts either individually or cumulatively related to increased VMT.

Nonetheless, the department has conducted additional transportation analyses based on updated local and regional transportation modeling, census data, and traffic counts at intersections in the Mission neighborhood. The analyses were undertaken as part of the department's response to previous CEQA appeals filed for two projects in the Mission District: 2675 Folsom Street (board of supervisors file no. 190890) and 2918-2924 Mission Street (board of supervisors file no. 180019).

The additional analyses include a 2016 transportation study and April 2017 traffic counts conducted for 2675 Folsom Street (Attachment A), and 2018 traffic counts conducted for 2918-2914 Mission Street (Attachment B). Overall, the studies found that observed traffic volumes were generally lower than what was expected compared to the amount of estimated development completed as of the date of the studies (2017 and 2018).[5] In other words, traffic data collected by the department indicates that current traffic volumes are similar to or slightly below PEIR projections, and the Eastern Neighborhoods PEIR overestimated the volume of vehicle trips that would be generated by development that could occur as a result of the Eastern Neighborhoods rezoning. The analyses provide evidence that TNC use, automobile ownership rates, and the purported increased reverse commute distances by families that no longer live in the Mission are not causing significant cumulative transportation impacts beyond those anticipated under the Eastern Neighborhoods PEIR.

Separately, the department revised its transportation analysis guidelines in 2019 to, among other things, update project trip generation and mode split assumptions for proposed projects. This revision relies on observational and intercept survey data collected from recently completed projects in the Mission and elsewhere in San Francisco. The updated trip generation rates are supported by data collected in 2016 and 2017 when TNCs were widely in use and, therefore, take into account estimates of the number of for-hire vehicles (e.g. taxis/TNCs) from new development. The updated trip generation rates were applied to the proposed project and included in the project analysis, as discussed on page 17 of the CPE Initial Study. As stated in the CPE, the proposed project would generate approximately 32 p.m. peak hour person trips (24 vehicle trips) and 5 for-hire person trips (4 vehicle trips).[6] In addition, the proposed project includes a new 45-foot-long passenger loading zone along Harrison Street that would be installed in coordination with the San Francisco Municipal Transportation Agency (SFMTA). The proposed passenger loading zone would facilitate passenger loading at the project site and decrease the potential for unsafe loading activities, which could lead to hazardous traffic conditions.

As discussed on page 4 of the CPE initial study, the cumulative analysis performed for the proposed project is project-specific and based on reasonably foreseeable projects that are currently proposed, entitled, or approved. In other words, the projects that were considered as cumulative development projects in the project CPE reflect present-day conditions. Furthermore, the cumulative impact analysis for the proposed

[5] Traffic volumes were estimated using the Eastern Neighborhoods PEIR trip generation methodology.

[6] Based on vehicle occupancy data, the number of vehicle trips may be lower than the number of person trips as multiple person trips may be accommodated in the same vehicle, therefore requiring fewer vehicles to travel to and from the site.

project includes updated analysis, as needed, to evaluate whether the proposed project could result in new or substantially more severe cumulative impacts than were anticipated in the Eastern Neighborhoods PEIR. For example, the cumulative transportation analysis in the Eastern Neighborhoods PEIR relied on 2025 cumulative transportation projects while the 2300 Harrison CPE cumulative transportation analysis is based on projected 2040 cumulative conditions. Based on the estimated trip generation and in conjunction with additional analysis presented in the CPE, the department concluded that the proposed project would not result in new or more severe transportation impacts than already disclosed in the PEIR. The department's conclusion is supported by substantial evidence; the appellant has not demonstrated otherwise.

Land Use, Recreation and Open Space, Noise, Shadow, and Health and Safety

The appellant contends that the department's determination to issue a CPE for the project is invalid because the amount of development that has been constructed, entitled, or is in the development pipeline has exceeded the development assumptions upon which the land use, noise, shadow, and recreation and open space cumulative analyses of the PEIR are based on.

As discussed above, the analysis for cumulative land use, recreation and open space, noise, and shadow impacts were updated as needed in the CPE initial study. The updated cumulative analysis also accounted for the potential for the project to cumulatively combine with reasonably foreseeable nearby projects to result in significant cumulative impacts for localized effects. Based on the analysis and as described in the CPE initial study, no significant cumulative impacts would occur under the proposed project. Moreover, the appellant has not demonstrated that the PEIR conclusions regarding cumulative land use, noise, shadow, and recreation and open space impacts are no longer valid as a result of significant new information or changed circumstances. The appeal letter provides no evidence or analysis that the proposed project would have a cumulatively considerable contribution to any such effects.

As stated in sections 1 – Land Use and Land Use Planning, 5 – Noise, 8 – Wind and Shadow, and 9 – Recreation of the initial study, the proposed project would not result in new or more severe cumulative impacts with respect to land use, noise, shadow, and recreation that were not identified in the Eastern Neighborhoods PEIR. The department's conclusion is supported by substantial evidence; the appellant has not demonstrated otherwise.

Health and safety concerns are discussed across various topics in the CPE Initial Study: pedestrian safety, noise, air quality, seismic and geologic hazards, flooding risks, and hazards and hazardous materials. The CPE Initial Study found that the proposed project would have less than significant health and safety impacts and includes mitigation measures to reduce health and safety impacts related to construction noise, hazardous building materials, and construction air quality to a less than significant level. The appellant neither describes the health and safety impact analyses in the Eastern Neighborhoods PEIR that can no longer be relied upon, nor provides any evidence to substantiate this assertion. The department's conclusion is supported by substantial evidence; the appellant has not demonstrated otherwise.

RESPONSE 2: The status of the provision of community benefits does not demonstrate that the project would result in significant physical effects on the environment not disclosed in the Eastern Neighborhoods PEIR and does not support a basis for an appeal of the CPE.

The appellant's contentions concerning the funding and implementation of community benefits do not demonstrate that the project would result in significant environmental effects that are peculiar to the project or its site that were not disclosed in the Eastern Neighborhoods PEIR, nor do they demonstrate substantial new information showing that environmental impacts would be more significant than described in the PEIR. Therefore, these contentions do not present a valid ground for an appeal of the determination that the project qualifies for a CPE.

For informational purposes, however, the department provides the following discussion about the status of the community benefits identified in the CEQA findings and Statement of Overriding Consideration for the adoption of the Eastern Neighborhoods Area Plans.

The appellant does not specify which community benefits "have not been fully funded, implemented or are underperforming..." or which findings and determinations for the Project "rely on the claimed benefits to override impacts outlined in the PEIR." Regardless, as the following discussion indicates, community benefits are being provided under the Eastern Neighborhoods Plan through an established process.

The Eastern Neighborhoods Plan included a Public Benefits Program detailing a framework for delivering infrastructure and other public benefits as described in an Implementation Document titled Materials for Eastern Neighborhoods Area Plans Initiation Hearing.[7] The Public Benefits Program consists of:

1. An Improvements Program that addresses needs for open space, transit and the public realm, community facilities and affordable housing;

2. A Funding Strategy that proposes specific funding strategies and sources to finance the various facilities and improvements identified in the Improvements Plan, and matches these sources to estimated costs; and

3. A section on Program Administration that establishes roles for the community and City agencies, provides responsibilities for each, and outlines the steps required to implement the program.

In terms of the process for implementing the Public Benefits Program, new development within the Eastern Neighborhoods Plan area, including the proposed project, are required to pay development impact fees upon issuance of the "first construction document" (either a project's building permit or the first addendum to a project's site permit). These fees are collected to fund approximately 30 percent of the infrastructure improvements planned within the Eastern Neighborhoods Plan area. Examples of fees that are collected under Planning Code section 423 (Eastern Neighborhoods Community Infrastructure Impact Fee) include: "Transit", "Complete Streets", "Recreation and Open Space", "Child Care", and in some portions of the Mission District and the South of Market Area, "Affordable Housing". Other benefits were to be funded by fees accrued with development and through other sources of funding. The Public Benefits Program was not intended to be a static list of projects; rather, it was designed to be modified by a Citizens Advisory Committee as needs were identified through time.

[7] San Francisco Planning Department, *Materials for Eastern Neighborhoods Area Plans Initiation Hearing, Case No. 2004.0160EMTUZ.* April 17, 2008. Available at: http://sf-planning.org/sites/default/files/FileCenter/Documents/1507-VOL3_Implementation.pdf, accessed January 31, 2020.

Additional funding mechanisms for infrastructure improvements are identified through the City's 10-year Capital Plan, which stipulates that 80 percent of development impact fees must go towards Eastern Neighborhoods priority projects until those priority projects are fully funded. The fees are dispersed to fund infrastructure improvements within the entirety of the Eastern Neighborhoods Plan area, on a priority basis established by the Eastern Neighborhoods Citizen Advisory Committee (CAC) and the City's Interagency Plan Implementation Committee (IPIC).

The IPIC works with the CAC to prioritize future infrastructure improvements. Furthermore, the Planning Department and Capital Planning Program are working with the implementing departments to identify additional state and federal grants, general fund monies, or other funding mechanisms such as land-secured financing or infrastructure finance districts to fund the remaining emerging needs. Impact fees are distributed among the following improvement categories: open space, transportation and streetscape, community facilities, childcare, library, and program administration. As stated in the latest January 2020 Planning Department's Interagency Plan Implementation Committee Annual Report,[8] the City expects to collect $393 million in impact fees through the year 2025. Infrastructure projects that are currently underway are also listed in the Planning Department's Interagency Plan Implementation Committee Annual Report. These include various streetscape, roadway, park, and childcare facility improvements.

Additionally, a Transportation Sustainability Fee was adopted in November 2015 (BOS File Number 150790) and expenditures of the revenue generated through this fee are allocated according to Table 411A.6A in the Ordinance, which gives priority to specific projects identified in different area plans. These processes and funding mechanisms are designed to provide for implementation of infrastructure improvements to keep pace with development and associated needs of existing and new residents and businesses within the area. The CPE Initial Study provides further information regarding improvements within the Eastern Neighborhoods Plan Area. Regarding transit, as discussed on page 20 the CPE Initial Study, Mitigation Measures E-5 through E-11 in the Eastern Neighborhoods PEIR were adopted as part of the Eastern Neighborhoods Area Plans with uncertain feasibility to address significant transit impacts. While these plan-level measures are not applicable to the Project, each is in some stage of implementation. Regarding recreation, the funding and planning for several Eastern Neighborhoods parks and open space resources are discussed on pages 33 and 34 of the CPE Initial Study.

Thus, based on the available evidence, the project is in the process of providing the public benefits required by the Public Benefits Program. As is generally the case with development fee-based provision of community benefits, capital facilities are constructed as fees are collected and are rarely provided in advance of development.

RESPONSE 3: The proposed project is consistent with the development density established under the Eastern Neighborhoods Area Plan and would not result in significant impacts on the physical environment due to conflicts with the General Plan or the Mission Area Plan that are peculiar to the project or the project site.

The appellant alleges that the proposed project is both individually and cumulatively inconsistent with the General Plan, Mission Area Plan, and Section 101.1(b) Priority Policies. However, the appellant's appeal

[8] City and County of San Francisco, *Interagency Plan Implementation Committee Annual Report, January 2020*. Available at https://sfplanning.org/project/implementing-our-community-plans-ipic#monitoring-plan-success, accessed February 3, 2020.

letter provides no specific information regarding how the project is inconsistent such that there would be a significant physical environmental effect, nor does the appellant provide evidence in support of this claim.

Topic 1(b) in the "Land Use and Land Use Planning" section of the CPE Initial Study limits review of the Project's conflicts with any applicable land use plan, policy, or regulation to those "adopted for the purpose of avoiding or mitigating an environmental effect." Project-related policy conflicts and inconsistencies do not constitute, in and of themselves, impacts on the physical environment under CEQA.

Through the Eastern Neighborhoods Plan rezoning process, the project site was rezoned from industrial use to Urban Mixed-Use district (UMU), which is intended to buffer industrial and mixed uses and promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially zoned area. It also allows for residential use. The proposed project is consistent with the UMU zoning district.[9] As discussed in the CPE Initial Study, implementation of the proposed project would limit and may preclude development of production, distribution, and repair (PDR) space on the project site in the future. The Initial Study further notes that loss of 14,000 square feet or more of potential PDR space would indirectly contribute to the significant cumulative land use impact related to loss of PDR uses that was identified in the Eastern Neighborhoods PEIR. However, the loss of 14,000 square feet would not be considered considerable. This loss would not result in new or more severe impacts than were disclosed in the PEIR and, therefore, the project's contribution to this cumulative impact is not considerable and would not require additional environmental review beyond the analysis provided in the Eastern Neighborhoods PEIR and project-specific Initial Study.

The project is also consistent with the Priority Policies as established in section 101.1(b) of the San Francisco Planning Code. The Priority Policies guide General Plan policies within the city and are broadly related to housing, transportation, safety, preservation, recreation, and economic development. The appellant has not demonstrated that there is any conflict with the Priority Policies.

Additionally, the proposed project is consistent with the Mission Plan. In particular, it is consistent with Objective 1.1, which calls for strengthening the mixed-use character of the neighborhood while maintaining the neighborhood as a place to live and work. The project is consistent with the development density established in the Eastern Neighborhoods Area Plans specifically the Mission Area Plan, and thus implementation of the proposed project would not conflict with applicable land use plans or policies adopted for the purpose of avoiding or mitigating an environmental effect.

While not relevant to this appeal, for informational purposes, it should also be noted that the consistency of the proposed project with those General Plan and Mission Area Plan policies that do not relate to physical environmental effects were considered by the Planning Commission as part of its determination of whether to approve, modify, or disapprove the project.

[9] Ordinance 200143 is pending legislation that is currently under consideration by the Board of Supervisors. If approved, the Ordinance would amend the Planning Code to prohibit office uses in the upper levels of certain developments within Urban Mixed Use (UMU) zoning districts.

Ongoing City Efforts Regarding Socioeconomic Impacts of Development

Further, the department is aware that large projects in the Eastern Neighborhoods, including in the Mission District, raise concerns with members of the public and the board alike. While not relevant to this CEQA appeal, the department notes the following ongoing efforts to address the socioeconomic impacts of development in these areas of the city.

The department is working with the community, Planning Commission, elected leaders, and city partners to undertake a series of policy and implementation efforts aimed at addressing socioeconomic issues. While economic displacement is a citywide phenomenon, the department recognizes the heightened effects are acutely felt by families and in communities of color, and neighborhoods that have historically been havens for immigrants and others seeking opportunity or freedom. The department is at work on its Racial and Social Equity Initiative Action Plan, which aims to proactively advance equity in the department's internal and external processes such as community planning, policy development, resource allocation and process improvements. The department's focus on racial and social equity was also reaffirmed by the Planning Commission on June 11, 2020 by Resolution No. 20738, which centers the department's work program and resource allocation on racial and social equity and directs the department to develop proactive strategies to address structural and institutional racism in collaboration Black and American Indian communities and communities of color. Internally, the department has established a Community Equity Division to elevate, prioritize and expand racial and social equity work within the department and in the community. This effort also applies to the Environmental Planning division, which is reviewing its internal and external processes and environmental analysis procedures to address racial and social equity in environmental review.

In addition, the department has been especially engaged in efforts in the Mission, working with former District 9 Supervisor Campos, current District 9 Supervisor Ronen, and the Mayor's Office to preserve the viability of the Latino community in the Mission. Efforts specific to the Mission District include the 2016 Mission Interim Controls for Restaurants and Storefront Mergers in the Mission Interim Controls Area, the Mission Action Plan 2020 ("MAP2020"), the Calle 24 Special Use District, and the Calle 24 Special Area Design Guidelines, which were adopted by the Planning Commission on November 21, 2019 and became effective December 1, 2019.

MAP2020 is one of the most robust Planning Department efforts to date regarding anti-displacement and is an unprecedented collaboration between the City family and Mission community organizations and residents. The department has taken an innovative approach to building a set of broad strategies to preserve, strengthen and protect existing residents, community services, local businesses, and the Mission's unique character. Most strategies in the MAP2020 are currently under implementation, including tenant business and nonprofit protection programs, process improvement measures, prioritization of affordable housing projects in the pipeline, and more. More information on the MAP2020 and updates on current implementation efforts can be found in the second annual status report, which was released in December 2019 and available on the department website.[10]

[10] San Francisco Planning Department, *Mission Action Plan 2020 – Annual Status Report,* December 2019. Available at: https://default.sfplanning.org/Citywide/Mission2020/MAP2020_Status_Report_2019.pdf, accessed January 31, 2020.

Other ongoing department efforts include development of a Community Stabilization Initiative, incorporation of Environmental Justice policies into the General Plan, the Cultural Districts Initiative, and the Housing Affordability Strategies project. The Community Stabilization Initiative is a multi-agency effort to assess the City's existing portfolio of tools, unify fragmented efforts into one comprehensive inventory, and identify priorities for the future. The initiative seeks to mitigate the impacts of ongoing displacement and help vulnerable populations thrive and contribute to the City's economy and culture. The city's efforts to integrate Environmental Justice into the General Plan elements is still in the early stages of development but, once adopted, would guide future city policies and decisions and potentially tie in with other General Plan policy updates. The department is also a supporting the City's Cultural Districts Initiative, led by the Mayor's Office of Housing and Community Development. The program's stated purpose is to: "formalize a collaborative partnership between the City and communities and bring resources and help in order to stabilize vulnerable communities facing or at risk of displacement or gentrification. and to preserve. strengthen and promote our cultural assets and diverse communities. so that individuals, families, businesses that serve and employ them, nonprofit organizations. community arts, and educational institutions are able to live, work and prosper within the City."[11] Additionally, the department is developing the Housing Affordability Strategies project which will provide a framework to help City staff, policymakers and the public evaluate how our housing policies and plans work together to address housing affordability for our diverse population. The project will inventory and assess current and potential policy tools in relation to metrics for improved housing affordability with a focus on outcomes for low- and moderate-income households in relation to the broader housing market. The Housing Affordability Strategies project has been ongoing since 2018, and a report is anticipated for later this spring.

Economic and social effects of a project shall not be treated as effects on the environment but may be used to determine the significance of a physical effect. Such an analysis is beyond the scope of environmental review under CEQA. Again, city staff acknowledge the concerns of the community and the appellant raised in the appeal. The above information is to summarize for the public and decision-makers that the Planning Department, in collaboration with community and City-agency partners, is working to address the socioeconomic issues of racial and social equity, affordability, economic displacement, and gentrification through land use planning and policy efforts.

CONCLUSION

The planning department's determination that the proposed project qualifies for a community plan evaluation pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183 is supported by substantial evidence in the record. The planning department conducted necessary studies and analyses and provided the planning commission with the information and documents necessary to make an informed decision at a noticed public hearing in accordance with the planning department's CPE initial study and standard procedures, and pursuant to CEQA and the CEQA Guidelines. Therefore, the planning department respectfully recommends that the board of supervisors uphold the department's determination that the CPE conforms with the requirements of CEQA and reject the appeal.

[11] San Francisco Board of Supervisors, Cultural Districts Program legislation, May 2018: https://sfbos.org/sites/default/files/o0126-18.pdf

Attachment A

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

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

FEHR PEERS

January 12, 2017

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

Subject: Eastern Neighborhoods / Mission District Transportation and Demographic Trends

Dear Chris:

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

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

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

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

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

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

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

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

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

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

Background and Literature on Factors Surrounding Travel Behavior

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

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

Socioeconomic Characteristics

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

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

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

Travel Options

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

Local Land Use and Built Environment

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

Regional Land Use and Built Environment

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

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

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

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

Number of Long-Distance Commute Trips

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

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

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

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

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

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

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

TABLE 1: COMMUTERS LIVING AND WORKING IN DIFFERENT COUNTIES, 2010[1]

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

1. VitalSigns does not provide data prior to 2010.
2. Median rents are based on self-reported rents paid by current residents across a variety of unit types, and do not reflect the rent accepted by new residents. Amounts shown are adjusted for inflation to 2014 dollars.
Source: Metropolitan Transportation Commission VitalSigns, 2016; Fehr & Peers, 2016

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

[8] ABAG projections are taken from Plan Bay Area 2013.

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

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

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

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

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

distances. However, the model does indicate that overall aggregate regional growth is expected to help reduce the average distance that a typical worker travels between home and work. The SFCTA has estimated that existing average VMT per household is 17.2 for the region and 8.4 in San Francisco. The regional VMT per household is expected to decrease to approximately 16 7.5 by the year 2040[10]. Employment data shows that the share of Bay Area residents living more than ten miles from their employer increased from 2004 to 2014 (See **Table 2**); over the same period, the absolute number of individuals living more than ten miles from their employer also increased. As such, a larger number of individuals are likely driving alone to work across longer distances. This does not, however, translate into a higher share of individuals driving alone to work; the regional drive alone commute modeshare is at its lowest point since 1960, based on census data.

TABLE 2: DISTANCE FROM HOME CENSUS BLOCK TO WORK CENSUS BLOCK[1], BAY AREA RESIDENTS, 2004 - 2014

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

1. LEHD data uses payroll and other labor information; distances may not represent an employee's typical workplace, but rather the location of their employer's office for labor reporting purposes.
2. 2004 base year is used due to data from 2000 not being available
Source: Longitudinal Employer-Household Dynamics, 2016; MTC VitalSigns, 2016; Fehr & Peers, 2016

Vehicle Trip Rates and Demographics of New Residents

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

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

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

TABLE 3: MIGRATION STATUS OF MISSION RESIDENTS[1] IN PAST YEAR AND MEDIAN INDIVIDUAL INCOME

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

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.
Source: ACS Table S0701, 5-year averages, 2004-2009, 2009-2014; Fehr & Peers, 2016

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

TABLE 4: DRIVE ALONE MODESHARE BY INCOME GROUP, MISSION RESIDENTS[1] (2009- 2014)

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

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.
Source: ACS Table S1901, 5-year averages, 2009-2014; Fehr & Peers, 2016

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

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

In addition to census data, Planning has conducted three case studies at residential developments built in the past ten years in the Mission Neighborhood. These sites are located at 2558 Mission Street, 555 Bartlett Street, and 1600 15th Street. Each building consists of newer, largely market-rate housing, although 555 Bartlett Street and 1600 15th Street each have between 15 and 20 percent of units set aside as below market rate housing. Surveys at these sites were conducted during the extended AM and PM peak hours, and consisted of intercepting individuals at all project entrances and exits to inquire about their mode choice. In addition, person counts and vehicle counts were conducted at all entrances. Results from these surveys are shown by site in **Table 6**.

TABLE 5: COMPARISON OF SHIFTS IN INCOME AND AUTOMOBILE TRAVEL INDICATORS, MISSION RESIDENTS[1]

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

1. Census data for Mission residents includes Census tracts 177, 201, 202, 207, 208, 209, 210, 228.01, 228.03, 229.01, and 229.02.
Source: American Community Survey, Tables B25044, B08130, S1901, 5-year averages, 2004 – 2009 and 2009 - 2014 ; Decennial Census, Tables H044, P030, DP3, 2000; Fehr & Peers, 2016

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

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

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

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

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

Transit Modeshare Over Time

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

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

TABLE 7: MISSION RESIDENT TRANSIT MODESHARE TRENDS, 2000 – 2014 (COMMUTE TRIPS ONLY)				
Year	**Total Transit Modeshare**	**Muni Bus or Rail[1]**	**BART[2]**	**Caltrain[3]**
2000	42%	24%	16%	1%
2004 – 2009	46%	29%	16%	1%
2009 – 2014	44%	24%	18%	3%

1. "Bus or trolley bus" and "Streetcar or trolley car" categories
2. "Subway or elevated" category
3. "Railroad" category

Source: ACS 2014; Fehr & Peers, 2016

Expected and Observed Peak Hour Vehicle Traffic Growth

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

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

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

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

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

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

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

1. 2016 to date projected volume is derived from the 2000 baseline volume plus 10 percent of Option C added project trips. Actual completed development analyzed in Option C amounts to 25% of studied residential units, and 4% of non-residential new development.
Source: Fehr & Peers, 2016; Eastern Neighborhoods TIS, 2008

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

Policy and Program Changes since Adoption of Eastern Neighborhoods Plan

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

San Francisco Bicycle Plan

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

Better Streets Plan

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

Muni Forward

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

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

Vision Zero

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

Propositions A and B (2014)

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

Transportation Sustainability Program

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

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

Commuter Shuttle Program

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

On-Demand Smartphone Ride Companies

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

Sincerely,

FEHR & PEERS

Eric Womeldorff, P.E.
Principal

Teresa Whinery
Transportation Planner

Attached:

Attachment A

Option A Percent Complete

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

Progress: Non-Residential & Non-PDR	20%
Progress: Residential	65%
Percent Complete, Option A	**40%**

Option C Percent Complete

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

Progress: Non-Residential & Non-PDR	4%
Progress: Residential	25%
Percent Complete, Option C	**10%**

No Project Percent Complete

	CIE	Medical	Office	PDR	Retail	Visitor	Residential
Net Change, 2011 - 2015	-25,211	15,200	108,400	-206,311	40,119	0	506
EN CNP Total (Delta from Baseline)	134,700	36,900	551,400	-513,185	144,000	1	420
Progress	-19%	41%	20%	40%	28%	100%	120%

Progress: Non-Residential & Non-PDR	16%
Progress: Residential	120%
Rounded Estimate Complete, No Project	**70%**
Time Estimate Complete, No Project (2016 - 2000) / (2025 - 2000)	**64%**

Attachment A - Turning Movement (Option A)

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

	NBL	59	63	71	62	64	2,018	39	1,572	-446	
	NBT	442	480	535	466	479		417			
	NBR	0	0	0	0	0		0			84%
	SBL	0	0	0	0	0		2			
	SBT	549	553	557	552	552		407			
	SBR	199	218	224	211	209		162			75%
	EBL	0	0	0	0	0		0			
	EBT	0	0	0	0	0		0			
	EBR	0	0	0	0	0		0			100%
	WBL	73	104	108	93	87		54			
	WBT	443	632	655	564	528		396			
Valencia & 16th	WBR	83	118	123	105	99		95			76%
	NBL	49	50	51	50	50	2,376	40	1,913	-463	
	NBT	398	433	497	420	438		323			
	NBR	73	74	78	74	75		71			77%
	SBL	70	74	77	73	73		43			
	SBT	499	530	535	519	513		364			
	SBR	50	53	54	52	52		48			71%
	EBL	28	30	29	29	28		36			
	EBT	318	336	334	330	324		272			
	EBR	65	69	67	68	66		44			84%
	WBL	58	62	63	61	60		52			
	WBT	604	647	645	632	620		549			
Valencia & 15th	WBR	75	80	81	78	77		71			89%

Sources:

2000 Baseline: Eastern Neighborhoods Plan TIS

2025 NP: Eastern Neighborhoods Plan TIS

2025 + Opt. A: Eastern Neighborhoods Plan TIS

2025 + Opt. B: Eastern Neighborhoods Plan TIS

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

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

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

Attachment A - Turning Movement (Option C)

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

	NBL	59	63	69	62	60	1,885	39	1,572	-313	
	NBT	442	480	518	466	450		417			
	NBR	0	0	0	0	0		0			89%
	SBL	0	0	0	0	0		2			
	SBT	549	553	583	552	552		407			
	SBR	199	218	230	211	202		162			76%
	EBL	0	0	0	0	0		0			
	EBT	0	0	0	0	0		0			
	EBR	0	0	0	0	0		0			100%
	WBL	73	104	99	93	76		54			
	WBT	443	632	603	564	459		396			
Valencia & 16th	WBR	83	118	113	105	86		95			88%
	NBL	49	50	53	50	49	2,311	40	1,913	-398	
	NBT	398	433	477	420	406		323			
	NBR	73	74	79	74	74		71			82%
	SBL	70	74	77	73	71		43			
	SBT	499	530	550	519	504		364			
	SBR	50	53	55	52	51		48			73%
	EBL	28	30	29	29	28		36			
	EBT	318	336	326	330	319		272			
	EBR	65	69	67	68	65		44			85%
	WBL	58	62	63	61	59		52			
	WBT	604	647	657	632	609		549			
Valencia & 15th	WBR	75	80	82	78	76		71			90%

Sources:

2000 Baseline: Eastern Neighborhoods Plan TIS

2025 NP: Eastern Neighborhoods Plan TIS

2025 + Opt. A: Eastern Neighborhoods Plan TIS

2025 + Opt. B: Eastern Neighborhoods Plan TIS

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

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

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

FEHR PEERS

MEMORANDUM

Date: April 17, 2017

To: Chris Kern, San Francisco Planning Department

From: Teresa Whinery and Eric Womeldorff, Fehr & Peers

Subject: Updated Eastern Neighborhoods Traffic Counts

SF16-0908

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

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

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

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

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

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

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

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

Attachment B

Fehr & Peers

2918 Mission St Analysis Memorandum

June 5, 2018

FEHR PEERS

MEMORANDUM

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

SF18-0978

Introduction

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

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

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

Project Description

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

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

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

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

Intersection Volumes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Transit Effects

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

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

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

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

Source: SFCTA Congestion Management Program, 2018