



# RESPONSES TO COMMENTS

## San Francisco 2004 and 2009 Housing Element

Revised EIR Alternatives Analysis

CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT  
CASE NO. 2007.1275E

STATE CLEARINGHOUSE NO. 2008102033

Draft EIR Publication Date:	<b>June 30, 2010</b>
Draft EIR Public Hearing Date:	<b>August 5, 2010</b>
Draft EIR Public Comment Period:	<b>June 30, 2010 – August 16, 2010</b>
Revised Draft EIR Publication Date:	<b>December 18, 2013</b>
Revised Draft EIR Public Hearing Date:	<b>January 23, 2014</b>
Revised Draft EIR Public Comment Period:	<b>December 18, 2013 – February 18, 2014</b>
Final EIR Certification Hearing Date:	<b>April 24, 2014</b>



SAN FRANCISCO  
PLANNING  
DEPARTMENT

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



# TABLE OF CONTENTS

---

## San Francisco 2004 and 2009 Housing Element Revised EIR Alternatives Analysis: Responses to Comments

<b>Volume III</b>	<b><u>Page</u></b>
<b>I. Introduction to Responses to Comments</b>	<b>I-1</b>
A. Purpose of this Responses to Comments Document	I-1
B. Organization of Comments and Responses	I-2
<b>II. Public Hearing Transcript and Public Comments</b>	<b>II-1</b>
A. List of Persons Commenting	II-1
B. Transcript	II-5
C. Comment Letters and Emails	II-50
<b>III. Responses to Comments</b>	<b>III-1</b>
A. Organization of Responses to Comments	III-1
B. Responses to Individual Comments	III-1
<b>IV. Revised EIR Text Changes</b>	<b>IV-1</b>
<b>Appendix A</b>	



# SECTION I

---

## Introduction to Responses to Comments

### A. Purpose of this Responses to Comments Document

On March 24th 2011, the San Francisco Planning Commission certified the Final Environmental Impact Report (FEIR) for the 2004 and 2009 Housing Element. On June 21, 2011 the San Francisco Board of Supervisors adopted the 2009 Housing Element as the Housing Element of the San Francisco General Plan. However, pursuant to the San Francisco Superior Court's direction in *San Franciscans for Livable Neighborhoods v City and County of San Francisco*, San Francisco Superior Court Case No. 513-077<sup>1</sup>, the Planning Department recirculated for public review a revised Chapter VII Alternatives of the FEIR, on December 18, 2014.

The following summarizes the changes made to the revised Chapter VII Alternatives:

- A subsection in Chapter VII Alternatives titled "Development Assumptions by Alternative" was added under the Analysis of Project Alternatives section. This discussion provides generalized assumptions regarding the location, density, and types of new housing anticipated under each alternative, based on the policies associated with each alternative.
- The environmental analysis of each alternative was revised to provide additional clarification and substantiation of the impact conclusions. The impact conclusions provided within the previously circulated Draft EIR have not been changed.
- The discussion in Chapter VII Alternatives, under the Alternatives Considered but Eliminated from Further Analysis section of the EIR, was revised.
- Table VII-4, Comparison of Alternatives to the proposed Housing Elements, has been revised to correct errata in the previously circulated EIR and to reflect refinements to the revised Chapter VII Alternatives analysis.

In addition, the Department recirculated and made conforming changes to Chapter II Executive Summary to reflect the revisions made in Chapter VII Alternatives (hereafter referred to as the "Revised EIR"). This Responses to Comments document was prepared in accordance with the California Environmental Quality Act (CEQA) *Guidelines* and contains all relevant comments on the Revised EIR and the Department's responses to those comments, including copies of the comment letters received and a transcript of the January 23, 2014 public hearing on the Revised EIR at the San Francisco Planning Commission. As specified in the Notice of Availability of the Revised EIR dated December 18, 2013, "Comments should be limited to the recirculated sections of the EIR in accordance with Section 15088.5(f)(2) of the CEQA Guidelines." Thus in accordance with CEQA Guidelines Section 15088(f)(2) this document formally responds only to comments on the recirculated Revised EIR sections. Comments provided on other sections of the EIR that were not recirculated are included in this document, but any associated response is provided for informational purposes only, and do not require any changes to the EIR.

---

<sup>1</sup> *San Franciscans for Livable Neighborhoods v City and County of San Francisco*, December 19, 2013. This document is part of the case file 2007.1275E and is available for review at the Planning Department, 1650 Mission Street, Suite 400.

This Responses to Comments document will be sent to public agencies and members of the public who testified at the public hearing on the Revised EIR and/or provided written comments via letters and emails. The Revised EIR, together with this Responses to Comments document and the unrevised portions of the EIR, will be considered by the Planning Commission in an advertised public meeting and then certified as a Final EIR if deemed adequate.

The Housing Element is a public policy document that addresses issues relating to housing needs for San Francisco residents. The Housing Element is prepared in response to Government Code section 65580 et seq., California state housing element law, which requires local jurisdictions to plan for and address the housing needs of its population to meet state housing goals. The 2004 and 2009 Housing Element EIR found that implementation of either the 2004 or 2009 Housing Element would result in significant environmental effects on the transit network that could not be mitigated to a less than significant level with implementation of mitigation measures.

## **B. Organization of Comments and Responses**

This document contains the written and oral public comments received on Revised EIR, and responses to those comments. Also included in this document are staff-initiated changes to the text of the revised portion of the Draft EIR.

Following this introductory section, Section II presents a table of all persons and organizations that provided written or oral comments, and the date of their communications. The public hearing on the Revised EIR occurred before the San Francisco Planning Commission on January 23, 2014. Following the list of commenters is the full transcript of the public hearing, and all written comments that were received by the Planning Department on the Revised EIR. The public comment period ran from December 18, 2013 through February 18, 2014 (the original close of the public comment period was February 3, 2014, but was extended to February 18, 2014 in response to requests from the public and the Planning Commissioners).

Section III provides the Planning Department's responses to the public comments. The order of the responses generally corresponds to the order of comments provided in Section II. The name of the commenter is indicated in parentheses following each comment number. In instances where multiple commenters made similar statements, those comments are typically responded to only once and subsequent comment responses refer the reader to the earlier (similar) response(s).

Section IV contains text changes to the Revised EIR, specifically Chapter VII Alternatives, provided by the EIR preparers subsequent to publication of the Revised EIR to correct or clarify information presented therein. Where applicable changes made to the text of the Revised EIR are shown in underline for additions and ~~striketrough~~ for deletions.

Numerous comments made both in writing and at the public hearing were directed towards the perceived merits of the project and not the adequacy or accuracy of the Revised EIR, or were directed to sections of the EIR that were not revised or recirculated. Such instances are noted in the responses. These comments will be available to decision-makers as they consider whether to approve the project.

The comments and responses to the Revised EIR will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final EIR, as indicated in the responses.

## SECTION II

### Public Hearing Transcript and Public Comments

#### A. List of Persons Commenting

Letter/Transcript Number	Commenter Name (Last, First)	Agency/Organization	Date	Media
R1	Scott, Leonard Gregory	Pacific Heights Residents Association	January 23, 2014	Public Hearing Transcript
R1	Bisho, Dave	Westwood Highlands Association		
R1	Russom, Michael	Park Merced Action Coalition		
R1	Ferguson, Charles	Presidio Heights Association of Neighbors		
R1	Devincenzi, Kathy	San Franciscans for Livable Neighborhoods		
R1	White, Steven			
R1	Hillson, Rose			
R1	Romanovsky, Paula			
R1	Romanovsky, Alex			
R1	Vaughey, Patricia	Marina Cow Hollow Neighbors and Merchants		
R1	Meiswinkel, Diane	Francisco Heights Neighborhood Association		
R1	Rawlins, Kathleen	Miraloma Park Improvement Club		
R1	Liberthson, Dan	Miraloma Park Improvement Club		
R1	Ross, Tom			
R1	Squeri, Carolyn	St. Francis Homes Association		
R1	Choden, Bernard	San Francisco Tomorrow		
R1	Fukuda, Hiroshi	Coalition for San Francisco Neighborhoods		
R1	Armour, Timothy	Miraloma Park Improvement Club		
R1	Teitelbaum, Risa	Liberty Hill Neighborhood Organization		
R1	Steiner, Shari	Liberty Hill Neighborhood Organization		
R1	Eliza, Mari	Coalition for San Francisco Neighborhoods		

R1	Courtney, Kathleen	Housing and Zoning for the Russian Hill Community Association		
R1	Howard, Catherine	Open Space Committee for Coalition for San Francisco Neighborhoods		
R1	Schaeffer, Chris			
R1	Gee, Robert	Miraloma Park Improvement Club		
R1	Barish, Jean			
R1	Bardis, John			
R1	Berkowitz, Judy	Coalition for San Francisco Neighborhoods		
R1	Sugaya, Bill			
R1	Moore, Kathrin			
R1	Borden, Gwyneth			
R2	Chiang, (Yen) Ken	CA PUC	February 04, 2014	Email
R3	Sampson, Rich	Cal Fire	December 31, 2013	Email
R4	Benedict, Libby	Francisco Heights Neighborhood Association	N/A	Letter
R5	Liberthson, Dan	Miraloma Park Improvement Club	February 13, 2014	Letter
R6	Fukuda, Hiroshi	Richmond Community Association	February 18, 2014	Email
R7	Courtney, Kathleen	Russian Hill Community Association	January 24, 2014	Email
R8	Anderson, Ed		February 16, 2014	Email
R9	Bancroft, David P.		February 14, 2014	Letter
R10	Bardis, John D.		February 21, 2014	Letter
R11	Bowman, Christopher		January 24, 2014	Email
R12	Buick, Jim		February 18, 2014	Email
R13	Charlton, Phyllis		February 18, 2014	Letter
R14	Choden, Bernard		February 07, 2014	Letter
R15	Criss, Bill		February 18, 2014	Email
R16	Devincenzi, Kathryn		February 18, 2014	Letter
R17	David Golick		February 18, 2014	Letter



R18	Donnici, Alessandra Louise		February 16, 2014	Email
R19	Donnici, Mary Louise		February 16, 2014	Email
R20	Donnici, Phillip Albert		February 16, 2014	Email
R21	Donnici, Patrick		February 17, 2014	Email
R22	Dougery, Marilyn R.		February 16, 2014	Email
R23	Eliza, Mari		February 18, 2014	Email
R24	Emmons, Don		February 18, 2014	Letter
R25	Finigan, Vincent		February 18, 2014	Email
R26	Frankenstein, George and Diane		February 18, 2014	Email
R27	Goodman, Aaron		January 22, 2014	Email
R28	Goodman, Aaron		January 22, 2014	Email
R29	Hempstead, Susan		February 18, 2014	Email
R30	Hilson, Rose		February 18, 2014	Email
R31	Hilson, Rose		February 18, 2014	Letter
R32	Kaufman, Malcolm		February 18, 2014	Letter
R33	Kennedy, Jo		February 18, 2014	Letter
R34	Leavens, Nancy P.		February 18, 2014	Email
R35	Leavens, Nancy P.		February 17, 2014	Email
R36	Martin, Francis J.		N/A	Email
R37	Monfredini, Janet		February 18, 2014	Email
R38	Murphy, Patty		February 18, 2014	Email
R39	Norris, Lynn/Ransick, Neil		February 18, 2014	Email
R40	O'Gara, Christine		N/A	Email
R41	O'Gara, Vincent		February 18, 2014	Email
R42	Pasquini, Frances		February 18, 2014	Email
R43	Squeri, Carolyn		February 17, 2014	Email
R44	Stone, Pamela A.		February 18, 2014	Email
R45	Wells, Wallace and Virginia		February 18, 2014	Letter

R46	Young, Rosilyn		February 16, 2014	Email
R47	Young, Gilbert		February 17, 2014	Email
48	Gissler, Cynthia		February 21, 2014	Letter
49	Wood, Geoff		February 18, 2014	Letter

SAN FRANCISCO PLANNING DEPARTMENT  
SAN FRANCISCO PLANNING COMMISSION

Commission Chambers, Room 400  
City Hall, 1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4689

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Thursday, January 23, 2014

3:15 p.m.

HOUSING ELEMENT, ITEM 15

Regular Meeting

Commissioners:

Cindy Wu, Vice-President

Gwyneth Borden Rich Hillis Kathrin Moore Hisashi Sugaya

Commission Secretary:

Jonas P. Ionin

Reported by: Peppina Rayna Harlow, CSR, CLR

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## I N D E X

## A P P E A R A N C E S

Stephen Smith, Environmental Planning  
Audrey Pearson, Deputy City Attorney  
John Rahaim, Director of Planning Department

## PUBLIC COMMENTERS:

Leonard Gregory Scott	Risa Teitelbaum
Dave Bisho	Shari Steiner
Michael Russom	Mari Eliza
Charles Ferguson	Kathleen Courtney
Kathy Devincenzi	Catherine Howard
Steven White	Chris Schaeffer
Rose Hillson	Robert Gee
Paula Romanovsky	Jean Barish
Alex Romanovsky	John Bardis
Patricia Vaughey	Judy Berkowitz
Diane Meiswinkel	
Kathleen Rawlins	
Dan Liberthson	
Tom Ross	
Carolyn Squeri	
Bernard Choden	
Hiroshi Fukuda	
Timothy Armour	

1 SAN FRANCISCO, CALIFORNIA

2 THURSDAY, JANUARY 23, 2014, 3:15 P.M.

3 --oOo--

4 (Call to Order of the Commission)

5 SECRETARY IONIN: Welcome, everyone, back to San  
6 Francisco Planning Commission regular hearing for  
7 Thursday, January 23, 2014.

8 I'd like to remind members of the public and  
9 audience to please silence all mobile devices that may  
10 sound off during the proceedings, and, when speaking  
11 before the Commission, if you care to state your name for  
12 the record.

13 Commissioners, we left off under your regular  
14 calendar case No. 2007.1275E,  
15 San Francisco 2004 and 2009 Housing Element, public  
16 hearing on revised sections of the Draft Environmental  
17 Impact Report. Written comments will be accepted until  
18 February 3rd, 2014.

19 I'd like to advise members of the public to  
20 limit your comments to only the revised sections of the  
21 draft environmental report. I repeat, only the revised  
22 sections of the draft environmental report. That is what  
23 is before you today -- or before the Commission.

24 Also, the Commission chair as determined that  
25 each member of the public will be afforded two minutes of

N/S

1 public comment.

2 MR. SMITH: Good afternoon, Vice President Wu  
3 and Members of the Commission. I am Stephen Smith of the  
4 Environmental Planning Section of the Planning  
5 Department. This is a hearing to receive comments on the  
6 partially-revised draft Environmental Impact Report for  
7 case No. 2007.1275E for the 2004 and 2009 Housing  
8 Element.

9 This EIR provides a separate analysis for the  
10 2004 and 2009 Housing Elements as individual projects.  
11 As for the Housing Element itself, which is part of the  
12 General Plan, is a policy document consisting of goals  
13 and policies to guide the City and private and nonprofit  
14 developers meeting existing and objective housing demand.

15 The City is required to have a Housing Element  
16 as part of its general plan which meets the State Housing  
17 Element problem which is administered by the California  
18 Department of Housing and Community Development for HCD.

19 The 2004 and 2009 Housing Elements were prepared  
20 consistent with state law. This includes the requirement  
21 that the Housing Element address the City's abilities to  
22 meet the Regional Housing needs allocation which  
23 establishes the City's fair share of regional housing  
24 production at various income levels and which is  
25 determined by the Association of Bay Area Governments in

N/S

1 coordination with the HCD.

2           On March 24, 2011, the San Francisco Planning  
3 Commission certified the Environmental Impact Report for  
4 the 2004 and 2009 Housing Element.

5           On June 21, 2011 the Board of Supervisors  
6 selected and adopted the 2009 Housing Element as the  
7 City's General Planned Housing Element under Ordinance  
8 108.11. However, pursuant to a recent court order  
9 regarding the 2004 and 2009 Housing Element EIR, the  
10 Planning Department has partially revised the EIR,  
11 specifically Chapter 7 Alternatives, and is recirculating  
12 the Alternatives Analysis for comment and review.

13           The primary provisions to the Chapter 7  
14 Alternatives include the following:

15           Number one, a new subsection entitled  
16 Development Assumptions by Alternative which provides  
17 generalized assumptions that required location, density  
18 and types of new housing anticipated under each project  
19 alternative.

20           Number two, revisions to the environmental  
21 analysis of each alternative, which provide additional  
22 clarification and substantiation of the impact  
23 conclusions. I would note here that no impact  
24 conclusions have changed from the previously circulated  
25 EIR.

N/S

1           Number three, an advanced discussion of  
2 alternatives considered but eliminated from further  
3 analysis.

4           Number four, revisions to Table 7-4, which  
5 provides a summary of impacts under each alternative as  
6 compared to the 2004 and 2009 Housing Elements.  
7 These revisions make minor corrections and reflect  
8 refinements made to the alternatives analysis.

9           Lastly, the department made conforming changes  
10 to Chapter 2, the executive summary, to reflect revisions  
11 in Chapter 7 alternatives.

12           Consistent with the CEQA guidelines and the  
13 recent Court order, comments today should be directed  
14 only to those sections of the draft EIR that have been  
15 recirculated, namely, the revised Chapter 7 alternatives  
16 and the conforming changes in the executive summary.  
17 Comments today should be directed to the adhocacy and  
18 accuracy of the information contained in these revised  
19 sections of the EIR.

20           Staff is not here to answer comments today.  
21 Comments will be transcribed and responded to in writing  
22 in a Responses to Comments document which will address  
23 all verbal and written comments received and, as  
24 appropriate, make revisions to recirculated portions to  
25 the draft EIR.

N/S



1 This is not a hearing to consider approval or  
2 disapproval of the project. That hearing will follow the  
3 final EIR certification.

4 Commenters are asked to speak slowly and clearly  
5 so that the court reporter can produce an accurate  
6 transcript. Commenters should also state their name and  
7 address so that they can be properly identified and so  
8 that they can be sent a copy of the comments and  
9 responses when completed.

10 After hearing comments from the general public,  
11 we will also take comments from the planning  
12 commissioners on the partially revised draft EIR.

13 The public comment period for this project began  
14 on December 18, 2013 and extends until 5:00 p.m. on  
15 Monday, February 3rd, 2014.

16 This concludes the presentation on this matter,  
17 and, unless the commissioner members have any questions,  
18 I would suggest that the public hearing be opened.

19 COMMISSIONER WU: Thank you.

20 I have a number of speaker cards. I will call them in  
21 batches. If you could please line up on the screen side  
22 of the room.

23 Greg Scott; David Bisho; Michael Newsome;  
24 Charles Ferguson.

25 First speaker?

N/S

N/S

1 SECRETARY IONIN: First speaker, please.  
 2 MR. SCOTT: My full name is actually Leonard  
 3 Gregory Scott. I'm president of the Pacific Heights  
 4 Residents Association. I reside at 2434 Jackson Street  
 5 in San Francisco.

R1-1

6 We would like to ask for a continuance because  
 7 we did not understand from the notice that we could  
 8 comment on the incorporated sections of the EIR as far as  
 9 they pertained to Alternatives. So please give us more  
 10 time to review these hundreds of pages is our request.

R1-2

11 The middle class in the City -- to support the  
 12 middle class in the city, the Housing Element should have  
 13 some single-family neighborhoods. And so you should  
 14 amend the EIR -- the element to institute policies that  
 15 would be effective in producing middle class  
 16 neighborhoods in order for the policies to be effective  
 17 to increase the middle class neighborhoods and middle  
 18 class housing. It's something not being given sufficient  
 19 attention in this City, and the crisis is not having  
 20 housing for the middle class of the city that is going to  
 21 force the middle class out of the city. There will be no  
 22 place for them. It will be a tragedy. It's a huge issue  
 23 for employers in order to attracting people who live and  
 24 work here.

25 So, again, we think the Housing Element as it

R1-2  
cont.

1 currently stands is wholly inadequate.

2 MR. BISHO: My name is Dave Bisho. My address  
3 is 120 Brentwood Avenue in San Francisco 94127. I'm  
4 president of Westwood Highlands Association, which is a  
5 90-year-old single-family neighborhood on Mount Davidson.  
6 I grew up here, went to school here, I work here, raised  
7 my family here and now my grandkids, everybody lives in  
8 the city. My family has been here four generations.

N/S

9 As you know, when the 1994 Housing Element was  
10 released without an EIR and with all of its Draconian  
11 plans for stacked up housing, parking elimination, and  
12 Manhattanization, our neighborhood coalition brought that  
13 to court, and we prevailed.

R1-3

14 Then Planning released the 2009 Housing Element.  
15 This time with the EIR, but an inadequate EIR. And, with  
16 that same terrible plans, that, among several other  
17 things, didn't properly address transportation. Right  
18 now the buses on Geary and Stockton and the underground  
19 J, K, L, M and N are already packed. I've ridden public  
20 transit downtown to work for over 35 years, and, finally,  
21 just recently started driving, which is much faster and  
22 easier. And that particular EIR did not offer  
23 alternatives. That's why the Court ordered this amended  
24 EIR, which most of the public doesn't even know about.  
25 Our neighborhoods have had only three weeks since

R1-3  
(Cont.)



1 Christmas to look at.

2           Glancing at it, though, the transportation  
3 situation still stuck out. But one huge alternative not  
4 addressed at all is housing that say middle class  
5 families with children can almost afford. That starter  
6 housing, with a little backyard and a garage, something a  
7 family with kids would need, kind of like Junior fives  
8 built after World War II out in Sunset and houses in  
9 Midtown Terrace. This housing element doesn't address  
10 this, it only calls for market rate expensive housing,  
11 which there is plenty of, and low end housing, which  
12 there is some of, but no family housing for sale.

R1-4

13 Without families, this City dies or morphs into a kind of  
14 wining and dining for adults, say, like Venice, Italy or  
15 South Beach, Florida, fun places, but no families here.  
16 This is no plan for San Francisco.

N/S



17           SECRETARY IONIN: Thank you, sir. Your time is  
18 up.

R1-5



19           MR. RUSSOM: My name is Michael Russom. I'm at  
20 the Park Merced Action Coalition, and I am very concerned  
21 that this new housing element does not take into  
22 consideration the need for transit before development.  
23 I've been very frustrated by what is coming from Park  
24 Merced where I understand that the plans called for an  
25 increase in something like 8900 residents up to 24,000

R1-5  
(Cont.)

1 units, and the cumulative impact of the environmental  
2 effects of this is just really not being considered.  
3 The -- my children have taken public transportation and  
4 have continually been frustrated by the impacted M train,  
5 the MUNI. To get onto BART from where we live, you have  
6 to take a shuttle from San Francisco State, and that line  
7 winds all the way around the administration building in  
8 San Francisco State. And, yet, all these 8500 new cars  
9 will be added to Park Merced and the northsouth corridor  
10 is already terribly impacted. The -- there just doesn't  
11 seem to be any real consideration of putting transit in  
12 there before development.

R1-6

13 I know the need for affordable housing, but, in  
14 getting rid of the affordable housing in San Francisco  
15 State and putting rent control at peril -- even Dennis  
16 Herrera has said that you can't guarantee that rent  
17 control will be kept when the apartments at Park Merced,  
18 the garden apartments are bulldozed. You are driving  
19 families out of the City. There's all kinds of lip  
20 service by the City to avoid family flight, to fight the  
21 family flight, and create affordable housing, but, in the  
22 end, with developer money and all the power that  
23 developers have, the whole process of planning here  
24 seems -- with the City attorney, the Planning Department  
25 Commission, it all seems to be like nothing but a howdy

R1-6  
(Cont.)



1 doody peanut gallery in the face of all this.

2           So I'd really like to have you make sure that  
3 you really seriously consider the plans for increasing  
4 the densification on the westside, particularly the City  
5 in the face of a lack of adequate transit and among other  
6 issues and the potential pollution coming up. There are  
7 many places in San Francisco where you can do righteous  
8 densification and urban infill. Park Merced is not one  
9 of those places. Thank you.

R1-7



10           VICE-PRESIDENT WU: Let me call a couple more  
11 names. Rose Hillson, Katherine Devincenzi, Steven White,  
12 Paula Romanovsky.

N/S



13           MR. FERGUSON: My name is Charles Ferguson. I  
14 live at 3398 Washington Street. I am director of the  
15 Presidio Heights Association of Neighbors.

R1-8



16           More importantly, I am a family man, a  
17 disappearing breed in this City. I live at my home with  
18 my wife and two teen-aged children.

19           And, more pertinent to today's events, I  
20 think -- with due respect to my fellow supporters here  
21 today -- it was my neighborhood and me personally who  
22 spearheaded the lawsuit that brings us all here today.  
23 We provided the seed money; I provided the ideas, and I  
24 have supported this for a long long time.

25           Contrary to what the agenda says, preliminary

1 recommendation, none, no action required, I am going to  
2 suggest that each one of you put on your thinking caps,  
3 take a page from the Presidio Trust and think about  
4 opening up the record again and letting -- letting the  
5 people tell you what it is that they want.

6 I served as the District 2 representative to the  
7 Citizens Advisory Board that helped the staff develop  
8 what we presented to you as a group on February 10th,  
9 2010, which was the 2009 Housing Element. We had our  
10 last meeting on that, and we spent hours -- I spent eight  
11 months and many hours working, working on that. Yet, the  
12 product disappeared from the record and was changed  
13 before the vote that you took on June 10.

14 We never had an opportunity to come back and  
15 tell you anything about your proposed changes. I think  
16 you should open the record, reconvene the CAB, and let us  
17 tell you how to solve these problems. Because we  
18 developed a Housing Element that we thought everyone in  
19 the City could support. Thank you.

20 VICE-PRESIDENT WU: Thank you.

21 MS. DEVINCENZI: Commissioners, I am Kathy  
22 Devincenzi representing San Franciscans for Liveable  
23 Neighborhoods.

24 The City was correct, its December 18th notice  
25 of availability and recirculate the revision with the

R1-8  
(Cont.)

R1-9

1 corrected notice for 45 days, or, in the alternative,  
2 grant a 30-day extension of the comment period to March  
3 3. The Notice erroneously states that comments should be  
4 limited to the recirculated sections and the agency need  
5 only respond to comments as to the parts of the EIR that  
6 are being recirculated. However, the revised alternative  
7 section incorporates by reference and refers to numerous  
8 other discussions of the impact analyses, and, on January  
9 15, the superior court clarified that the comments may be  
10 made as to the revisions and these reference sections  
11 insofar as they pertain to the alternatives, and the  
12 public had inaccurate notice that it had to review these  
13 other reference sections which amount to hundreds of  
14 pages insofar as they amount to alternatives.

15 Today the secretary and the staff repeated the  
16 incorrect instructions. The writ issued by the Court  
17 says you must submit any and all revisions to the EIR for  
18 public review and consider all comments that you received  
19 as to the revisions to the EIR and consider all comments  
20 you received as to the revisions.

21 So, your notice is inadequate, and you must  
22 recirculate. The Court held that the City abused its  
23 discretion by rejecting alternatives in conclusory  
24 findings and that the EIR's discussion of alternatives  
25 was also unlawful and conclusory. You must give genuine

R1-9  
(Cont.)

R1-10



R1-10  
(Cont.)

1 consideration to alternatives now because the Court set  
2 aside your approval of the project and you have  
3 the opportunity to recommend to the Board alternative  
4 Housing Element policies that will be better.

R1-11

5 We will submit written comments but essentially  
6 you should eliminate the excess and encourage the amount  
7 of housing production that you need to satisfy the income  
8 targets of the housing allocation for this planning  
9 period. Of the pipeline units anticipated to be  
10 developed are 25,000 more than you need.

N/S

11 SECRETARY IONIN: Thank you, ma'am, your time is  
12 up.

13 MS. DEVINCENZI: I'd like to continue with the  
14 if you would give me another minute.

15 VICE-PRESIDENT WU: You can submit your comments  
16 in writing. Thank you.

17 DR. WHITE: My name is Steven White, 151  
18 Beaumont Avenue 94118.

R1-12

19 I support the continuance. I'm worried about

R1-13

20 major changes in the quality of our neighborhood. And

R1-14

21 also worried about transportation issues. Thank you.

N/S

22 MS. HILLSON: (Rose Hillson, 115 Parker Avenue  
23 94118)

24 May I have the overhead please. Okay. So these  
25 are several bullet points that I have in respect to the

N/S



1 alternatives document which I now understand was supposed  
 2 to also talk about the other things that have been  
 3 incorporated into the revised alternatives document which  
 4 I didn't know, so I'm totally confused, but it's okay, I  
 5 got a lot of it down.

R1-15



6           The EIR will be used for all future developments  
 7 for San Francisco for the next 50 years because this is  
 8 probably the last Housing Element EIR that we're going to  
 9 see. This EIR was written very generally and broadly so  
 10 that it can be tailored to all future EIRs for Housing  
 11 Elements. The moderate income units and low income, they  
 12 are not enough. Mostly market rate housing units are  
 13 being done. You're going to say good-bye to low density  
 14 areas, RH-1 and -2, which is the middle class, 70 percent  
 15 of San Francisco. Then we are going to allow for these  
 16 infill units according to the map that Ms. Charlotte Mack  
 17 is going to present, it's basically a whole city within  
 18 2500 feet of a MUNI line. Then you have less or no open  
 19 space.

R1-16



20           And do you suffer from MUNI's incapacity? Let  
 21 me tell you, I've been riding the buses for a long time,  
 22 and taking one hour and forty-five minutes to get from  
 23 Golden Gate Bridge to Bayview-Hunters Point is no fun.  
 24 Getting bypassed by multiple buses on lines is no fun.  
 25 It is incapacity; it is not working out, and it's not



1 going to work out -- and it's not going to work by 2030  
 2 even if you add the 67 percent more 60 footers.

3           There are billions of dollars of general  
 4 obligation bonds coming, if you look at SFMTA and CTA  
 5 documents. And are you going to pay for them? Is the  
 6 regular person going to? Is it going to be increased  
 7 property taxes, sales tax increases, 9 to 10 percent.  
 8 Ordinary San Franciscans, disabled, on pensions,  
 9 disability. I mean it goes on and on. And you don't  
 10 even think about the inflow of transit from the Bay  
 11 Bridge, Golden Gate Bridge, 11 percent.

12           Thank you very much.

13           VICE-PRESIDENT WU: Thank you.

14           Call few more names.

15           Alexander Romanovsky, Diane Meiswinkel, Patricia  
 16 Vaughey, Kathleen Rawlins and Dan Liberthson.

17           MS. PAULA ROMANOVSKY: I'm Paula Romanovsky, and  
 18 I support the continuance. I did not understand from the

19 notice that I was able to comment on the incorporated  
 20 sections of the EIR so I am happy to be able to come here

21 today and stand in front of you to tell you that I am a  
 22 resident of Francisco Heights Neighborhood Association,

23 and I am also -- I have been an officer of that  
 24 neighborhood organization for more than 30 years. I also

25 have spent more than eight years as a board member of San

R1-16  
(Cont.)

N/S

R1-17

N/S

N/S  
(Cont.)



1 Francisco Education Fund, and I just want to point out  
 2 that our big concern with the Ed. Fund is these families  
 3 fleeing the City once their kids are -- when it's time  
 4 for school. It's not so much dissatisfaction with the  
 5 public schools, but it's more about a lack of  
 6 family-friendly neighborhoods, and this is the RH-1 zone  
 7 that we're talking about. So I want you to think hard  
 8 about that, destroying the character of those  
 9 neighborhoods is going to have an impact on the  
 10 prosperity of our public schools. Thank you.

R1-18



11 VICE-PRESIDENT WU: Thank you.



12 MR. ROMANOVSKY: I'm Alex Romanovsky, 45 Loraine  
 13 Court.

N/S



14 I also support a continuance because I did not  
 15 understand from the notice that I can comment on the  
 16 incorporated sections of the EIR insofar as they pertain  
 17 to alternatives. I'm most concerned with the  
 18 overcrowding, transportation issues that others have  
 19 brought up as well. Thank you.

R1-19



20 MS. VAUGHEY: Patricia Vaughey, Marina Cow  
 21 Hollow Neighbors and Merchants. My address is 2742 Baker  
 22 Street, San Francisco 94123.

N/S



23 I'm asking for the continuance because I wasn't  
 24 noticed. Period. I found out about this hearing about  
 25 two days ago, number one.

R1-20

1           Number two, what I did get to read in the few  
2 hours that I had was a lack of affordability and a lack  
3 of treating the low and middle income people like humans,  
4 stack them all up, stick them in a tower.

5           I think that this needs to be re-looked at, and  
6 I think that the plan was -- it looks like it was planned  
7 by someone who tried to do this in '76, and it caused  
8 Prop M. And I really believe that you need to continue  
9 this, and I need to have the right to do adequate  
10 response to the revised sections. Thank you.

11           VICE-PRESIDENT WU: Thank you.

12           Next speaker?

13           MR. CHODEN: I'm here for moral support. She  
14 asked me to stand.

15           MS. MEISWINKEL: Hello --

16           VICE-PRESIDENT WU: Can you please speak into  
17 the microphone.

18           MS. MEISWINKEL: I do need help...

19           Hello, I'm Diane Meiswinkel, 24 Lorraine Court,  
20 and I am a member of Francisco Heights Association, and  
21 I'm here representing a lot of my neighbors that cannot  
22 make it, and I'm very concerned. We've --

23           Let me tell you, I'm a third generation San  
24 Franciscan. I remember going way back in many years and  
25 seeing the City grow and we had control, the City had

R1-21

N/S

N/S  
(Cont.)

1 control over the guidance of the beauty of it. I know we  
2 have to worry about this contingency, and I would like  
3 you to take consideration.

4 My father, grandfather and even my husband  
5 partake in beautifying San Francisco. They worked on the  
6 La Penal Project. My son worked here at City Hall  
7 beautifying it. I mean I'm here, and I think San  
8 Francisco is still the Paris of the West, and I'd like to  
9 see it stay like that. Friendly and warm and room to  
10 spread around and our children to grow.

R1-22

11 I grew my five children here, and I'm lucky to  
12 have two still in the City that can afford to stay. But  
13 what I see now where I have lived 52 years are new  
14 families coming in, and they are sacrificing a lot to  
15 live in a family neighborhood. And they need a chance.  
16 More families need a chance. They want the education.  
17 They want the museums. They want all those things.

18 Please give it to them, and consider all the  
19 things above.

20 VICE-PRESIDENT WU: Thank you.

N/S

21 MS. RAWLINS: Good afternoon, Commissioners. I'm  
22 Kathleen Rawlins; I'm at 333 Molimo Drive in San  
23 Francisco. I have not only lived in the San Francisco  
24 area for many years, but I started as a renter and now  
25 I'm a homeowner. I have gone to school here; I work

N/S  
(Cont.)



R1-23

R1-24

R1-25

R1-26

N/S

1 here. I want to let you know that I'm very concerned  
 2 about the speed with which this document was pushed out.

3 I do support the continuance. I'm very concerned  
 4 about the lack of transportation consideration. I have  
 5 taken MUNI many years. I know what it feels like to have  
 6 eight buses pass you by waiting for the right one to come  
 7 along, only to see that one totally packed and unable to  
 8 get on. I know that there is situations for the middle  
 9 class, and we do need to increase our housing for those  
 10 people. We need to keep the RH-1 and RH-2 neighborhoods  
 11 to provide security and safety within the City for all of  
 12 our citizens and to give everyone a right there.

13 I'm very concerned about the increased density  
 14 and the towers that are proposed as this will decrease  
 15 light and decrease the morale and the happiness of those  
 16 that are trying to live within the City with just shadows  
 17 and fog blowing through it.

18 I love the City the way it is, and I would like  
 19 you to please continue this so that we have a better  
 20 chance of giving input and reviewing the document.

21 Thank you very much.

22 VICE-PRESIDENT WU: Thank you.

23 MS. RAWLINS: I also wanted to state for the  
 24 record that I am a board member of the Miraloma Park  
 25 Improvement Club.

N/S  
(Cont.)

1 VICE-PRESIDENT WU: Next speaker please.  
 2 MR. LIBERTHSON: Good afternoon, commissioners.  
 3 My name is Dan Liberthson. I live at 333 Molimo Drive,  
 4 and I am a director of the Miraloma Park Improvement  
 5 Club.

R1-27

6 Miraloma Park, one of our primary concerns is  
 7 protecting single-family zoning. Our entire neighborhood  
 8 is a single-family zoned. Lately, it's been wonderful to  
 9 see many families with children moving into the area,  
 10 partly because our elementary school has -- under a new  
 11 principal -- leapt from a low grade to a very high grade  
 12 in the school system, and we'd like to encourage families  
 13 to be able to keep coming into our neighborhood.

14 To do this, I think we need to preserve this RH-1  
 15 zoning. Families need a place in the City as well as  
 16 people who can use condos. As someone before said, he  
 17 needed a standalone building with some yard to raise  
 18 kids.

R1-28

19 We have gotten a very limited time to review this  
 20 document, in part because there was wide misunderstanding  
 21 because of the wording about what we could address and  
 22 not address here. We feel that the current document does  
 23 not adequately address the issue of protecting zoning --  
 24 particularly, RH-1 and RH-2 zoning -- and really does not  
 25 consider the exodus of family and middle class in the



R1-28  
(Cont.)

1 City at all. So I think I would like to ask for a  
2 continuance so that this can be done.

N/S

3           Recently I visited Quito in Ecuador, just as an  
4 example of infrastructure that we also considered  
5 inadequate. They built a wonderful airport, but they had  
6 neglected to build a road to the airport. What was  
7 available was a two-lane highway that it took one hour to  
8 go from any area where a tourist might be to the airport.

9           Let's take a look at the infrastructure that we  
10 need and get that in place, get that lined up first.

11 Thank you.

12           VICE-PRESIDENT WU: Thank you. Next speaker.

13           And let me call a few more names.

14           Timothy Armour, Bernard Choden, Carolyn Squeri,  
15 Hiroshi Fukuda and Shari Steiner.

16           MR. ROSS: Hello, my name is Tom Ross. I'm at 60  
17 Almaden Court 94118-2403.

18           Anyways, I've been a third generation resident  
19 here in San Francisco. I wish to thank the Planning  
20 Commission for taking the time to hear us, and I request  
21 that you grant us the extension of time necessary so that  
22 we can go ahead and review the pages that pertain to the  
23 EIR.

R1-29

24           There's very much a need for there to be  
25 single-family residences, and we need to keep the RH-1 in

R1-30

R1-30  
(Cont.)

1 place. There's been a lot of discussion about the lack  
2 of transportation or the MUNI transportation not being up  
3 to par, which I don't need to get into. I think that  
4 kind of speaks for itself.

R1-31

R1-32

5 Parking is also a problem.

R1-33

6 And, with all of these considerations, if you  
7 would grant us the extension, it would be greatly  
8 appreciated. Thank you.

N/S

9 VICE-PRESIDENT WU: Thank you.

10 MS. SQUERI: Good afternoon. Carolyn Squeri, St.  
11 Francis Homes Association, 12 San Leandro Way, San  
12 Francisco, 94127.

R1-34

13 I also support the continuance. I did not  
14 understand until just a couple of days ago that we could  
15 comment on the incorporated sections that pertain to the  
16 alternatives, and I need more time.

R1-35

17 Policy 1.6 should add a reference to  
18 neighborhoods and RH-1 zoned areas such as St. Francis  
19 Wood that one-unit density limits be maintained to  
20 preserve single-family home neighborhood character in San  
21 Francisco for us and for the other family neighborhoods.  
22 We just celebrated our Centennial in 2012 as a  
23 single-family neighborhood in San Francisco, and those  
24 are the types of neighborhoods that should be encouraged  
25 in San Francisco.

R1-36

1           Regarding current density. MUNI is unable to  
2 adequately serve our existing population during rush  
3 hour. I live near 14th and West Portal and use the K, L,  
4 and M lines. Normally, it's 20 minutes to downtown.  
5 Although during rush hour trains are completely stopped  
6 during the trip, cars are packed. MUNI cannot get the  
7 number of cars they need through the tunnel to serve the  
8 commute. You just sit in the tunnel five minute at a  
9 time and nothing happening. Sometimes it's stop and go.  
10 My husband has fainted twice. During the commute, that  
11 normal straight shot from West Portal to Powell or  
12 Montgomery, it normally takes 20 minutes, it takes 40  
13 minutes or longer. We do have density and a  
14 transportation problem.

N/S

15           I also want to add that I used to work in  
16 Belmont/Redwood Shores, the trip three years ago took me  
17 30 to 40 minutes. And by one year ago it was taking an  
18 hour and 20 minutes or longer for each way. I quit that  
19 job to get a job in the City, but I was very disappointed  
20 to find that my commute in the City was not what I had  
21 expected it to be. Thank you.

22           VICE-PRESIDENT WU: Thank you.

23           Next speaker?

24           MR. CHODEN: Secretary, would you pass these out.

25 Thank you.

R1-37

1 My name Bernard Choden, and I represent San  
 2 Francisco Tomorrow. I am also and we are also in support  
 3 of the continuance in that the range of alternatives had  
 4 not been formerly presented to you as directed by the  
 5 Court, and having been a party to the writing of the code  
 6 which you are considering, I can say you do not meet  
 7 state the mandate regarding alternatives. Particularly I  
 8 want to emphasize one alternative you are not  
 9 considering, the range of cumulative environmental  
 10 impacts which as a matter of operating policy is ignored  
 11 as not being significant. It is significant with regard  
 12 one specific, resources land. Land is in scarce supply  
 13 in San Francisco as you're aware. It's monopolistic,  
 14 inelastic in terms of economic markets. That means a  
 15 developer, forced to buy over-priced monopolistic-priced  
 16 land, has to provide overexpensive building and  
 17 enforcement if you like for seismic safety. That means  
 18 you cannot, in the free market, in effect, get affordable  
 19 housing. It also means that prudent developers have to  
 20 compete with cheap money from overseas which competes for  
 21 that land and has free rein in terms of overpriced  
 22 high-rise housing which seem to be endemic in this  
 23 Commission. Thank you.

R1-38

N/S

24 VICE-PRESIDENT WU: Thank you. Next speaker?

25 MR. FUKUDA: Good afternoon, my name is Hiroshi

N/S  
(Cont.)

1 Fukuda, 146 - 18th Avenue, Coalition for San Francisco  
2 Neighborhoods.

3           If I were a teacher, I would give the Planning  
4 Department and the A Department an A for data analysis.  
5 Very good. However, Part 2, objectively, to be polite,  
6 an E for effort, but, realistically, an F. And the  
7 reason why is that all the alternatives to provide a  
8 feasible plan for all income levels is not there. You  
9 know the information, you know what's needed, but, at the  
10 bottom -- at the end of the day, or the end of year you  
11 have not met your objectives. And if you don't meet your  
12 objectives any time soon, it only compounds the problem.  
13 What the department has to do or should to is every year  
14 keep a tally of how far behind you're getting. You know,  
15 if you hear it year by year, it doesn't sound like, oh,  
16 we're only 500 units behind. But if you hear that, gee,  
17 after 10 years, we're 5000, 50,000 units behind, moderate  
18 income or low income, then it's a different picture.

19           So I think it's important that you give us a  
20 tally every five or ten years to see how far behind we  
21 are. And I think in a way it should be like a permit  
22 system, the permit system will be that few -- wherever  
23 the greatest need is, the permits are virtually free.  
24 But if you have a permit for something that is in excess,  
25 then you have a permit fee, say, \$200,000 for each year

R1-39

R1-39  
(Cont.)

1 you're in excess. That way affordable housing will catch  
2 up.

R1-40

3 Second thing. There's a major disconnect between  
4 MUNI and timing. Timing is coming along real fast, MUNI,  
5 get brakes on, no funding, not, good. They need to go  
6 together.

7 VICE-PRESIDENT WU: And I'll call more names.

8 Courtney, Kevin Howard, Risa Teitelbaum, Mari  
9 Eliza, Chris Schaeffer.

N/S

10 MR. ARMOUR: Good afternoon, Commissioners. My  
11 name is Timothy Armour, A-r-m-o-u-r. I live at 439 Myra  
12 Way, San Francisco. I am also a board member of the  
13 Miraloma Park Improvement Club, and I'm just here as a  
14 tax-paying citizen to let you know that I think it's time  
15 to slow down on this plan, look at all of the angles.  
16 There doesn't need to be a rush into this because I want  
17 to just talk about things that were done 30, 40 years ago  
18 that were rushed, the double-decker freeways, the  
19 destroying of thousands of homes in the Japantown area.  
20 All that was great Modernism at the time, those where the  
21 great ideas for the future, but now that we look back on  
22 those ideas we all say, what were they thinking to tear  
23 down all those homes, to build all those double decker  
24 freeways. So that's what I'm asking you to do is just to  
25 support -- I'm here to ask you to support the

R1-41

R1-41  
(Cont.)

1 continuation of the EIR to give everybody an extra time  
2 to bringing their ideas and thoughts, make this a really  
3 transparent ideas.

R1-42

4           And I'm concerned about the flight of the middle  
5 class in San Francisco. It's very hard to raise your  
6 family here. And, if you take out R-1 and R-2 housing,  
7 we will be literally getting all of the middle class  
8 families that we need for the City to keep it viable out  
9 of the City. So --

R1-43

10           And MUNI also is another issue. I ride MUNI  
11 every day, and I have to sometimes wait for several  
12 trains and several buses. Thank you very much.

13           VICE-PRESIDENT WU: Thank you.

14           Next speaker.

N/S

15           MS. TEITELBAUM: Good afternoon, Commissioners.  
16 My name is Risa Teitelbaum. I have lived at 10 Hill  
17 Street in the Mission for 33 years. I'm also speaking  
18 for the Liberty Hill Neighborhood Organization which is  
19 composed of people of many perspectives. One thing that  
20 I know for sure however is that we are all  
21 environmentalists. We need our environmental safeguards  
22 strengthened and not weakened. We want our neighborhoods'  
23 character to be protected, we want the historic fabric of  
24 our community preserved without overly large and  
25 incompatible developments destroying our community.

N/S

1 Valencia Street has experienced densification permitted  
 2 by the eastern neighborhoods plan. And what we've seen  
 3 is a complete onslaught of condominium developments.  
 4 Residents can no longer afford to live in the Mission.  
 5 People who are -- want to have businesses are being  
 6 priced off the Valencia Street, and large corporations  
 7 that are basically fronts for Internet companies are the  
 8 ones who are renting those storefront now for exorbitant  
 9 rents. Everyone wants affordable housing. At first we  
 10 must improve our infrastructure and our transit.

R1-44

11 In my neighborhood alone, since there has been a  
 12 Transit First policy in San Francisco, all our transit  
 13 has been cut by three-quarters of a percent. We need to  
 14 catch up with the buildings that have already been built.  
 15 According to San Francisco Magazine 10,000 units already  
 16 approved are in construction are going on in San  
 17 Francisco.

N/S

18 Thank you.  
 19 VICE-PRESIDENT WU: Thank you.  
 20 Next speaker please.

R1-45

21 MS. STEINER: Good afternoon. My name is Shari  
 22 Steiner, I'm president of the Liberty Hill Neighborhood  
 23 Association. My address is 3357 - 21st Street, San  
 24 Francisco 94110. I want to let the members of the  
 25 Commission know that our organization has the Board and



R1-45  
(Cont.)

1 our organization has voted to support the continuance and  
 2 to express our concern about the inadequacy of the EIR as  
 3 it's currently being circulated, and also the total  
 4 inadequacy of the BART and MUNI system to get anyone in  
 5 the City anyplace except perhaps downtown if you are not  
 6 in a terrible rush for one reason or another.

R1-46

7           The transportation system as it stands so far has  
 8 been inadequate for many years. But, as my colleague,  
 9 Risa, has explained, our buses have been cut by several  
 10 lines, and our -- the remainder are often full or they  
 11 don't stop or they don't have any space.

R1-47

12           I believe that the Commission needs to consider  
 13 all these things and, therefore, I am voicing my support  
 14 for continuance. Thank you.

15           VICE-PRESIDENT WU: Thank you.

N/S

16           MS. ELIZA: Good afternoon, Commissioners, Thank  
 17 you for hearing us today. Mari Eliza from the Coalition  
 18 for San Francisco Neighborhoods. And I just had a couple  
 19 of questions I wanted to raise here which I don't believe  
 20 that they have been addressed.

21           Where are all these people coming from? Nobody  
 22 is really talking about that. We are being -- there are  
 23 huge numbers of properties being built in big cities all  
 24 over the country and all over the world that are empty so  
 25 we're not really sure where these people are coming from.

R1-48

1 But the major question that concerns us today is one of  
2 water shortage. We are in the middle of a drought. We  
3 don't have enough water for the people that are here now.  
4 Where is the water going to come from for these new  
5 people and new developments?

6           Seems like it would make more sense to actually  
7 develop some solar desalination plants if we're going to  
8 have all these people coming in. Nobody is talking about  
9 that. Where is the water going to come from?

10           I have one other thing here which I'll mention,  
11 that a lot of us feel that the Commission on the City  
12 owes their loyalty to existing San Francisco residents,  
13 not any potential new residents.

14           Thank you very much.

N/S

15           VICE-PRESIDENT WU: Thank you.

16           MS. COURTNEY: Commissioners, good afternoon. My  
17 name is Kathleen Courtney. I'm chair of Housing and  
18 Zoning for the Russian Hill Community Association, and  
19 I'd like to build on the comment that was just made.

20           We are your constituents, we rely on you to look  
21 out for our City and our best interests. We recognize  
22 that that's a heavy responsibility, but you raised your  
23 hand and you volunteered to be on the Planning  
24 Commission, and we ask you to fulfill your responsibility  
25 here.

N/S  
(Cont.)

1           The Russian Hill Community Association will look  
 2 forward to reviewing all of the documents. We generally  
 3 have meetings we discuss the points, we -- are very  
 4 respectful of your time. We generally appear before you  
 5 with data in hand, and we've been unable to do this. To  
 6 be noticed on December 18th for a hearing today to  
 7 present our ideas in the midst of the holiday period is a  
 8 ridiculous -- a ridiculous statement, a ridiculous  
 9 protocol.

R1-49

10           Commissioners, I am terrified that we're on the  
 11 brink of another Fontana Apartment here. We are on the  
 12 brink of a decision-making process that does not review  
 13 all of the data and take into account fully your  
 14 responsibility to the people of San Francisco and our  
 15 responsibility to you to provide you with information.

16           As many of my colleagues here in the audience  
 17 have said, I respectfully request that you continue this  
 18 issue for a minimum of 60 days so, as the gentleman, as  
 19 Kathy, as several people have said, we can come before  
 20 you with well thought out ideas about how to address  
 21 these issues. Thank you very much.

22           VICE-PRESIDENT WU: Thank you.

23           MS. HOWARD: Good afternoon, commissioners.

N/S

24 Catherine Howard, Open Space Committee for Coalition for  
 25 San Francisco Neighborhoods and various court advocacy

N/S  
(Cont.)

1 groups, and I have lived in San Francisco for over 20  
2 years.

R1-50

3 I am in favor of neighborhood-appropriate  
4 development with adequate transit. I live in the outer  
5 Sunset near Judah. To say that there is MUNI incapacity  
6 in our neighborhood is an understatement. We have one  
7 line that goes downtown, N Judah. When it breaks down,  
8 you can see the long line of street cars lined up all the  
9 way out to the ocean and we are stuck. In addition, I am  
10 concerned about the impact of tall dense buildings on our  
11 parks, our gardens, and our public open space. You just  
12 heard a presentation on Eco districts. Vegetables do not  
13 grow in the dark.

R1-51

14 I hope this Commission will give serious  
15 consideration to the policies of Alternative A, that  
16 better mitigate the impact of development on open space.

R1-52

17 I support the continuance. I didn't understand the  
18 notice that I can comment on the incorporated sections of  
19 the EIR as they pertain to alternatives.

N/S

20 Please give us more time to review this large  
21 document and submitting comments. Thank you.

22 VICE-PRESIDENT WU: Thank you.

23 Let me call a few more names as our next speaker  
24 comes up.

25 Robert Gee, Karen Dreslen, Jean Barish, John

N/S  
(Cont.)

1 Bardis.

2 MS. SCHAEFFER: Hello. I'm Chris Schaeffer. I  
3 live at 46 Annapolis Terrace and have been a resident in  
4 San Francisco for over 40 years. I'm a member of the  
5 University Terrace Association, and I believe that that  
6 neighborhood would be an example of our future based upon  
7 this design. And I think that -- I'll give you an  
8 example.

R1-53

9 We live already with very tall, large, dense,  
10 micro-living units. They are called dormitories. And  
11 there are thousands of people who already live near our  
12 neighborhood. Our neighborhood is RH-1, RH-2 and some  
13 apartment buildings. And, to give you an example of what  
14 -- I live in a duplex. I own a duplex, RH-2, the change  
15 in RH-2 would dramatically and significantly reduce the  
16 quality of life for us. If there were more people than  
17 the four people below us -- my husband's had cancer  
18 twice. There's no way to have somebody who is ill in a  
19 situation like that. Or the cost of having more density  
20 where we bear the costs for utilities and our PG&E is  
21 over \$400. So you can imagine what that can mean to  
22 people. So I'm trying to provide you with some realistic  
23 view of what that would be like.

N/S

24 Today I took MUNI to get here. I was on a bus  
25 with two different wheelchairs. There was not enough

1 room then for people standing. Last night when I came on  
2 MUNI. Of course I'm disabled right now. I cannot even  
3 see my feet because of this contraption. I'm disallowed  
4 from coming into the front of the bus because he's  
5 already too full so I have to come up those middle stairs  
6 where I can't see the stairs. Hang on with one arm, and  
7 finally do get a seat, which I'm sitting next to two  
8 people, one woman next to me has two replaced knees, the  
9 other woman with her cane next to me has a replaced hip.

10 We don't have MUNI --

11 SECRETARY IONIN: Thank you, ma'am. Your time is  
12 up.

13 MS. SCHAEFFER: All right.

14 MR. GEE: Good afternoon. My name is Robert Gee.  
15 I live 9 Bella Vista Way, 94127. I've been a resident of  
16 San Francisco for over 50 years. I live in Miraloma Park  
17 neighborhood; I am currently president of the Miraloma  
18 Park Improvement Club.

19 The EIR as revised doesn't adequately address  
20 middle class housing. Our City needs to support the  
21 middle class. There's no dispute that there's a  
22 hollowing out of middle class in our City. Our City over  
23 use of market rate housing, yet woefully not meeting its  
24 target for moderate rate housing. You should immediately  
25 amend the Housing Element to incorporate policies which

N/S  
(Cont.)

R1-54

R1-54  
(Cont.)

1 will have the effect of producing middle class housing.

R1-55

2           Secondly, one of the policies in the revised EIR  
3 should be changed to state that in areas zoned RH-1 such  
4 Miraloma Park, one unit density limits should be  
5 maintained to preserve the character of single-family  
6 neighborhoods. The 2009 Housing Element needs to have  
7 some single family neighborhoods.

R1-56

8           I also support the continuance requesting  
9 additional time for comment. I see that the revised  
10 alternatives discussion refer to other sections of the  
11 EIR that were not being circulated. I didn't have an  
12 opportunity to comment on those other sections. So,  
13 therefore, I respectfully request for more time in order  
14 for the public to review the reference sections not being  
15 recirculated, not preparing comments.

N/S

16           Thank you for your time.  
17           VICE-PRESIDENT WU: Thank you.  
18           Next speaker please.

R1-57

19           MS. BARISH: Good afternoon. My name is Jean  
20 Barish. I'm a long-time resident of the Richmond  
21 district. I'm also a member of Planning Association for  
22 the Richmond, but I'm not speaking on their behalf this  
23 afternoon. I'm going to add my voice to the many  
24 requests that you've heard to please grant a continuance  
25 for the review of this process. As you already heard,



1 many of us did not understand the Planning Department's  
 2 notice that we could comment on other incorporated  
 3 sections of the EIR insofar as they pertain to the  
 4 alternative section.

5           In interest of fairness, due process and the  
 6 legal reasons presented by Ms. Devincenzi, granting a  
 7 continuance would be appropriate. This is much too  
 8 important of a document. The issues under consideration  
 9 are far too critical to the future of San Francisco as  
 10 well as present and future residents of San Francisco to  
 11 ram this process through without giving everyone in the  
 12 City a chance to give comments on all of the issues in  
 13 this EIR.

14           Please grant us a continuous. Thank you.

15           VICE-PRESIDENT WU: Thank you.

16           MR. BARDIS: Good afternoon, Commissioners. My  
 17 name is John Bardis. This hearing is a hearing that's  
 18 been called to comply with a court order. It would have  
 19 been appreciated if, in complying with the Court order,  
 20 it would have been at least a constructive notice for the  
 21 hearing. The notice was sent out on December the 18th  
 22 during the holidays for the public to review and to  
 23 comment on the 23rd of January for the organizations of  
 24 the City to get together and to be able to develop their  
 25 document and make appropriate comments to the EIR being

R1-57  
(Cont.)

N/S

R1-58





1 recirculated, but, worse than that, the notice was  
 2 incorrect. The notice said that the hearing will be  
 3 limited to only certain sections that were circulated,  
 4 and that was contrary to what the Court has requested.

5 Under those circumstances, it is essential in  
 6 order to comply with the Court's decision to have this  
 7 process go on that this hearing be continued so it can be  
 8 properly noticed and the vote be properly circulated.  
 9 And all in the City will have the opportunity to study  
 10 the documents properly and give complete and meaningful  
 11 response to what -- the documents being presented.

12 So I urge the Commission to continue the hearing  
 13 to March the 3rd. Thank you.

14 VICE-PRESIDENT WU: Thank you.

15 Judy Berkowitz, Richard Werner.

16 MS. BERKOWITZ: Good afternoon, Commissioners.

17 Judy Berkowitz, Coalition for San Francisco  
 18 Neighborhoods comprised of 48 neighborhood organizations  
 19 throughout the City. I myself live in the Mission.

20 The City -- the EIR states that pipeline units  
 21 are anticipated to be developed total 25,000 more than  
 22 the 31,183 units sought by the regional housing needs  
 23 allocation for the 2007 to 2014 planning period, and  
 24 further rezoning and area planning processes would allow  
 25 the additional capacity of 27,844 units. The City is

R1-58  
(Cont.)

N/S

R1-59

R1-59  
(Cont.)



1 overproducing market rate housing and woefully failing to  
2 produce middle class housing.

3           For the prior 1999 to 2006 planning period,  
4 market rate housing was overproduced at the rate of 153  
5 percent of the production of the market rate production  
6 target, whereas only 13 percent of the moderate housing  
7 rate, 52 percent of the low income and 83 percent of the  
8 very low income targets were met.

9           Ms. Devincenzi has done a yeoman's job of work on  
10 this document and the previous Housing Element EIR and  
11 the element itself since 2005 and this one since 2010.  
12 And she's been -- she brought this full document to this  
13 point.

R1-60



14           I do strongly support and urge you to grant  
15 another month for consideration of these -- of the  
16 documents until at least March 3rd, and, at most April,  
17 3rd, because -- due to inadequate notice. Thank you.

18           VICE-PRESIDENT WU: Thank you.

19           Any further public comment? Okay. Seeing none,  
20 public comment is closed.

N/S

21           Commissioner Sugaya?

22           COMMISSIONER SUGAYA: I'll just start with one  
23 comment that -- I have a question, actually, for staff.

24           Has this been scheduled before the Historic  
25 Preservation Commission?



N/S  
(Cont.)

1 MR. HILLIS: I can't speak to the previously  
2 circulated EIR, but this one has not.

3 MR. SUGAYA: I think having a hearing before the  
4 Historic Preservation Commission under Charter Section  
5 4.135 under referral to certain matters and also other  
6 duties in which matters that came to be sources and  
7 effect historic resources must be circulated before the  
8 Historic Preservation Commission, and I find that such a  
9 statement is contained in the executive summary in which  
10 it says the EIR concludes that Alternative A could result  
11 in a potentially-significant impact on historic  
12 resources, et cetera, et cetera.

R1-61

13 So my contention is that that could mean to  
14 circulate this through Historic Preservation at some  
15 point.

16 Second, there's been lots of allegations that  
17 Notice for this has been inadequate. That's a legal  
18 issue that I'm not -- what's the right word --  
19 without going through a long, protracted discussion  
20 between attorneys and everything, I can only accept what  
21 is before us as being adequate.

R1-62

22 I am open, however, to extending the comment  
23 period, not this particular hearing, just the comment  
24 period itself for another three weeks. I don't know how  
25 the other commissioners would view that, but we can get

R1-62  
(Cont.)

1 to that in a motion.

2 VICE-PRESIDENT WU: Commissioner Moore?

3 COMMISSIONER MOORE: I believe all the arguments  
4 for further clarification have been brought forward  
5 respectfully and, without having all the sections in  
6 front of me, I feel there's a consensus over a large  
7 group of people that at least extending the time frame  
8 would be of benefit.

R1-63

9 This has been sitting around for a long time. I  
10 don't think we should artificially extend it further  
11 seeing as there are unresolved issues that may come back  
12 to haunt us.

13 I would suggest that we consider 45 days. The  
14 issues are rather complex. I heard three time frames  
15 mentioned, 30, 45 and 60. 60 I think might be for the  
16 larger picture of moving the document. A little bit  
17 long. I would settle on 45. But I also need support of  
18 the other members of the Commission who may only  
19 recommend 30.

20 DIRECTOR RAHAIM: The comment period is 45 days.  
21 So the question would be whether -- how far beyond the 45  
22 days you are proposing to go?

23 MS. MOORE: You are commenting on the -- not  
24 February 3rd, but 30 days or 45 days from that particular  
25 date in order to allow the additional time.

R1-63  
(Cont.)

1 DIRECTOR RAHAIM: Sorry. Comment?

2 MS. JONES: Excuse me. Sarah Jones,  
3 Environmental Review Officer.

4 I just want to raise what Chapter 31 of the  
5 Administrative Code says around the EIR comment period.  
6 That's up to the ERO's discretion. So it comes back to  
7 the ERO for final decision on the comment period.

8 What CEQA says about comment period on an EIR is  
9 that it is a period of 45 days. The maximum comment  
10 period considered appropriate under CEQA is 60 days under  
11 particularly complex circumstances.

12 So that's what's stated under state law as the  
13 guidelines on comment periods.

14 VICE-PRESIDENT WU: Commissioner Borden?

15 COMMISSIONER BORDEN: I think however you get to  
16 the 60 days, maybe additional 15 or whatever makes sense,  
17 perhaps, I think we have seen this document as a  
18 recirculation of the 2009 document as we understand it.  
19 This sounds like it may go to the HCD, which may provide  
20 another forum. But I think what people have asked for  
21 specifically is a chance to provide substantive written  
22 comments, an additional time to allow them to do that.  
23 But I don't know if it could be.

24 VICE-PRESIDENT WU: So can I confirm with City  
25 attorney then whether or not we can make a motion to ask

R1-63  
(Cont.)

↑

1 for extension, or do we provide the ERO with suggestion?

2 MS. PEARSON: Audrey Pearson from the City  
3 Attorney's office.

4 You could advise staff, but the decision is by  
5 the ERO.

6 VICE-PRESIDENT WU: Okay. Thank you.

7 COMMISSIONER SUGAYA: Unless Commissioners have  
8 other comments, which you might, I just want to go ahead  
9 and make that recommendation to staff, especially the  
10 Environmental Review Officer to extend the period out to  
11 60 days more.

12 Do we make that in the form of a motion?

13 COMMISSIONER BORDEN: No.

14 DIRECTOR RAHAIM: It's technically not our  
15 jurisdiction, but we have consensus from commissioners to  
16 go from 45 to 60 days. Thank you.

17 VICE-PRESIDENT WU: Any further comments?

18 SECRETARY IONIN: Seeing none, Commissioners, we  
19 can move on to your next item.

20 (Whereupon, Item 15 adjourned at 4:17 p.m.)

21

22

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

REPORTER'S CERTIFICATE

I, PEPPINA RAYNA HARLOW, a Reporter licenced by the State of California in and for the County of San Francisco, for California Reporting, LLC, 52 Longwood Drive, San Rafael, CA 94901 (415) 457-4417 Office (415) 454-5626 Fax, californiareporting@sbcglobal.net, do hereby certify:

That the foregoing transcript, as reduced to transcript by computer under my direction and control to the best of my ability, is a full, true and correct computer transcription of the shorthand notes taken as such reporter of the proceedings in the above-entitled matter.

-----

Peppina Rayna Harlow, CSR #7433

**From:** [Chiang, Yen K.](#)  
**To:** [Smith, Steve](#)  
**Cc:** [Groag, Carlo](#); [Wong, Leo](#); [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov); [Mozaffari, Siavash](#)  
**Subject:** SCH 2008102033 San Francisco 2004 and 2009 Housing Element, DEIR, January 31, 2014  
**Date:** Tuesday, February 04, 2014 9:19:13 AM  
**Attachments:** [SCH 2008102033 San Francisco Housing Element, DEIR, January 31, 2014.pdf](#)

---

Hi, Steve @ (415) 558-6373:

Attached is a copy of the comment letter issued by the California Public Utility Commission (CPUC) for the subject project.

Thanks for the opportunity to provide comments for the project.  
Pls email or call me if you ave questions on the comment letter.

(Yen) Ken Chiang, P.E.  
 Utilities Engineer  
 Rail Crossings Engineering Section  
 California Public Utilities Commission  
 320 West 4th Street, Suite 500  
 Los Angeles, CA 90013  
 (213) 576-7076//FAX: 576-7029

CPUC Rail Crossings Engineering Section  
<http://www.cpuc.ca.gov/crossings/>

N/S



## PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500  
 LOS ANGELES, CA 90013  
 (213) 576-7083



January 31, 2014

Mr. Steven Smith  
 City of San Francisco  
 1650 Mission Street, Suite 400  
 San Francisco, California 94103

Dear Mr. Smith:

Re: SCH 2008102033 San Francisco Housing Element – DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the draft *Environmental Impact Report (DEIR)* for the proposed City of San Francisco (City) Housing Element project.

The project area includes active railroad tracks. RCES recommends that the City add language to the Housing Element so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian/bike circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (213) 576-7076, [ykc@cpuc.ca.gov](mailto:ykc@cpuc.ca.gov).

Sincerely,

Ken Chiang, P.E.  
 Utilities Engineer  
 Rail Crossings Engineering Section  
 Safety and Enforcement Division

C: State Clearinghouse

**From:** [Sampson, Richard@CALFIRE](mailto:Sampson.Richard@CALFIRE)  
**To:** [Smith, Steve](mailto:Smith, Steve)  
**Cc:** [Browder, Chris@CALFIRE](mailto:Browder, Chris@CALFIRE); [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)  
**Subject:** CAL FIRE response to SCH # 2008102933  
**Date:** Tuesday, December 31, 2013 1:29:51 PM  
**Attachments:** [SF Housing.pdf](#)

---

See attached

Rich Sampson  
Division Chief - Forester II  
Resource Management - Fire Prevention LE

**CAL FIRE**

San Mateo - Santa Cruz Unit  
6059 Highway 9  
Felton, CA 95018  
(831) 335-6742

N/S



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P.O. Drawer F-2  
6059 Highway 9  
Felton, CA 95018  
(831) 335-6740  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



Date: December 31, 2013  
SCH #: 2013102033  
Draft EIR – Revised Alternatives  
San Francisco 2004 and 2009  
Housing Element

Steven H. Smith  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Mr. Smith,

The above referenced Notice of Preparation was reviewed by the Resource Management office of the San Mateo-Santa Cruz Unit of the California Department of Forestry and Fire Protection (CDF). No site visit was attempted during this review. After reviewing the document and its maps, I have determined that the property is in Local Responsibility Area and not on “Timberland” as defined in the Public Resources Code. The property is also not with-in a Local Government Contract area served by CAL FIRE. For those reasons, CAL FIRE has no additional comment on this project.

If you need any assistance or information, please call or write to the Resource Management Office at the above listed address or telephone number.

Sincerely,

*Original with signature on file*

Richard Sampson  
Forester II – Unit Forester  
RPF #2422

Cc:

Chris Browder  
California Department of Forestry and Fire Protection  
Environmental Protection,  
P.O. Box 944246  
Sacramento CA 94244-2460

State Clearinghouse  
P.O. Box 3044  
Sacramento CA, 95812



N/S

Ms. Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

**RE:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
State Clearinghouse No. 2008102033

Dear Ms. Jones and Planning Commissioners,

I am writing to you on behalf of the Francisco Heights Civic Association, an active neighborhood association representing approximately 475 homeowners for over 70 years. We find the revised EIR inadequate to meet the needs to cultivate and support a healthy middle class in San Francisco. It fails to protect existing single-family neighborhoods or protect the needs of potential middle-class residents, with families, which we desperately need to maintain the social fabric of this city. Policy 1.6 should be changed to state that in areas zoned RH-1, one-unit density limits should be maintained to preserve the single-family neighborhood character. The City of San Francisco is in desperate need of middle-class housing, a need which is not addressed in the Housing Element.

In the last year, the two smallest (2bd/1ba) homes on Almaden Court were recently purchased by families of **five** (2 adults, 3 children). Families with children want to live in SF, and there are certain amenities families with children still desire: a garage, a small yard, a neighborhood with character.

Certainly we want to *encourage* middle-class families with public-school aged children to stay in San Francisco. *We don't want them moving out of the city because they can't afford a house with enough space to raise a family.* By any standards, a 2 bedroom/1 bath house is tight for a family of 5, but it's all they can afford, and the stock of middle-class housing is woefully inadequate for the number of young families that want to live here.

We have a crisis in middle class housing – ask any realtor and any number of families trying to buy a home to raise their families. The Housing Elements of 2004 and 2009 fail to address this crisis, and should be amended.

Sincerely,

Libby Benedict, Executive Committee  
Francisco Heights Neighborhood Association  
77 Almaden Court  
San Francisco, CA 94118  
415.386.6432

N/S

R4-1

N/S



# Miraloma Park Improvement Club

February 13, 2014

Rodney Fong, Cindy Wu, Michael J. Antonini, Gwyneth Borden, Rich Hillis, Kathrin Moore, Hisashi Sugaya  
San Francisco Planning Commission  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2414

N/S

RE: Case No. 2007.1275E, *Revised Alternative Analysis for the 2004 and 2009 Housing Elements*

Dear Commissioners:

The Miraloma Park Improvement Club (MPIC), founded in 1937 and now comprising over 500 members, represents a neighborhood entirely zoned RH-1 and is committed to preserving that zoning in Miraloma Park. We strongly urge you not to approve the *Revised Alternative Analysis for the 2004 and 2009 Housing Elements* because we are certain that the vague wording of this document would dilute the zoning designation RH-1 by permitting widespread and substantial in-fill. Established zoning should have priority and precedence over "area plans," and wide swaths of land proposed for increased transit-corridor density.

R5-1

Specifically, Policy 1.6 should be changed to state that in areas zoned RH-1, including Miraloma Park, one-unit density limits should be maintained to preserve the single-family neighborhood character. The text stating that in RH-1 areas "existing height and bulk patterns should be maintained to protect neighborhood character" appears to permit evasion of zoning restrictions by not emphasizing the one-unit density limit associated with the zoning as the primary basis for assessment of the suitability of new construction. The middle-class and families with children are being squeezed out of San Francisco, and the future of the City as a viable, living entity depends on this sub-population, which will not be served by overproduction of market-rate condos and the introduction of mass-transit oriented, automobile-hostile units over wide areas of the City that seems to be the goal of the Revised Alternative Analysis.

Furthermore, plans to upgrade infrastructure systems in order to support an additional 56,000 residential structures city-wide are either non-existent or inadequate. Muni service is presently inadequate throughout the City. Many of our residents have experienced long waits for public transportation not only in Miraloma Park but also at Forest Hill and West Portal Stations and on the Geary corridor, and the EIR does not assess the unavoidable negative impact of another 56,000 units on a system whose managers seem to have no systematic plan for expansion. The drought, the already inadequate roadways now increasingly narrowed by proliferating bicycle lanes, and the spiraling cost of water to residents seem to be nowhere addressed in the environmental assessment. Respectfully, we therefore request that you decline to approve the Revised Alternative Analysis.

R5-2

Sincerely,

Dan Liberthson, Corresponding Secretary

cc: J. P. Ionin, Commission Secretary; S. Jones, ERO; J. Rahaim, Director; S. Sanchez, Zoning Administrator

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: H.E. Alternatives Comments  
**Date:** Tuesday, February 18, 2014 2:34:18 PM  
**Attachments:** [H.E. comments final 021814.docx](#)

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** NINERSAM@aol.com [mailto:NINERSAM@aol.com]  
**Sent:** Tuesday, February 18, 2014 2:31 PM  
**To:** Jones, Sarah; Rahaim, John  
**Cc:** Lee, Mayor; Chiu, David  
**Subject:** H.E. Alternatives Comments

Please see attachment for letter:

Dear Ms. Sarah Jones

Subject: Revised Sections of the Draft Environmental Impact Report for San Francisco  
2004 and 2009 Housing Element Planning Department Case No. 2007.1275E  
State Clearinghouse No. 2008102033

The Richmond Community Association urges the Planning Department and Planning Commission to reject all of the alternatives except for one. The only alternative which is acceptable is one of the original drafts of the 2009 Housing Element that limited the growth and densification to areas adjacent to heavy rail and light rail e.g. BART and street cars. This draft was produced after a series of meetings with all different constituents of the City e.g. non-profits, developers, labor, and community activist. Sadly and unfortunately, this was changed after pressure from the development community, to allow growth and densification to all areas where there were bus and trolley routes, essentially the entire city.

The 2004 and 2009 Housing Element Objectives and Policies do not provide an answer to the most important needs of for the future of San Francisco. The Data and Needs Analysis provide much information, but the Objectives and Policies do not provide solutions that are identified the Data and Needs Analysis.

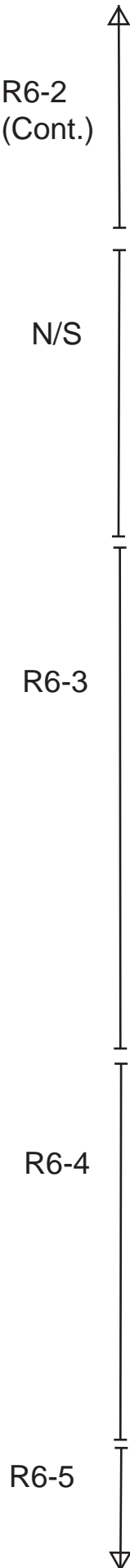
The Data and Needs Analysis is based on projections provided by ABAG which

N/S

R6-1

R6-2





unfairly penalizes San Francisco by allocating a large number of housing despite being a “built out” city compared to the other regions in ABAG. San Francisco has very limited space to growth, after the built out of Bayview/Hunter’s Point, Treasure Island, and Park Merced in the future, there does not appear to be another major “opportunity Site” in San Francisco. ABAG allocations expect San Francisco to build up and have a density such as Manhattan but without an efficient subway system

The number of housing units needed by 2030 is reported to be 52,061 units. The new jobs created from 2010 to 2030 is expected to be 140,060. The population increase from 2010 to 2020 will be over 106,000. Much of the growth of jobs will be for low to medium skilled workers, with salaries of \$17,900-\$22,800. The new job seekers will discover that only 15% of the new housing units will be affordable; 85% of the new housing units will be market rate which is affordable to only 10% of San Francisco residents. Most importantly, very little rental housing is expected to be produced.

1. Types of housing needed and types of housing being built are contradictory. The need is greatest for moderate and middle income residents. For the period of 1999-2006, only 13% of these were built. The percentage of market rate housing produced for the same period was 154% of the allocation. The 2004 and 2009 Housing Element policies will be more of the same, no mitigations.

The housing policies do not address the need for moderate income families with children. Most of the housing being built is market rate housing, 85%. It provides housing for the wealthy. Who are the buyers of market rate housing? Do they presently live in the City or are they out of town. Are the new units being used as a primary residence, or as a second home, or corporate housing? The Housing Element will not provide needed outcome for the type of housing needed. We need creativity and to think outside of the box, just as the City did in approving the City Health Plan

2. Rental housing needs are not addressed. San Francisco is different from other cities because the percentage of home owners is approximately only 38%, and renters are 62% of the residents in the City. Please note that this is not by choice. The reason is primarily affordability. If someone could afford a house they would buy one if they plan to live in the City. The ABAG projections and Regional Housing Needs Allocation (RHNA) cannot be taken seriously unless they understand the reality of home ownership in San Francisco. They need to include rental housing needs because a very high percentage of the new residents will not be able to afford market rate housing and will require rental housing. . I do not know the number of rental units that are in the pipeline, but I would believe it is well under 5%.

The 2004 Housing Element includes a number of policies which encourage certain types of housing (policy 1.7 and Implementation Measures 1.7.1 and 4.5.1) to allow

for a variety of units. The important issue is that affordability is not addressed. The new units being built are for the most part 85% market rate housing. If there are a variety of units available, they must be built for new residents who are expected to be in the low income category, and not only for high income residents and highly paid tech workers. Please note that only 10% of S.F. residents can afford market rate housing.

R6-5  
(Cont.)

The purchasing of housing and cars can be analyzed in the following manner. If one can afford a luxury car there are many options, if one chooses to purchase an economy car, there again are many options. If one can afford market rate housing, there are many options, if one can only afford “affordable” housing, the availability for “extremely low” and “low” income housing are extremely minimal, and for “moderate” and “middle” income, the availability is virtually non-existent. The cost of housing and housing opportunities is one reason that moderate and middle income families are leaving the City. San Francisco is becoming a City for the very rich and very poor. San Francisco’s diversity is one of the key elements which make San Francisco so great. We are losing that diversity by forcing middle income to leave the City. A prime example is former Supervisor Chris Daly.

**Comments for HE 2004 February 23, 2009 regard distributed handout**

Data Needs Analysis findings state the following:

Population increase of approximately 50K projected between 2010 and 2020 (pg 4). Jobs projected to be primarily in the service industry sector i.e. food preparation, waiter, cook, office clerk, retail salesperson, health aide, laborer, cashier, janitor, etc. Income level under \$30K(pg 30). Problem: Housing unit needs is balance of market rate, moderate income, low income, very low income. Production is primarily market rate.

The Objectives and Policies do not compliment Data and Needs Analysis.

The Housing needs Objectives have been made in the past, and units completed for each income level have not been met except for market rate units. There is an estimated surplus of over 800 units in intermediate development Pipeline (pg 80) for each of the extremely low and very low income for the period up to 2014. The market rate units are estimated to be a surplus of 6,766 units for the same time period. There is a shortfall of 5,000 units for the low income and 3,586 units for moderate income units for the same time period. The excuse that matching funds are not available for moderate income units has been the excuse for years. It is time to spend the money to provide "work force" housing for safety officers, teachers, and nurses.

R6-6

San Francisco is different from most major cities in the US because approximately 65% of the residents are renters, and 35% are home owners. This is just the opposite for the other major cities in the US. The Housing Element does not address this. Most new residents and jobs will not allow for home purchase, this needs to be solved. Almost 85% of the new construction is for market rate housing. We know that only 10% (probably much less) of the residents can afford to purchase a home in SF. We are building housing units for the rich who will use it has a second home. Housing Element needs to address problems in a meaningful manner. If diversity is



R6-6  
(Cont.) ↑  
important, the City must only allow the type of housing which will maintain and sustain the diversity of San Francisco.

R6-7  
Holding capacity for the City is not reported, and it needs to be known and reported. Do we have adequate water supply including in prolonged drought periods. Mr. Gary Golick, a Planning Consultant, reported that the 2009 Housing Element will have potentially significant effects on water supply and that the construction of new water production facilities which were not discussed in the FEIR. The environmental effects of the construction will be substantially more severe than reported in the FEIR.

The water supply in the future is certainly questionable because of the binding contracts with neighboring counties, and reduced contracted supply to SF residents. The other water districts are not demanding conservation to the extent San Francisco residents are asked to conserve.

R6-8  
Does the City have an effective emergency evacuation plan following a major earthquake. Will there be enough firemen when most firefighters live outside the City. Are there enough hospitals and medical services throughout the City following a major earthquake? Fire fighting in one high rise would be a major concern, what is to be expected if there are fires in many high rises after a major earthquake? Are there enough emergency services i.e. fire, medical, police to handle a catastrophic disaster?

Another major concern is the number of high rises recently constructed, and the number of high rises in the pipeline. The seismic standards are only for safe evacuation from a building and not for reoccupying the building. There will be a tremendous financial loss for condo owners.

R6-9  
The concept of building along the transit corridors with increased heights, increased density, and reducing parking is flawed. It is based on having a reliable and efficient transit system to allow residents to take Muni, bike, hike, or car share so that car ownership is discouraged. The problem is that Muni is not a reliable and efficient system. Many residents take Muni to go to work, but many residents use their cars after work, or families need a car to transport their children to afterschool activities, or seniors and disabled need their cars for appointment, shopping, etc. Residents can see the hypocrisy when City officials have parking spaces all around City Hall, and vote to reduce parking for new construction.

R6-10  
Renowned planner, Professor Michael Bernick wrote in the San Francisco Chronicle, November 23, 2004 that the City completely misunderstands the research and theory of transit-based housing as well as the process of community-building. The Housing Element supposedly claims that it better connects transit and land use by densifying housing and reducing parking requirements near transit corridors. Other issues misunderstood:

- Transit Village is based on “heavy” rail, not light rail or buses.
- Automobile ownership is acceptable and parking is needed.
- San Francisco already has villages, but that they are fragile and can be destroyed by over development.

R6-11

The diversity of San Francisco is what made San Francisco so great in the past, we are losing that diversity. Moderate income families are leaving because of the lack of affordable housing. We have a serious problem, and the 1990 Residents Element, the 2004 and 2009 Housing Element Objectives and Policies do not provide the answers.

N/S

The Housing Element needs to have Policies which can be implemented and enforced. It must not be merely a wish list of unobtainable goals, otherwise the Housing Element has no creditability and is an excise in futility.

R6-12

The Planning Department has only relied on the old formula of 15% onsite affordable units or 20% off-site units or an in-lieu fee. This formula does not work because the need for affordable housing is approximately 58% not 15% or 20%. The Planning Department professionals need to think outside of the box. The San Francisco Health Plan is an example of creative thinking. Another example are the different transit agencies, they have been very aggressive in trying to decrease greenhouse gasses by controlling the use of private autos:

1. Bridge tolls increased during the commute periods
2. Concept of congestion management zones and tolls.
3. Metered parking rates increased during periods high use.
4. Airline tickets more expensive during holiday periods

The affordable housing requirement for developers needs to be carefully examined. The 15% affordable units on site requirement or 20% in lieu fees for off site has been effect for 10 years or so. The developers have not complained excessively about the numbers, perhaps it is because they are making A LOT of profit.

The Planning Department should consider:

1. As a first step, increase the affordable units to 20% for on-site or 25% for off site units, or increase the in-lieu fees to \$275,000/unit.
2. Change permit fees depending on the type of units in greatest need, e.g. zero cost for permits if units are in greatest need (affordable units, moderate income units), double the fees if units are in excess of RHNA numbers e.g. market rate units or triple the fees for luxury condos.
3. Approve projects only for units which are under 50% of ABAG RHNA until the short fall is no more than 50% of ABAG RHNA.

R6-13

Since the 2009 H.E. was written, ABAG and the MTC started the One Bay Area Plan. The importance of this plan cannot be overstated. The San Francisco Planning Department and the Planning Commission has wholehearted embraced the One Bay Area Plan. The next important step is to include Muni in any large land use project approval, and future land use plan that is dependent on Muni service.

R6-13  
(Cont.)

The Plan Bay Area is a long-range integrated transportation and land-use/housing strategy through 2040 for the San Francisco Bay Area. On July 18, 2013, the Plan was jointly approved by the Association of Bay Area Governments (ABAG) Executive Board and by the Metropolitan Transportation Commission (MTC). The Plan includes the region’s Sustainable Communities Strategy and the 2040 Regional Transportation Plan and represents the next iteration of a planning process that has been in place for decades.

Plan Bay Area marks the nine-county region’s first long-range plan to meet the requirements of California’s landmark 2008 Senate Bill 375, which calls on each of the state’s 18 metropolitan areas to develop a Sustainable Communities Strategy to accommodate future population growth and reduce greenhouse gas emissions from cars and light trucks. Working in collaboration with cities and counties, the Plan advances initiatives to expand housing and transportation choices, create healthier communities, and build a stronger regional economy.

Plan Bay Area makes the 2009 H.E. obsolete. The San Francisco Planning Department has not acknowledged the basic principles of the One Bay Area Plan, the need to integrate of land use planning and transit. The Planning Department has been approving a great number of housing, albeit, not enough affordable housing, but the housing units far exceeds the capacity of Muni.

Most importantly, the San Francisco Planning Department ignores the reality of the transit problem in San Francisco. Service is terrible, the deferred maintenance problem only adds to breakdowns and further delays. The biggest problem is the lack of funding, another is the terrible union contract which allows excessive employee no shows and results unreliable service. The decision of the Mayor, the Board of Supervisors, the Transit Authority, and Muni to approve the Central Subway was a huge mistake that will have a negative impact on Muni service for all other areas of the City. I believe the cost per mile, per passenger on the Central Subway is 100 times more than the other lines, please correct me if I am mistaken.

R6-14

Adding additional service demands on a dysfunctional Muni, only compounds the problem. ABAG should not allocate transit funds to San Francisco for accepting a large RHNA until Muni proves it can provide adequate service for its current number of users. ABAG needs to be more forceful in prodding areas such as the Bishop Ranch area in Contra Costa County, especially near the BART stations to produce more housing AND more transit. Transit must be dramatically improved to decrease the green house gasses in the suburbs. This requires massive funding that ABAG can provide.

N/S

**Alternative C: 2009 Housing Element–Intensified:**

These concepts are intended to encourage housing by: 1) allowing for limited expansion of allowable building envelope for developments meeting the City’s affordable housing requirement on site with units of two or more bedrooms; 2) requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines; 3)

giving height and/or density bonuses for development that exceeds affordable housing requirements in locations that are directly on TEP rapid transit network lines; 4) allowing height and/or density bonuses for 100 percent affordable housing in all areas of the City except in RH-1 and RH-2 zones; and 5) granting of administrative variances (i.e. over the counter) for reduced parking spaces if the development is:

- a) in an RH-2 zoning district that allows for greater residential density (e.g., adding a second unit without required parking);
- b) in an area where additional curb cuts would restrict parking in areas with parking shortages; or
- c) on a Transit Preferential Street.<sup>1</sup>

This EIR concludes that Alternative C could result in a **significant and unavoidable** impact to the City's transit network.

The problem with this response is that this plan allows for **unacceptable transit, and this alternative C should be rejected**. ABAG must consider region-wide plans that distributes the responsibility equally to the entire region. The suburban areas have had a free pass, and this practice must not be allowed to continue.

San Francisco should not have a RHNA that exceeds its transit capacity. Transit must catch up before any additional units are approved. San Francisco proclaims itself as a Transit First City, unfortunately this Policy is just a Policy and has not provided acceptable level of transit to its residents. Muni has been under pressure to improve timeliness since 1999, when San Francisco residents voted to require the transit agency to be on time at least 85 percent of the time. From July to September 2011, the transit agency's on-time performance was a dismal 59 percent!

The Planning Department approves permit after permit without regard to the transit situation. The City must integrate housing and transit, as required by One Bay Area Plan. The Planning Department and Muni must work together in the future. During any military conflict, the advancing army must not advance faster than its supply line or it will be defeated. In medicine, you cannot admit more patients than there is staff to care for them. In a smart City, the Planning Department should not approve more permits for housing than there is the capacity of the transit system, that is Smart Growth.

Yours truly,

Hiroshi Fukuda, President  
 Richmond Community Association  
 Chair, Coalition for San Francisco Neighborhoods

N/S  
(Cont.)

R6-15

N/S

**From:** [Secretary, Commissions](#)  
**To:** [Gerber, Patricia](#)  
**Cc:** [Smith, Steve](#)  
**Subject:** FW: Case No. 2007.127SE - Request for Postponement  
**Date:** Friday, January 24, 2014 7:37:24 AM  
**Attachments:** [RHCA 1-23-14 ChaptVII PlanningComm.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
**Importance:** High

---

*Jonas P. Ionin*  
 Director of Commission Affairs  
 Commissions Secretary  
 Custodian of Public Records

Planning Department | City & County of San Francisco  
 1650 Mission Street, Suite 400, San Francisco, CA 94103  
 Direct: 415-558-6309 | Fax: 415-558-6409

[jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)  
[www.sfplanning.org](http://www.sfplanning.org)




---

**From:** Kathleen Courtney [mailto:kcourtney@rhcasf.com]  
**Sent:** Thursday, January 23, 2014 1:35 PM  
**To:** [planning@rodneymfong.com](mailto:planning@rodneymfong.com); [cwu.planning@gmail.com](mailto:cwu.planning@gmail.com); [wordweaver21@aol.com](mailto:wordweaver21@aol.com); [plansf@gmail.com](mailto:plansf@gmail.com); [richhillssf@yahoo.com](mailto:richhillssf@yahoo.com); [mooreurban@aol.com](mailto:mooreurban@aol.com); [hs.commish@yahoo.com](mailto:hs.commish@yahoo.com)  
**Cc:** Secretary, Commissions; Jamie Cherry RHCA ; Chris Arrott RHCA; Chiu, David  
**Subject:** Case No. 2007.127SE - Request for Postponement  
**Importance:** High

Dear President Fong and Members of the San Francisco Planning Commission,

Attached and pasted below is the Russian Hill Community Association's request that the hearing on the proposed revised Chapter VII Alternatives of the Housing element be postponed for 60 days so that the RHCA, its members and neighborhood associations throughout the City have adequate time to review the document and prepare meaningful comments.

Thank you for considering our request.

Kathleen Courtney  
 Chair, Housing & Zoning Committee  
 Russian Hill Community Association  
[kcourtney@rhcasf.com](mailto:kcourtney@rhcasf.com)  
 (c) 510-928-8243

N/S

R7-1

N/S

# Russian Hill Community Association

1158 Green St. San Francisco, CA 94109 415-776-2014 rhcasf.com

January 23, 2013

Rodney Fong, President San Francisco Planning Commission and  
Members of the San Francisco Planning Commission

Subject: Case No. 2007.127SE - Proposed revised Chapter VII Alternatives for the 2004  
and 2009 Housing Element EIR

Dear President Fong and Members of the Planning Commission:

When the Superior Court ordered the City and County of San Francisco to prepare and have a public review of the proposed revised Chapter VII Alternatives for the 2004 and 2009 Housing Element EIR in accord with the California Environmental Quality Act, the Russian Hill Community Association determined to prepare our comments with the same diligent review and examination as we do for all of our presentations before your Commission.

However, the notice protocol for this critical hearing was less than optimal – particularly for an association of lay citizens. The timetable we are working under did not allow for the meetings and discussions among ourselves and sister organizations throughout the City.

The notice for a January 23, 2014 hearing was issued on December 18, 2013. Given the holidays, that’s less than three weeks notice. The public review period is truly inadequate and does not allow the RHCA membership time to meet, review, discuss and develop meaningful comments on a document which required months of court hearings by professionals to review and prepare.

Therefore, the Russian Hill Community Association respectfully requests that the hearing on the proposed revised Chapter VII Alternatives be continued for sixty days so the members of RHCA and the citizens of San Francisco can study and respond to a document which took professional city planners and attorneys more time to produce than the time period allowed the public to review.

Sincerely,

**Kathleen Courtney**  
Chair, Housing & Zoning Committee  
Russian Hill Community Association  
[kcourtney@rhcasf.com](mailto:kcourtney@rhcasf.com)

cc: Supervisor David Chiu; Jamie Cherry, Chris Arrott, Russian Hill Community Association

N/S

R7-2

N/S

**From:** [Edward Anderson](#)  
**To:** [Jones, Sarah](#)  
**Cc:** [Secretary, Commissions](#); [Smith, Steve](#); [planning@rodneymfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis. State Clearinghouse No. 2008102033  
**Date:** Sunday, February 16, 2014 1:26:15 PM

---

N/S

Dear Ms. Jones

My wife Kathleen and I are native San Franciscans and have owned and resided at 330 Santa Clara Ave. San Francisco 94127 for the last 18 years. We are fortunate to live in the historic St. Francis Wood neighborhood which has been an ideal place to raise our two daughters.

In the past, I have served on the Board of our St Francis Homes Association and my wife Kathleen is active in various neighborhood groups including the Garden Club which works to preserve our neighborhood. One project that I dedicated considerable time and to which I am particularly proud was the publishing of a book on St Francis Wood which celebrates its 100th Anniversary and documents the historic architecture of our neighborhood as well as its extensive community activities which makes it a wonderful place to raise a family. I understand that you and others are considering changes to the housing element which would place the foregoing attributes of our historic family neighborhood at risk. As your own analysis concedes:

R8-1

“Alternative A could result in **residential development** that includes inappropriate **alterations**, or **additions to existing housing**, or **new construction that detracts from the historical or cultural significance of an existing building or area... cumulative impacts could arise... diminishing the historic significance of the area.**”

For more than 100 years, through the extensive efforts of generations of residents of St. Francis Wood, we have maintained our historic family neighborhood through extensive volunteer efforts and the use of CCRs and design guidelines. San Francisco should not put this irreplaceable historic family community at risk.

Thank you for your consideration.

N/S

Very truly

Ed Anderson

Edward V. Anderson  
330 Santa Clara Ave.  
San Francisco, CA 94227  
415 661 9473

Circular 230 Notice: In accordance with Treasury Regulations we notify you that any tax advice given herein (or in any attachments) is not intended or written to be used, and cannot be used by any taxpayer, for the purpose of (i) avoiding tax penalties or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein (or in any attachments).

Attention: This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

N/S  
(Cont.)



Letter R9  
RECEIVED

FEB 14 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

**David P. Bancroft**  
**2934 Broderick St.**  
**San Francisco, CA., 94123**

February 12, 2014

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: The Deficient 2009 Housing Element EIR: No Neighborhood-Supported  
Community Planning Process

Dear Ms. Jones,

The changes to the Planning Code, made under the 2009 Housing Element, to  
“further accommodate housing near transit,” can responsibly occur only through a  
neighborhood-supported community planning process. Accordingly, the EIR should  
canvass a representative number of resident groups from the neighborhoods where  
these growth policies will be effected in order to list and index their questions,  
comments and suggestions.

Otherwise, there is no confirmation that the process is “neighborhood supported,” as  
required under the General Plan. The substantial impacts identified by the residents  
should then be subject to a detailed analysis and accorded the same weight and be  
given the same consideration in the EIR as all the environmental conditions.

Only in this way can the process be fairly deemed “neighborhood supported” as  
required by law.

Very Truly Yours

  
David P. Bancroft

FEB 21 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

John D. Bardis  
1158 Green Street  
San Francisco, CA 94109

February 19, 2014

Ms. Sarah B. Jones, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: San Francisco 2004 and 2009 Housing Element, Case #2007.1275E  
Hand delivery of paper copy of letter to Planning Commission dated February 18, 2014

Dear Ms. Jones,

In my email message to you on February 18th, I enclosed a copy of my letter dated February 18, 2014 confirming my oral public comments made to the Planning Commission during the public hearing on January 23, 2014 regarding the San Francisco 2004 and 2009 Housing Element Draft EIR, Case # 2007.1275E.

However, the letter sent in the email message to you contained typos which required correction.

Please find enclosed a paper copy of my letter (corrected for typos) dated February 18, 2014 to the San Francisco Planning Commission.

Please replace the letter enclosed with the email message to you with this attached copy of the letter to the Planning Commission dated February 18, 2014 which has been corrected for typos.

Yours truly,

  
John Bardis

Attached: Copy of corrected letter dated February 18, 2014 to San Francisco Planning Commission

N/S

John D. Bardis  
 1158 Green Street  
 San Francisco, CA 94109

February 18, 2014

Mr. Rodney Fong, President  
 San Francisco Planning Commission  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94102-2479

RE: Flawed public notice - San Francisco 2004 and 2009 Housing Element, Case #2007.1275E  
 Commission Meeting, Jan. 23, 2014, Hearing Agenda #15; Public Notice Dec. 18, 2013

Dear President Fong and members of the Planning Commission:

This letter confirms the oral public comments presented regarding the flawed public notice issued for the above referenced public hearing regarding the Revised Draft Environmental Impact Report (EIR) which the City was ordered by the Superior Court to revise and recirculate for public review. Given the two minute limitation for oral public comments, this letter presents a more clear and complete statement regarding the flawed public notice issued for this hearing.

More specifically, the Hearing Notice dated December 18, 2013 issued for the above referenced January 23, 2014 public hearing was flawed as follows:

1. Issued prematurely. The notice for the January 23, 2014 public hearing before the Planning Commission was dated December 18, 2013 — a date 28 days prior to the January 15, 2014 date of the Superior Court’s Peremptory Writ of Mandate which officially set aside and voided the certification and approval of the San Francisco 2004 and 2009 Housing Element Final EIR and ordered the City to submit all revisions to the EIR for public review, consider all comments received and prepare written response to issues raised by the commentators. As noted below, the notice was not only premature but it also was incomplete and erroneous.

2. Failed to disclose Superior Court decision. The notice did not disclose to the public that the Superior Court found that, “THE FINDINGS ADOPTED BY THE PLANNING COMMISSION AND BOARD OF SUPERVISORS AS REQUIRED BY CEQA ARE INADEQUATE.” Furthermore, the Superior Court declared, “...the City abused its discretion in approving the 2009 Housing Element because the City failed to explain the rationale for the findings that rejected each of the alternatives described in the EIR ...” as required by CEQA Guidelines. Also the notice failed to disclose to the public other information regarding the failure of the City to comply with CEQA.

3. Erroneously restricted scope of public comment. Since the notice to the public was issued 28 days before the Superior Court officially issued on January 15, 2014 its Peremptory Writ of Mandate, the notice issued to the public erroneously restricted public comment to only the revised sections of the Draft EIR that were circulated. However, the official order of the Superior Court to the City was for the City to perform a public review of the entire Draft EIR for the 2004 and 2009 Housing Element in compliance with CEQA.

4. Failed to provide constructive notice. The notice to the public was issued December 18, 2013, i.e., one week before Christmas. Allowing for the holiday period, the notice effectively was from January 2, 2014, or just three weeks before the public hearing. Even if the notice were flawless, it was not a constructive notice to the public when it was issued during the holiday period and allowed insufficient time for community organizations to review, evaluate, and prepare their position in keeping with the public review ordered by the Superior Court.

N/S

In view of the above deficiencies in the public notice issued for the public review ordered by the Superior Court, The Planning Commission was respectfully requested to have the Planning Department reissue the hearing notice and to continue the January 23, 2014 public hearing to March 1, 2014.

Yours truly,

  
John Bardis

cc: Members of Planning Commission and Environmental Review Officer

**From:** [Secretary, Commissions](#)  
**To:** [Bill Sugaya](#); [Cindy Wu](#); [Gwyneth Borden](#); [Kathrin Moore](#); [Michail Antonini](#); [Rich Hillis](#); [Rodney Fong](#)  
**Cc:** [Gerber, Patricia](#); [Smith, Steve](#)  
**Subject:** FW: Revised Alternative Analysis for the 2004 and 2009 Housing Element  
**Date:** Friday, January 24, 2014 7:37:05 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

FYI

*Jonas P. Ionin*  
 Director of Commission Affairs  
 Commissions Secretary  
 Custodian of Public Records

Planning Department | City & County of San Francisco  
 1650 Mission Street, Suite 400, San Francisco, CA 94103  
 Direct: 415-558-6309 | Fax: 415-558-6409

[jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)  
[www.sfplanning.org](http://www.sfplanning.org)




---

**From:** Christopher Bowman [mailto:chrisbowman@sbcglobal.net]  
**Sent:** Thursday, January 23, 2014 1:29 PM  
**To:** Secretary, Commissions  
**Subject:** Revised Alternative Analysis for the 2004 and 2009 Housing Element

Dear Commissioners:

I will be unable to attend today's hearing regarding the revised alternative analysis for the 2004 and 2009 Housing Element, but am submitting for inclusion in the public record my views.

As a native San Franciscan and life-long Republican, I've always favored increased density and opposed height limits in the Financial District and South of Market east of 4th Street and south of the Bay Bridge approach, because it would contribute to the economic growth and vitality of the City as a world class city. Additionally, I continue to have no problem with conversion of high-rise office buildings to condominiums or residential rental units.

At the time, in the 1970's and early 1980's, the Financial District and the Rincon Hill, and the Yerba Buena Gardens areas were not established

N/S

residential neighborhoods -- at best a few hundred residents lived in both neighborhoods.

Like most native San Franciscans, I was opposed and continue to be opposed any development or new construction (or rezoning or spot zoning) which is out of character of each of San Francisco's unique established neighborhoods.

Homeowners and property owners made a life-time investment based on realistic assumptions that the character of the neighborhoods they were moving into, would remain essentially the same as they were when they were developed, when they purchased their homes or properties, and into the foreseeable future.

These assumptions have led to the creation and continuation of a stable middle class in the City.

Now the Planning Department, and the majority of the Planning Commissioners, with significant political backing by some members of the Board of Supervisors and the Mayor, so called "urban environmentalists" at SPUR, pressure from ABAG, and the State are in the process of increasing density in all our neighborhoods, without the consent of the current homeowners, property owners, and residents, which will adversely affect the quality of life and character of our neighborhoods.

For instance, the density of the new Park Merced project will be as great as that of the average density in Manhattan, and one need travel west on Market Street, between Franklin and Noe to see the out of character dense housing that this Commission and the Planning Department approved, which dwarf existing apartment buildings, homes, and businesses.

On a massive, City-wide scale such developments will degrade our neighborhoods and lower the property value of existing homes. Under SB-1 (which could become law), we could see Kelo on steroids taking place in neighborhoods which have detached homes, row homes, or duplexes, and eminent domain could be used to tear down entire swaths of neighborhoods because they are "underutilized".

I was shocked to learn, when I delivered a typhoon relief check to Rudy Asercion at the West Bay Pilipino Multi-Service Center (on 7th Street), that

N/S

R11-1

R11-1  
(Cont.)

1/4 of Filipino residents have left the South of Market neighborhoods which have been their home for several generations -- which exodus accounts for almost all the decline of Filipinos citywide from 40,000 in 2000 to 36,000 in 2010. This is largely happening because of infill housing. Just imagine when dense, massive, Infill housing becomes the norm and standard in existing neighborhoods.

Beyond the social costs, if property values drop because of denser rezoning, so too will the City's property taxes, from the 140,000 homeowners in the City and the City's ability to provide essential services to its residents, without raising taxes.

R11-2  
(Cont.)

Additionally, the impact on the existing infrastructure (beyond on parking and traffic, new schools, and fire stations), on our overtaxes Hetch Hetchy and sewer system (which was rebuilt in the 1970, when the City had below 700,000 people), will be borne largely by property owners of the City, through the passage and issuance of G.O. Bonds. (Currently, except for School Bonds, a 2/3 vote is required. There's movement afoot to lower that to 55% in Sacramento, so there will be no constraints on the submission and passage of such proposals). We are talking about tens of billions of dollars, beyond the Mayor's \$10.1 billion transportation infrastructure proposal.

R11-3  
(Cont.)

It's time for the City to put a moratorium on new proposed developments which require exemptions to existing zoning requirements. Those projects currently in the pipe-line should be allowed to continue to completion, but then we need to reassess what all the new in-fill development has begotten the City, before we go forward with new development or rezoning.

The Commission and the Department owe their first loyalty to existing San Franciscans, not potential new residents.

Let's go back to square one on the 2004 and 2009 Housing Elements, and related documents.

N/S

Sincerely,

Christopher L. Bowman

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: 2004 and 2009 Housing Element  
**Date:** Tuesday, February 18, 2014 12:47:17 PM

---

N/S

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Jim Buick [mailto:jbuick4@msn.com]  
**Sent:** Sunday, February 16, 2014 2:11 PM  
**To:** Jones, Sarah; Secretary, Commissions  
**Subject:** 2004 and 2009 Housing Element

R12-1

Dear Sarah Jones-- I am writing in opposition to the revised EIR and alternatives analysis regarding the proposed changes in the 2004 and 2009 Housing Element. Most specifically, I am opposed to those elements that would adversely impact single family neighborhoods by allowing secondary units to be added to these homes. The resulting increased congestion in the neighborhoods and the inability of Muni to transport an expanded population in these areas seems short sighted.

R12-2

I am a 4th generation San Franciscan and proud of our City. Our family grew up in the Sunset and Parkside neighborhoods where the homes were occupied by single families. Unlike many of my friends that I grew up with in San Francisco, my own family is lucky to still be residents of our great City.

N/S

The exodus of families from San Francisco is well documented. Certain elements of the proposed Housing Element recommendations that erode the character of single family neighborhoods will only serve to discourage families from remaining in our City.

R12-3

I strongly urge that those recommendations that adversely impact the character of our single family neighborhoods be removed as their potential impact on our neighborhoods would be dramatic. I urge you to consider alternatives to our housing situation.

N/S

Thanks for your consideratrion, Jim Buick, 67 San Andreas Way, 94127



February 14, 2014

RECEIVED

FEB 19 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

N/S

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

Dear Ms. Jones

San Francisco is an unique city but recent efforts are being made fo destroy a place where the middle class can enjoy a comfortable place in which to raise their children. It is preposterous to change neighborhoods by eliminating RH-1 zoning laws. We already have more dogs than young children in San Francisco. West of Twin Peaks area offers an exceptionally wide variety of neighborhoods in which to raise a family in peace and comfort. Young families are the life-blood of any city. Please don,t force them out.

I am 93 years old and have lived my entire life in San Francisco West of the Twin peaks and have seen too many ridiculous changes made only to see them later recinded. Incidentally I must congratulate you on finally bringing two districts back together- Japantown and the Fillmore. The Geary Blvd project was a disaster.

Sincerely,

Phyllis M. Charlton

- cc Steve Smith
- Rodney Fong
- Cindy Wu
- Michael Antonini
- Gwyneth Borden
- Rich Hillis
- Kathryn Moore
- Hisashi Sugaya
- John Rahaim

R13-1

N/S

To: San Francisco Planning Commission  
Fr: Bernard Choden ( [Choden@sbcglobal.net](mailto:Choden@sbcglobal.net) )  
Re: Housing Element EIR

FEB 07 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Jan. 23, 2014

N/S

Resubmitted today continuing critique of the proposed Housing Element EIR are the San Francisco Tomorrow supporting documents for Kathryn R. Devincenzi's "Appeal of Certification of Final Impact Report for 2004 and 2009 Housing Elements and related CEQA findings." These documents remain highly relevant today regarding the mandated and professional requirements and mitigating alternatives needed to implement the diverse housing needs of this city.

To reiterate, CEQA requires in the city's EIR the following inclusions now absent:

- 1. Failure to review past Housing Elements shortcomings in achievement of mandated goals, objectives and policy programs and the need to recommend specific mitigations for those shortcomings.
- 2. Failure to accurately measure land resources controlled by the city under law and institutional process that can be used for the diversity of city housing needs.
- 3. Failure to mitigate the effects on housing development costs due to rising economic inelastic land costs due to this overheated housing market lack of cost mitigation means and resources.
- 4. Failure to contain cost increases affecting limited public resources due to permissive developments that exceed the city's holding capacity for infrastructure (such as transport and utilities), services and, especially earthquake prone mitigations for public safety and functional continuity.
- 5. Failure to fully provide the Board of Supervisors all of the alternative program means and resources that could feasibly meet professional and legal standards.

These failures reflect the major defect in the EIR; i.e. lack of response to and analysis of cumulative development impacts.

I ask the Planning Commission to use, under its Charter Powers, outside counsel for advice regarding required CEQA mandates. This is necessary to avoid, as presently, inherent "conflicts of interest" represented by the City Attorney's duties as defender of the city's interest and Officers of the Court.

Sincerely,

Bernard Choden

N/S

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: San Francisco 2004 and 2009 Housing Element  
**Date:** Tuesday, February 18, 2014 9:15:04 AM

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Bill Criss [mailto:bill@crisses.com]  
**Sent:** Monday, February 17, 2014 5:52 PM  
**To:** Jones, Sarah  
**Cc:** Smith, Steve; [planning@rodneymfong.com](mailto:planning@rodneymfong.com); [cwu.planning@gmail.com](mailto:cwu.planning@gmail.com); [wordweaver21@aol.com](mailto:wordweaver21@aol.com); [plangsf@gmail.com](mailto:plangsf@gmail.com); [richhillissf@yahoo.com](mailto:richhillissf@yahoo.com); [mooreurban@aol.com](mailto:mooreurban@aol.com); [hs.commish@yahoo.com](mailto:hs.commish@yahoo.com); Rahaim, John  
**Subject:** San Francisco 2004 and 2009 Housing Element

Dear Ms. Jones,

I am a resident owner of a home in St. Francis Wood. My neighbor has made me aware of your good efforts to study the environmental impact of alternatives to revise the housing element in San Francisco and set a baseline for future housing development. I moved to St. Francis Wood in 1997 specifically to raise a family in a single family (RH-1) neighborhood that had cultural and historical significance and within walking distance or available public transportation to schools and with a safe environment including parks and open spaces where school children could live near one another and share activities together both social and scholastic. I believed, and this proved correct, that parenting and shared parenting would be more effective in this type of single family housing environment. I also wanted to remain in San Francisco where my work was located and where I was paying taxes and adding value to the San Francisco economy through my work and involvement with many non-profit cultural and charitable organizations. Prior to San Francisco I lived and worked in New York City which in the 1970's lost significant portions of its higher-end tax base with policies that forced their tax payers to flee the city. The city faced a major financial crisis as a result.

1. Have we considered the impact on the quality of life such as I describe above and the impact this would have on the tax base including the property tax base?
2. In my reading of the alternatives each appears to have a significant impact on either historic resources or the transit network and cannot be mitigated to less than significant without implementation of M-NO-1. This leads to the question have considered enough alternatives? For example could we expand the existing transit network to more neighborhoods or areas for development such as Candlestick park rather than rely on the existing transit stop areas for development?

Thank you for your time and courtesy. I look forward to your response.

N/S


R15-1

R15-2

N/S

Bill Criss  
115 San Pablo Avenue  
San Francisco, CA 94127  
[bill@crisses.com](mailto:bill@crisses.com)

N/S  
(Cont.)



**KATHRYN R. DEVINCENZI**  
ATTORNEY AT LAW  
22 IRIS AVENUE  
SAN FRANCISCO, CALIFORNIA 94118-2727  
Telephone: (415) 221-4700  
Facsimile: (415) 346-3225

**RECEIVED**

BY HAND

February 18, 2014

FEB 18 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Environmental Review Officer  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Re: Draft Environmental Impact Report, San Francisco 2004 and 2009 Housing Element Revised Alternatives Analysis Planning Department Case No: 2007.1275E**

The following comments are submitted on behalf of San Franciscans for Livable Neighborhoods ("SFLN") as to the Revised Draft Environmental Impact Report, San Francisco 2004 and 2009 Housing Element, Revised Alternatives Analysis (the "Revision").

SFLN secured an Order of the Superior Court finding that the City violated the requirements of the California Environmental Quality Act, Public Resources Code sections 21000 *et seq.*, because the discussion of alternatives in the above-described EIR was conclusory and lacking in factual support. The Court held that the City abused its discretion by rejecting alternatives in conclusory Findings that lacked factual support and that the EIR's discussion of alternatives was also conclusory and inadequate. The City must now give genuine consideration to alternatives and since the Court set aside the City's approval of the 2009 Housing Element, the City must recommend to the Board of Supervisors an alternative Housing Element that contains policies which would reduce or eliminate the proposed project's significant impact on transit and the other effects that the EIR should have deemed significant. Accordingly, SFLN hereby incorporates by reference as though fully set forth all its prior comments as to the EIR for the 2004 and 2009 Housing Elements that the City previously released for public comment.

Pertinent excerpts from the Court Order finding the EIR for the 2009 Housing Element inadequate are attached hereto as Exhibit 2.

The Court also issued a Peremptory Writ of Mandate that commanded the City to: (1) set aside and void the City's certification and approval of the San Francisco Housing Element Final Environmental Impact Report, (2) set aside and void the City's approval of CEQA Findings that the City adopted with respect to the approval of the proposed 2009 Housing Element Update Amendment, (3) set aside and void the City's approval of any and all changes from the City of San Francisco's 1990 Residence Element that are embodied in the 2009 Housing Element, and (4) commanded the City to refrain from enforcing, relying upon, approving or implementing the changes from the City of San Francisco's 1990 Residence Element that are

N/S

R16-1

R16-2

R16-3

Environmental Review Officer  
 February 18, 2014  
 Page 2

embodied in the 2009 Housing Element which are identified in the 2009 Housing Element as “Policies With Potential for Physical Environmental Impacts” under the heading “2009 Housing Element” on Table IV-8 at pages IV-33 through IV-36 of the Final Environmental Impact Report for the San Francisco 2004 and 2009 Housing Element at 1 Administrative Record 183 through 186, until the City fully complies with the requirements of CEQA in the manner required by the Peremptory Writ of Mandate. A copy of the Peremptory Writ of Mandate is attached hereto as Exhibit 3.

**1. FEASIBLE ALTERNATIVES ARE AVAILABLE SINCE THE 2009 HOUSING ELEMENT WOULD PRODUCE FAR MORE NEW HOUSING UNITS THAN NEEDED TO ACCOMMODATE THE RHNA FOR THE 2007-2014 PLANNING PERIOD.**

“It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” Public Resources Code section 21002; 14 CCR section 15021(a)(2). A public agency is required “to mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.” Public Resources Code section 21002.1(b). Reflecting these policies, Public Resources Code sections 21081(a)(1)-(3) provide that if one or more significant impacts will not be avoided or substantially lessened by adopting mitigation measures, alternatives described in the EIR that can avoid or reduce the impact must be found infeasible if they are not adopted.

The 2009 Housing Element would have a significant impact on transit, so the City must adopt a feasible alternative to the proposed project.

As explained in the accompanying Statement of City Planner David Golick, Exhibit 1 hereto, there are feasible alternatives to the proposed 2009 Housing Element that the City must adopt if the City does not adopt one of the feasible alternatives described in the EIR or in SFLN’s prior comments.

**2. THE REVISED DEIR IS CONCLUSORY AND LACKS FACTUAL SUPPORT.**

All the Alternatives utilize the Data and Needs Analysis, Part I of the 2009 Housing Element, and seek to accommodate the RHNA for the 2007-2014 planning period. The Revision states that: “The number of housing units that would be constructed under each of the project alternatives would be substantially similar, as each alternative reflects the housing needs and population projections provided by ABAG. VII-6. Thus, all the Alternatives seek to produce the

R16-3 (Cont.)  
 R16-4a  
 R16-4b  
 R16-5

Environmental Review Officer  
 February 18, 2014  
 Page 3

same amount of new housing units for the designated income categories. VII-4-5, VII-44, 46, 79, 80.

**A. The EIR’s Definition of Alternative A as Subject to the Area Plans Contradicts the Claim that Growth Under Alternative A Would be Dispersed Throughout the City.**

The Revision claims that housing produced under Alternative A “would generally result in patterns of residential development that are relatively dispersed throughout the City, compared to the 2004 Housing Element or the 2009 Housing Element.” VII-6 The Revision claims that this is due in part to the particular policies and implementation measures provided in the 1990 Residence Element, including Objective 2 (To increase the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods).

This conclusion is flatly contradicted by the definition of Alternative A as being subject to all existing Area Plans and Redevelopment Plans, where 90% of the additional housing production is expected to be constructed. The revised DEIR states that: “Similar to 2004 Housing Element, new development under Alternative A would be subject to the controls in existing Area Plans and Redevelopment Plans, and would serve to complement - and not conflict with - the policies and land uses in an Area Plan or Redevelopment Plan.” (VII-20)

The Final EIR states that the City “has recently updated zoning controls for the following neighborhoods: Market/Octavia, Mission, East SoMa, Showplace Square/Potrero Hill, Central Waterfront, and Balboa Park. These planning efforts have developed updated zoning, heights, bulks, and densities in balance with infrastructure. A number of other planning efforts are currently underway including, but not limited to the Transit Center District Plan, Treasure Island, and West SoMa, which could result in increased residential development potential in those areas.... (Ex. B to Statement of Golick- AR 169, p. IV-22 and Table IV-6). The new area plans approved after the 2004 Housing Element, including Market/Octavia, Eastern Neighborhoods, Rincon Hill, and others “potentially increase housing capacity by over 55,000” units, and the “Planning Code amendments adopted with each new neighborhood plan also served to expand potential development capacity in each of these areas, using tools such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements. Ex. B to Statement of Golick-97 AR 53107-53108; 18 AR 9582-9583, 9586, 9564-9565, 9568, 9474, 9485, 9496, 9486.

As explained by the Legislative Analyst, tools such as height increases, removal of maximum densities, and reduction or elimination of parking requirements are proven development strategies which increase housing production. 1 A 2936-2945, Exhibit C to the accompanying Statement of David Golick. The Revision admits that the rezoning is expected to increase housing production in the Plan Areas, as it states that: “Promoting housing in recently

R16-4  
 (Cont.)

R16-6a

R16-6b

Environmental Review Officer  
 February 18, 2014  
 Page 4

R16-6b  
 (Cont.)

rezoned Plan Areas would likely encourage build out of those areas, as anticipated under those plans.” However, the EIR fails to provide the details as to the general nature of the build out expected in the recently rezoned Plan Areas, even though the EIR is required by law to disclose the general nature of the expected build out and analyze its indirect or cumulative effects. SFLN requests that the City disclose the general nature of the build out expected in the recently rezoned Plan Areas and analyze the effects of that build out as an indirect effect of implementing 2004 and 2009 Housing Element policies or cumulative effects.

R16-6c

The 2004 Housing Element acknowledged that its “[n]ew policies strive to expand land capacity necessary to increase housing production, will direct new housing to appropriate locations, especially in areas well served by transit” and seek to achieve a “far greater” rate of new housing construction than was previously produced. Ex. C to Statement of Golick-1 A 82, 16, 283, 328. It is not true that the area plans approved after the 2004 Housing Element was adopted sought to encourage increased housing production near transit? The Negative Declaration admitted that the 2004 Housing Element policy changes were intended to provide the “policy basis” for the more specific planning efforts, such as adopting numerous area plans containing new zoning controls identified in 2004 Work Programs. 15 A 4185-86, 4199; 1 A 328.

The 2009 Housing Element also directs increased housing production to areas near transit. 2009 Housing Element Policy 1.4 is to “Ensure community based planning processes are used to generate changes to land use controls,” and the policy text states that “Such plans can be used to target growth strategically to increase infill development in locations close to transit and other needed services, as appropriate.” (Ex. B to Statement of Golick-AR 53139-2009 Housing Element Part 2, p. 9)

R16-6d

ABAG has granted San Francisco’s application to designate various areas as Priority Development Areas (“PDAs”) that have “plans for significant increases in housing units” and are near transit. Ex. B to Statement of Golick-20 AR 10511-10512, 10328, 10330, 10532-38, 10463-72; 19 AR 10234-41. Such Priority Development Areas generally include the areas for which new Area Plans were approved after the 2004 Housing Element was adopted. Thus, the Area Plans approved after the 2004 Housing Element are substantially similar to the PDAs.

The City plans to accommodate over 90% of the growth to 2035 in the PDAs. Ex. F to Statement of Golick-December 17, 2010 ABAG letter to SFMTA, Exhibit 6, tenth page.

The City has admitted that the “lion’s share of city’s growth will continue to be focused in its PDAs” and that the adopted and planned PDAs “collectively accommodate over 63,000 new housing units.” Ex. F to Statement of Golick-December 17, 2010 ABAG letter to SFMTA, Exhibit 6, twelfth page. As to infill opportunity sites outside PDAs, the City has acknowledged that: “The city includes numerous small-scale infill opportunity sites close to transit throughout



Environmental Review Officer  
 February 18, 2014  
 Page 5

all of its neighborhoods. Such sites outside of Priority Development Areas could accommodate another 17,000 new housing units, distributed reasonably evenly throughout the city.” *Id.*

In view of the fact that 90% of the growth is expected in the plan areas, where growth is directed to transit, there is no evidence indicating that a significant amount of growth outside the plan areas would occur in dispersed locations throughout the City during the 2007-2014 planning period. The 2004 and 2009 Housing Elements and the EIR provide no estimate of the amount of growth expected outside the plan areas, and there is no evidence that a substantial amount of new housing development will occur during the 2007-2014 planning period outside the plan areas in locations that are dispersed throughout the City.

For the same reasons, the evidence does not support the Revision’s claim that under Alternative A “most future housing development would take place in established neighborhoods, with the exception of recently rezoned plan areas where such rezoning has substantially increased development capacity. VII-20. Based on the evidence that 90% of the growth is expected in the plan areas, most future housing development would take place in the plan areas, rather than in established neighborhoods.

Similarly, the Revision’s claims that Alternative A would not increase residential densities “to the same extent” as the 2004 Housing Element, promotes housing opportunities “more generally throughout the entire City,” and would have “less” potential for land use conflicts than under the 2004 Housing Element, are unexplained and unquantified generalizations that are contradicted by the definition of Alternative A as subject to the existing Area Plans. VII-20-21. Also, due to the definition of Alternative A as subject to the existing Area Plans, the evidence does not support the Revision’s claim that development under Alternative A could result in “incrementally fewer” potential land use conflicts because development would continue to be introduced similar to historic patterns. VII-21.

Also because Alternative A was defined as being subject to existing Area Plans, the evidence does not support the Revision’s assertion that the encouragement for housing development, which could result in some land use conflicts, could occur to a greater extent under Alternative A than under the 2009 Housing Element because Alternative A encourages housing throughout the City and according to historical patterns. VII-21. The Revision defines development under Alternative A as “subject to the controls in existing Area Plans and Redevelopment Plans” and states that it would not substantially conflict with the existing policies and land uses in current Area Plans or Redevelopment Plans. VII-21. For the same reasons, the evidence does not support the assertion that “Alternative A could incrementally increase the likelihood of potential land use conflicts due to the encouragement of housing in more locations,” and therefore, “impacts related to land use conflicts could be incrementally greater under Alternative A than the 2009 Housing Element.” VII-21. The Revision’s assertions that any new residential development would be required to be developed in accordance with the

R16-6d  
 (Cont.)  
 R16-6e  
 R16-6f  
 R16-6g

Environmental Review Officer  
 February 18, 2014  
 Page 6

R16-6g  
 (Cont.)

City’s Residential Design Guidelines, the Urban Design Element and Chapter 35 of the City’s Administrative Code are also conclusory and not supported by evidence. The Revision fails to explain the manner in which the referenced material could reduce the potential for land use conflicts, and the evidence in the record which SFLN cited in previous comments states that the Residential Design Guidelines had been modified to facilitate infill development.

R16-6h

Also because Alternative A was defined as subject to existing Area Plans, the evidence does not support the Revision’s claim that Alternative A promotes increased growth more generally throughout the entire City than the 2009 Housing Element. VII-22. Also unexplained is the Revision’s assertion that: “Alternative A could result in more developments built to the maximum building heights more generally citywide, potentially increasing the height and number of new developments that affect a scenic vista.” VII-22. The 1990 Residence Element contained policies that strongly maintained neighborhood character and did not contain any policies that encouraged developments built to maximum building heights. The first policies that proposed maximization of density were proposed in the 2004 Housing Element, and the Court enjoined the City from implementing such amendments until the City fully complied with CEQA. See Ex. 5-Peremptory Writ of Mandate. The Revision admits that “Alternative A includes policies and guidelines for development that are intended to preserve neighborhood character and protect existing visual character.” VII-22. The conclusion that such policies are similar to the 2009 Housing Element is not supported by the evidence, since 2009 Housing Element policies respect, rather than maintain, neighborhood character. As the Court of Appeal explained, the policies which allow more subjective interpretation afford less protection than those which maintain neighborhood character. The Revision’s allegation that “Overall, the aesthetic impacts of Alternative A would increase slightly compared to the impacts of the 2009 Housing Element” are also not supported by the evidence. VII-22. The Revision’s discussion of the impacts of alternative A is conclusory and internally contradictory.

R16-6i

Also misleading and unsupported by evidence is the Revision’s assertion that residential development in the city would occur regardless of the policies contained in Alternative A of the proposed 2004 and 2009 Housing Elements. VII-22. The City is not legally required to adopt a general plan that calls for continued housing development. The Revision’s reference to the lack of a substantial change in the workers-to-household ratio “that would occur between 2005 and 2025” erroneously measures impacts against projected future conditions rather than against existing conditions in the environment. VII-23. Further, the assertion that “because the Housing Element does not *cause* housing growth, no additional demand for housing would occur as a result of Alternative A” ignores the indirect effect of implementing the policies of Alternative A. VII-23-24.

R16-6j

R16-6k

Also because Alternative A is defined as subject to existing Area Plans, the evidence does not support the Revision’s assertion that “Alternative A would promote increased housing on a broader, citywide scale to a greater extent because the policies of the 2009 Housing Element

Environmental Review Officer  
 February 18, 2014  
 Page 7

R16-6k  
 (Cont.)

promote housing at limited locations in the City.” VII-23. 90% of the housing growth is expected to occur in the Plan Areas, and there is no evidence that a significant amount of growth would occur throughout the City outside the Plan Areas.

**B. The Conclusion that Total Development Potential Under the 2004 Housing Element Would Not Be Substantially Greater than Under the 1990 Residence Element Policies Because the 2004 Housing Element Does Not “Include” Any Changes to Allowable Land Uses Is Misleading and Contradicted by the Evidence.**

The Revision states that:

R16-7a

“The 2004 Housing Element also promotes increased density by reducing or eliminating minimum density restrictions (Implementation Measure 1.3.1), eliminating density requirements (Implementation Measure 1.7.1, reducing parking requirements (Policy 11.7), (which can reduce the amount of space per parcel devoted to parking and increase the amount of space available for housing units); and support for secondary units (which could increase the number of second housing units in San Francisco (Policy 1.8) and flexible land use controls (Policy 11.6)...Together or individually, these housing policies could introduce higher density development in certain areas of the City. However, because the adoption of the 2004 Housing Element does not include any changes to allowable land uses or building heights and bulk - and new residential projects would continue to be constrained by these existing controls - total development potential under the 2004 Housing Element would not be substantially greater than that under the 1990 Residence Element policies. Rather, the 2004 Housing Element policies would support and encourage development concentrated in certain areas, rather than distributed throughout the City pursuant to the 1990 Residence Element policies.” VII-17.

The evidence in the record shows that the post-2004 Housing Element Area Plans were identified as Work Programs that would implement the 2004 Housing Element policies through rezoning various areas. Ex. C to Statement of Golick- 1 A 328. The 2004 Housing Element acknowledged that its “[n]ew policies strive to expand land capacity necessary to increase housing production, will direct new housing to appropriate locations, especially in areas well served by transit” and seek to achieve a “far greater” rate of new housing construction than was previously produced. Ex. C to Statement of Golick-1 A 82, 16, 283, 328. The Negative Declaration admitted that the 2004 policy changes were intended to provide the “policy basis” for the more specific planning efforts, such as adopting numerous area plans containing new zoning controls identified in 2004 Work Programs. 15 A 4185-86, 4199; 1 A 328. Thus, although the post-2004 Area Plans were not “included” in the resolution approving the 2004 Housing

Environmental Review Officer  
 February 18, 2014  
 Page 8

R16-7a  
 (Cont.)

Element, these Area Plans were the indirect result of adoption of the 2004 Housing Element, because they were the means by which the City would implement the 2004 Housing Element policies that were designed to increase the City’s capacity for new housing units.

R16-7b

The evidence also shows that the post-2004 Area Plans greatly increased the development capacity of the plan areas. The new area plans adopted after the 2004 Housing Element, including Market/Octavia, Eastern Neighborhoods, Rincon Hill, and others “potentially increase housing capacity by over 55,000” units, and the “Planning Code amendments adopted with each new neighborhood plan also served to expand potential development capacity in each of these areas, using tools such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements. Ex. B to Statement of Golick-97 AR 53107-53108; 18 AR 9582-9583, 9586, 9564-9565, 9568, 9474, 9485, 9496, 9486. Capacity was significantly increased, as Better Neighborhoods and Eastern areas identified as 2004 Housing Element Work Programs had existing capacity for 8,628 new units before 2004 and would add 18,285-38,835 additional potential units with rezoning. Ex. C to Statement of Golick-2004 Housing Element Administrative Record-1 A 180.

R16-7c

The 1990 Residence Element did not mention rezoning in the areas that the 2004 Housing element identified as Work Programs for implementing the 2004 Housing Element. The 1990 Residence Element also did not contain any increased density-related development standards. Rather, as the Court of Appeal recognized, the 1990 Residence Element contained policies that emphasized preservation of existing neighborhood character. (Ex. —to Statement of Golick.)

As shown above, and as acknowledged in the FEIR, the 2004 Housing Element included numerous increased density-related development standards. Thus, the claim in the Revision that total development potential would not be substantially greater under the 2004 Housing Element than under the 1990 Residence Element because the 2004 Housing Element did not “include” changes to allowable land uses, ignores the indirect effects of implementing 2004 Housing Element policies and is contradicted by the evidence set forth above as to the 2004 Housing Element’s inducement of the post-2004 Area Plans. No similar Area Plans or rezonings were promulgated under the 1990 Residence Element.

R16-7d

Moreover, the stated purpose of the 2004 Housing Element to implement new policies that strive to expand land capacity, contradicts the Revision’s allegation that total development potential would not be increased under the 2004 Housing Element. The Revision’s statement that “Together or individually, these housing policies could introduce higher density development in certain areas of the City” also contradicts this claim. The EIR also failed to measure the potential impacts of adopting the 2004 Housing Element on existing conditions in the existing environment. The EIR’s use of existing plans as the erroneous baseline against which potential impacts would be measured ignores the indirect effect of carrying out the 2004 Housing Element policies in area plans and erroneously treats the post-2004 area plans as

Environmental Review Officer  
 February 18, 2014  
 Page 9

R16-7d  
 (Cont.)

unconnected with the 2004 Housing Element.

R16-7e

The Area Plans are not unconnected with the Housing Element policies since the Area Plans must be consistent with the policies set forth in the general plan. The General Plan is the long-term plan for the physical development of the City, is “atop the hierarchy of local government law regulating land use,” and “embodies an agency’s fundamental policy decisions to guide virtually all future growth and development.” *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 409. Under Planning Code section 101.1( c)-(e), all zoning and project approvals must be consistent with the provisions of the General Plan. Section 4.105 of the San Francisco Charter requires the preparation of “special area, neighborhood and other plans designed to carry out the General Plan.”

R16-7f

Moreover, the City has been enjoined from implementing the 2004 Housing Element policies calling for use of increased density-related standards in the Peremptory Writ of Mandate issued in relation to the 2004 Housing Element amendments. Ex. 5.

**C. The Conclusion that the 2009 Housing Element Does Not Promote Increased Residential Densities More So Than the 1990 Residence Element is Contradicted by the Evidence and Is Misleading.**

R16-8a

The Revision concludes that “Citywide the 2009 Housing Element does not, overall, promote increased residential densities more so than the 1990 Residence Element policies.” VII-17. This allegation is false and contradicted by the evidence.

2009 Housing Element Policy 1.4 is to “Ensure community based planning processes are used to generate changes to land use controls,” and the policy text states that “Such plans can be used to target growth strategically to increase infill development in locations close to transit and other needed services, as appropriate.” (Ex. B to Statement of Golick-AR 53139-2009 Housing Element Part 2 p. 9)

The EIR admits that the “2009 Housing Element generally promotes increased density through community planning processes (Policies 1.4, 1.6, and Implementation Measures 13 and 79) and for affordable housing (Policy 7.5 and Implementation Measures 36 and 64). The 2009 Housing Element also includes a strategy designed to reduce the amount of space required for non-housing functions (Implementation Measure 12).” Ex. B- 2 AR 769- Final EIR p. V.L-36. The Final EIR further explains: “While implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, it would encourage new Area Plans with similar planning -related strategies that may be designed to accommodate growth.” Ex. B-1 AR 257; Final EIR p. V.B.-28.

Environmental Review Officer  
 February 18, 2014  
 Page 10

The 2009 Housing Element estimates that the total estimated new housing construction potential in the “Adopted Plans & Projects” of Balboa Park Area Plan, Market/Octavia Area Plan, Central Waterfront Area Plan, Mission Area Plan, East SOMA Area Plan, Showplace Square/Potrero Hill Area Plan, Rincon Hill Area Plan, Visitacion Valley Area Redevelopment Plan, Transbay Redevelopment Plan, Mission Bay Redevelopment Plan and Hunters Point Shipyard/Candlestick Point is 39,500 housing units. (Ex. B to Statement of Golick-AR 53139-2009 Housing Element Part 2 p. 9)

The Final EIR states that the City “has recently updated zoning controls for the following neighborhoods: Market/Octavia, Mission, East SoMa, Showplace Square/Potrero Hill, Central Waterfront, and Balboa Park. These planning efforts have developed updated zoning, heights, bulks, and densities in balance with infrastructure. A number of other planning efforts are currently underway including, but not limited to the Transit Center District Plan, Treasure Island, and West SoMa, which could result in increased residential development potential in those areas. Under existing zoning capacity, these planning areas could accommodate 3,669 net new housing units, representing approximately six percent of the total citywide existing capacity of 60,995 units as described previously. The additional potential capacity with rezoning initiatives currently underway is approximately 28,844 units. (Ex. B to Statement of Golick- AR 169, p. IV-22 and Table IV-6). Table IV-6 in the Final EIR estimates that a total of 28,844 additional units could be added with rezoning in the Executive Park, Glen Park, Park Merced, Transit Center District, Western Soma, India Basin, Hunters Point Shipyard, Candlestick Park and Treasure Island neighborhoods, which were identified as areas subject to ongoing community planning processes (Ex. B to Statement of Golick-AR 169, Final EIR IV-22; see also AR 9499-2009 Housing Element, Part I, p. 95)

Thus, key policies 1.4 and 1.6 of the 2009 Housing Element use community planning processes to promote increased density, even though capacity for 39,500 additional housing units had already been added through rezoning in area plans adopted before the 2009 Housing Element. Thus, the principal strategy of the 2009 Housing Element to use community planning processes as a vehicle to facilitate increased capacity and density disprove the conclusion that the 2009 Housing Element would not overall promote increased residential densities more so than the 1990 Residence Element. The Revision also contradicts the conclusion that the 2009 Housing Element would not overall promote increased residential densities more so than the 1990 Residence Element. The Revision states that the 2009 Housing Element included “density-promoting policies” which can be seen in “Table IV-8 Policies 1.4, 1.5, 1.6, 7.5, and 11.4.” VII-18. In fact, the “density-promoting policies” identified in Table IV-8 as 2009 Housing Element Policies with Potential for Adverse Physical Impacts have been enjoined in the Peremptory Writ of Mandate that the Superior Court issued as to the 2009 Housing Element. (See Exhibit 3 hereto.) Thus, other sections of the Revision contradict the conclusion that the 2009 Housing Element would not overall promote increased residential densities more so than the 1990 Residence Element.

Environmental Review Officer  
 February 18, 2014  
 Page 11

R16-8b | The Revision claims that the 2004 Housing Element and the 2009 Housing Element should be considered alternatives to each other, but the EIR lacks the comparison of the impacts that would result from the 2004 Housing Element as compared with the impacts that would result from the 2009 Housing Element. Such a comparison of impacts of alternatives is required to constitute an evaluation of alternatives in an EIR. (VII-2) The EIR merely compares the alleged impacts of the 2009 Housing Element with the impacts of Alternatives A, B and C. (See VII-6, stating the alternatives analysis compares the impact of each alternative to the two project options, the 2004 Housing Element and the 2009 Housing Element.) The EIR also only compares the alleged impacts of the 2004 Housing Element with the impacts of Alternatives A, B and C.

R16-8c | In addition, the statement that the Housing Element does not “cause” population growth is ambiguous and misleading. VII-3. Since the Housing Element policies have to be carried out, they have indirect effects, but the revision fails to address the indirect effects of carrying out the Housing Element policies, as explained in the accompanying statement of City Planner David Golick, at pages 4-5.

**D. The Revision’s Assertions the Alternative A Would Be Less Effective in Meeting Certain Project Objectives Are Not Supported by the Evidence.**

R16-9a | Since Alternative A is defined as subject to the existing Area Plans, the evidence does not support the Revision’s premise that under Alternative A, housing development would continue as encouraged under the 1990 Residence Element. VII-44.

R16-9b | The evidence also does not support the assertion that Alternative A would be less effective at attaining the following project objectives than either the 2004 or 2009 Housing Element. VII-24. Since Alternative A is defined as subject to the existing Area Plans, which encouraged new housing development near transit, the evidence does not support the statement that Alternative A would less actively encourage residential development in areas served by transit than either the 2004 or 2009 Housing Element. VII-25. The evidence also does not support the conclusion that neither the 2004 or 2009 Housing Elements would demonstrably alter neighborhood character and that the 2009 Housing Element specifically emphasizes development in a manner that does not present conflicts with neighborhood character. The 1990 Residence Element contained policies that maintained neighborhood character, whereas the 2009 Housing Element contains policies that merely respect neighborhood character, and other policies implement increased density-related building standards. VII-45. The Revision fails to provide factual support for the conclusion that Alternative A does not promote the use of strategies for improving the affordability of new housing “to the same degree” as the 2004 or 2009 Housing element. VII-45. Since Alternative A was defined as subject to existing Area Plans, which encouraged new housing development near transit, the Revision lacks support for the conclusion that by not promoting increased density in transit corridors or reduced parking requirements,

Environmental Review Officer  
 February 18, 2014  
 Page 12

Alternative A does not encourage a development pattern that maximizes sustainability on a local or regional level. VII-45.

R16-9b  
 (Cont.)

Since the Revision defined Alternative A as subject to existing Area Plans and Redevelopment Plans, the evidence does not support the conclusion that the City would have a decreased ability to meet the RHNA if the 1990 Residence Element policies were in place. VII-24. Similarly, since the 1990 Residence Element had a raft of policies designed to protect historical resources, the evidence does not support the conclusion that there would be a greater risk to to historical resources if Alternative A was adopted. VII-24. The Revision acknowledges that the City has well-established criteria and procedures to evaluate impacts to historic resources and that CEQA review procedures would also apply to such resources. VII-24. The 1990 Residence Element contained Policy 5-5 preserving historic buildings, Policy 3-1 that discouraged “demolition of sound housing,” and had incorporated preservation policies in major rezonings. 5 AR 2128, 2139, 2160, 2146, 2195-2196; 6 AR 2754-2755. Alternative A was based on the 1990 Residence Element, and under both Alternatives A and B, the City will continue to implement the Priority Policy “that landmark and historic buildings be preserved,” the City would assist in environmental review of buildings receiving federal assistance, and various surveys would be conducted to document resources, so implementations were substantially similar; the EIR does not identify any implementation measure that would provide greater protection in the 2004 Housing Element or 2009 Housing Element. 5 AR 2195-2196; 6 AR 2754-2755; 3 AR 1140.

R16-9c

**E. The Evidence Does Not Support the Revision’s Conclusions as to the Effects of Alternative B.**

After reviewing policies of the 2004 Housing Element that the Court struck in the Peremptory Writ, the Revision asserts without substantiation that the themes of Alternative B focus on increasing housing supply through higher density, encouraging family-sized housing, and reducing parking requirements to make more space available for housing units. VII-49. The Revision fails to cite any remaining unenjoined policy of Alternative B that supports such development. The Peremptory Writ enjoined policies of Alternative B that reduced or eliminated parking requirements, encouraged maximization of density and encouraged family-sized housing. Ex. 5. The Revision also fails to explain or substantiate the assertion that the 2009 Housing Element contains a number of implementation measures to promote increased density that are not included in Alternative B and that Alternative B would result in smaller/less dense projects “overall.” VII-49.

R16-10a

Since Alternative B was defined as subject to existing Area Plans and Redevelopment Plans, the evidence does not support the claim in the Revision that under Alternative A, areas for future housing development would occur primarily as infill on individual parcels as most future housing development would take place in established neighborhoods. VII-49.

R16-10b



Environmental Review Officer  
 February 18, 2014  
 Page 13

R16-10c

The Revision fails to explain the assertion that due to the elimination of certain policies which the Court struck from Alternative B, “the resulting changes would be more likely to affect the density of housing (i.e. the number of units) within new buildings more than the number of buildings constructed,” and, as such, the potential for land use conflicts from new housing that affect neighborhood character would not substantially differ under Alternative B compared to the 2004 Housing Element. VII-50.

R16-10d

The Revision also does not specify the policies that would support, or provide factual support for, the assertion that Alternative B would encourage housing integrated into all new commercial or institutional projects, near major transit lines, and through community planning efforts. VII-50.

R16-10e

Since Alternative B was defined as subject to existing Area Plans and Redevelopment Plans, the evidence fails to support the claim in the Revision that incrementally smaller residential buildings might be constructed under Alternative A, resulting in incrementally fewer potential impacts to scenic vistas than the 2004 or 2009 Housing Elements. VII-50. There is no evidence that a significant number of new residential buildings would be constructed outside the plan areas.

R16-10f

Also misleading and unsupported by evidence is the Revision’s assertion that similar to the 2004 and 2009 Housing Elements, San Francisco’s population and development to meet that population would occur regardless of the housing development policies included in Alternative B. VII-51. The City is not legally required to adopt a general plan that calls for continued housing development. Also unsubstantiated is the Revision’s assertion that the policies under Alternative B would not cause a substantial change in the workers-to-household ratio that would occur between 2005 and 2025, as compared to the 2004 and 2009 Housing Elements. VII-51. This statement also erroneously measures impacts against projected future conditions rather than against existing conditions in the environment. VII-51.

With respect to Alternative B, the Revision does not contain factual support for the statement that: “Impacts created by increases in population and housing would be the same as under the 2004 Housing Element.” VII-51. Also unsupported by facts is the assertion that “because the Housing Element does not *cause* housing growth, no additional demand for housing would result from implementation of Alternative B.” VII-51-52

R16-10g

Since Alternative B was defined as subject to existing Area Plans and Redevelopment Plans, the evidence does not support the assertions that housing density would be less under Alternative B than under the 2009 Housing Element and that Alternative B would not induce additional demand for housing. VII-52. Such plans implemented increased density-related building standards and encouraged new housing near transit lines. The Revision fails to disclose the zoning changes and building standards that were implemented in the post-2004 Area Plans

Environmental Review Officer  
 February 18, 2014  
 Page 14

and Redevelopment Plans.

R16-10h With respect to attainment of project objectives, the Revision does not provide factual support for the claim that Alternative B focuses on infill and mixed-use development directed toward specific areas, affordable housing, and utilization of City-owned vacant or underused sites; encourages increased housing in neighborhood commercial districts; and would direct housing to areas in transition with existing or planned infrastructure, as well as capacity and opportunity for new housing development. VII-79-80. 2004 Housing Element policies that encouraged increased housing production in neighborhood commercial areas were stricken by the Court. The evidence also does not support the claim that Alternative B contains several policies designed to ensure that new housing maintains existing neighborhood character, and the Revision does not identify any such policies. VII-80. As explained by the Court of Appeal, the 2004 Housing Element contained policies that merely respected, rather than maintained, neighborhood character.

R16-10i The Revision also does not explain why a lack of emphasis on increased density and reduced parking requirements would not be as effective as either the 2004 or 2009 Housing Element at concentrating new housing along transit corridors. VII-80. Increased density strategies and reduced parking requirements do not concentrate density in any particular location.

R16-10j The evidence does not support the allegation that “development under Alternative B would not be expected to meet the income categories in the City’s RHNA as well as the 2004 or 2009 Housing Element,” and the Revision fails to explain the basis for this assertion. VII-80. The evidence shows that the new area plans approved after the 2004 Housing Element, including Market/Octavia, Eastern Neighborhoods, Rincon Hill, and others “potentially increase housing capacity by over 55,000” units, and the “Planning Code amendments adopted with each new neighborhood plan also served to expand potential development capacity in each of these areas, using tools such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements. Ex. B to Statement of Golick-97 AR 53107-53108; 18 AR 9582-9583, 9586, 9564-9565, 9568, 9474, 9485, 9496, 9486. Since Alternative B was defined as subject to existing Area Plans and Redevelopment Plans, the increased-density and reduced parking strategies implemented in those plans would be equally effective at achieving affordability as the 2004 or 2009 Housing Elements. Since 90% of new housing development is expected in the plan areas, there is no evidence that a significantly greater amount of affordable housing would be produced under the 2004 or 2009 Housing Element, as compared with Alternative B.

R16-11 **F. The Evidence Does Not Support the Revision’s Conclusions as to the Environmentally Superior Alternative or as to Effects of Alternative A.**

The evidence does not support the conclusion that Alternative A would result in a

Environmental Review Officer  
 February 18, 2014  
 Page 15

R16-11  
 (Cont.)

potentially significant impact to historic resources. VII-106. The 1990 Residence Element contained Policy 5-5 preserving historic buildings, Policy 3-1 that discouraged “demolition of sound housing,” and had incorporated preservation policies in major rezonings. 5 AR 2128, 2139, 2160, 2146, 2195-2196; 6 AR 2754-2755. Alternative A was based on the 1990 Residence Element, and under both Alternatives A and B, the City will continue to implement the Priority Policy “that landmark and historic buildings be preserved,” the City would assist in environmental review of buildings receiving federal assistance, and various surveys would be conducted to document resources, so implementations were substantially similar; the EIR does not identify any implementation measure that would provide greater protection in the 2004 Housing Element or 2009 Housing Element. 5 AR 2195-2196; 6 AR 2754-2755; 3 AR 1140. New CEQA requirements would also apply to any alternative adopted.

Thus, evidence does not support the Revision’s conclusion that Alternative A does not contain policies that identify and protect historical resources to the same degree as either the 2004 or 2009 Housing Element and that Alternative A could result in an “incremental increase” in historic resource impacts. VII-25. The Revision does not even discuss the policies of the 1990 Residence Element that protected historical resources, including those that provided for various surveys to be conducted. The Revision also admits that the 2004 and 2009 Housing Elements and Alternative A “would protect landmark buildings and other historical resources to a similar degree.” VII-25. Also, 1990 Residence Element Policy 3-1 discouraged “demolition of sound housing,” so the evidence does not support the Argument that Alternative A had an absence of policies that would prevent projects that could cause a substantial change to a historical resource or that there is greater potential for such resources to be indirectly affected by incompatible development. VII-25-26. Thus, substantial evidence does not support the conclusion that Alternative A could result in greater impacts on historic resources than the 2004 and 2009 Housing Elements. VII-25.

**G. The Evidence Does Not Support the Revision’s Conclusions as to the Effects of the Alternatives on Transportation and Demand for Water.**

R16-12a

Since Alternative A was defined as subject to existing Area Plans and Redevelopment Plans, the evidence does not support the conclusion that under Alternative A “less future housing growth would occur in proximity to these job cores, services and/or along transit lines.” VII-26. As explained above, the Area Plans and Redevelopment Plans direct new residential development to such areas and there is no evidence that a substantial amount of new housing will be produced outside such areas. For the same reason and because Alternative A does not “promote increased density as aggressively as: the 2004 or 2009 Housing Elements,” the evidence does not support the conclusion that Alternative A can be expected to result in an overall increase in citywide vehicle trips as compared with the 2004 and 2009 Housing Element. VII-26-28.

Environmental Review Officer  
 February 18, 2014  
 Page 16

R16-12b | Based on the evidence discussed above, substantial evidence also does not support the Revision’s conclusion that because Alternative A promotes increased density more generally throughout the City than the 2009 Housing Element, but less so than the 2004 Housing Element, Alternative A policies would result in more multi-family housing units compared to the 2009 Housing Element, but less than the 2004 Housing Element. VII-36. Alternative A policies do not employ increased density-related building standards, as do policies of the 2004 and 2009 Housing Elements.

R16-12c | The evidence does not support the Revision’s claim that Alternative B contains policies that would direct growth to certain areas of the City. VII-61. The Revision and the FEIR identified policies that would direct growth to certain areas as “Implementation Measures 1.3.2, 1.6.1, 2.6.4, 1.8.1, 1.9.2, 2.4.2, 8.6.1 and 11.4.2.” VII-61; 3 AR 1148-1149. The FEIR shows that Implementation 1.3.2 merely refers to introducing unspecified zoning changes in the Eastern neighborhoods; however, the 2004 Work Program shows that enjoined policies 1.1, 1.2, 1.3, 1.6, 1.7 and 4.4 were proposed to provide a policy basis for the Eastern Neighborhoods rezonings, and Implementation 1.1 calling for “higher density, mixed-use residential development in transit-rich areas” was also enjoined in the Peremptory Writ, so there is no evidence of any remaining policies that would support increased-density rezoning of these areas. 3 AR 1142; 1 A 328.

R16-12d | The Amendment to Writ enjoined use of “floor-to-area ratio exemptions” in Downtown areas and areas subject to a Better Neighborhoods process under Implementation 1.3, but the Revision and EIR erroneously claim that the City can implement such measures in the Downtown under Implementation Measure 1.6.1. Ex. 5 hereto-Peremptory Writ and Amendment to Peremptory Writ; 3 AR 1142. Implementation 2.4.2 refers to the “citywide action plan” which the Peremptory Writ enjoined in Implementation 1.1. Ex. 5; 3 AR 1144. Implementation Measure 8.6.1 deals with housing to meet the needs of specific groups such as families, but Policy 1.7 encouraging new family housing was enjoined, and language calling for reduction in parking and higher density, mixed-use development in transit rich areas was enjoined under new language in Policy 1.1 and Implementation 1.1. Ex. 5; 3 AR 1144. Implementation 1.6.4 refers to updating the Land Use Element to define areas for mixed-use development focused along transit corridors; however, the 2004 Work Program shows that enjoined policies 1.1, 1.2, 1.3, 1.6, 1.8, 11.1, 11.6, 11.8 and 11.9 were needed to provide the policy basis for this update to the Land Use Element, and the Writ enjoined higher density, mixed-use residential development in transit-rich areas under Implementation 1.1. Ex. 5; 3 AR 1143. Implementation 1.8.1 pertains to legislation as to secondary units that the Board did not adopt, and Implementation 1.9.2 pertains to institutional master plans and Implementation 11.4.2 to housing for workers and students of institutions. 3 AR 1143. Similarly, the EIR erroneously claims that Alternative B may implement Policy 4.4 to consider granting “parking requirement exemptions for the construction of affordable or senior housing,” but such policy language was specifically enjoined in the Amendment to Peremptory Writ. Ex. 5; 3 AR 1146. For these reasons, the record does not support the Revision’s unsubstantiated claim that Alternative B includes policies that would

R16-12e |

Environmental Review Officer  
 February 18, 2014  
 Page 17

R16-12e  
 (Cont.)

direct growth to certain areas of the City or that advocate for zoning changes in many areas of the City that have undergone area planning processes. VII-61.

R16-12f

Also, the conclusion that Alternative B could potentially encourage increased transit ridership, potentially above Muni’s capacity utilization standard of 85 percent, is based on the unsubstantiated conclusion that under Alternative B, “it is possible” that encouraging housing in mixed use districts and in industrial and commercial districts where housing is located in proximity to transit could potentially shift “some trips” to transit. VII-61. The Revision provides no support for this conclusion and lacks any evidence that the number of trips potentially shifted to transit would be significant. Further, the Revision contradicts this conclusion by acknowledging that “Alternative B does not include policies that pertain to directing new development to transit-rich areas of the City, neighborhood commercial districts, Downtown and mixed-use areas.” VII-61. Such policies contained in the 2004 Housing Element were enjoined in the Peremptory Writ. Thus, there is no evidentiary support for the conclusion that Alternative B contains policies that encourage a mode shift to transit and that Alternative B may result in a potentially significant impact on the City’s transit system. VII-63. For the same reasons, there is no evidentiary support for the conclusions that the 2004 Housing Element would generally result in more beneficial impacts to the City transportation network than Alternative B, and Alternative B would have generally similar impacts to the transportation network as the 2009 Housing Element policies. VII-62. Further, since the 2004 Housing Element policies that provide for increased density-related building standards were enjoined in the Peremptory Writ, and Alternative B was defined as subject to existing Area Plans which encourage new housing development near transit, there is no evidence to support the conclusion that Alternative B can be expected to result in an overall increase in citywide vehicle trips as compared to the 2004 and 2009 Housing Elements do, through the inclusion of either policies encouraging increased density or reduced parking strategies. VII-62

R16-12g

Substantial evidence also does not support the Revision’s claim the Alternative B includes Policies 2.2 and 2.3 from the 2004 Housing Element that could increase residential density more generally throughout the City, as compared to the 2009 Housing Element. VII-62. 2004 Housing Element Policy 2.2 controls the merger of residential units to retain existing housing and Policy 2.3 restricts the conversion of rental housing to other forms of tenure or occupancy. 1 A 227-228. Thus, neither such policy increases residential density.

R16-12h

Based on the evidence discussed above, since Alternative B was defined as subject to existing Area Plans, the evidence does not support the conclusion that impacts to water supply from Alternative B would be similar, but incrementally smaller than the 2004 and 2009 Housing Elements. VII-70.

R16-12i

The evidence also does not support the conclusion that Alternative B could result in residential development that includes inappropriate alterations or additions to existing housing,

Environmental Review Officer  
 February 18, 2014  
 Page 18

R16-12i  
 (Cont.)

or new construction that detracts from the historical or cultural significance of an existing building or area. VII-52. The evidence also does not support the conclusion that due to the differing policies contained in the 2004 and 2009 Housing Elements, potential impacts (specifically from demolition of non-landmark historic buildings and resources) could be incrementally greater under Alternative B than under the 2004 or 2009 Housing Element, which would be a potentially significant impact. VII-52. Policies that reduced protection for existing neighborhood character were struck from Alternative B by the Court but are contained in the 2004 and 2009 Housing Elements. In addition, the conclusion that the impact would be potentially significant was based on a misstatement of Implementation Measure 11.1.3 from the 2004 Housing Element, which actually states that the Planning Department should encourage “adaptive reuse of older buildings to enhance neighborhood vibrancy.” This Implementation measure fell under enjoined Policy 11.1, to use new housing development as a means to enhance neighborhood vitality and diversity, which was explained in policy text to encourage mixed-use infill housing with minimum density requirements and maximum parking requirements in areas well served by transit and neighborhood retail. 1 A 276-277. That policy and its implementation measures employed increased density-related building standards. Also, the Revision acknowledges that development under Alternative B would be subject to the city’s well-established review criteria and procedures to evaluate impacts to historic resources at the project level and would also be subject to environmental review under CEQA. VII-52.

**H. The Revision’s Elimination of the Bayview Waterfront Alternative From Further Analysis Is Conclusory and Not Supported by Facts.**

R16-13

The Revision states that the Bayview Waterfront Alternative is now known as the Candlestick Point/Hunters Point Shipyard Project and that this project underwent environmental review before the EIR for the 2004 and 2009 Housing Elements was completed. VII-109. The Revision claims that the Housing Element EIR assumed the development of this project as “a reasonably foreseeable project.” VII-109. Therefore, this project is clearly a feasible project which is capable of being successfully implemented. The assertion in the Revision that it was assumed that this project was already within the range of the DEIR analysis and would not provide useful new information evades the controlling legal standard that a feasible alternative must be implemented if it would substantially reduce or eliminate a substantial impact on the environment of the project proposed for adoption.

Given the excess housing production projected for the 2001-2014 planning period, and the great increases in capacity for additional provided in Area Plans approved after the 2004 Housing Element was adopted, an alternative that directed growth to this area but not to other areas to which growth was proposed to be directed, such as Treasure Island, Japantown, Executive Park, Glen Park, Park Merced, Transit Center District, West SOMA, which the 2009 Housing Element projected could accommodate 18,200 additional housing units, would reduce the impact on transit by limiting the areas to which transit would have to be enhanced. The

Environmental Review Officer  
 February 18, 2014  
 Page 19

reduction of the transit impact is explained in the accompanying and previous statements of City Planner David Golick. (See accompanying Statement of City Planner David Golick and Ex. B to Statement of Golick-AR 53139). The alternative of directing growth to the Candlestick Point/Hunters Point Shipyard Project but not to other new plan areas would certainly be feasible given the projected excess housing production for the 2007-2014 planning period and the amount of increased housing capacity already added as a result of Area Plans approved after the 2004 Housing Element. The Revision has not demonstrated that this alternative would be infeasible.

The evidence also does not support the new claim in the Revision that this alternative “includes the 1990 Residence Element Objectives, Goals and Policies, and assumes the zoning in place at the time the 2009 Notice of Preparation for this EIR was issued.” VII-106, 109. The 2009 Housing Element identifies the Candlestick Point and Hunters Point Shipyard areas as areas where planning efforts were “underway” and details “the estimated additional potential capacity with rezoning” in Candlestick Point as 7,500 units and projects that the capacity of Hunters Point could be increased from 1,500 units to 4,00 units with potential rezoning. Ex. B to Statement of Golick-AR 53120. The 2009 Housing Element also states that the planning efforts underway in the listed areas “will result in increased residential development potential.” *Id.*

Since the evidence shows that the Candlestick Point/Hunters Point Shipyard Project was to be rezoned to increase its capacity for additional housing units, the evidence does not support the claim in the Revision that this alternative included the 1990 Residence Element Objectives, Goals and Policies, because those policies did not call for rezoning of areas to increase their capacity for additional housing units.

**I. The Revision’s Elimination of the Focused Development Alternative From Further Analysis Is Conclusory and Not Supported by Facts.**

The Revision explains that the Focused Development Alternative “would comprise existing zoning at the time of NOP issuance and rezoning connected to area plans in progress at that time.” VII-109. Thus, this Alternative would include the increased capacity provided in Area Plans adopted after the 2004 Housing Element. The new area plans approved after the 2004 Housing Element, including Market/Octavia, Eastern Neighborhoods, Rincon Hill, and others “potentially increase housing capacity by over 55,000” units, and the “Planning Code amendments adopted with each new neighborhood plan also served to expand potential development capacity in each of these areas, using tools such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements. Ex. B to Statement of Golick-97 AR 53107-53108; 18 AR 9582-9583, 9586, 9564-9565, 9568, 9474, 9485, 9496, 9486. It would also include all ongoing area planning efforts. VII-109.

R16-13  
 (Cont.)

R16-14

Environmental Review Officer  
February 18, 2014  
Page 20

Since the Area Plans approved after the 2004 Housing Element implemented strategies that encourage production of affordable housing, such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements, the evidence does not support the claim in the Revision that the alternative would compromise the City’s ability to achieve the affordability goals of the RHNA or that this alternative would “severely restrict” the amount of land available for housing. VII-109. Substantial parts of the City are subject to the new Area Plans.

Moreover, the Revision clearly states that the Alternative would be comprised of the existing zoning at the time the NOP was issued plus rezoning connected to area plans in progress at that time. VII-109. It also states that the City’s existing zoning allows for residential development outside of area plans. VII-109. Thus, the alternative did not call for rezoning or downzoning of areas outside of area plans. The conclusory allegation elsewhere that the Alternative would also include policies which “allowed” little or no growth to occur outside of these areas was unexplained and contrary to the definition of the alternative as utilizing existing zoning for areas outside of plan areas. The allegation that this Alternative would require downzoning or other limitations on development outside of area plans is clearly contrary to the definition of this Alternative as utilizing existing zoning for areas outside of plan areas.

Similarly, the conclusion that this Alternative would conflict with other General Plan policies encouraging sustainable development and equitable development citywide was erroneously based on the premise that this Alternative would necessarily involve curtailing development in substantial portions of the City. The Alternative would only involve refraining from rezoning further areas of the City outside of the Plan Areas and limiting new area plan rezonings to those underway.

There is no evidence that this Alternative would conflict with other General Plan policies supporting public transportation or promotion of mixed commercial and residential character in neighborhood commercial districts, or striking a balance between preservation of existing housing and needed expansion of commercial activity. Thus, the evidence and the discussion of this Alternative do not support the Revision’s determination that this Alternative would be infeasible. There is no evidence that refraining from rezoning further areas outside of the plan areas already approved or underway would substantially impede accommodation of the RHNA or achievement of any other objectives of the 2009 Housing Element. The projected excess housing development for the 2007-2014 planning period and substantial areas subject to area plans amply supports achievement of the objectives of the 2009 Housing Element.

**J. The Revision’s Elimination of the Reduced Land Use Allocation Alternative From Further Analysis Is Conclusory and Not Supported by Facts.**

R16-14  
(Cont.)  
R16-15



Environmental Review Officer  
 February 18, 2014  
 Page 21

R16-15  
 (Cont.)

The Revision states that under the Reduced land Use Allocation Alternative, “less growth would be assumed Citywide” but does not disclose the amount of growth that would be assumed. The Revision states that this Alternative would include the 2004 Housing Element Objectives, Goals, Policies and Implementation Measures “but assumes a lower total number of new housing units over the planning period 2005-2025.” VII-110. The Revision did not disclose the lower total number of new housing units assumed. The Revised DEIR states that two primary objectives of the proposed Housing Elements are to provide “a vision for the City’s housing and growth management through 2014” and to ensure “capacity for the development of new housing to meet the RHNA at all income levels.” (VII-3-4) Since the reduced land use allocation would apply to the planning period 2005-2025, there is no evidence that a reduced land use allocation alternative would be infeasible for the planning period 2007-2014, especially in view of the projected production of 25,000 new housing units in excess of the RHNA and the anticipated increased capacity in further area planning efforts. The EIR states that the pipeline units anticipated to be developed total 25,000 more than the 31,193 units sought by the Regional Housing Needs Allocation for the 2007-2014 planning period and further rezoning and area planning processes would allow the additional capacity of 27,844 units. Exhibit B to Statement of Golick-1 AR 328.

Under the 2004 Housing Element, the City needed to build 2,717 new housing units per year to meet its share of the region’s projected housing demand, which amounted to a total of 20,374 new units for the planning period of January 1999 through June 2006. I A 145, 207. The 2009 Housing Element states that the City had successfully advocated for “changes that direct more transportation money to jurisdictions, like San Francisco, that take on greater housing growth as part of the 2007-2014” RHNA Process. Ex. B to Statement of Golick-18 AR 9595, 9581. Thus, San Francisco did not have to accept the 31,193 units sought by the Regional Housing Needs Allocation for the 2007-2014 planning period. Exhibit B to Statement of Golick-1 AR 328. In view of this reality, the claim in the Revision that this Alternative might not accommodate projected growth fails to take into account the reality that San Francisco officially played a role in agreeing to the amount of growth that is allocated to jurisdictions during the 2007-2014 RHNA process. Under this Alternative, San Francisco should not accept additional units during the RHNA allocation process in order to secure more transportation money and should pursue a more measured type of growth that recognizes the constraints presented by the limited area in the City. Clearly, a reduced land use allocation similar to the RHNA sought by the 2004 Housing Element would be feasible because it would be capable of being accomplished, and there is no requirement that new housing units actually be produced in the amounts sought by the RHNA. To comply with State Housing Element law, a jurisdiction must only demonstrate that it has capacity to accommodate the amount of housing allocated to it in the RHNA.

The Revision’s configuration of this alternative as applying to the 2005-2025 planning period is unreasonable and as applied to the 2009 Housing Element, a reduced land use alternative would be a feasible alternative.

Environmental Review Officer  
 February 18, 2014  
 Page 22

**K. Other Assertions Are Not Supported by the Evidence.**

R16-16a

In general, the EIR continually repeats that it does not directly cause housing production. However, the 2009 Housing Element acknowledges that its aim is to increase the supply of housing. Since its aim is to increase the supply of housing, the 2009 Housing Element certainly accommodates increased housing production through implementation of its principal strategy of ensuring that community based planning processes are used to generate changes to land use controls. (Policies 1.4 and 1.2) As explained by the Legislative Analyst, the increased density-related building standards that the 2009 Housing Element supports are known to increase housing production, and therefore indirectly induce population growth. Ex. C-1 A 2936-2945. It is recognized in the planning community that “If you build them, they will come,” which means that if additional housing is built in the City, it will attract additional residents. If additional housing is not built in the City, the potential additional residents will go elsewhere or not move from their present locations. Statement of Golick.

R16-16b

While the Revision claims that the Housing Elements also emphasize the use of the existing housing stock to meet San Francisco’s affordable goals, the alleged support for this claim refers primarily to providing direction for how and where new housing development in the City should occur and only mentions preserving and upgrading existing housing units to ensure they do not become dilapidated, abandoned, or unsound. VII-3. No explanation is given as to how the Housing Elements propose to use existing housing stock to meet San Francisco’s affordable goals.

R16-16c

The Revision also claims that an EIR may consider and analyze one or more alternatives at an equal level of detail, or may identify a preferred project, and include an analysis of alternatives at a lesser level of detail. VII-5. The Revisions claims that it incorporates both approaches, but fails to identify a preferred project, so clearly does not follow the latter approach and is not entitled to analyze alternatives at a lesser level of detail. The Revision identifies the 2004 Housing Element and the 2009 Housing Element as “the two project options.” VII-6. This claim is also contrary to law, because the Superior Court held that EIR’s analysis of alternatives was legally inadequate and unsupported by facts. Thus, factual support that amounts to substantial evidence would be required to overcome the Court Order setting aside the City’s certification of the defective Final EIR.

R16-17

**L. The City’s Notice of Availability of the Revised Draft EIR is Deficient.**

The City must correct its December 18, 2013 Notice of Availability of an EIR and recirculate the revision with a corrected notice for 45 days. The Notice erroneously states that comments “should be limited to the recirculated sections of the EIR” and that “the agency need only respond to comments to the parts of the EIR that are being recirculated.” However, the revised alternatives section incorporates by reference numerous discussions of the impact

Environmental Review Officer  
February 18, 2014  
Page 23

R16-17  
(Cont.)

analyses, and on January 15, 2014 the Superior Court clarified that comments may be made as to these referenced other sections insofar as they pertain to the alternatives. The public had inadequate notice that it had to review these other referenced sections which amount to hundreds of pages insofar as they amount to alternatives due to the City's inadequate notice.

**Conclusion**

R16-18

The revised discussion of alternatives presented in the Revised Draft EIR is conclusory and not supported by facts or substantial evidence in the Administrative Record. The City has not cured the deficiencies cited by the Court in its Order finding the EIR's discussion of alternatives inadequate. In addition, since the 2004 and 2009 Housing Elements would have a significant impact on transit, the City must adopt a feasible alternative that would reduce or mitigate this impact.

N/S

Very truly yours,

*Kathryn R. Devincenzi*  
Kathryn R. Devincenzi

Attachments: Exhibits 1 through 5

# **EXHIBIT 1**

**STATEMENT OF CITY PLANNER DAVID GOLICK  
AS TO DRAFT EIR, SAN FRANCISCO 2004 AND 2009 HOUSING ELEMENT,  
REVISED ALTERNATIVES ANALYSIS**

I have been a professional city planner for over forty years and have practiced in the Bay Area for over forty years. During that time, I served as Chief of Planning for the City of Concord, the largest city in Contra Costa County, for ten years. During my career, I have either prepared or reviewed approximately 1,000 initial studies and environmental impact reports. I have become familiar with and have a deep working knowledge of the California Environmental Quality Act (“CEQA”) and the CEQA Guidelines. I have coached subordinate employees regarding CEQA requirements and have addressed CEQA issues at conferences of the American Planning Association. The City of San Francisco retained me to participate in oral board examinations of candidates for planning positions, such as the position of Planner III, Environmental Review. As Chief of Planning for the City of Concord, my duties included overseeing the activities of the planning department staff in updating the housing element of Concord’s general plan as periodically required by the State of California Department of Housing and Community Development. A copy of my resume is attached hereto as Exhibit A.

In this statement, I will discuss feasible alternatives to the proposed 2009 Housing Element.

**FEASIBLE ALTERNATIVES ARE AVAILABLE SINCE THE 2009 HOUSING ELEMENT WOULD PRODUCE FAR MORE NEW HOUSING UNITS THAN NEEDED TO ACCOMMODATE THE RHNA FOR THE 2007-2014 PLANNING PERIOD.**

**Introduction and Factual Background**

The EIR states that the pipeline units anticipated to be developed total 25,000 more than the 31,193 units sought by the Regional Housing Needs Allocation for the 2007-2014 planning period and further rezoning and area planning processes would allow the additional capacity of 27,844 units. Exhibit B-1 AR 328. In 2007 and 2008, 5,830 new housing units were produced and as of 1009, 56,435 additional units were in the development pipeline. Exhibit B-1 AR 170; 18 AR 9430. Production trends show that 75-80% of pipeline units are completed within 5-7 years, so 42,326 additional new units could be expected. *Id.*

The EIR also admits that “the total number of units identified in the RHNA can be accommodated under the existing zoning capacity and/or through development currently in the City’s pipeline.” Exhibit B-Final EIR p. VIII-207. Thus, there is no need for rezoning to accommodate the RHNA.

The revised DEIR states that the “2004 and 2009 Housing Element do not include any changes to the land use objectives and policies in the City’s Area Plans or Redevelopment Plans. (VII-2) The revised DEIR states that similar to new housing development under the 2009

R17-1

R17-2a

R17-2b

Housing Element “development under Alternative B would not substantially conflict with the policies and land uses in current Area Plans and Redevelopment Plans.” (VII-50) The revised DEIR also states that similar to the 2004 Housing Element that “development under Alternative B would be subject to existing Area Plans and Redevelopment Plans and would serve to complement (and not conflict with) the policies and land uses in an Area Plan or Redevelopment Plan.” (VII-49)

Alternatives A and B and C would use the 2009 Data and Needs Analysis and the updated RHNA allocation of 31,193 for the January 2007 through June 2014 planning period. (Revised DEIR, p. VII-4-6, 19-20; Executive Summary p. 1; Final EIR IV-11) The revised DEIR states that “under all alternatives, it is assumed that the 2009-2014 RHNA and Part I (Data and Needs Analysis) of the 2009 Housing Element are in effect.” (VII-4) Both the 2004 and 2009 Housing Elements discussed in the EIR utilized the 2009 Housing Element Part I Data and Needs Analysis and sought to achieve the 2007-2014 RHNA. (Final EIR IV-13-14)

The 2009 Housing Element states that:

“In order to increase the supply and affordability of housing, the City has engaged in significant planning for housing through Area Plans (portions of the General Plan which focus on a particular part of the City), Redevelopment Plans (community revitalization plans authorized and organized under the provisions of the California Community Redevelopment law), and major development projects created in partnership with private sponsors. Adopted community plans include Balboa Park, Market and Octavia and the Central Waterfront neighborhoods; the Eastern Neighborhoods program including the Mission, South of Market, Showplace Square and Potrero Hill; Candlestick, and Hunters Point Shipyard; and several Redevelopment Area Plans, most recently Visitacion Valley/Schlage Lock.

Plans underway include Japantown, Glen Park, Western SoMa and Executive Park. Other major projects in development with the City include Treasure Island, Park Merced and the Transbay Transit Center. These ongoing community planning efforts should continue. These projects could result in a community accepted housing vision for the neighborhood, related zoning changes and neighborhood specific design guidelines that will encourage housing development in appropriate locations.

Together, these planning efforts could provide capacity for significantly more than the 31,000 units allocated for this planning period (2007-2014). ” Ex. B- AR 53137-53140.

The Final EIR states that the City “has recently updated zoning controls for the following neighborhoods: Market/Octavia, Mission, East SoMa, Showplace Square/Potrero Hill, Central Waterfront, and Balboa Park. These planning efforts have developed updated zoning, heights, bulks, and densities in balance with infrastructure. A number of other planning efforts are currently underway including, but not limited to the Transit Center District Plan, Treasure Island, and West SoMa, which could result in increased residential development potential in those areas. Under existing zoning capacity, these planning areas could accommodate 3,669 net new housing

units, representing approximately six percent of the total citywide existing capacity of 60,995 units as described previously. The additional potential capacity with rezoning initiatives currently underway is approximately 28,844 units (Ex. B- AR 169, p. IV-22 and Table IV-6). Should these rezoning initiatives be adopted and implemented, the City would be able to accommodate 89,829 net new housing units, which, if developed, would represent a 25 percent increase in the City’s housing stock.” (Ex. B- AR 169, Final EIR IV-22) Table IV-6 estimates that a total of 28,844 additional units could be added with rezoning in the Executive Park, Glen Park, Park Merced, Transit Center District, Western Soma, India Basin, Hunters Point Shipyard, Candlestick Park and Treasure Island neighborhoods, but states that the additional units that could be added with rezoning in Japantown are “To be Determined.” (Ex. B-AR 169, Final EIR IV-22; see also AR 9499-2009 Housing Element, Part I, p. 95)

The 2009 Housing Element estimates that the total estimated new housing construction potential in the “Adopted Plans & Projects” of Balboa Park Area Plan, Market/Octavia Area Plan, Central Waterfront Area Plan, Mission Area Plan, East SOMA Area Plan, Showplace Square/Potrero Hill Area Plan, Rincon Hill Area Plan, Visitacion Valley Area Redevelopment Plan, Transbay Redevelopment Plan, Mission Bay Redevelopment Plan and Hunters Point Shipyard/Candlestick Point is 39,500 housing units. (Ex. B-AR 53139-2009 Housing Element Part 2 p. 9)

The EIR portrayed the “recently updated zoning controls” for the Market/Octavia, Mission, East SoMa, Showplace Square/Potrero Hill, Central Waterfront, and Balboa Park neighborhoods as providing the “existing zoning capacity” and claimed that the 2004 and 2009 “do not include any changes” to land use policies in the City’s area or Redevelopment plans and that the “rezoning efforts will increase the existing capacity” in target neighborhoods.” Ex. B-1 AR 169, 202, 161. The new area plans adopted after the 2004 Housing Element, including Market/Octavia, Eastern Neighborhoods, Rincon Hill, and others “potentially increase housing capacity by over 55,000” units, and the “Planning Code amendments adopted with each new neighborhood plan also served to expand potential development capacity in each of these areas, using tools such as height increases, removal of maximum densities, removal of minimum required lot sizes and reduction or elimination of parking requirements. Ex. B-97 AR 53107-53108; 18 AR 9582-9583, 9586, 9564-9565, 9568, 9474, 9485, 9496, 9486. Capacity was significantly increased, as Better Neighborhoods and Eastern areas identified as 2004 Housing Element Work Programs had existing capacity for 8,628 new units before 2004 and would add 18,285-38,835 additional potential units with rezoning. Ex. C-2004 Housing Element Administrative Record-1 A 180. The 2004 Housing Element acknowledged that its “[n]ew policies strive to expand land capacity necessary to increase housing production, will direct new housing to appropriate locations, especially in areas well served by transit” and seek to achieve a “far greater” rate of new housing construction than was previously produced. Ex. C-1 A 82, 16, 283, 328.

The Court of Appeal held that the “Housing Element identifies areas for potential development,” and the Peremptory Writ enjoined policies calling for increased density development in areas well served by transit in 2004 Housing Element Policy 11.1 (minimum density requirements and maximum parking standards), modified Policy 11.6 (flexible land use

controls and increased residential densities), Policy 1.2 (increased housing densities and reduced residential parking requirements in neighborhood commercial districts), new language added to Policy 1.1 (modification of residential parking requirements), new implementation 1.1 (higher density, mixed-use residential development in transit-rich areas and reduced parking requirements in Downtown areas or through a Better Neighborhoods type planning process), language added to Implementation 1.3 (floor-to-area ratio exemptions in Downtown areas and areas subject to a Better Neighborhoods type planning process). Ex. D-Excerpts from Court of Appeal decision, p. 12 and Peremptory Writ of Mandate and Amendment to Peremptory Writ of Mandate.

2009 Housing Element Policy 1.4 is to “Ensure community based planning processes are used to generate changes to land use controls,” and the policy text states that “Such plans can be used to target growth strategically to increase infill development in locations close to transit and other needed services, as appropriate.” (Ex. B-AR 53139-2009 Housing Element Part 2 p. 9)

The EIR admits that the “2009 Housing Element generally promotes increased density through community planning processes (Policies 1.4, 1.6, and Implementation Measures 13 and 79) and for affordable housing (Policy 7.5 and Implementation Measures 36 and 64). The 2009 Housing Element also includes a strategy designed to reduce the amount of space required for non-housing functions (Implementation Measure 12). Ex. B- 2 AR 769- Final EIR p. V.L-36. The Final EIR further explains: “While implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, it would encourage new Area Plans with similar planning -related strategies that may be designed to accommodate growth.” Ex. B-1 AR 257; Final EIR p. V.B.-28.

For the prior 1999-2006 planning period, market rate housing was overproduced at the rate of 153% of the market rate production target, whereas only 13% of the moderate rate, 52% of the low income and 83% off the very low income targets were met. Ex. B- AR 53118 and 1 AR 323.

The 2009 Housing Element states that San Francisco’s fair share of the regional housing need for January 2007 through June 2014 was calculated as 31,190 units, which seeks to accommodate forecast household and employment growth “as well as allocating regional household and employment growth to jurisdictions with established or planned transit infrastructures.” Ex. B-18 AR 9445-2009 Housing Element Part I, p. I.41. However, the 2009 Housing Element and the EIR do not disclose the amount of the 2007-2014 RHNA goal that allocated regional household and employment growth to jurisdictions with established or planned transit infrastructures.

The Revised DEIR states that two primary objectives of the project are to provide “a vision for the City’s housing and growth management through 2014” and to ensure “capacity for the development of new housing to meet the RHNA at all income levels.” (VII-3-4)

In general, the EIR continually repeats that it does not directly cause housing production. However, the 2009 Housing Element acknowledges that its aim is to increase the supply of

R17-2b  
(Cont.)

R17-2c

R17-2d



R17-2d  
(Cont.)

housing. Since its aim is to increase the supply of housing, the 2009 Housing Element certainly accommodates increased housing production through implementation of its principal strategy of ensuring that community based planning processes are used to generate changes to land use controls. (Policies 1.4 and 1.2) As explained by the Legislative Analyst, the increased density-related building standards that the 2009 Housing Element supports are known to increase housing production, and therefore indirectly induce population growth. Ex. C-1 A 2936-2945. It is recognized in the planning community that “If you build them, they will come,” which means that if additional housing is built in the City, it will attract additional residents. If additional housing is not built in the City, the potential additional residents will go elsewhere or not move from their present locations.

**1. THE NO JAPANTOWN AREA PLAN ALTERNATIVE IS FEASIBLE.**

Japantown should be eliminated from the areas to which growth would be directed in Policy 1.2, since the total number of new housing units that the 2009 Housing Element estimates could be added with rezoning does not include any additional units to be constructed in Japantown. The chart that estimates the number of additional units that could be added with rezoning in various areas states that the amount of additional new housing that could be developed with rezoning in Japantown was “To be determined.” However, the 2009 Housing Element identified Japantown as an area where planning efforts “will result in increased residential development potential.” Ex. B-AR 9499-2009 Housing Element, Part I, p. I. 95. In view of the projected excess housing production during the 2007-2014 planning period, rezoning to increase capacity for housing production should not be pursued in Japantown.

R17-3a

It is feasible to eliminate Japantown as an area to which growth would be directed in Policy 1.2 since the EIR states that the pipeline units anticipated to be developed total 25,000 more than the 31,193 units sought by the Regional Housing Needs Allocation for the 2007-2014 planning period and further rezoning and area planning processes would allow the additional capacity of 27,844 units. Ex. B-1 AR 328. Directing growth to Japantown is clearly not needed to accommodate the RHNA for 2007-2014. The pipeline units anticipated to be developed exceed the 2007-2014 RHNA, and the anticipated new rezoning efforts are not needed to accommodate the RHNA for 2007-2014. With respect to the anticipated new rezoning efforts, the additional capacity of 27,844 units under rezoning proposals did not include any projected number of new units through rezoning in Japantown. Further, after Japantown residents protested the 2009 Draft Better Neighborhoods’ Plan for to rezone Japantown for increased heights, the City consulted the community and adopted the Japantown Cultural Heritage and Economic Sustainability Strategy (“JCHESS”). (See Ex. E-excerpt from JCHESS, p. 35) Thus, eliminating Japantown from the areas to which growth should be directed in Policy 1.2 would be consistent with the community’s vision that height limits should not be increased in Japantown. If the City believes that directing growth to Japantown is needed to achieve the RHNA for 2007-2014, the 2009 Housing Element needs to state the specific basis of this belief and the number of estimated new housing units which the City seeks to achieve in Japantown for the 2007-2014 planning period.

R17-3a  
(Cont.)

Eliminating Japantown from an area to which growth would be directed would reduce impacts on transit, land use and visual resources and neighborhood character. As stated in My March 24, 2011 statement, the City’s lack of funds to enhance transit was the basis of the EIR’s rating as a significant impact the 2009 Housing Element’s impact on transit. Eliminating Japantown as an area to which bus service would have to be enhanced would mitigate this significant impact on transit. Ex. F-March 24, 2011 Statement of David Golick in administrative record, which is incorporated by reference herein, pertinent excerpts of which are attached at AR 22138-22261.

R17-3b

Moreover, the City is currently experiencing serious incapacity problems with Muni. The San Francisco Transportation Plan 2040 states that capacity needs are most acute in the Downtown, South of Market, Market/Octavia and Eastern Neighborhoods and that “Expected growth will significantly increase transit crowding and street congestion downtown.” Ex. G. The Mayor’s Transportation Task Force 2030 also shows that many Muni routes are at or over capacity in 2012 and that the City’s transportation infrastructure is inadequate to meet current demand. Ex. H., pp. 21, 33. A recent article has also documented current Muni incapacity. (See Ex. I- January 29, 2013 San Francisco Examiner article, *With packed vehicles people opt for private cars, SFMTA says*. Thus, Muni’s capacity problem from overcrowded buses is a current impact and not merely a significant impact projected to occur in the future.

**2. THE NO UNLIMITED AREA PLAN OR UNLIMITED PLANNING PROCESSES ALTERNATIVE IS FEASIBLE.**

Another feasible alternative is to eliminate unlimited area plans and community based planning processes from Policy 1.2 and limit new area plans and community based planning processes only to those areas identified in the 2009 Housing Element, except for Japantown.

R17-4a

The EIR states that the “2009 Housing Element generally promotes increased density through community planning processes (Policies 1.4, 1.6, and Implementation Measures 13 and 79) and for affordable housing (Policy 7.5 and Implementation Measures 36 and 64). The 2009 Housing Element also includes a strategy designed to reduce the amount of space required for non-housing functions (Implementation Measure 12). Ex. B-2 AR 769- Final EIR p. V.L-36. The Final EIR further explains: “While implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, it would encourage new Area Plans with similar planning -related strategies that may be designed to accommodate growth.” Ex. B-1 AR 257- Final EIR p. V.B.-28.

Also as part of this alternative, the process by which a new community based planning process is initiated should be revised to eliminate burying it in the budgetary process since Policy 1.4 provides that: “The process should be initiated by the Board of Supervisors, with the support of the District Supervisor, through their adoption of the Planning Department’s or other overseeing agency’s work program, and the scope of the process should be approved by the Planning Commission.” Ex. B-AR 53140. The approval of budgetary support for a departmental work program is not an appropriate venue for initiation of a planning process. The public does

not expect initiation of a planning process in a budgetary process and Policy 1.4's language provides for a potentially deceptive initiation process that lacks transparency. As an adjunct to elimination of unlimited community based planning processes, Policy 1.4 should be revised to require that the process of initiating a new community based planning process should first be initiated only by a publicly noticed meeting of the Planning Commission that clearly discloses the intent to initiate a new community based planning process and that delineates the scope of the new planning process. In addition, notice of the proposed initiation of a new community based planning process should be mailed to each known neighborhood organization that serves areas located within one mile of the land that would be affected by the new community based planning process, and such notice should be mailed thirty to sixty days before the meeting of the Planning Commission at which the intent to initiate a new community based planning process would be discussed.

Such an alternative would provide for the growth that is needed to accommodate the 2007-2014 planning period. If the 2009 Housing Element aims to accommodate growth for a later period, the 2009 Housing Element needs to identify the period for which the 2009 Housing Element seeks to accommodate growth and the amount of additional housing production it seeks to accommodate for each income level.

Eliminating new area plans or planning processes beyond those needed to accommodate growth for the period covered by the 2007-2014 RHNA would reduce impacts on transit, land use and visual resources and neighborhood character. As stated in My March 24, 2011 statement, the City's lack of funds to enhance transit was the basis of the EIR's rating as a significant impact the 2009 Housing Element's impact on transit. Eliminating more areas to which bus service would have to be enhanced would mitigate this significant impact on transit.

The EIR states that policies of the 2009, 2004 Housing Elements, and Alternatives B and C that encourage a mode shift toward transit could result in an increase in transit ridership which may exceed Muni's capacity utilization standard of 85 percent and that "[g]enerally, as transit ridership increases, transportation agencies respond by expanding transit service and/or increasing transit frequency. However, given SFMTA fiscal emergencies, Muni may not be able to increase transit service to accommodate increased transit ridership resulting from the 2009 Housing Element policies that encourage residential development in transit-rich areas or other policies that encourage the use of alternative transportation in the City." Ex. B-1 AR 497, 483 as to 2004; 3 AR 1149, 1150, 1175, 1176; see also Ex. J-41 AR 22145, referring to "capital capacity constraints." As I explained in my prior March 24, 2011 statement, directing housing to fewer areas or providing a lesser number of housing units would reduce the significant impact on transit. Ex. J-41 AR 22143-22155, 22158. The EIR states that policies of the 2009, 2004 Housing Elements, and Alternatives B and C that encourage a mode shift toward transit could result in an increase in transit ridership which may exceed Muni's capacity utilization standard of 85 percent, and that "[g]enerally, as transit ridership increases, transportation agencies respond by expanding transit service and/or increasing transit frequency. However, given SFMTA fiscal emergencies, Muni may not be able to increase transit service to accommodate increased transit ridership resulting from the 2009 Housing Element policies that encourage residential development in transit-rich areas or other policies that encourage the use of alternative transportation in the City."

R17-4a  
(Cont.)

R17-4b

R17-4b  
(Cont.)

Ex. B-1 AR 497, 483 as to 2004; 3 AR 1149, 1150, 1175, 1176; see also Ex. J-41 AR 22145, referring to “capital capacity constraints.” Thus, as I previously explained, directing housing to fewer areas or providing a lesser number of housing units would reduce the 2009 Housing Element’s significant impact on transit. 41 AR 22143-22155, 22158.

R17-4c

Moreover, the City is currently experiencing serious incapacity problems with Muni, as demonstrated in the attached January 29, 2013 San Francisco Examiner article, *With packed vehicles people opt for private cars, SFMTA says*. (See Ex. I) Thus, Muni’s capacity problem from overcrowded buses is a current impact and not merely a significant impact projected to occur in the future. This alternative would also reduce other effects related to increased housing production including impacts on transportation, air quality, noise, water supply land use, and visual resources and neighborhood character.

R17-4d

**3. THE JUNE 2010 DRAFT OF THE 2009 HOUSING ELEMENT ALTERNATIVE IS FEASIBLE.**

R17-5a

The version of the 2009 Housing Element that was included in the draft EIR that was circulated for public comment in 2010 was the June 2010 Draft of the proposed 2009 Housing Element (“June 2010 Draft”). The EIR’s analyses of whether impacts of the proposed project would be significant was based on implementation of the policies stated in the June 2010 Draft of the 2009 Housing Element. Public comment was also based on the June 2010 Draft. The set of policies stated in the June 2010 Draft and the amount of increased housing production supported by those policies is a feasible alternative because the EIR stated that “the total number of units identified in the RHNA can be accommodated under the existing zoning capacity and/or through development currently in the City’s pipeline.” Ex. B-AR 1400-Final EIR p. VIII-207. The EIR’s statement that the RHNA can be accommodated was based on the policies in the June 2010 Draft, so that Draft clearly would accommodate the 2007-2014 RHNA. Ex. K.

R17-5b

The City has not presented any evidence showing that the number of housing units anticipated to be produced would be significantly greater under the version of the 2009 Housing Element that the City subsequently adopted rather than under the June 2010 Draft of the 2009 Housing Element. The City also has not presented any evidence showing that any of the City’s project objectives would be better served by the version of the 2009 Housing Element that the City subsequently adopted rather than by the June 2010 Draft of the 2009 Housing Element. As explained below, adoption of the June 2010 Draft would mitigate the significant impact on RH-1 neighborhoods that could result from the changed policy ultimately adopted. The revised alternatives analysis also lacks any evidence that the draft of the 2009 Housing Element ultimately adopted would produce a significantly greater number of housing units or better serve stated project objectives.

R17-5c

The June 2010 Draft stated in Policy 1.6 text that “[i]n some areas, such as RH-1 and RH-2, density limits should be maintained to protect neighborhood character.” In the draft subsequently adopted, this policy text was changed to state “[i]n some areas, such as RH-1 and RH-2, existing height and bulk patterns should be maintained to protect neighborhood character.”

For the reasons stated in the March 24, 2011 Statement of David Golick, this change would constitute a significant impact on the environment because the policy change to eliminate density limits in RH-1 neighborhoods would degrade the quality of those neighborhoods. Ex. J-AR 22151-22154. Current density limits, such as the one-unit limit in an RH-1 area, maintain the quality of single-family RH-1 neighborhoods. Also, use of “flexibility in the number and size of units” was expanded to apply through “community based planning processes” and therefore would apply to projects outside plan areas and to individual projects, instead of merely to “community plan areas” as previously proposed in June 2010 Draft Policy 1.6. *Id.* In view of the excess housing production projected under the June 2010 Draft, these changes in policy language are not needed, and the June 2010 Draft is a feasible alternative.

ABAG has granted San Francisco’s application to designate various areas as Priority Development Areas (“PDAs”) that have “plans for significant increases in housing units” and are near transit. Ex. B-20 AR 10511-10512, 10328, 10330, 10532-38, 10463-72; 19 AR 10234-41.

The City plans to accommodate over 90% of the growth to 2035 in the PDAs. Ex. F-December 17, 2010 ABAG letter to SFMTA, Exhibit 6, tenth page.

The City has admitted that the “lion’s share of city’s growth will continue to be focused in its PDAs” and that the adopted and planned PDAs “collectively accommodate over 63,000 new housing units.” Ex. F-December 17, 2010 ABAG letter to SFMTA, Exhibit 6, twelfth page. As to infill opportunity sites outside PDAs, the City has acknowledged that: “The city includes numerous small-scale infill opportunity sites close to transit throughout all of its neighborhoods. Such sites outside of Priority Development Areas could accommodate another 17,000 new housing units, distributed reasonably evenly throughout the city.” *Id.* In view of the excess housing production projected to occur under the 2009 Housing Element, as stated in the EIR, the City does not need another 17,000 housing units to accommodate the RHNA, much less elimination of density limits in RH-1 areas that would constitute only a portion of those 17,000 units.

How many additional housing units would be accommodated by the Policy 1.6 text that would maintain existing height and bulk patterns in RH-1 areas rather than density limits in RH-1 areas? To what degree would any project objectives not be served by the June 2010 Draft’s Policy 1.6 text that maintained density limits for RH-1 areas? In view of the projected exceedance of the RHNA for the 2007-2014 period, there is no substantial evidence that the significant impact on RH-1 areas is needed to accommodate the 2007-2014 RHNA, and previous policies relating to RH-1 areas should not be disturbed. Therefore, the June 2010 Draft of the 2009 Housing Element is a feasible alternative that would reduce or eliminate the significant impact on the quality of RH-1 neighborhoods. Since the general plan established the controlling policies, and zoning must be brought into conformance with the policies of the housing element of the general plan, it is evasive to state that the zoning has not yet been changed to eliminate the one-unit density limits that protect the single-family character of RH-1 neighborhoods.

In addition, the outlying RH-1 neighborhoods are not well served by transit, so it would not serve the City’s goal of directing new housing units to locations well served by transit to

R17-5c  
(Cont.)

R17-5d

R17-5e

R17-5f

R17-5f  
(Cont.) ↑ support secondary units in such areas. The San Francisco Transportation Plan 2040 states that the outlying neighborhoods such as the Sunset are less accessible throughout the day by transit, and that in such lower-density Sunset neighborhoods the transit network is less dense, resulting in fewer transit alternatives and extra waits. Ex. G, p. 12)

R17-5g ↓ Also, the last minute change stating that in RH-1 and RH-2 areas “existing height and bulk patterns should be maintained to protect neighborhood character” was not evaluated by the Community Advisory Body and was not subjected to public review and comment during the Draft EIR comment period. To support the middle class in the City, the Housing Element should maintain the existing single-family neighborhoods.

**4. THE EXCESS MARKET-RATE TRANSIT SUBSIDY ALTERNATIVE IS FEASIBLE.**

R17-6a ↓ For the prior 1999-2006 planning period, market rate housing was overproduced at the rate of 153% of the market rate production target, whereas only 13% of the moderate rate, 52% of the low income and 83% of the very low income targets were met. Ex. B-18 AR 9497; 1 AR 323.

The overproduction of market rate housing is contrary to the City’s RHNA allocation, and the City is woefully failing to accommodate the RHNA allocation as to moderate rate units. According to the 2009 Housing Element, the City’s estimated shortfall of production of moderate rate units for the 2007-2014 planning period is 3,586 less than the 6,754 moderate units allocated. (Ex. B-AR 9497-2009 Housing Element Part I, p. I. 93) The crisis in the loss of the middle class in the City is now severe. (See Ex. L-January 8, 2014 San Francisco Examiner article, *Are you part of San Francisco’s disappearing middle class?*)

R17-6b ↓ An alternative that would impose an appropriate per unit transit-mitigation fee on all market rate housing units that are produced in the City in excess of the RHNA allocation for market rate units for the applicable RHNA planning period would reduce the significant impact on transit that would result from directing growth to areas near transit. The amount of this fee would be determined by a nexus study that would determine the cost of providing Muni service to the excess market rate housing units that are produced, based on the estimated cost of providing service to such excess market rate units as well as the cost of any capital improvements needed to support such service. Such fee would be in addition to any other fees that the City may impose. It is feasible for the City to pass an ordinance requiring such a fee, since it would support the City’s policies directing housing growth to areas near transit, and the City has successfully passed other ordinances requiring inclusion of affordable housing or payment of a fee in lieu of provision of such housing. Given the estimate that 6,766 market rate units in excess of the RHNA allocation will be produced for the 2007-2014 planning period, such transit-mitigation fee would mitigate the project’s significant impact on transit. Ex. B-AR 9497.

R17-6c ↓ In addition, the overproduction of market rate condominiums is serving technology workers who live in San Francisco and commute to jobs in Silicon Valley and other locations

south of San Francisco, especially as to the condominiums being built in the South of Market area near the freeway on-ramps. This has produced a substantial reverse commute which is increasing vehicle emissions in the region, contrary to the regional goals.

**5. THE NORMAL POPULATION INCREASE, NO CONCENTRATION, ALTERNATIVE IS FEASIBLE.**

The San Francisco Transportation Plan 2040 states that:

“To meet the SB 375 target, the Regional Transportation Plan, known as Plan Bay Area, calls for concentration of growth in densely developed areas with good transit access especially in San Francisco, San Jose, and Oakland...Concentrating jobs and housing in San Francisco is good for the city’s economy as well as the environment, but will also increase congestion and transit system crowding in downtown San Francisco and Eastern neighborhoods. By 2040, new growth will result in about 300,000 new transit trips per day on a local and regional system that is already strained by crowding and reliability issues. The San Francisco Planning Commission has adopted land use plans that direct much of the city’s projected growth in the central and eastern neighborhoods, where crowding is already acute.” Ex. G, p. 14.

The Revised DEIR states that two primary objectives of the project are to provide “a vision for the City’s housing and growth management through 2014” and to ensure “capacity for the development of new housing to meet the RHNA at all income levels.” (VII-3-4) However, the sixth project objective is to “Develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals.” *Id.* The 2009 Housing Element and EIR do not specifically explain how this objective is to be met and only vaguely allude to supporting housing near transit. The 2009 Housing Element states that the City had successfully advocated for “changes that direct more transportation money to jurisdictions, like San Francisco, that take on greater housing growth as part of the 2007-2014” RHNA Process. Ex. B-18 AR 9595, 9581. The 2009 Housing Element and the EIR should disclose how much more housing growth San Francisco accepted in that regard as part of the 2007-2014 RHNA process and for what income categories.

Since the EIR states that the pipeline units anticipated to be developed total 25,000 more than the 31,193 units sought by the Regional Housing Needs Allocation for the 2007-2014 planning period and further rezoning and area planning processes would allow the additional capacity of 27,844 units, the 2009 Housing Element is actually producing more new housing units than called for by the 2007-2014 RHNA. Ex. B-1 AR 328. In view of the excess production, the additional capacity for 27,844 units through rezoning appears directed to accommodate an unexplained objective of the 2009 Housing Element.

The 2009 Housing Element states that San Francisco’s fair share of the regional housing need for January 2007 through June 2014 was calculated as 31,190 units, which seeks to accommodate forecast household and employment growth “as well as allocating regional household and employment growth to jurisdictions with established or planned transit

R17-6c  
(Cont.)

R17-7a

R17-7b

R17-7c

infrastructures.” Ex. B-18 AR 9445-2009 Housing Element Part I, p. I.41. However, the 2009 Housing Element and the EIR do not disclose the amount of the 2007-2014 RHNA goal that allocated regional household and employment growth to jurisdictions with established or planned transit infrastructures. We request that the City provide that information in response to these comments. The EIR, 2009 Housing Element, and the City should disclose the estimated number of new housing units that would be needed during the 2007-2014 planning period to accommodate growth from only normal factors such as births and deaths in the City. The EIR, 2009 Housing Element, and the City should also disclose the estimated number of new housing units that would be needed during the 2007-2014 planning period to accommodate any portion of the projected regional household and employment growth that was allocated to San Francisco in the RHNA for the 2007-2014 planning period. In view of the 25,000 new units anticipated to be produced in excess of the RHNA allocation for 2007-2014, it should be feasible to eliminate from the 2009 Housing Element any portion of the projected regional household and employment growth that was allocated to San Francisco in the 2007-2014 planning period.

R17-7c  
(Cont.)

**CONCLUSION**

The alternatives described above are feasible alternatives that would reduce the 2009 Housing Element’s significant impact on transit and its significant impacts on land use and neighborhood character. The 2009 Housing Element is projected to produce excess housing production, which can be feasibly scaled back to meet, but not exceed, the RHNA.

R17-8

DATED: February 17, 2014

  
 \_\_\_\_\_  
**DAVID GOLICK**



N/S

**From:** [Marilu Donnici](#)  
**To:** [Smith, Steve](#); [planning@rodneyfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#)  
**Cc:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Sunday, February 16, 2014 4:02:54 PM

---

R18-1

I do not approve of revising the zoning in the west part of the City.

R18-2

The city should respect and value historic neighborhoods, such as St. Francis Wood, Forest Hill, etc. As the analysis admits: “Alternative A could result in **residential development** that includes **inappropriate alterations**, or **additions to existing housing**, or **new construction** that **detracts from the historical or cultural significance of an existing building or area... cumulative impacts** could arise... **diminishing the historic significance of the area.**” SFW has an extraordinary collection of early 20<sup>th</sup> century architect-designed homes. SFW has endured for 100 years thanks to the involvement of its homeowners, their CC&Rs and Design Guidelines. These are important historic assets for the city and should not be so easily put at risk. The importance of single-family neighborhoods on the west side of the city is keeping the middle class in San Francisco.

R18-3

A change of zoning will further affect the transportation infrastructure being inadequate as it is.

N/S

Alessandra Louise Donnici  
 115 San Fernando Way  
 San Francisco CA 94127

N/S

**From:** [Marilu Donnici](#)  
**To:** [Smith, Steve](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#)  
**Cc:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Sunday, February 16, 2014 3:59:21 PM

---

I live at 115 San Fernando Way San Francisco, CA 94127

R19-1

I do not approve of revising the zoning in the west part of the City.

R19-2

The city should respect and value historic neighborhoods, such as St. Francis Wood, Forest Hill, etc. As the analysis admits: “Alternative A could result in **residential development** that includes **inappropriate alterations**, or **additions to existing housing**, or **new construction** that **detracts from the historical or cultural significance of an existing building or area... cumulative impacts** could arise... **diminishing the historic significance of the area.**” SFW has an extraordinary collection of early 20<sup>th</sup> century architect-designed homes. SFW has endured for 100 years thanks to the involvement of its homeowners, their CC&Rs and Design Guidelines. These are important historic assets for the city and should not be so easily put at risk. The importance of single-family neighborhoods on the west side of the city is keeping the middle class in San Francisco.

R19-3

A change of zoning will further affect the transportation infrastructure being inadequate as it is.

N/S

Mary Louise Donnici  
 115 San Fernando Way  
 San Francisco CA 94127

N/S

From: [Marilyn Donnici](#)  
 To: [Smith, Steve](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commiss@yaho.com](#); [Rahaim, John](#)  
 Cc: [Jones, Sarah](#); [Secretary, Commissions](#)  
 Subject: Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
 Date: Sunday, February 16, 2014 4:05:35 PM

---

Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis

I do not approve of revising the zoning in the west part of the City.

The city should respect and value historic neighborhoods, such as St. Francis Wood, Forest Hill, etc. As the analysis admits: “Alternative A could result in **residential development** that includes **inappropriate alterations**, or **additions to existing housing**, or **new construction** that **detracts from the historical or cultural significance of an existing building or area... cumulative impacts** could arise... **diminishing the historic significance of the area.**” SFW has an extraordinary collection of early 20<sup>th</sup> century architect-designed homes. SFW has endured for 100 years thanks to the involvement of its homeowners, their CC&Rs and Design Guidelines. These are important historic assets for the city and should not be so easily put at risk. The importance of single-family neighborhoods on the west side of the city is keeping the middle class in San Francisco.

A change of zoning will further affect the transportation infrastructure being inadequate as it is.

Phillip Albert Donnici  
 115 San Fernando Way  
 San Francisco CA 94127

**From:** [Patrick M. Donnici](#)  
**To:** [Jones, Sarah](#)  
**Cc:** [Secretary, Commissions](#); [Smith, Steve](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Monday, February 17, 2014 2:19:15 PM

---

N/S

Dear Ms. Jones,

The City's plans to increase housing stock by allowing secondary units and "infill" of private open space throughout the city, effectively eliminating RH-1 zoning, will negatively impact San Francisco's historic neighborhoods (and thus dilute the diversity of the overall pattern of neighborhoods presently existing in the City). Moreover, the existence of single-family neighborhoods on the west side of the City has made it possible for keeping the middle class in San Francisco, and the City's plans will only hasten the exodus of middle-class families.

The City should encourage and respect, rather than denigrate and jeopardize, historic neighborhoods, and as pointed out in the analysis itself: "Alternative A could result in **residential development** that includes **inappropriate alterations**, or **additions to existing housing**, or **new construction** that **detracts from the historical or cultural significance of an existing building or area... cumulative impacts** could arise... **diminishing the historic significance of the area.**" Historic neighborhoods, such as St. Francis Wood, Forest Hill, Westwood Highlands and Miraloma Park, have an extraordinary collection of early 20<sup>th</sup> century architect-designed homes which would be severely and negatively impacted.

Finally, existing MUNI transportation to such neighborhoods is already overtaxed (and as a regular rider and San Francisco resident I observe this daily), and this proposed elimination of RH-1 zoning will only increase the burden on our existing public transportation system, and encourage commuters to seek alternatives, such as personal automobile transportation.

**Patrick M. Donnici**  
*A Professional Corporation*  
**Attorney & Counselor at Law**  
**353 Sacramento Street, Suite 1140**  
**San Francisco, California 94111**  
 Telephone: 415.986.1338, ext. 149  
 Facsimile: 415.986.1231  
 email: [pmd@donnicilaw.com](mailto:pmd@donnicilaw.com)

The author of this transmission is an attorney. The transmission may contain privileged and confidential information, intended only for the use of the person or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any review, communication, distribution or copying of this message and any attachments is prohibited. If you have received this transmission in error, please immediately notify the sender by return email and return the original message to me, or delete it and all attachments from your computer and inform me by return email that you have done so. Thank you for your cooperation.

To ensure compliance with revised Treasury Regulations under Circular 230, this is to advise you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of avoiding tax-related penalties that may be asserted against the taxpayer, or promoting, marketing or recommending to another party any transaction or matter addressed herein. A taxpayer may rely on professional advice to avoid federal tax penalties only if that advice is reflected in a comprehensive tax opinion that conforms to stringent requirements under federal law.

R21-1

R21-2

R21-3

N/S

**From:** [Marilyn Dougery](#)  
**To:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Cc:** [Smith, Steve](#); [planning@rodneyfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhellissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives AnalysisD  
**Date:** Sunday, February 16, 2014 2:38:22 PM

---

Dear Ms. Jones and Others Involved in Decisions Pertaining to the Above Case,

Please do not destroy the middle class neighborhoods in San Francisco. We have owned a home in St. Francis Wood for about 50 years, having stayed with our family despite the middle class flight when bussing began while our children were young and attending the already integrated Commodore Sloat School. We have watched as the reverse commute of years ago has turned to gridlock both in and out of San Francisco during the rush hours. It is particularly noticeable and onerous to us in the afternoon if one tries to return to SF on 180 or 101. Your attempts to increase housing in SF will just add to this gridlock as you will be providing housing for people working outside of SF.

Also we ask that you consider the destruction of our many fine middle class neighborhoods your plan will cause, not just in St. Francis Wood, but throughout the city. Instead of enhancing the city, I think your plan will lead to urban flight for our middle class, something that has led to the destruction and blight of other cities.

Now on St. Francis Wood itself. It is one of, if not the first, planned single family home neighborhoods in the country. It is a historic landmark and acclaimed nationwide both for its design and for the fact that its residents have continued to maintain it at a high level. Our residents volunteer their time and money widely, not just within St. Francis Wood but city-wide, and thus add to the texture and accoutrements of San Francisco as a whole. To change the zoning, or by allowing multi family units, or by legalizing in-law units certainly will change the character of this historic resource and possibly will destroy it.

But as I said above, it is not just St. Francis Wood that I ask you to protect, but all the single family middle class communities in SF. They are the strength of this city and provide the backbone of enjoyable living. Families WANT to live in such single family areas with parks and open space to enjoy and if not already there, aspire to get there. Without that resource or that goal, they will move to the suburbs leaving a blighted urban core. Our city will not thrive without families.

One last comment, the well intentioned but misguided limit that was put on parking spaces for new residential construction has not led to less cars but has added terribly to traffic as people drive round and round seeking a parking place. I fear that this new plan, though equally well-intentioned, may have an even more negative affect on SF.

Your alternative plans are not clear to me, seem contradictory in explanation, and I hope you will explain them more clearly to me.

N/S

R22-1

R22-2

R22-3

R22-4

R22-5

R22-6

R22-7

Thank you for considering my comments.

Marilyn R. Dougery

[mdougery@sbcglobal.net](mailto:mdougery@sbcglobal.net)

165 Santa Ana Ave.  
San Francisco, CA 94127

N/S

**From:** [mari](#)  
**To:** [Smith, Steve](#)  
**Subject:** RE: Revised Alternative Analysis for the 2004 and 2009 Housing Elements  
**Date:** Tuesday, February 18, 2014 4:56:08 PM

---

February 18, 2014

San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

RE: Revised Alternative Analysis for the 2004 and 2009 Housing Elements  
Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
State Clearinghouse No. 2008102033

We are primarily concerned over the vast changes we see coming to San Francisco if all of the suggested changes in the Housing Element go through, and we do not like the future that we see.

Four of our greatest concerns:

1. The loss of R1 and R2 housing for middle class families seeking single family dwellings with yards, near schools and other family-friendly services and amenities.
2. We also feel the city should build the infrastructure to support an increased population prior to building housing.
3. Shadows are the enemy of solar independence, and drive the demand for carbon-based fuels higher. Passage of this version of the Housing Element will eliminate the possibility for expanding independent solar systems in San Francisco, keeping the entire city dependent on the grid. Creating massive swaths of shadows will increase the need for burning more carbon fuels to heat the colder buildings.
4. We have a water shortage and a drought and are looking at spending billions of dollars to repair our water and sewer system just to keep up with our current needs. Asking citizens to pay more for services in order to allow more people to move in and crowd them out, is not going over very well.

We urge you to move very slowly and deliberate on other options that can allow for greater energy independence. We need to keep the middle-income level housing that we have and improve transit services before we bring in any more people. We need transit before development, and we need to keep the solar option open.

Eliminating renewal energy opportunities has a tremendous impact on the environment that should be taken under consideration, along with all the other carbon saving concepts. Solar power enhances the city by keeping the power-generating requirement low.

Sincerely,

Mari Eliza, Concerned San Francisco Citizen

N/S

R23-1

R23-2

R23-3

R23-4

R23-5

R23-6

N/S

RECEIVED

FEB 18 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

Don Emmons  
2552 Greenwich St.  
San Francisco, CA 94123

February 14, 2014

N/S

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

I live in Cow Hollow, one of the many low-rise and single-family neighborhoods surrounding the downtown area of San Francisco. My family enjoys our neighborhood because of the residential nature and lower scale of the single-family homes and duplexes that populate the streets.

R24-1

Changes made to the 2009 Housing Element were not properly studied or noticed under the EIR. This is because they were added later and did not go through the normal review that the other parts of the EIR process. Density limits were haphazardly removed allowing higher density from garage conversions and larger and higher buildings in some ill-defined areas. These changes could significantly impact our neighborhoods forcing single families out of the city, or significantly changing the lives of those who elected to stay in the city.

R24-2

Without sensible density limits that should be spelled out in city housing policy, the changes from multiple garage conversions and from height and mass increases, which the new Housing Element allows, could cause irreversible damage to the residential character of Cow Hollow and other residential neighborhoods in the city. Unless the density limits are restored to the Housing Element, the impact of the loss of garage space on each residential street must be adequately studied under a new EIR. Where will all these cars park?

R24-3

There are approximately 20 garages on just my block. Many garages can hold three or four cars, but average at least two. Therefore, converting 20 garages into living space would put an additional 40 cars on our street. My block has 12 street parking spaces now. Would they double park? Triple park? These impacts must be considered in any EIR where city-wide density limits are ill-defined or removed as was done under the 2009 Housing Element.

Sincerely,



Don Emmons



**From:** [Paul Finigan](#)  
**To:** [Jones, Sarah](#); [Secretary, Commissions](#); [Smith, Steve](#); [Rahaim, John](#); [planning@rodneyfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#)  
**Subject:** Case No. 2007.1275E, SF 2004 &2009 Housing Element, Revised Alternatives Analysis; State Clearing House No. 2008102033  
**Date:** Tuesday, February 18, 2014 4:32:15 PM

---

N/S

I write in opposition to the referenced Revised Alternatives Analysis (RAA). There has been insufficient and inadequate notice and opportunity to discuss and comment upon the RAA. This will result in a successful challenge to the adoption or enactment of the RAA.

Moreover, the RAA fails to adequately address a number of serious issues. These include but are not limited adverse impacts upon: public transportation (MUNI); traffic congestion and safety; parking; and other negative impacts on various neighborhoods with respect to schools, public services (e.g. police and fire) and sanitation.

In addition, the validity and integrity of many decades of city planning and development will be jeopardized and reversed by the RAA. There was and remains good cause and reason to protect and preserve the nature and character of the City's neighborhoods. The perhaps unintended consequences of a wholesale rash implementation of an "urban infill" planning approach and philosophy will include negative impact on the issues mentioned above and an irreversible destruction of the nature and character of many R-1 single-family neighborhoods. The negative impact will be both immediate and long term [e.g., in property values (and property tax receipts), quality of neighborhoods and neighborhood life; additional departures from the City of property owners; and, inability to attract and retain property owners to previous R-1 single family neighborhoods].

At a minimum, there should be a more open, honest and transparent public discussion and vetting of the RAA.

At some point very soon, the City will reach an irreversible negative tipping point because of continuing enactments that target, prejudice and negatively impact single-family residential property owners. This point will result in both an exodus from the City and an inability to attract and provide housing opportunities sought by a population of tax-paying property owners that has been very valuable to the City for many years and generations.

Your response will be appreciated,

Vincent Finigan  
 90 Lansdale Avenue  
 San Francisco CA 94127

R25-1

R25-2

R25-3

N/S

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: SFHA - Comments to be sent to the City  
**Date:** Tuesday, February 18, 2014 11:36:31 AM

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Frankenstein, George D. [<mailto:george.frankenstein@credit-suisse.com>]  
**Sent:** Tuesday, February 18, 2014 8:25 AM  
**To:** Jones, Sarah  
**Cc:** Diane Frankenstein; [cogara@sbcglobal.net](mailto:cogara@sbcglobal.net)  
**Subject:** RE: SFHA - Comments to be sent to the City

Case #2007.1275E SF 2004/2009 Housing Element As my family has been a resident of LAKESIDE for 35 years, I must weigh in on my OUTRAGE to think the planning commission would even think of changing the wonderful makeup of our area!!! Single family dwellings are the backbone of the city/the backbone of the middleclass and school system---inappropriate development would be a disaster!!!!!! I take the MUNI daily and we need no more traffic on this strained system!!!!!!!!!! Traffic in the area is also maxed out---emergency vehicles flying by at all hours!!!

Us long time SF residents/taxpayers sure hope you understand our commitment to keep the west-side family neighborhoods exactly that!!! George and Diane Frankenstein/170 Junipero Seer Blvd/SF 94127  
George D Frankenstein  
PB USA San Francisco  
+1 415 249 2011 (\*726 2011)

**From:** Diane Frankenstein [<mailto:diane@dianefrankenstein.com>]  
**Sent:** Monday, February 17, 2014 8:24 AM  
**To:** Frankenstein, George D. (SAES 1)  
**Subject:** Fwd: SFHA - Comments to be sent to the City

----- Forwarded message -----

**From:** **Christine O'Gara** <[cogara@sbcglobal.net](mailto:cogara@sbcglobal.net)>  
**Date:** Saturday, February 15, 2014  
**Subject:** Fwd: SFHA - Comments to be sent to the City  
**To:** Paul Finigan <[vpfinigan@gmail.com](mailto:vpfinigan@gmail.com)>, Diane Frankenstein <[diane@dianefrankenstein.com](mailto:diane@dianefrankenstein.com)>, Pat Lee <[patriciann@gmail.com](mailto:patriciann@gmail.com)>, Antonette Glynn <[afglynn@comcast.net](mailto:afglynn@comcast.net)>, Eda and John McNulty <[eda.mculty@gmail.com](mailto:eda.mculty@gmail.com)>, Richard Warren <[bd1947@sbcglobal.net](mailto:bd1947@sbcglobal.net)>

This is going to affect all of our neighborhoods, and not for the better.  
We could lose R-1 housing as well as CC&Rs.  
The more input the better

**Bebject: SFHA - Comments to be sent to the City**

View attachment after reading the following.

N/S

R26-1

N/S



Wendy and Judith, please pass this info on to your groups.

Concerned residents,

Thank you for your willingness to submit comments to the city regarding their *2004 & 2009 Housing Element, Revised Alternatives Analysis* (revised Environmental Impact Report). The **comments are due Tuesday, February 18 by 5 pm**. My apologies for the delay in getting this out; it took me quite a while to try to gather enough, but not too much, for you to be able to make your own informed comments. Let me know if you need more.

For those who need to get caught up, the city plans to increase housing stock by allowing secondary units and “infill” of private open space throughout the city, effectively eliminating RH-1 zoning. If the Draft EIR is approved it will become the new baseline for future housing development in San Francisco. If you comment, the city is required to respond to you and to keep you informed in the future.

The document essentially says, “yes, there will be some impacts, but they will be insignificant, so our plan is fine.”

Please send comments re any of these that resonate for you:

- 1) **Quality of life in a single-family neighborhood**, what it means to have single-family neighborhoods in the city. The importance of single-family neighborhoods on the west side of the city in keeping the middle class in San Francisco. Children, community, parks, etc.
- 2) Transportation infrastructure being inadequate as it is.
  - a. **Muni incapacity**. Personal stories about Muni or the buses
  - b. **Traffic**; reverse commute, etc
- 3) You do not understand the alternatives; they are contradictory; please explain.
- 4) Alternative A: the city should respect and value historic neighborhoods, such as St. Francis Wood, Forest Hill, etc. As the analysis admits: “Alternative A could result in **residential development** that includes **inappropriate alterations**, or **additions to existing housing**, or **new construction** that **detracts from the historical or cultural significance of an existing building or area... cumulative impacts** could arise... **diminishing the historic significance of the area.**” SFW has an extraordinary collection of early 20<sup>th</sup> century architect-designed homes. SFW has endured for 100 years thanks to the involvement of its homeowners, their CC&Rs and Design Guidelines. These are important historic assets for the city and should not be so easily put at risk, etc..

**Comments to be sent to: Deadline 5 pm February 8, 2014**

•  
Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

[sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
[Commissions.Secretary@sfgov.org](mailto:Commissions.Secretary@sfgov.org)

You can also send your comments to the following (the more they hear from us the better).  
You can cut and paste these into your cc transmittal. (Who's who explanations follow):

[Steve.smith@sfgov.org](mailto:Steve.smith@sfgov.org)  
[planning@rodneymfong.com](mailto:planning@rodneymfong.com)  
[cwu.planning@gmail.com](mailto:cwu.planning@gmail.com)  
[wordweaver21@aol.com](mailto:wordweaver21@aol.com)  
[plangsf@gmail.com](mailto:plangsf@gmail.com)  
[richhillissf@yahoo.com](mailto:richhillissf@yahoo.com)  
[mooreurban@aol.com](mailto:mooreurban@aol.com)  
[hs.commish@yahoo.com](mailto:hs.commish@yahoo.com)  
[john.rahaim@sfgov.org](mailto:john.rahaim@sfgov.org)

Steve Smith, Planner  
Commissioners: Rodney Fong, Cindy Wu, Michael Antonini (wordweaver), Gwyneth Borden (plangsf), Rich Hillis, Kathryn Moore (mooreurban), Hisashi Sugaya (hs.commish)  
John Rahaim (Director of Planning)

**Subject line:**  
Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis

You could also reference: State Clearinghouse No. 2008102033

**It is important that you provide your name and address**, so that they have to respond. Do not fall for the "OK to submit anonymous comments" ruse.

I am attaching a pdf document that was used to get an extension for the comment period. Do not use those talking points, but the documents with it might help.

Here's the link to find the **pdf files for the Draft EIR Revised Alternatives documents**:  
<http://www.sf-planning.org/index.aspx?page=3562>

On the Planning website, this was found under "Environmental Impact Reports & Negative Declarations" (You will not find them under the "General Plan" or "Citywide Planning")

Thanks for your help.

Carolyn Squeri

--  
Diane W. Frankenstein  
Strategic Literacy  
[www.dianefrankenstein.com](http://www.dianefrankenstein.com)

=====

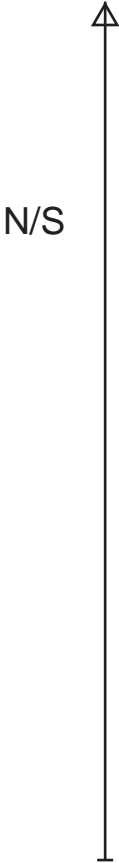
N/S



Please follow the attached hyperlink to an important disclosure relating to the Private Banking USA business of Credit Suisse Securities (USA) LLC  
[http://www.credit-suisse.com/legal/en/pb/pb\\_usa\\_email.jsp](http://www.credit-suisse.com/legal/en/pb/pb_usa_email.jsp)

=====

=====  
Please access the attached hyperlink for an important electronic communications disclaimer:  
[http://www.credit-suisse.com/legal/en/disclaimer\\_email\\_ib.html](http://www.credit-suisse.com/legal/en/disclaimer_email_ib.html)  
=====



N/S

**From:** [Aaron Goodman](#)  
**To:** [Board of Supervisors](#)  
**Cc:** [Jones, Sarah](#); [Smith, Steve](#); [Secretary, Commissions](#); [Rahaim, John](#)  
**Subject:** EIR Housing Element Revisions 2004/2009 EIR - Memo 01.22.2014 (A.Goodman)  
**Date:** Wednesday, January 22, 2014 6:13:27 PM  
**Attachments:** [housingelement2004\\_2009.pdf](#)  
[0409\\_housingelement2.pdf](#)  
[transformativehousing11212013.pdf](#)

01.22.14

Attn:  
 SF Board of Supervisors, SF Planning Commission, SF Historic Preservation Commission, Planning Department Head Mr. Rahaim and the Chief Environmental Review Officer Sarah Jones for the Housing Element 2004 and 2009

Per the prior legal action by SPEAK and other concerned organizations, I am submitting my prior memo on the 2009 Housing Element, a current memo on the revised Housing Element, and a memo on housing in relation to housing concerns as a general issue currently, please include these documents as my comments and submitted issues for the hearing and deadlines for comments on the revised EIR as I will be unable to attend.

Due to the current ongoing "pipeline" of projects that have yet to develop seriously the needed housing rental stock for working class citizens of this city, I feel it is important to remind those in positions of the public trust the concerns for not addressing the current imbalance of housing types being constructed. There is also the concern for still the non-existent connectivity of transit to support the large development pressures being placed on many areas of the city. For example the traffic near the Phelan Bus housing development occurring which on a recent evening backed up onto the freeway some distance blocking further commute issues. The 19th Ave. Transit Study and lacking objectivity to separate the city from the developer's views on transit and routing of public systems and ensuring an up-front connectivity for SFSU-CSU to Daly City BART not in 20 years but in 5 or less.

With cranes in full "swing" along market street and other areas of the city, we still have not seen a significant upswing of essential housing in each neighborhood where development pressures are occurring. Building our way out of this is not the solution, especially without the changes needed in infrastructure and open-space planning. A larger group inclusive of tenancy organizations, and housing advocates is needed, and the litigation(s) still in progress such as the Parkmerced lawsuit, and Housing Element Lawsuit must be resolved prior to any resolution of these issues. Though solutions may come to help resolve some of the problems currently in many of the existing development plans.

This imbalance is a critical issue currently and has already affected many neighborhoods, where essential services such as public schools, transit, and institutional growth has gone on un-checked and unbalanced in its current approach.

There is a need stronger than ever to look closely at the case regarding the housing element in 2004 and 2009 by SPEAK the Sunset Parkside Education and Action group, and various neighborhood organizations whom have consistently attended hearings and voiced concerns on the housing element changes and impacts. Only by opening the doors more to neighborhood organizations, and community groups concerned with the public's best interests will we have more understanding up front of what and how our city must change to meet the growing needs of a limited city outline.

Linkages, Looping, and Systems layered and crossing at focal areas, and a more transformative architecture is the only way to approach the myriad of problems our city is facing due to its current limits, yet we still have not seen any effort by planning and city agencies to address the imbalance and lack of communication outside of the small developer and business circles that have continued to spiral out of control without any real changes being addressed. A simple example was the discussion I had with others and the SFCTA lead Peter Albert on the L-Line and the changes that could occur on the western side of SF with a linkage of it back up to West Portal on Sloat, with a change towards Stonestown and the possible future development by

N/S

R27-1

R27-2



R27-2  
(Cont.)

General Growth Properties (\*note: to date unknown in concept size and scope)

For the benefit of the housing concerns so consistently raised by community organizations, tenant organizations, and the general public. I am re-submitting to you my memo from 2009 on the Housing Element with an additional short memo on the current proposed EIR and a response I sent regarding housing in general.

I am sorry that I cannot attend the hearing, and hope that the issues raised by SPEAK and other organizations are understood to be the primary issues to be resolved and that our submitted articles and ideas, can help in the discussion and resolution of the housing concerns currently for future generations of San Franciscans. I apologize for the longwinded items, but I think best in prose.

Sincerely

Aaron Goodman

N/S

Aaron B. Goodman  
25 Lisbon St  
SF, CA 94112  
Tel: 415.786.6929

**Attn: Environmental Review Officer Sarah Jones  
San Francisco Planning Department  
1650 Mission St. Suite 400  
San Francisco, CA 94103**

**Re: San Francisco Housing Element Revised Alternatives 2004 and 2009  
Plan Case# 2007.1275E  
State Clearing Housing No. 2008102033**

January 20, 2014

To whom it may concern;

I have written prior to the SF Planning Department as a member of the PmAC (Parkmerced Action Coalition, San Francisco Tomorrow Board member and as an Architect, bay area native resident, renter, and homeowner, on the Housing Element and concerns for the lack of rental housing being built throughout San Francisco. Specifically I sent a longer memo on the changes proposed to the Housing Element changes prior 2009 EIR, and what that has done to dis-enfranchise the development and building of essential rental housing stock. We have submitted serious housing based alternatives on the Transit and Infrastructure along 19<sup>th</sup> Avenue, and submitted comments and attended hearings on housing related projects and issues throughout the city.

An initial thought is that currently the public's concern and the related media and articles written showcase the increasingly limited options and alternatives on housing stock being provided for by the City Planning Process. Pipeline proposed large scale projects already approved and the many cranes building housing currently ignore the premise and need for large scale development of housing meant for low-middle income renters, and providing for the backbone and support for transitional housing needs in an urban area. The consistent limited property available, and the need to secure and develop new sites and redevelopment of existing areas and neighborhoods becomes a requirement but has not been addressed in terms of equity and development density maximums for urban areas by ABAG or the other proposed One Bay Area Plan since they both ignore the issues of the limited growth available of San Francisco vs. surrounding cities and the need to enforce equitable investment financially in the main city urban areas to alleviate problems that arise with congestion, traffic, transit, and housing concerns based on commuting changes, institutional growth, and essential needs for those losing the ability to live and work in San Francisco namely the middle class, families, students and seniors.

The last major project of rental housing built was in the 1950's in Parkmerced. To date no other project meets the scale and needs of the city, in the current housing crisis. The proposed pipeline of

N/S

R28-1





projects will meet only developer’s goals and those of ABAG and Plan One Bay Area, and has not adequately balanced the lack of essential housing built. BMR and “affordability” discussions miss the point on how and in what ways the city needs to be spear-heading housing development along its infrastructural systems. For example West Portal is the exodus of 3 major muni lines, yet the city has done nothing to change the height limits along west portal or to promote bank owned sites such as the 3-4 major bank branches and investment offices along west portal to change or transition to essential housing over retail development and densification.

How can you discuss the demolition of sound rental housing such as Parkmerced while ignoring single story buildings along West Portal, Ocean Ave, Taraval, and other areas of the city. Where is there a more “balanced approach” to housing if you allow Stonestown to sit with empty Parking lots while institutional sites like SFSU-CSU gobbles up valuable land meant for the public development and city possible development of essential housing? The ongoing debate on the 2004 and 2009 Housing element and court case should be significantly reviewed in regards to the ongoing lack of current housing options being provided for by the city. We cannot allow market forces to dictate housing policy, when the largest portion of families and those needing housing have been consistently forced out to date.

I have attached the prior memos on the Housing Element submitted prior in addition to Having submitted written and oral comment on the housing element and SF General Plan, and provided alternatives on projects such as the Parkmerced “Vision” plan, that would provide significant alternatives not thoroughly considered by your department on providing additional density and use of the Mills Act to receive local and federal monies to re-invest in the property while preserving the low-scale and removing and rebuilding the existing towers.

A real vision for the future of housing in San Francisco will take more than just developers sitting around a table with real estate and private financial interests. It takes a city and its citizens, neighborhoods, and homeowners, renters, and planners, landscape architects and architects, transit planners, and social advocates including renter’s organizations, and a more formal process for reviewing sites, streets and locations for density and redevelopment with a mindfull purpose of providing the essential housing we are losing citywide.

Please remind yourselves when reviewing the memos submitted that the section 8.1 removed prior in the housing element specifically stated the issue of the “OPTION” to rent vs. to BUY housing units developed, and this is a significant one, and only by enforcing the 50-50 development in all developments built can we begin to re-adjust how housing is developed and adjudicated for the general public.

Sincerely

Aaron B. Goodman

E: [amgodman@yahoo.com](mailto:amgodman@yahoo.com)

Cc: Board of Supervisors, SF Planning Commission, SF Historic Preservation Commission, Planning Department Director J. Rahaim. WOTPCC, CSFN, PmAC, SFTU, Tenants Together, HRCSF.

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Tuesday, February 18, 2014 12:46:26 PM

---

N/S

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Susan Hempstead [mailto:shempstead@dudnyk.com]  
**Sent:** Sunday, February 16, 2014 6:49 PM  
**To:** Secretary, Commissions; Jones, Sarah  
**Cc:** Smith, Steve; [planning@rodneyfong.com](mailto:planning@rodneyfong.com); [cwu.planning@gmail.com](mailto:cwu.planning@gmail.com); [wordweaver21@aol.com](mailto:wordweaver21@aol.com); [plangsf@gmail.com](mailto:plangsf@gmail.com); [richhillissf@yahoo.com](mailto:richhillissf@yahoo.com); [mooreurban@aol.com](mailto:mooreurban@aol.com); [hs.combish@yahoo.com](mailto:hs.combish@yahoo.com); Rahaim, John  
**Subject:** 2004 & 2009 Housing Element, Revised Alternatives Analysis

please respect and value historic neighborhoods, such as St. Francis Wood. St. Francis Wood has an extraordinary collection of early 20<sup>th</sup> century architect-designed homes. It has endured for 100 years thanks to the involvement of its homeowners, their CC&Rs and Design Guidelines. These are important historic assets for the city and should not be so easily put at risk.

Please consider this as you vote.

**Susan Hempstead**  
340 St. Francis Blvd.  
San Francisco, CA 94127

R29-1

N/S

**From:** :)  
**To:** [Jones\\_Sarah; planning@rodnevfong.com; cwu.planning@gmail.com; wordweaver21@aol.com; plangsf@gmail.com; richhillissf@yahoo.com; mooreurban@aol.com; hs.commish@yahoo.com](mailto:Jones_Sarah; planning@rodnevfong.com; cwu.planning@gmail.com; wordweaver21@aol.com; plangsf@gmail.com; richhillissf@yahoo.com; mooreurban@aol.com; hs.commish@yahoo.com)  
**Cc:** [Secretary, Commissions; Smith, Steve; Rahaim, John](#)  
**Subject:** Case No. 2007.1275E - DEIR SF 2004 & 2009 Housing Element, Revised Alternatives Analysis; State Clearinghouse No. 2008102033  
**Date:** Tuesday, February 18, 2014 1:52:44 PM  
**Attachments:** [HE-2007.1275E-DEIR SF 04-09 HE Rev Alt Analysis Comments PkgFINAL-rh.pdf](#)  
[HE-2007.1275E-DEIR SF 04-09 HE Rev Alt Analysis Comments-MuniIncapacityLtrFINAL-rh.pdf](#)

---

N/S

Dear Ms. Sara Jones & Planning Commissioners,  
Attached are documents in response to the subject-referenced matter.  
Earlier today I also dropped off 5 hardcopies at 1650 Mission, Suite 400, for Ms. Jones, “Planning Commission,” “Commissions Secretary,” Mr. Smith, and one for the “Public File.”  
Thank you very much for your time and attention to this matter.  
Sincerely,  
Rose Hillson

February 18, 2014

Ms. Sara Jones, ERO  
Planning Commissioners  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

via email & hand-delivered

Subject: 2007.1275E – DEIR-SF 2004 and 2009 Housing Element, Revised Alternatives Analysis (December 18, 2013 version), State Clearinghouse No. 2008102033

Dear Ms. Jones & Planning Commissioners,

My comments on the subject-referenced document:

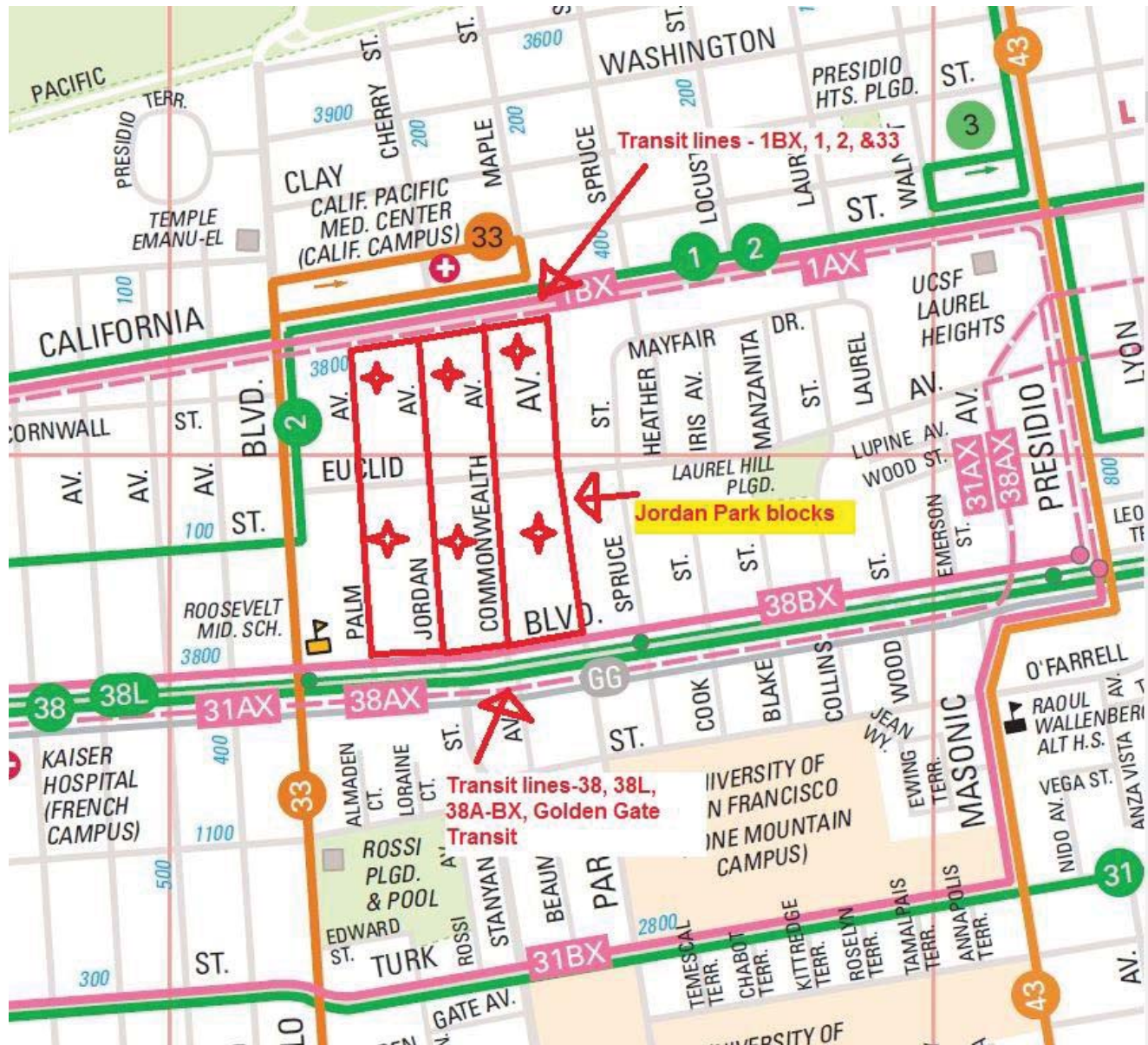
R30-1 The Dec. 2013 version of the DEIR SF 2004 & 2009 Housing Element Revised Alternatives Analysis document (HERAA) still does not accommodate neighborhood specific conditions found in different parts of San Francisco. Jordan Park is a microcosm of a predominantly low-density area reflecting ordinary middle-class life which is severely pressured out of existence from this City. Jordan Park is unique in relation to every other area of the city in terms of how it does NOT fit into the HERAA policies and implementation measures outlined. Detrimental impacts to a suburb-like Jordan Park will result from the overly vague policies and the corresponding lax implementation measures in the HERAA. The proposed and ongoing changes to Planning Code and to zoning ordinances and those made and approved by the Board of Supervisors to rely on the direction of the HERAA have already started to negatively impact this area.

R30-2 The City must accommodate and give relief to this extraordinary neighborhood locale since every CEQA impact category will be compromised with any further implementation of the policies and measures in the HERAA as it applies to Jordan Park. From an arbitrary designation of particular transit streets, Jordan Park, a low-density area, just happens to have found itself in between an arbitrarily determined "Transit Effectiveness" street called California and an arbitrarily designated "Transit Corridor" street called Geary. The ramifications from this arbitrary government land use decision and the fact that it is the ONLY area with the zoning between two such transit streets causes great physical impacts to the residents in terms of noise, congestion, change in neighborhood character, etc. with added intensification as proposed in the HERAA. The City also is not understanding that Geary adjacent to Jordan Park does not have the intense downtown or other sections of Geary with more dense number of units or businesses. The small area of Jordan Park should not be held to the same policy and implementation measures outlined in the HERAA due to an extraordinary situation created by government. Jordan Park requests relief.

R30-3 The HERAA continues with the one set of densification policies and implementation measures that assume no significant impacts even though portions have changed and no NEW DATA from the 2009 Housing Element has been analyzed. It pretends that it fits all SF neighborhoods equally while not creating an equal number of units for EVERY income level and overproducing in the "over market rate" category. It makes no logical sense to tear apart an established neighborhood once known as Lone Mountain from the Pioneer Days with massive and tall structures with densely packed units along the very different stretch of Geary by Jordan Park. There is clearly no consideration given to the objective Planning code criteria for residential buildings (as shown below from DEIR Part 1 V.B) when variances and "conditional uses" are handed out like candy

R30-4 before the Planning Commission. Jordan Park's area between Geary and California from Palm to Parker Avenues inclusive deserve an equal footing to other predominantly single-family home / low-density areas NOT arbitrarily caught between transit lines. The new alternatives in the

HERAA do not solve this problem and only exacerbates issues for low-density RH-1 & RH-2 Jordan Park. Look at this TEP (Transit Effectiveness Project) map of transit lines:



R30-4  
(Cont.)

R30-5

This HERAA will be used for the next 50 years with its vaguely and broadly written policies and implementation measures which will impact all neighborhoods but the average homeowner and resident do not know what is coming next door to him since this “policy” document has not been explained as to the consequences such as increased noise and vibration, drinking more blended water for us to drink, initiating projects to densify -- cramming and jamming units saying they will stay “affordable” when there is no guarantee of the affordability level for them, negating the character of single-family and duplex areas with more “in-fill” units, making small structures into larger ones so they are even less affordable to regular people, overtaxing Muni and other transit systems, and finally having us all pay for it all somehow (bonds, increase property and sales taxes, e.g.). Ordinary SF people to pay for more garbage, water, sewer & utility rates, too. Social and economic impact for many just to house people on a small amount of land.

R30-6

SF’s RHNA for 2014-2022 has been determined to be 28,869. That is the new figure and yet and still we do not make enough regular middle-income homes but keep over-producing above market-rate and the very low units.

**Existing Zoning**

There are a total of 13 residential zoning districts in the City, reflecting a mix of land use. A summary of the planning code provisions for residential uses is provided in the San Francisco Planning Code Zoning Districts, Residential Districts Controls Summary, on the Planning Department's website.<sup>1</sup> The Summary of the Planning Code Standards for Residential Districts provides the name of the zoning district and maximum dwelling unit density, as well as other land use controls. Residential zoning designations in the City include, but are not limited to RH-1 (D) (House-One Family, Detached Dwellings), RH-2 (House-Two Family), RM-1 (Mixed [Apartments and Houses], Low Density) to RM-4 (Mixed [Apartments and Houses], High Density), RC-3 (Residential-Commercial Combined, Medium Density), RED (Residential Enclave District) and RTO (Residential Transit Oriented Development). Generally, RH-1 zoning districts allow for one dwelling unit per lot, RH-1(S) zoning districts allow for an additional minor second unit, RH-2 zoning districts generally allow for two units per lot, with RH-3 zoning districts allowing three units per lot. Residential Mixed zoning districts can allow up to three dwelling units per lot (RM-1), or up to one unit per 200 square feet (sf) of lot area (RM-4). RC-3 districts allow up to three units per lot or one unit per 400 sf of lot area and RC-4 districts allow up to one unit per 200 sf of lot area. RED districts have similar density standards as RC-3 and RM-3 zoning districts, in that, RED districts allow for one dwelling unit per 400 sf of lot area. RTO zoning districts generally allow one dwelling unit per 600 sf of lot area, although these density limits may be exceeded for providing additional affordable housing units and other special uses.

**Existing Height and Bulk Districts**

The City contains 25 separate height and bulk districts that range in height from 40 feet to 400 feet. The different classes of height and bulk districts are indicated on the zoning maps. Additional height limits are imposed for certain use districts, such as areas located within narrow streets or alleys. Section 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section. Some of the areas eligible for exceptions to the height limits include north and south of the Ferry Building, east and west of Chinese Playground, Chinatown corners and parapets, and north of

<sup>1</sup> San Francisco Planning Department, Zoning Districts, Residential Districts Controls Summary, website: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=5358>, accessed April 9, 2009.

➤ Many other RH-1 single-family home areas in San Francisco still have the charm and relief from the overly densified areas. Relief from urban encroachment into every corner of the City is needed for there to be livability for all groups of people of all economic levels to live here. When one homogenizes the City with the HERAA policies and implementation measures which are deemed to NOT have any significant CEQA impacts except to the transit network without current rather than stale data and no further needs analysis, it does not reach conclusions based on today's facts of how the City has changed since 2004 / 2009 Housing Elements and this HERAA.

R30-6  
(Cont.)

R30-7

R30-7 (Cont.) Statements of impact are conclusory and do not show the reality of life in this city shown by unavailable data in the HERAA.

R30-8 With current significant lack of transit capacity and with the proposed increase in “in-fill” units passed so no CEQA review is needed (SB226) so that “in-fill” development projects are not located in only new building developments as was proposed earlier but rather also stuffed into older buildings, there will be more people along Geary and California Streets with taller, denser buildings which reflect all the additional noise towards Jordan Park due to the “canyon effect.” More traffic circles around due to SFMTA / SFCTA’s decision to make parking of vehicles as difficult as possible with meters and elimination of spaces. More people drive since Muni is over capacity. Nobody wants to take a bus which takes 3 times longer than it would to drive somewhere. To say that “in-fill” projects are the “greener” alternative does not work when the basic infrastructure is not in place (transit network), water quality and adequacy, emergency shelters, health impacts (spread of contagious diseases with overcrowding), hospital staff and beds for all the residents, new parks needed since recreational facilities will be over-utilized, etc.

R30-9 For new parks, at least one new one was created and more are proposed as in in the Planning Department Work Program FY14-16 1-15-14 FINAL version. There will be significant impacts to the open space / recreation availability because there will be too many residents and not enough parks when the existing parks will be over-utilized. That is why one will see more parks being created to accommodate the explosion of people in this City. If there is no data to support the creation of additional parks, why create them? Where is the data in this HERAA to show need today for these parks? The creation of new parks and thus more open space should not be used as a tool for stuffing more people into more units. There was not enough open space and parks to support what people we have as is. The ratio of parks to people is never disclosed for SF nor in this HERAA. What is it?

R30-10 Legislation to allow units even without the minimum private open space forces residents to almost reach out and touch the other residents’ units. Jordan Park has always enjoyed a very generous rear yard and even side yard open space policy. Jordan Park’s physical conditions and the environment surrounding it have not been considered in the Revised Alternatives analysis and the impact they will have to this historic neighborhood of RH-1 and RH-2 lots adjacent to NC-3 zoned Geary and California streets. Residents of Jordan Park have relied on the objective criteria in Planning Code for their low-density area. See Table V.K-2 on Page 8 of DEIR Part 1:

Table V.K-2

**Minimum Usable Open Space for Dwelling Units and Group Housing Outside the Eastern Neighborhoods Mixed Use District**

District	Square Feet Of Usable Open Space Required For Each Dwelling Unit If All Private	Ratio of Common Usable Open Space That May Be Substituted for Private
RH-1(D), RH-1	300	1.33
RH-1(S)	300 for first unit; 100 for minor second unit	1.33
RH-2	125	1.33
RH-3	100	1.33
RM-1, RC-1, RTO, RTO-M	100	1.33
RM-2, RC-2, SPD	80	1.33
RM-3, RC-3, RED	60	1.33
RM-4, RC-4, RSD	36	1.33
C-3, C-M, SLR, SLI, SSO, M-1, M-2	36	1.33
C-1, C-2	Same as for the R District establishing the dwelling unit density ratio for the C-1 or C-2 District property	1.33
NC-1, NC-2, NCT-1, NCT-2, NC-S, Inner Sunset, Sacramento Street, West Portal Avenue, Ocean Avenue	100	1.33
NC-3, Castro Street, Inner Clement Street, Outer Clement Street, Upper Fillmore Street, Haight Street, Union Street, Valencia Street, 24th Street-Mission, 24th Street-Noe Valley, NCT-3, SoMa, Mission Street	80	1.33
Broadway, Hayes-Gough, Upper Market Street, North Beach, Polk Street	60	1.33
Chinatown Community Business, Chinatown Residential Neighborhood Commercial, Chinatown Visitor Retail	48	1.00
DTR	This table not applicable. 75 square feet per dwelling. See Sec. 135(d)(4).	

*Source: Table 135A in the San Francisco Planning Code.*

R30-10  
(Cont.)

R30-11

Since PDAs were created by the BOS on an ARBITRARY basis as well and were NOT required by ABAG, it is a wonder how they were selected. Japantown is a PDA and all PDAs are slated for high-density growth. Even without Japantown, the number of units built has satisfied the RHNA units allocated for SF. Yet, SF continues to spin the story that SF does not have enough housing units. The HERAA states that the conclusions for the previous versions of the Housing Elements



R30-11 (Cont.) apply even with the new revised alternatives. That cannot be true. Where is the CURRENT data of the reality of housing and transit and GHGs, etc. used for this HERAA?

R30-12 In addition, the HERAA does not consider Japantown's total units which were NOT even in the calculations of the Housing Elements as it was not determined at their time of adoption. No NEW and recent data for each of the Areas in the old Table 6 shown below was used in this HERAA arrive at the conclusions that it did. It seems that factual current data does not matter but that the City will continue to build regardless of neighbors' input or even of real need. Perhaps the need is like the "Emperor's New Clothes"? There is not any real need. Continuing on the path of utilizing the policies and measures of the HERAA has already started if not substantially damaged certain fabrics of the many special neighborhoods we have. All the rezoning and arbitrarily targeted areas and proposed development -- See DRAFT EIR Appendix A Page 19:

**Table 6**  
**Estimated New Housing Construction Potential with Proposed Rezoning of Select Neighborhoods**

Area	Under Current Zoning			With Proposed Rezoning	
	Undeveloped	Underdeveloped	Total Estimate	Total New Estimate	Additional Potential Units with Rezoning
Executive Park	114	97	211	1,600	1,389
Glen Park	5	6	11	100	89
Japantown <sup>1</sup>	99	514	613	To be determined	
Park Merced	3	0	3	5,600	5,597
Transit Center District	44	78	122	1,200	1,078
Visitacion Valley	885	460	1,345	1,200	0
Western SoMa	466	743	1,209	2,700	1,491
India Basin				1,200	1,200
Hunters Point Shipyard			1,500	4,000	2,500
Candlestick Point				7,500	7,500
Treasure Island				8,000 <sup>2</sup>	8,000
<b>Total</b>	<b>1,616</b>	<b>1,898</b>	<b>5,014</b>	<b>32,100<sup>3</sup></b>	<b>27,844</b>

*Source: City and County of San Francisco, Planning Department, Draft Housing Element, Part I: Data and Needs Analysis, April 2009, at page 84.*

<sup>6</sup> This information is based on the Draft Housing Element: Part I: Data and Needs Analysis. April 2009. Draft for public review. Table I-55 (page 61). This document is available online at the Planning Department's website at: [www.sfgov.org/planning](http://www.sfgov.org/planning).

<sup>7</sup> City and County of San Francisco, Planning Department, Draft Housing Element, Part I: Data and Needs Analysis, April 2009, at page 24. The existing housing stock is estimated at 363,662 housing units citywide.

R30-13 The whole premise of this "transit-only development" with PDAs (allowed in SB375) is to supposedly allow SF to get grant money for transit infrastructure maintenance and development. The HERAA does not include a list of all the infrastructure maintenance projects that will be upgraded. Which parts of the city's transit infrastructure is being upgraded, improved, and maintained? What then is the grant money being used for? Where is the data analysis for the transit network using current data?

R30-14 ➤ Inadequate number of units for the low-mid-income earners (“affordable”) is due to the funding and reward system inherent in the development approval process. The HERAA do nothing to fix this problem and thus the compounding, the exacerbation of a condition to drive the lower middle income people out of the city. This includes families and seniors and disabled who do not qualify for the very low income bracket services offered. They fall through the cracks in the existing system. Family members no longer can rent or buy a small starter home since there is no incentive for developers to put those into existing neighborhoods. A new system which allows equal building for all income categories can be adopted by the City but the leadership of the City continues to ignore the problem with middle income flight and concentrating only on low income housing for the non-profits who manage them and for above market-rate luxury condominiums. The consequences of the policies for developers to build to maximize their profits only for the very low and above market rate have severe environmental and physical impacts which are not addressed by the HERAA. The total units in the pipeline shows on Page 22 of the DEIR Part 1, that there are already 54,790 new units which is well above the RHNA allocation of 31,193 for SF. Also, per Page 9 of DEIR Part 1 V.D., there will be 25,000 more units than RHNA:

A housing element is required to adequately plan for and address the housing needs of all segments of its population, such that all communities contribute to the attainment of the state housing goals. As shown in Table V.D-5, based on ABAG projections and the resulting RHNA, the 2009 Housing Element identifies San Francisco’s share of the regional housing need for January 2007 through June 2014 as 31,193 housing units, or 4,159 units per year. The proposed Housing Elements would help achieve the RHNA goals through implementation of housing-related policies. In developing the proposed Housing Elements, the City found that there are substantial infill housing opportunity sites to meet the City’s share of the RHNA.<sup>12</sup> According to Tables IV-7 and IV-5 in Section IV (Project Description), there are approximately 56,435 units are anticipated to be developed in the City (pipeline projects), with the capacity for 60,995 additional units, respectively. The pipeline units anticipated to be developed in the City total approximately 25,000 units more than the City’s share of the RHNA. Additionally, area planning processes and rezoning alternatives would allow the additional capacity of 27,844 units.

Housing growth would occur regardless of the proposed Housing Elements. The proposed Housing Elements provide direction for that growth with a specific emphasis on housing affordability. As

<sup>12</sup> City and County of San Francisco, Planning Department, Draft Housing Element, Part I: Data and Needs Analysis, April 2009, at page 82.

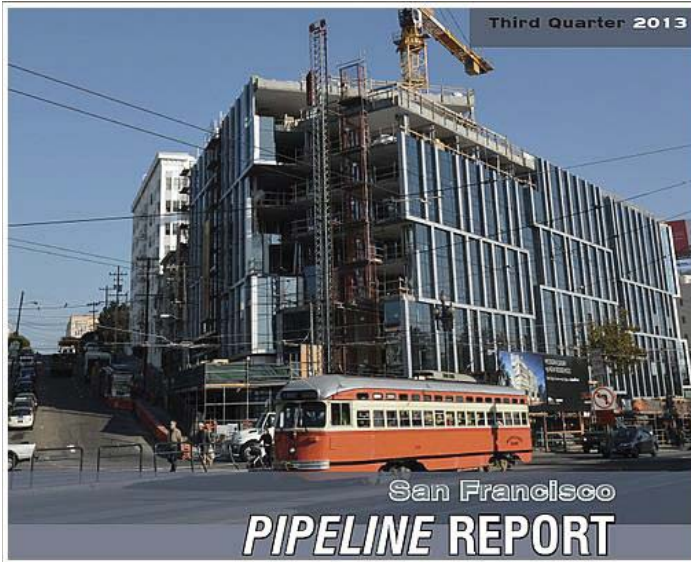
R30-15 Although the above states there are “approximately 56,435 units anticipated to be developed in the City (pipeline projects)” and the cry is for still more units because the MIDDLE CLASS housing units are NOT being built. However, with limited land, there will be nowhere to put this MIDDLE CLASS housing especially if the “affordable housing” fund is not to be touched for MIDDLE CLASS housing nor the public sites that could be used for middle class housing be taken from the very low income unit affordable housing sites. This creates a huge problem. If the City is serious, it will start to equalize the number of units for the MIDDLE CLASS units and slow down the other income category units or many people of a certain income and maybe even race will be gone.

Here’s the 3<sup>rd</sup> Quarter 2013 Pipeline Count from SF Planning in the next article:

[http://www.socketsite.com/archives/new\\_developments/](http://www.socketsite.com/archives/new_developments/)

**December 17, 2013**

## **San Francisco's Housing Pipeline Breaks The 50,000 Unit Mark**



R30  
-15

(Cont.)

While only 1,600 new housing units were completed in San Francisco over the past year and commercial space in the city declined by 183,000 square feet (due to conversions to residential use), there are now over 6,000 housing units under construction in the City which should hit the market over the next year or two along with 900,000 feet of commercial space.

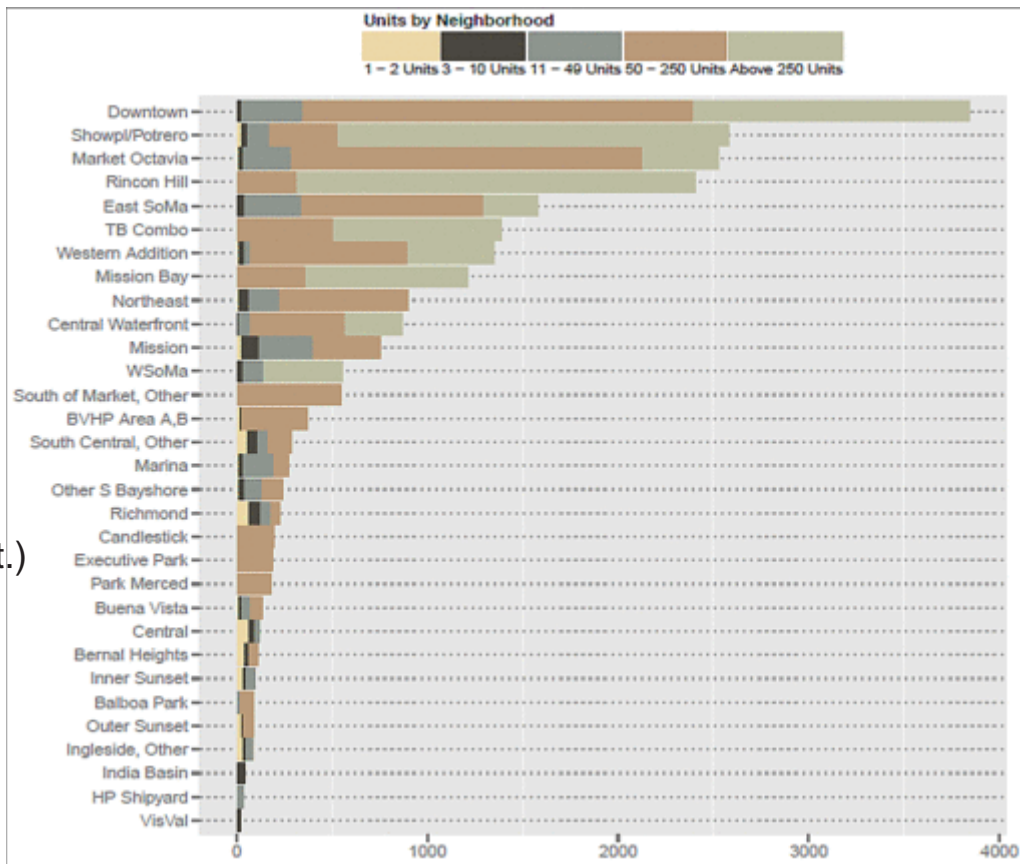
Building permits for another 9,500 housing units in San Francisco have either been approved or requested, units which should start hitting the market in two to four years along with another 5,000,000 square feet of commercial space.

In addition to the nearly 16,000 housing units which are either under construction, ready to break ground, or waiting for a permit, another 27,000 housing units have been entitled to be built in San Francisco which includes [10,500 units by Candlestick](#), [7,800 units on Treasure Island](#) and [5,680 units in Park-Merced](#), projects which still have timelines measured in decades, not years.

And with plans for an additional 7,650 housing units on the boards, San Francisco's Housing Pipeline currently totals over 50,000 units. For context, a total of roughly 12,000 housing units have been built in San Francisco since 2007; a total of 26,000 new units since 2000.

With respect to commercial development in San Francisco, in addition to the nearly 6,000,000 square feet already under construction, ready to break ground or awaiting a permit, plans for another 6,000,000 square feet of commercial development have been approved.

▲ A breakdown of the residential developments in the works across San Francisco by neighborhood, not including those at Candlestick, Park-Merced or Treasure Island (click [the chart](#) to enlarge):



R30-15 (Cont.)

· [San Francisco Pipeline Report: Third Quarter 2013](#) [sf-planning.org]

R30-16

▶ The problem is that the units for EACH economic group is not being built to even nearly equal in each. This RHNA allocation only shows allocation but not what is actually built in SF. It makes it seem like these numbers are what are actually built but they are not. See Comment #3, Table 4 for units actually built. Here is the RHNA allocation chart from DEIR Part 1 V.D. Page 5:

**Table V.D-5  
2009 Housing Element Regional Housing Needs Allocation**

Household Income Category	Percentage of Area Median Income (AMI) <sup>a</sup>	No. of Units	Percentage
Extremely Low	< 30%	3,294	10.5%
Very Low	31 – 50%	3,295	10.6%
Low	51 – 80%	5,535	17.7%
Moderate	81 – 120%	6,754	21.7%
Above Moderate	> 120%	12,315	39.5%
<b>Total</b>	--	<b>31,193</b>	<b>100%</b>

*Note: The Department of Housing and Urban Development determines the AMI for the San Francisco Primary Metropolitan Area, which includes the counties of San Francisco, Marin and San Mateo. For 2008, the area median income for a single person household was over \$66,000 and \$94,300 for a household of four people.*

*Source: City and County of San Francisco, Planning Department, Part I: Data and Needs Analysis, June 2010, at page 41.*

R30  
-16  
(Cont.)

RHNA does **NOT COUNT** units that have been rehabilitated or remodeled and counts **ONLY NEW** units, so in reality, the City already has way more housing units INCLUDING all the illegal 25,000 units and those that landlords have permanently kept vacant.

Here is the **2013** breakdown from the State Housing Department on **AMI (\$130,000)** for SF:

<b>VERY LOW</b>	<b>≤ 50% of AMI</b>	<b>≤ \$51,500</b>
<b>LOW</b>	<b>51% - 80% of AMI</b>	<b>\$52,530 - \$82,400</b>
<b>MODERATE</b>	<b>81% - 120% of AMI</b>	<b>\$83,430 - \$123,600</b>
<b>ABOVE MODERATE</b>	<b>&gt; 120% of AMI</b>	<b>&gt; \$123,600</b>

NOTE: 2013 STATE HOUSING LIMITS - SAN FRANCISCO AMI (Area Median Income) for 4 persons = \$103,000

R30  
-17

The HERAA has not analyzed the feasibility of their policies and implementation measures and collected and published data on all housing units in SF since their old 2004/2009 documents and just concludes every CEQA impact will be the same. Where is the data analysis, needs and impact statements?

See also Comment #60 later.

R30-18

➤ No mitigation measures for all the different areas of San Francisco which is composed of different physical environments of people have been accounted for in the HERAA policies. Since the 2008 "Great Recession," and the 2010 U.S. Census, many projects have gone forward or have been approved under the 2009 Housing Element. Even these projects are allowed to go through after this public comment period whether or not the public agrees with the CEQA impacts from them. All local planning seems to have gone out the window.

R30-19

➤ The consequences of this HERAA has not been explained to regular non-legal tax paying citizens in terms that is understood by all San Francisco property owners. No individual notices to explain

R30-19 (Cont.) that their neighbors can put more living space and potentially remove all parking amenities in buildings has been explained, among other issues. These people are not at the table because there could be some friction if they all found out. It is not that they do not care. It is that they are unaware due to lack of noticing.

R30-20 The City has continued to proceed with projects that follow both the 2004-adjudicated and 2009-intensified policies whilst the appeal by San Franciscans for Livable Neighborhoods is active so future construction projects need to be carefully studied based on the latest housing unit count, the locations of all of the projects and determine future project compatibility with neighborhood character and impacts to CEQA categories.

R30-21 With State CEQA law and SF ordinances and Planning Code changes morphing continuously, there needs to be a new analysis of how these HERAA policies. In actuality, the process should be reversed with ordinances and code changes being debated before doing a wholesale policy change in the HERAA which does not completely and accurately analyze the state of the City and the CEQA category impacts. The City is continuing to construct per this HERAA regardless.

R30-22 The HERAA continues the myth that rezoning will not be required. Yet and still, rezoning of areas of SF has occurred since the 2004 Housing Element and is ongoing. What is the analysis that shows that there is a need for rezoning when there are sufficient number of units already to meet RHNA? When there are 25,000 illegal in-law units, when there are many units left vacant? When there are many more units that have been rehabilitated and remodeled to accommodate more people already? Where are the data for all the permits issued by DBI to do so in this HERAA? There are none.

R30-23 The Housing Element Revised Alternatives Analysis still says everything from the 2004-adjudicated and 2009 Housing Elements will not cause any impact changes that were found in the earlier analysis. It basically clings on to the conclusion from DEIR Part 1, Page 31, V.K.:

**MITIGATION AND IMPROVEMENT MEASURES**

**Mitigation Measures**

No mitigation measures are warranted by the proposed Housing Elements.

**Improvement Measures**

No improvement measures are warranted by the proposed Housing Elements.

The landscape has changed since 2004 and the impacts are palpable. The transit system is broken. People in low-density housing near the arbitrarily determined transit lines are found in an unequal footing to the same residentially zoned lots not adjacent to the larger transit lines. This is the government imposition which has caused an entire community to be affected. Jordan Park needs to be relieved of this government imposed burden. Mitigation measures are required.

1. Pages 1-2, Executive Summary: “Alt A will have a “significant impact” to Historic Resources. Alt B will have a “significant impact” to the Transit Network. Alt C will have a “significant impact” to the Transit Network.” All 3, it states, will be mitigated to “less than significant” by implementing M-NO-1. What is the factual basis including documents previously cited with data and analysis for demonstrating the conclusion that all 3 will be mitigated by the implementation of M-NO-1?

R30-23  
(Cont.)

NOTE: M-NO-1 = Project construction would result in noise levels in excess of local standards.

Where is the supporting data and analysis done for this HERAA of all the potential Historic Resources and existing Historic Resources in SF that have or will be affected before the conclusion is reached that Alt A will have a “significant impact” to Historic Resources and can be mitigated to “less than significant” via implementation of M-N-01? Where is the citywide survey for these existing and potential Historic Resources to back up the statement? Where is the inventory of these places? Without a baseline survey of the historic and potential historic resources, the statement that the “significant impact” to historical resources can be mitigated via M-NO-1 cannot be relied upon. Where are the complete, accurate and thorough analyses of each and all of the potential or current Historic Resources that will be affected by Alt A supposedly mitigated by M-NO-1? If each of the potential Historic Resources and those categorized as Historic Resources are not all identified, how does the City conclude that all of them will be mitigated by M-NO-1 only? Or be impacted in any other CEQA category that has not been analyzed since they have not all been identified and analyzed? The final statement that concludes that M-NO-1 will resolve the “significant impact” to “less than significant” for all 3 alternatives appears to be conclusory without the accurate, adequate and complete analysis of all of the City’s potential and current Historic Resources. Some construction projects near these resources and even near infrastructure have caused vibrations sufficient for pipes to break.

Per the following Jan. 13, 2014 SF Examiner article, 25% of construction work has led to pipe breakage. An unknown number of historical resources and potential historic resources, especially in older established neighborhoods, can be negatively and irreversibly impacted. Where is the data and analysis to show the cumulative damage for each property location that could occur from all the development related to bringing this HERAA to fruition?

<http://www.sfexaminer.com/sanfrancisco/construction-related-water-main-breaks-on-the-rise-in-sf/Content?oid=2676146>

January 13, 2014

## Construction-related water main breaks on the rise in SF

by Chris Roberts @cbloggy



• ANNA LATINO/S.F. EXAMINER FILE PHOTO

- A large water main break caused damage to homes and cars in San Francisco's Parkside neighborhood last year.

Cold weather and old age can cause San Francisco’s aging water mains to regularly break open, but — in a time of booming building in The City — accidental breaking of pipes caused by construction is on the rise.

↑ Pipes disturbed by nearby construction caused 25 percent of all breaks recently surveyed, a “significant percentage,” according to documents on file with the [San Francisco](#) Public Utilities Commission.

That marks a four-year high of potentially costly water main breaks stemming from building, according to documents.

While excavators are causing a portion of the damage, much of The City’s pipe infrastructure is at risk of rupturing at any time due to advanced age, documents show.

Cast-iron pipes installed between 1920 and 1950, such as the ones that popped near [Joost Street](#) last week and near [Wawona Street](#) last spring, are breaking with the most regularity: more than 90 percent of breaks last year were in pipes from that era, according to the SFPUC. Seventy-five percent of all The City’s pipes are 40 years of age or older.

More construction is afoot in [San Francisco](#) today, with the tech-fueled economic boom making a crane-crazed city skyline higher and higher.

But water officials say all the building and related digging — including gas and electrical work, as well as an ongoing sewer replacement project — isn’t an extra risk to busting open a water pipe.

Instead, the construction illustrates why a project to replace The City’s water infrastructure network is necessary, according to Tyrone Jue, a spokesman for the SFPUC.

R30  
-24  
(Cont.) The breaks aren’t all from old pipes,” he said.

No data on which companies caused the most breaks — or how many were working on projects for The City — were available from the SFPUC.

The commission is planning to ramp up pipe replacement efforts, from 6 miles of new water mains laid per year to 15, according to Jue.

Over half of the SFPUC’s 1,241 miles of pipe are made of cast iron or made in the era from 1920 to 1950, which is even more likely to fail than other older or newer pipes, according to the SFPUC. Replacing the infrastructure “is positive for our public,” Jue said.

The City believes a contractor is to blame for the worst water main break in recent memory. Property owners have to date filed \$1.3 million in claims after a large water main broke last spring and caused flooding damage to more than 70 homes at [15th Avenue and Wawona near West Portal](#), according to the City Attorney’s Office.

That water main ruptured after a construction firm contracted with The City to replace sewers dug up the area, according to the SFPUC, which Jue said is in the process of reaching a payment settlement with contractor Precision Engineering.

The SFPUC did not have information on the names of contractors or construction companies involved in other recent breaks.

The City can be held liable for damage to homes caused by water main breaks if city-contracted work led to the break.





R30-25

The Executive Summary also states that Alternatives B (2004 HE-Adjudicated) & C (2009 HE-Intensified) have a “significant impact” to the Transit Network. For each of the Alternatives, I do not see a study on whether the additional units and density and number of people projected to reside in SF was done for this Dec. 2013 iteration of the Draft EIR. The HERAA bases everything on older analysis documents and does not re-examine the current environment or that of even a year ago. Without this, it is not complete, accurate and thorough. The conclusions are assumptive.

R30-26

2. Page 2, Executive Summary: Alt C incorporates TEP rapid transit network lines into affecting the HE development for increased density and height bonuses. Where has the TEP directed the increase in units, how many units, and what portions of the city based on the “increased density and height bonuses”? Where is the recent data? The TEP lines were also arbitrarily chosen so certain communities of concern are getting divided. Any analysis done on this?

In addition, where, whether projects in the pipeline or not, will the additional units with “increased density and height bonuses” be built which do NOT follow the current existing definitions of the number of units, density, and use allowed under Planning Code?

If the TEP were not used to “affect the HE development for increased density and height bonuses,” where would the “increased density and height” be located? Where is the comparative analysis that thoroughly demonstrates that only Alt B & C would have a “significant impact” on the Transit Network? What about Alt A? And the comparison to how the increased density and height has changed since the 2004 HE adjudicated? And since the 2009 HE?

R30-27

3. Page VII-1: PRC Sec. 21002: “...local agencies shall be guided by the doctrine of “feasibility.” If there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effect of such projects. In the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

Without knowing where all the projects in the pipeline are going to be located to see where they are feasible or appropriate, there can be no overarching conclusions that Alternatives A, B, and C will have no significant impact. Not having this list and then using less restrictive language in the 2009 HE vs. the 2004 HE via inclusion of words such as “prevailing” rather than the objective standards in current Planning Code that lays out the specific densities, units allowed, open space required, floor-area-ratios, etc. and by omitting the 1990 HE which sets out the number of dwelling units per square footage of lot area means there is a change to the physical environment. The associated impacts cumulatively are also not considered -- without CURRENT factual basis (e.g. a study of what has occurred e.g. in the years during which the appeal of the Housing Elements has been debated) and a clear study with all the projects which have rezoned, been given Variances, height and bulk exceptions, additional units, etc. -- one cannot compare the 3 alternatives or even attempt to cobble pieces of them together to form yet another alternative to figure out the real impacts with a full data and needs analysis which is NOT provided. The statements of conclusion are not based on facts. What portions of each of the 3 alternatives do the projects already approved from 2004 to December 18, 2013 are satisfied under the 3 alternatives? What portions do they digress from the 3 alternatives? Where is the data and analysis of these projects? And for

those in the pipeline yet to be approved since 2009? How many are there, where are they, what categories of income do they meet (e.g. “very low income,” “low income,” “moderate income,” “market rate income,” “above market rate income”)?

The DRAFT EIR – Appendix A, Page 20 shows the number of units in the pipeline as of 2009. Where is the current data (2013 actual and 2014 pipeline) used for the HERAA?:

**Table 7**  
**New Housing Construction Pipeline (2<sup>nd</sup> Quarter of 2009)**

Type of Activity	No. of Projects	No. of Units
Under Construction	156	6,510
Building Permit Approved/Issued	168	2,850
Building Permit Application Filed	316	4,480
Planning Department Approved	92	6,200
Planning Department Filed	130	34,750
<b>Total Pipeline</b>	<b>862</b>	<b>54,790<sup>1</sup></b>

*Source: City and County of San Francisco, Planning Department, Pipeline Report, 2009 Quarter 2, July 2009, at page 3.*  
<sup>1</sup> Total No. of Housing Units as presented in the Pipeline Report.

R30-27 (Cont.)

<sup>8</sup> City and County of San Francisco, Planning Department, Part I: Data and Needs Analysis, April 2009, at page 83.

Of these projects, what is the breakdown for the income levels? Even with projects that are “approved in spite one or more significant effects thereof,” they again do not address housing for ALL income levels: very low, low, moderate and market-rate. In fact, a recent Examiner article, dated January 8, 2014, mentioned the loss of the middle-class in SF. The number of housing units for the low (\$45,000 + \$100,000 two people) and moderate (\$67,000 single or \$50,000 + \$42,000 two people) to “above moderate” (\$85,000 + \$65,000 with two children or \$100,000 single) income people is steadily declining and will continue to be in decline based on PlanBayArea / OneBayArea documents. The situation will hit a crisis where only the very low (\$35,000 single with one child) and the market-rate (\$75,000 + \$100,000 two people, no children) residents will be able to live in SF. That will destroy the middle-class neighborhood character of the city where many of the City’s support service working people such as firefighters, teachers, police, cab drivers, Muni bus drivers, etc. live. With this kind of housing development scheme, the regular working people will be almost non-existent in the City and will have to commute in.

Look at this chart from DRAFT EIR Appendix A Page 7 which shows the “low” income housing (4.2% of actual production & 2.2% of RHNA goal) and “moderate” middle income housing (7.1% of actual production & 3.0% of RHNA goal) not being produced to keep these people in SF:

In order to meet the projected RHNA allocation, San Francisco must construct approximately 4,159 new dwelling units per year, an approximately 62% increase in annual housing production. Table 4, below, details the annual housing production targets needed to meet the RHNA allocation for the current planning period (2007-2014).

**Table 4. HOUSING PRODUCTION TARGETS, 2007-2014 and ACTUAL PRODUCTION, 2007**  
Including Acquisition and Rehabilitation of Existing Units as Permitted by HCD Guidelines

Income Category	ABAG/HCD Regional Housing Needs Determination (RHND) Production Goals 2007-June 2014		Annual Production Target to Meet Total Production Goals*	Actual New Housing Production and Acquisition/Rehabilitation 2007**		
	No. of Units	% of Total		No. of Units	No. of Units	% of Actual Production
Very Low (< 50% AMI)	6,589	21.1%	879	718***	25.0%	10.9%
Low (50-79% AMI)	5,535	17.7%	738	120	4.2%	2.2%
Moderate (80-120% AMI)	6,754	21.7%	901	203	7.1%	3.0%
Market (over 120% AMI)	12,315	39.5%	1,642	1,832	63.8%	14.9%
<b>TOTALS</b>	<b>31,193</b>	<b>100.0%</b>	<b>4,159</b>	<b>2,873</b>	<b>100.0%</b>	<b>9.2%</b>

\*Annual production based on 7.5 year reporting period (1 January 2007 - 30 June 2014)

\*\*Source: Housing Inventory 2007

\*\*\*Includes 306 units acquired or rehabbed in 2007

<sup>10</sup> Ibid.

Case No. 2007.1275E  
Notice of Preparation

San Francisco Housing Element Update  
October 2008

And, the more the City fails to meet the RHNA targets for “affordable housing,” the more units the City will be expected to build so the number given to the City will be increasing only to create more housing more for the very low and the market-rate which is detrimental to the low and moderate (middle-class) housing situation. With NO penalties for not building enough housing units for the low and moderate, this trend will continue. Putting in funding mechanisms to try to plug the hole in the dam so that more low and moderate housing is built will not work without serious housing built for the working class.

Any such measure must include the low and moderate housing stock as well.

4. Page VII-1: I do not believe there are “substantial environmental advantages (CEQA Guidelines Sec. 15126.6(c))” for Alternatives B & C. I do not believe that GHGs are being reduced by inviting more and more people to live in SF. More resources will be consumed. Less land for many activities. More demands will be put on the transit system which is overcapacity and will not be

R30-27  
(Cont.)

R30-28

able to transport all the people without developing new and expanded services, including for Muni, for the parks, for recreation, for public safety, for water treatment and transport, for delivery of goods and services. There will be more GHGs per Page 21, DEIR Part 1 Page 21:

**Table V.I-4**  
**Projected Greenhouse Gas Emissions from Residential Development (2020 and 2025)**

Emission Source	GHG Emissions (MT CO <sub>2</sub> e per year)		
	2020	2025	
Construction Emissions	3,670	3,702	
Operational Emissions	Natural Gas Consumption	349,572	360,989
	Electricity Use	223,790	231,099
	Water Consumption	17,378	17,499
	Waste Generation	10,687	11,017
	Motor Vehicle Use	4,088,369	4,219,837
	Landscape Equipment Use	39	40
	<b>Total Operational</b>	<b>4,689,835</b>	<b>4,840,481</b>

*Note: Construction emissions include housing units constructed between 2009-2020 and 2009-2025 and are annualized over the projection period (11 years and 16 years, respectively).*  
*Source: Christopher A. Joseph & Associates, May 2010. Calculation data and results provided in GHG Memorandum dated May 28, 2010.*

As shown in Table V.I-4 annual construction GHG emissions were estimated to be 3,670 MT CO<sub>2</sub>e per year for 2020 and 3,702 MT CO<sub>2</sub>e per year for 2025. The construction emissions are substantially less than those estimated for operational emissions. Annual operation GHG emissions would result in 4,689,835 MT CO<sub>2</sub>e in 2020 and 4,840,481 MT CO<sub>2</sub>e in 2025. As with the baseline emissions, the vast majority of operational GHG emissions are associated with motor vehicle use.

5. Page VII-2: "The 2004 Housing Element and 2009 Housing Element do not include any changes to the land use objectives and policies in the City's Area Plans or Redevelopment Plans. However, the proposed Housing Elements include the use of specific neighborhood and area plans as part of the planning process. For example, Policy 11.6 in the 2004 Housing Element encourages a "Better Neighborhoods type planning process," and Policy 1.4 of the 2009 Housing Element would "Ensure community based planning processes are used to generate changes to land use controls." Thus, while implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, they would nonetheless guide future development within plan areas and throughout the City, and could influence the...

Page VII-3 (above cont'd): "uses within future plan areas, such as whether an area allows mixed-use development or residential uses only."

R30-29  
(Cont.)

↑ Areas not in plan areas where there is low-density housing become densified beyond the basic Planning Code definitions of RH-1 (single-family) and RH-2 (two-family), usually with a garage for at least 1 vehicle. With low-emissions vehicles, it is not the vehicle these days that is putting out as much pollution as the commercial vehicles (including large distribution trucks) which now inundate and overburden the residential streets in San Francisco. As well, the buses and shuttles now have to transport employees and children to school since the place of employment is not necessarily in SF nor are the schools to which the children are being transported. Such buses and shuttles are not necessarily full so per rider, there is a lot of pollutants since these are not electric or hybrid vehicles.. All of this is not in the HERAA which would indicate greater CEQA category NO (Noise and Vibrations) and TR (Transit) impacts. On what objective data are the conclusions based that “community based planning” poses the least environmental impact than maintaining low-density residential as zoned? What objective data shows that real estate without garages for families with children and dependents will cost more than those without?

R30-30  
(Cont.)

6. Page VII-3: “Housing element law was enacted to ensure that localities plan and make land available for new housing in all income categories.”  
 “The proposed Housing Elements are policy documents that provide direction for accommodating new housing, at all income levels, driven by population growth.”  
 The problem is that although housing at “all income levels” may be produced, they are unequal and do not fulfill the criteria of Proposition M, Sec. 101.1 of Planning Code: Master Plan Consistency and Implementation,” (b)(2) That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;...”.

Where is the data that shows the number of housing units for each economic income category that shows the equality of housing production in each income category? In order to keep the low-moderate and middle-class (RH-1 and RH-2 density areas in general) in the city, the city needs to produce family-sized housing for low-mid income groups. That is not being done so that the market-rate housing and the very low income housing are the only ones being built. Where is the data from the 1990 through 2013 which shows how many units of housing have been created for each income category to sustain the level of economic diversity which leads to cultural diversity of our city? Otherwise, the 2004 and 2009 Housing Elements and Alternatives A, B, and C all policies that guide the city to become a city for only the very poor and the very rich with what little middle-class people there are to pay disproportionately as part of their income the new costs associated with such Housing Element plans and alternatives. See Pages 19-20 of 2004 Housing Element Data Needs & Analysis which states that such “family sized” units have not been produced for DECADES (**even back as far as 2004!!**):

Occupation	Hourly Wage	Annual Wage	Number of Workers	Total Annual Wages
Cooks	\$ 10.41	\$ 21,640.00	410	5,610
General Office Clerks	\$ 11.77	\$ 24,474.00	220	18,560
Receptionists and Information Clerks	\$ 12.46	\$ 25,930.00	610	8,430
Painters, Construction & Maintenance	\$ 16.57	\$ 34,460.00	190	1,930
Carpenters	\$ 20.86	\$ 43,390.00	230	3,420
Registered Nurses	\$ 21.99	\$ 45,732.00	410	7,370
Electricians	\$ 23.79	\$ 49,490.00	180	2,180
Systems Analysts, Electronic Data Processing	\$ 29.74	\$ 61,000.00	1,640	5,760
General Managers & Top Executives	\$ 40.51	\$ 75,000.00	1,000	20,110

Source: EDD, Occupational Employment Statistics Survey

R30-30  
(Cont.)

San Francisco has not produced a large number of family-sized units for a number of decades. This is explained in part by the lower profit margins associated with constructing family housing units. But it is also a response to demand, which is in turn affected by a number of factors. First, the cost of family-sized housing is prohibitive to many families who currently live in smaller units. Second, quality of life issues, perceived or real, affect families' decisions to live in the city: the quality of the school system, the general cost of living, access to open space, sense of security, the environment. This can encourage existing families to leave the city and discourage families living elsewhere from moving into the city. Thus, to house the work force requires not just building housing appropriate to a certain demographic but creating a place that, overall, is inviting to them; creating livable neighborhoods, more than just constructing units, is essential. Furthermore, in San Francisco, the right kind of unit must

Housing Element Part I 19 Adopted May 13, 2004

be encouraged. For families, this does not mean single family homes; rather, given land availability, three and four bedroom units in multi-unit buildings would be appropriate.

- R30-31 7. Page VII-3: Where is the data and analysis of the projected number of units, individual people count and household count (please define household (e.g. 3 people?)) for each of the alternatives?
- R30-32 8. Page VII-3: Where is the data and analysis of how SF demonstrated that there is "adequate land available for residential development to accommodate the total RHNA?"
- R30-33 9. Page VII-5: City may adopt version of HE that is a combination of the alternatives. How can that determination be made without the initial thorough, accurate and complete analysis for all 3 alternatives as the starting point, let alone start the discussion about a "combination of the alternatives"? Before any decision is made on any individual alternative in this "Revised Alternatives" document, there should be at least another alternative of the "combination of the

R30  
-33  
(Cont.) alternatives” before a decision is made. The unknown potential impacts of cobbling together bits and pieces from 2 or more of the 3 alternatives need to be analyzed thoroughly for impacts including cumulative impacts and other issues unknown since the cobbling has not taken place yet.

10. Page VII-5: “Alternative C: 2009 Housing Element-Intensified. This alternative includes concepts that more actively encourage housing development through zoning accommodations....concepts are intended to encourage housing by: 1) allowing for limited expansion of allowable building envelope for developments meeting the city’s affordable housing requirement on site with units of two or more bedrooms; 2) requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines; 3) giving height and/or density bonuses for development that exceeds affordable housing requirements in locations that are directly on TEP rapid transit network lines; 4) allowing height and/or density bonuses for 100 percent affordable housing in all areas of the City except in RH-1 and RH-2 zones; and 5) granting of administrative variances (i.e. over the counter) for reduced parking spaces if the development is: a) in an RH-2 zoning district that allows for greater residential density (e.g., adding a second unit without required parking); b) in an area where additional curb cuts would restrict parking in areas with parking shortages; or c) on a Transit Preferential Street.<sup>2</sup>

Again, see comments on Pages 1-2 of this document on Jordan Park being a low-density microcosm of suburban-like life in SF. See also the TEP map on Page 2 showing Jordan Park in the middle of it all. See also Comment #23 later. No impact analysis for an extraordinary situation done. No data analysis for similar areas in SF included as to conclusions in the HEARR.

R30  
-34 This Alternative C does not take into account the Residential Design Guidelines of RH-1 and RH-2 zoning areas and allows maximum buildout. How would the residential character of several low-density neighborhoods be impacted? Where is the data and analysis for these areas?

Where is the data which shows that property with reduced or no parking will attract only people who do NOT bring in new vehicles which end up overburdening the streets which in turn creates the artificial state of the entire city having “areas with parking shortages” (Alt C: 2009 Housing Element-Intensified, p. VII-7) which under this Alternative C Policy of “Granting of administrative variances (i.e. over the counter) for reduced parking spaces” then directs more housing with no parking in RH-2 zoning districts which then bring in more people with the additional units with now greater density with people who bring vehicles which then causes overcrowding of established neighborhoods. This is made worse by the same residents that reside in the “no parking” units and rent or lease parking space elsewhere or park a bit farther and take public transit which is slow and overcapacity. This leads to more pollution.

SFMTA / SFCTA is implementing parking so that there will be more areas with parking shortages if there are not already those areas all over SF as it is. With this condition being generated through this scheme, the Planning Department than moves in behind SFMTA’s / SFCTA’s restrictive parking process and they say that there is a parking shortage and thus no more curb cuts can be made so the only alternative is to build dense housing to the full building envelope whether or not the neighborhood character of an established area is upheld. This method of creating the situation to further justify a development plan – which is the Housing Element -- that is going against common sense, against lowering GHGs, against the neighborhood values in established areas, against an entire homeowners’ association’s wishes to accommodate one person or a handful of people who have disseminated a development plan for the entire city is not about democracy. It is against the Planning Code. It will also violate Proposition M.

11. Page VII-6: “As noted previously, adoption of the proposed Housing Elements would not directly result in the construction of residential units, but instead would shape how and where new residential development would occur, while ensuring there is adequate land available to meet future housing needs.”

R30  
-35

The alternatives would “shape how and where new residential development would occur” but the alternatives do not analyze the impacts based on shortfalls to NO (Noise and Vibrations) and TR (Transit). Without the full analysis and data for each area where the projects in the pipeline are to be placed, it will be difficult to know the impacts of each and the destruction of the environment due to cumulative effects, especially of Alternative C which is the “intensified” version. Where is the data analysis for the entire city on this? Certain areas of the city which are low-density zoned will encounter overcrowding. What current analysis for this HERAA has been done to predict areas of overcrowding in established neighborhoods prior to implementing any of the Housing Elements / any of the Alternatives prior to making the conclusory statement that NO mitigation measures will be needed nor any further data analysis and needs be required?

12. Page VII-6: “The analysis of alternatives that follows this discussion is based on the following generalized assumptions regarding the location, density, and type of new housing anticipated under each alternative. These assumptions in turn are based on the policies and implementation strategies particular to each project alternative, as listed in Table VII-1, and the Planning Department’s and other City department staff experience and expertise related to residential development in San Francisco.”

R30  
-36

Would like to see the data for each Alternative and where and the type of housing for the locations used in this HERAA document. Please provide. I believe a complete and thorough and accurate list is required and should have been included in the HERAA as well. See the following from Page 86 of the 2004 Housing Element Data Needs & Analysis the City says it is NOT needed:



building square footage, number of stories, building height, lot area, floor area ratio, and other pertinent data. The parcels have also been identified by geographical divisions used by the City Planning Department to allow comparison of data over time.

Data were collected from various sources including the Assessor's Records, Dunn & Bradstreet, and databases kept by the Department of Building Inspection and the City Planning Department. These data are usually updated yearly and were considered current at the time this report was drafted in May 2001. While not perfect, the information gathered is generally accurate at least 90% of the time. Field surveys conducted by the Planning Department for the industrial protection zone and mixed use housing zone land use study, the Better Neighborhoods 2002 program areas, and select transit-oriented neighborhood district supplemented and improved this database. While the Planning Department recognizes that some individual records may be inaccurate in one attribute or another, it considers the aggregate statistical calculations to be within reason. Thus, individual listings of parcels by addresses were not included in this report.

Table I-56 below disaggregates this new housing potential according to the parcels' existing state of underutilization or lack of development. There are about 3,300 parcels classified as undeveloped where over 18,000 new housing units could potentially be erected. In addition, Mission Bay has been slated to accommodate 6,000 new units. Another 237 lots are also seen as developable for residential uses, possibly yielding almost 5,150 new units.

R30  
-36  
(Cont.)

13. Page VII-7: For Alternative B in Table VII-1, where is the data and analysis of buildings along the neighborhood commercial districts where "higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households"? How many single-family or duplex buildings were demolished to make units for the lower income or middle class since the Planning Commission certification of the 2004 Housing Element and the 2009 Housing Element? Where is this data in this alternative analysis that was used to indicate there was no "harmful effects"? What areas specifically have these developments been built in and how have they impacted the noise, vibrations and the transit system and congestion on the streets thus far? Where is the data and analysis on this?

R30  
-37

14. Page VII-7:

R30  
-38

R30  
-38  
(Cont.)

▲ For Alternative C in Table VII-1, where is the data and analysis of where the “additional curb cuts would restrict parking in areas with parking shortages”? What are the names of the streets or block and lots or a map of these areas that were used to potentially grant “administrative variances (i.e. over the counter) for reduced parking spaces”? What are the “Transit Preferential Streets”? What are the cumulative impacts of having reduced parking spaces in development on these streets to adjacent streets? Where is the data for the noise and vibrations and transit impact that was used to incorporate this policy process #5 (a through c) in the 2009 and revised alternatives document release on Dec. 18, 2013? When all the development is produced with reduced parking spaces in the RH-2 zone districts (“allows for greater residential density”) citywide, how is that impacting middle-class and lower income families who need cars to transport their children when the non-working transit system is not in place to support such development? Alternative C encourages the flight of the low income and middle-class out of the city.

R30  
-39

15. Page VII-8: Alternative B: (Stricken language) “Implementation Measure 1.2.1: The Planning Department will develop proposals in neighborhood commercial districts (NCDs) well served by transit to strengthen their functions as a traditional “town center” for the surrounding residential districts.”

It is already done. I am assuming the Court struck this language because it questioned the legality of it? Why has Planning already implemented this then? The Housing Element directed there to be a “transit center” at Geary and Masonic. The Planning Commission has approved and has completed the “City Center” at Masonic & Geary as a form of “town center” even though it would create impacts to the neighborhood in terms of Muni overcrowding and traffic congestion in that area.

R30  
-40

16. Page VII-8: Alternative B: “Implementation Measure 1.3.1: ~~“Downtown areas and areas subject to a Better Neighborhoods type planning process will be expected to absorb major office and residential developments over the next decade. Planning and zoning code changes should include floor to area ratio exemptions.~~ These development bonuses would be conferred only in cases where in return the development will provide major public benefits to the community.”

The “floor-to-area ratio exemptions” mentioned in the stricken language in the Revised Alternatives Analysis document for this Implementation Measure 1.3.1 have been and continue to be made by Planning Commission. How many floor-to-area exemptions have passed while the Housing Elements are appealed? Where is the data to show that such exemptions have NOT caused any significant environmental impacts when there is no such data to look at when the HERAA was released?

What are “major public benefits”? If it means that more “affordable housing” (if focusing only on the very low income housing, then it will not work to have a diverse economic base of people in the city) without consideration for the immediate people living very close to the site (e.g. 1,250 ft radius), then the neighborhood character of the mature residential areas can be undermined with additional traffic congestion, transit impacts, noise and vibrations, air quality issues. Where is the data and analysis that was done for this to be accepted into this “Alternative B, 2004 Housing Element – Adjudicated”?

R30  
-41

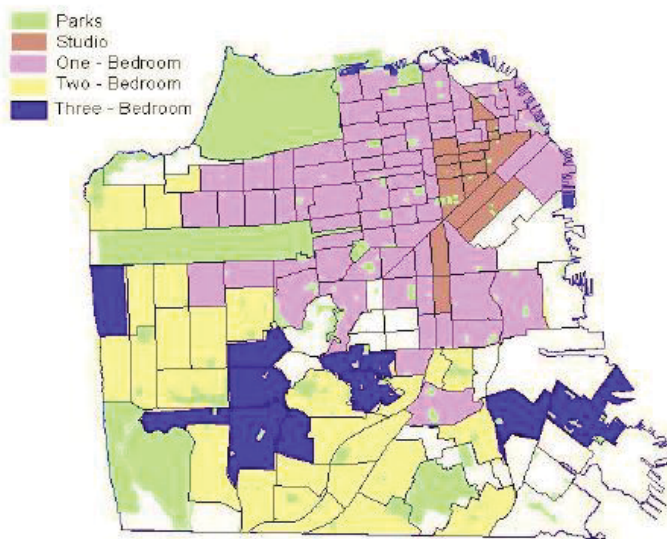
17. Page VII-9: Alternative B: “Policy 1.4: Locate in-fill housing on appropriate sites in established residential neighborhoods.”

Where is the list of “appropriate sites” in these “established residential neighborhoods”? Without a baseline, it is hard to project impact. Some “established residential neighborhoods” do not have “in-fill” housing (e.g. if one considers “in-law” or “secondary units” as “in-fill housing”) because the

neighborhood does not support them). The residential character of the neighborhood and the impact with the additional residents add to the need for more energy, more likely they are not all on a "transit corridor" and thus will have use of a vehicle and add to the congestion in the city, impact the neighborhood noise level and vibration level with more people milling about at all hours and will add to the demand on Muni and other transit services IF they do not get access to their own vehicles or taxis which will increase and drive people around even more than the current fleet today. What is the added pollution and congestion from all of these new "taxis" and people? Where is the data that was used to come up with the alternatives in this HERAA?

The following is the predominant housing types map of the City from the 2004 Housing Element Page 41. The proposed HERAA would so most of the pink and yellow will diminish leading to overcrowding.:

*MAP I-4  
Predominant Housing Unit Size*



For better map readability, please see document on-line at  
[http://www.sfgov.org/planning/citywide/c1\\_housing\\_element.htm](http://www.sfgov.org/planning/citywide/c1_housing_element.htm)

R30  
-41

18. Page VII-9: As is clear from the stricken text for Alternative B, Policy 1.6.2, the Planning Department was intent on “increasing height limits, eliminating density requirements and modifying off street parking requirements in the Transbay/Rincon Hill Redevelopment survey areas. The Mid-Market redevelopment survey area will be rezoning to include mixed-use residential areas and reduced residential parking requirements.”

The issue with Policy 1.6.2 is not that these proposed changes are limited to these areas described. The changes since the 2004 Housing Element was certified by the Planning Commission shows that other areas of the city were impacted by new residential parking requirements in an environment where the transit network was already failing. Although Planning zeroed in on the Transbay / Rincon Hill and Mid-Market redevelopment areas, there has not been a complete and accurate data analysis of the impact of moving forward with the reduced residential parking requirements in these areas in relation to the congestion created with an under-capacity Muni system, an overcapacity of vehicles coming into the city from the Peninsula, Marin County and the Bay Bridge with BART incapacity as well.

Where is the current data needs and analysis for this policy to be adopted which shows no significant environmental impact that was used in the publications for the 2004 Housing Element-adjudicated and the 2009 Housing Element –Intensified as well as this current HERAA?

Where is the data analysis to show the impact on additional noise and vibrations, for additional transit incapacity? Where is the data analysis for each so-called “established residential neighborhood” in re impacts (Policy 1.4 “Locate in-fill housing on appropriate sites in established residential neighborhoods”)? Please provide the document you used to do this analysis prior to reaching the conclusions for this Draft EIR document for the 2004 and 2009 Housing Element Alternatives Analysis.

19. Page VII-9: “Policy 1.6: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects.”

With the housing shortages in categories other than “very low income” and “market rate,” it is surprising that in order to have a diverse economic and vibrant cultural community inclusive of people of all categories of income, you do not have incentives for the people with incomes that this city has decided to neglect – that of the middle-class. The low income group has subsidies which will help pay for many of their needs. The upper income is not dependent on any financial assistance. The middle-class will be disappearing from the city to create a city for only the wealthy and the very poor, some of whom may be serving the wealthy. Solving the middle-class housing shortage with new builds is one thing. To destroy what is left of the starter homes in the RH-1 and RH-2 zoned lots of established neighborhoods with additional in-fill units in all of the RH-2’s as proposed in BOTH Alternative B and Alternative C, will mean the buildings will cost MORE and make them unaffordable to the middle-class just trying to start out. The city will kill off the middle class. They also do not need additional debt so there must be another program such that the burden is not tossed back on them. Look at the history of the production of housing for the different income levels since 1999 within this document. You will see there is very little built except for the “affordable, low income” and “market rate” housing. It is not true that there is not enough “affordable housing being built” in relation to the other income categories which are left out.

See again Comment #3, Table 4. Again, keep in mind that data does not only include for new units which is the RHNA unit count. The low percentages show also for remodels AND acquisitions so the “% of Actual Production” / “% of RHND” is even lower than the 4.2%/2.2% and 7.1%/3.0% respectively for the “low” and “moderate” income categories. No NEW data has been

used to conclude in the 2004 & 2009 Housing Element Revised Alternatives Analysis document of Dec. 2013 that the statistics are even worse today and has significant impact on physical changes to the environment.

R30  
-43  
(Cont.)

20. Page VII-10: Alternative B: "Implementation Measure 1.6.4: The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit."

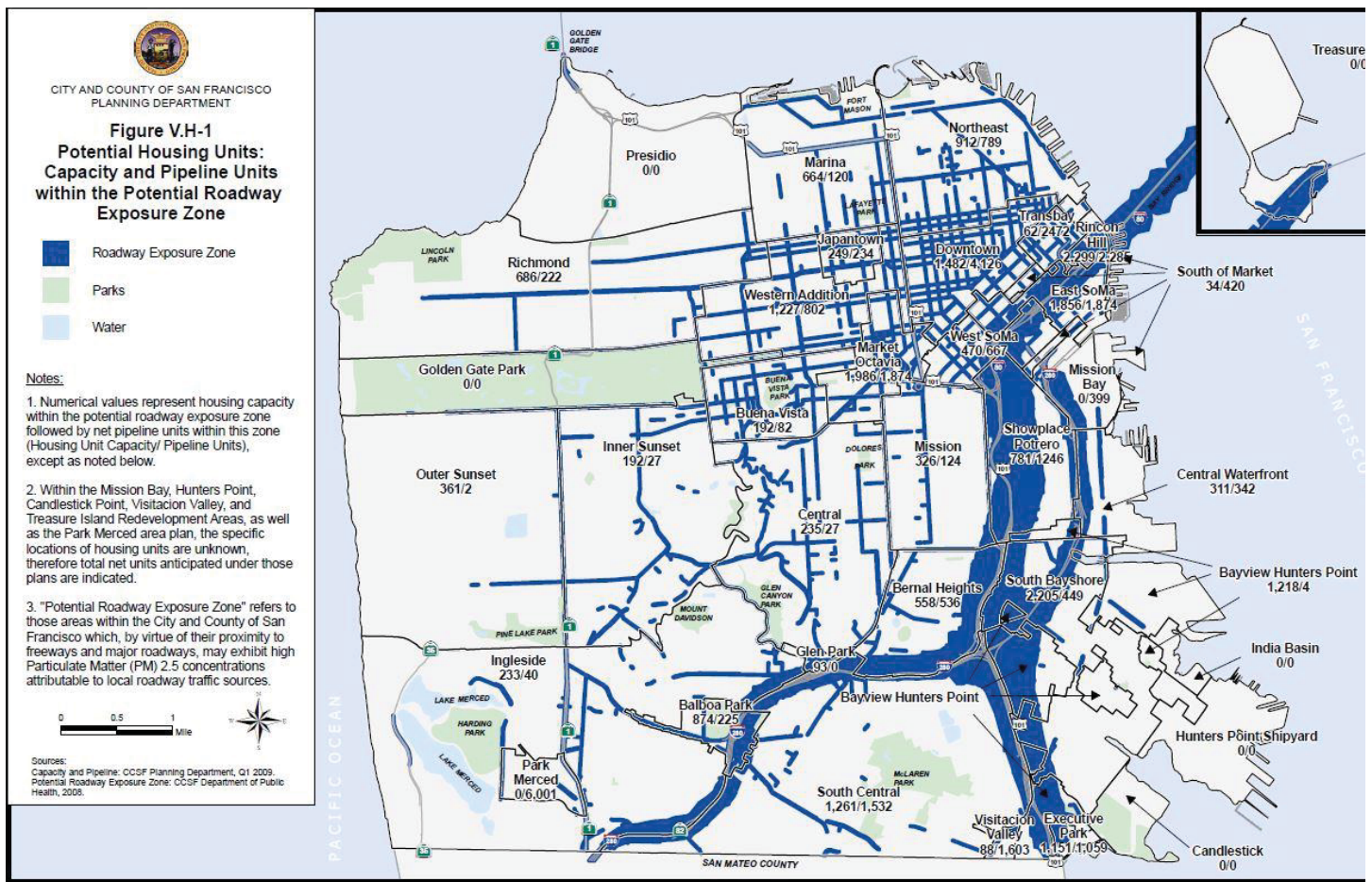
The Planning website does not have the "Land Use Element" document that has been adopted yet. In order to determine the feasibility of the Revised Alternatives policy document (Alternatives A, B or C), one needs to define exactly where the "areas of mixed-use development" that will be "focused along transit corridors that are determined to be served by sufficient and reliable transit." It appears that the policy document is being used to drive changes to city land use without the data needs and analysis being done first. The transit network is not "sufficient" and it is not "reliable." The conclusions drawn for each of the Alternatives ASSUMES many things not based on fact. The assumptive nature of the document leads to the illogical conclusions that the policies and implementation measures within each will not lead to "significant" environmental impact. A reasonable person can ascertain that if such a grand plan is being envisioned and for it to work, one needs to ensure that all the infrastructure is in place with all the resources available to support the number of people projected for the city. This analysis and data gathering has not been done for the entire city, for all neighborhoods whether "established" or not.

R30  
-44

From a transit network impact point of view, numerous articles and anecdotal comments from riders of transit are seen daily from various sources (see attached at the end).

Where is the "data needs and analysis" to determine that there will be no "significant" effects or that such impacts will be mitigated to "less than significant" if there is no basis and every lot has not been surveyed and defined for such development has not occurred? Please provide the inventory of land suitable for residential development that was used for this HERAA document.

In addition, what is the sense in putting so many units of housing along these "transit corridors" where the inhabitants are going to be exposed to potential roadway contaminants, health hazards from excessive vibrations, noise, emissions, etc.? What is the point in putting the public at risk in these locations? Where is the latest study on this since more units HAVE been built and what analysis was done for each of the new alternatives shown in the HERAA? See DEIR Fig. V.H:



R30  
-44  
(Cont.)

21. Page VII-10: Alternative B: "Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit."

R30  
-45

It assumes that ONLY a SECOND unit will be installed but the ordinance does not stop at only a "secondary" unit. It also goes contrary to the neighborhood character of low-density housing areas such as Jordan Park.

22. Page VII-10: Alternative B: "Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit."

R30  
-46

Unfortunately, the proposed amendments are allowing "secondary units" into all buildings in all residentially-zoned lots – even low-density single-family and duplex lots. Jordan Park homes may be close to Geary (neighborhood commercial district with public transit) but it is not that kind of neighborhood. Jordan Park is exceptional in this regard as pointed out

23. Page VII-10: Alternative C: "Requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines."

R30  
-47

See previous comments on Pages 1-2. See also Comment #10. No thorough data analysis done, no needs analysis done. Broad brushstroke approach used to make conclusory statements in HERAA.

24. Page VII-11: Alternative C: "Giving height and/or density bonuses for development that exceeds affordable housing requirement in locations that are directly on TEP rapid transit network lines."

This statement makes it attractive to developers to continue building "affordable" units while neglecting the other income categories of persons who cannot find housing. This will lead to a disproportionate number of residents from lower-middle income categories from residing in the city.

Numerous articles exist on the middle-class being driven out of the city (see attached at end).

25. Page VII-12: Alternative B: "Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households."

What categories of income does this policy statement apply to? Different affordability criteria are used by different agencies. If it is HUD, the number of units being built in SF for the lower and middle class especially are not being met. The middle class units are severely lacking in this entire scheme. People today who are teachers, waiters, fire fighters – "regular people" who used to be common – are no longer the majority of people living in this city. This is the flight of the middle class and the lower class.

Here is a story of the how the middle class was already pretty pushed out even in Oct 2013 per the Atlantic Cities article:

<http://www.theatlanticcities.com/housing/2013/10/where-even-middle-class-cant-afford-live-any-more/7194/>

## Where Even the Middle Class Can't Afford to Live Any More

- EMILY BADGER
- OCT 10, 2013



Shutterstock

High-cost cities tend to have higher median incomes, which leads to the simple heuristic that, sure, it's costlier to live in San Francisco than in Akron, but the people who pay bills there make enough money that they can afford it.

In reality, yes, the median household income in metropolitan San Francisco is higher than it is in Akron (by about \$30,000). But that smaller income will buy you much, much more in Ohio. To be more specific, if you make the median income in Akron – a good proxy for a spot in the local middle class – 86 percent of the homes on the market there this month are likely within your budget.

If you're middle-class in San Francisco, on the other hand, that figure is just 14 percent. Your money will buy you no more than 1,000 square feet on average. That property likely isn't located where you'd like to live. And the options available to you on the market are even fewer than they were just a year ago, according to data crunched by Trulia. To frame this another way, the median income in metro San Francisco is about 60 percent higher than it is in Akron. But the median for-sale housing price per square foot today is about 700 percent higher.

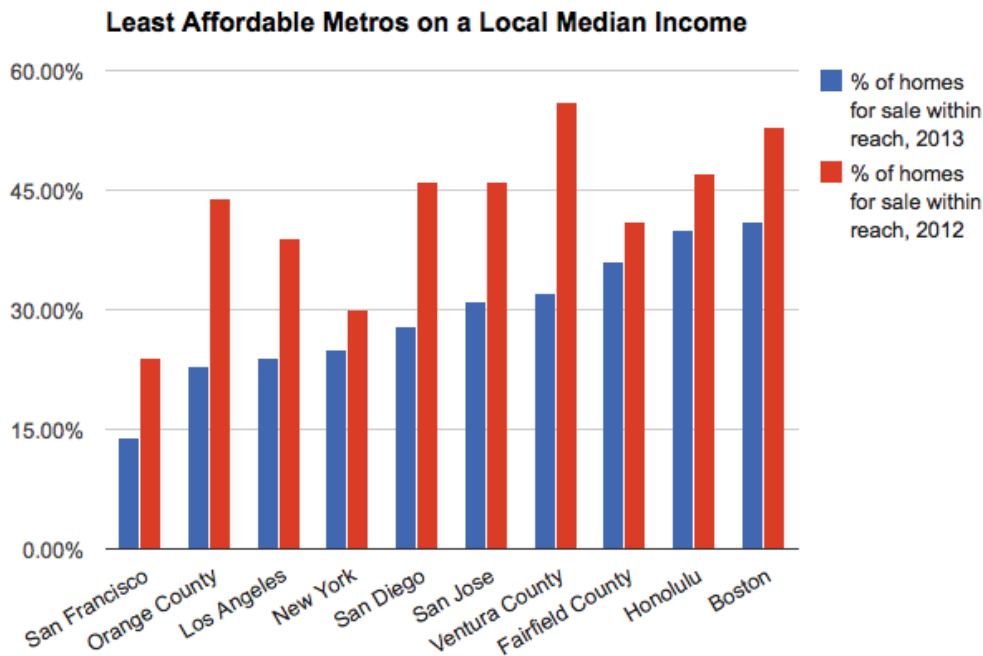
The gulf between those two numbers means that the most expensive U.S. cities aren't just unaffordable for the average American middle-class family; they're unaffordable to the relatively well-off middle class by local standards, too.

To use an even more extreme example, the median income in metropolitan New York is about \$56,000 (including families in the surrounding suburbs). If someone making that much money wanted to buy a home on the market this October in Manhattan, the most expensive home they could afford would cost about \$274,000. A mere 2.5 percent of for-sale housing that's available in Manhattan now costs that little. Oh – and those properties are averaging 500 square feet.

R30  
-49  
(Cont.)

Trulia ran these numbers based on the assumption that a family shouldn't spend more than 31 percent of its pre-tax income on housing (and that it must pay local property taxes and insurance). This data also assumes that a family makes a 20 percent down payment on a home – a daunting feat even on a six-figure income in somewhere like Los Angeles or New York.

By those calculations, these 10 metros are the least affordable, using Census data on median incomes (note that the data refers to metros, not cities):



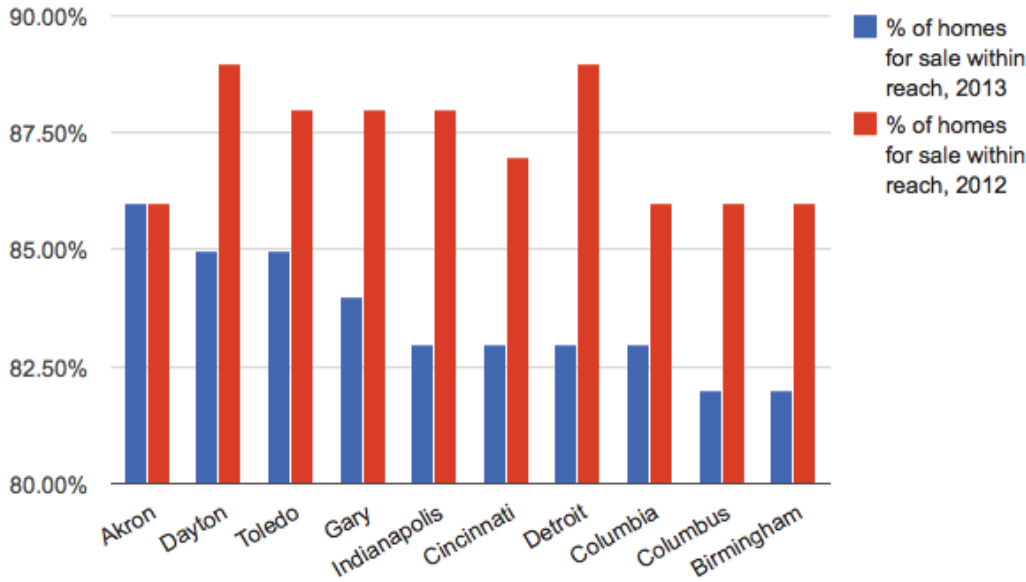
Data courtesy of Trulia



△ In San Francisco, a household making \$78,840 a year can top out buying a home worth about \$409,000. 24 percent of the homes for sale in the area were below that threshold last October. Now it's just 14 percent. In fact, in every one of those 10 metros, a smaller share of homes are considered affordable now to the middle class than last year.

The same trend is true even in those metros where the vast majority of housing is accessible on a local median income:

**Most Affordable Metros on the Local Median Income**




Data courtesy of Trulia

R30  
-49  
(Cont.)

Affordability is effectively declining as home prices are rising (and at a much faster rate than median incomes). Within the most expensive metros, the most affordable housing is also located in the areas that require some of the longest commutes. In metro New York, for instance, the Bronx and Nassau County are home to the bulk of the most affordable housing in the region.

Or, there's always a move to Akron. Here is the full data from the 100 metros that Trulia examined:

<http://trends.truliablog.com/2013/10/middle-class/>  [http://public.tableausoftware.com/static/images/FG/FG5W9PQPG/1\\_rss.png](http://public.tableausoftware.com/static/images/FG/FG5W9PQPG/1_rss.png)  
style='border: none' />

[Learn About Tableau](#)

Top image: [ventdusud/Shutterstock.com](http://www.shutterstock.com/ventdusud)

Keywords: Boston, Detroit, Honolulu, Los Angeles, New York, San Diego, San Francisco, Affordable Housing, Mortgages, Housing Market, Middle Class



Emily Badger is a staff writer at The Atlantic Cities. Her work has previously appeared in *Pacific Standard*, *GOOD*, *The Christian Science Monitor*, and *The New York Times*. She lives in Washington, D.C. [All posts »](#)

Perhaps in response to the above article, this one from Nov. 27, 2013 in the SF Examiner highlights how not enough of the aid is for the middle class rents and housing costs:

<http://www.sfexaminer.com/sanfrancisco/sf-housing-official-says-middle-income-units-have-not-been-focus-of-government-programs/Content?oid=2636045>

## SF housing official says middle-income units have not been focus of government programs

by Jonah Owen Lamb @jonahowenlamb  
November 27, 2013



• COURTESY TECHCRUNCH

- Mayor Ed Lee's office is looking to address affordable housing issues in The City.

On the heels of a poll showing San Franciscans are worried most about the cost of one of life's necessities — shelter — Mayor Ed Lee's housing adviser says The City has not done enough to aid the middle class as rents and housing costs increase.

"Is there more that we can do for this band in the middle?" Director Olson Lee of the Mayor's Office of Housing said rhetorically. "There's clearly a demand for affordable housing we need to address."

A majority of people polled in a recent survey blamed the increasing price of housing, including rents and home prices, for San Francisco's lack of affordability. But the blame cannot all be laid on the steps of City Hall, Lee said. Economic cycles, housing policy focused on the poor and funds linked mainly to construction of low-income units have all helped exacerbate the problem.

Much of The City's housing policy in past decades has been focused on creating housing for the poor, not the middle class, said Lee, because people at the bottom are by far the most in need.

Of the roughly 20,000 affordable- and low-income units in The City's portfolio of housing — not including Housing Authority units — about 15 percent are part of homeownership programs for the middle class.

That program is The City's main way to help those people find housing, he said. The yearly income level to qualify for the aid is between about \$45,000 to \$86,000 for one person.

"I think the homeownership has been a much smaller portion of the goal of this office over the last 20 years," Lee said.

Recently, he said, The City has committed to doubling the down-payment assistance program. That would amount to about \$15 million from the Housing Trust Fund.

But more than anything, construction is what will have the largest impact on housing costs, he said.

The City can incentivize the building of more housing, but new construction is subject to the whims of economic cycles. During the Great Recession, middle-class housing was not an issue since no one was building, Lee said.

"Every cycle has their ups and their downs. This is a cycle just like any other cycle. We are experiencing a spike in rents and prices based on a demand," he said.

Right now, there is a building boom and it will impact prices, he said.

According to the Planning Department, there are 6,000 new units under construction and roughly 32,000 entitled units ready to build. What's more, planning has been completed for roughly 72,000 units for larger projects in The City, including Treasure Island, Parkmerced and Hunters Point.

Here is one in the Jan. 8, 2014 SF Examiner on the loss of the middle class in SF:

R30  
-49  
(Cont.)



**sweeps SHC**  
is win a thriller,  
is capture trophy  
**E 18**

**ier's nugget**  
yson savors kick  
first playoff win  
**E 19**

**CITY**  
**iffing for help**  
draiser started for  
gje Diner heads  
**E 7**

**t for profit**  
h shuttle fee  
ied on state law  
**E 5**

**pop**  
.4 figures  
ee many  
akout  
**E 11**



FORCES OF CHANGE IN SAN FRANCISCO

# Middle class disappearing from The City

Over the past 30 years, San Francisco has steadily become a metropolis of haves and have-nots

**PAGE 4**



# Are you part of San Francisco's disappearing middle class?

by Jonah Owen Lamb @jonahowenlamb



• MIKE KOZMIN/THE S.F. EXAMINER

Melissa LaBonge of The City has a well-paid job that puts her solidly in the middle class, but fears she'll have to join friends who've had to leave the increasingly pricey city.

Melissa LaBonge is among a disappearing group of San Franciscans.

The 38-year-old Potrero Hill resident and her boyfriend together make \$80,000 — about \$7,000 more than the median household income — making them solidly part of The City's shrinking middle class.

"Very few still live here," LaBonge said of her middle-class friends. "Most of them have moved. ... Everyone else has three jobs."

As the debate continues about affordability and the housing crisis, and how large a role the tech sector plays, San Francisco has become a city of haves and have-nots. A slow but very real trend has been transforming The City's population over the past three decades — a hollowing-out of the middle.

In that time, the number of middle-income households — now only about 33 percent of the population — has declined while the poor and rich, especially, have increased, according to [new data from the U.S. Census Bureau](#).

The simplest way to understand the trend is to picture an inverted bell curve, with the middle class being at the bottom.

More than half the households in San Francisco — about 66 percent — are either very poor or very well-off, while the rest are somewhere in the middle, according to the Census Bureau's 2012 American Community Survey.

For the past 30 years, the number of middle-income households has slowly been in decline, but the data show a precipitous recent change: The City's richest households increased by 10 percent from 2008 to 2012 as the middle declined by almost the same percentage. Bear in mind that The City's population grew by about 20,000 from 2010 to 2012.

R30  
-49  
(Cont.)

# Middle class falling out of city

**Class lines grow sharper in pricey S.F. as people of moderate means flee**

By Jonah Owen Lamb  
S.F. Examiner Staff Writer

Melissa LaBonge is among a disappearing group of San Franciscans.

The 38-year-old Potrero Hill resident and her boyfriend together make \$80,000 — about \$7,000 more than the median household income — making them solidly part of The City's shrinking middle class.

"Very few still live here," LaBonge said of her middle-class friends. "Most of them have moved. ... Everyone else has three jobs."

As the debate continues about affordability and the housing crisis, and how large a role the tech sector plays, San Francisco has become a city of haves and have-nots. A slow but very real trend has been transforming The City's population over the past three decades — a hollowing-out of the middle.

In that time, the number of middle-income households — now only about 33 percent of the population — has declined while the poor and rich, especially, have increased, according to new data from the U.S. Census Bureau.

The simplest way to understand the trend is to picture an inverted bell curve, with the middle class being at the bottom.

More than half the households in San Francisco — about 66 percent — are either very poor or very well off, while the rest are somewhere in the middle, according to the Census Bureau's 2012 American Community Survey.

For the past 30 years, the number of middle-income households has slowly been in decline, but the data show a precipitous recent change: The City's richest households increased by 10 percent from 2008 to 2012 as the middle declined by almost the same percentage. Bear in mind that The City's population grew by about 20,000 from 2010 to 2012.

In 2012, of The City's 341,721 households, only 114,960 could call themselves middle class, accounting for only about one-third of all households. Those at the bottom — some 28 percent of households — number 95,774, while the 131,285 at the top make up a plurality of all households at about 38 percent.

Academics and journalists have been arguing over and writing about the phenomena for decades, while The City itself also has clearly drawn

## Getting squeezed out



### S.F. income breakdown

#### THE BOTTOM

• Very low income: A single person with one child making \$35,000 or less



#### THE MIDDLE

• Low income: Young couple — one makes \$45,000, one makes \$10,000



• Moderate income: Single person making \$67,000; or two housemates, one making \$50,000 and the other making \$42,000



• Above moderate income: Married couple with two children — one makes \$85,000, the other makes \$65,000; or a single person making \$100,000



#### THE TOP

• Upper income: Married couple without kids, one making \$75,000 and the other making \$100,000



Source: Mayor's Office of Housing and Community Development, Income Data 2012

### Income groups according to The City's calculations:

**33%** Middle-income households in S.F.  
**41.7%** Middle-income households in California  
**44%** Middle-income households nationwide

Source: U.S. Census Bureau, 2012 American Community Survey



Melissa LaBonge of The City has a well-paid job that puts her solidly in the middle class, but fears she'll have to join friends who have had to leave the increasingly pricey city.

lines of who is poor, who is middle class and who is rich.

The most recent housing-cost report by The City's economists, released in 2012, contained more than housing data. It also laid out how much San Francisco is becoming increasingly divided and how much you have to make to be called middle class or, if you are lucky, rich.

Those in the middle are broken into three parts: low, moderate and above-moderate income. Technically, any household making from 50 to 150 percent of the area median income — roughly \$73,000 — is defined as middle class.

The lower-middle class — for

example, a construction worker making \$45,000 and his wife, a part-time waitress, making \$10,000 — has since 1990 been in slow decline, making up about 55,000 people as of 2010.

The middle of the middle class, according to The City, might be a single man who is a designer making \$67,000. This group's numbers also have declined, hovering just below

60,000 in 2010. An upper-middle-class household would be a couple with two children — one a professor making \$85,000 and the other an architect making \$65,000. Unlike their middle-class brethren, this group — a small proportion of the middle — has increased

over this period to about 36,000.

Almost all of these numbers about the middle class have gone down since, as the data used by The City are a few years old.

Besides breaking down who fits where on the income ladder, little is said in The City's report about the cause of the middle's decline.

"San Francisco's income mix may be changing for many reasons. We cannot isolate factors that have led to net decline in low and moderate income households," notes the report, which only posits some possible causes — job opportunities, cost of living and housing prices.

The relatively well-paid LaBonge, who works at a nonprofit, considers herself lucky — she has a \$1,012-a-month, rent-controlled apartment. Still, she's looking for another job outside of San Francisco. It's just too expensive here, she said, and her landlord just moved into the building.

jlamb@sfexaminer.com

## FORCES OF CHANGE IN SAN FRANCISCO



An ongoing series of articles delving into issues faced by residents and businesses.



And here is another from sfist (Oct. 25, 2013):

<http://sfist.com/2013/10/25/san-francisco-is-the-least-affordab.php>

## San Francisco Is The Least Affordable City For Middle Class Homeowners



This place out by the beach was for sale for a mere \$650,000 in 2010. (Photo: [Rob Koziura](#))

R30  
-49

(Cont.)

When discussing the affordability of San Francisco living, the conversation tends to turn towards whether low income residents and starving artists can still afford to live here amongst all the blue bloods and tech money — but what about the folks in the middle? A new report from the real estate data miners at [Trulia](#) suggests San Francisco is the least affordable housing market in the country for the middle class.

In San Francisco, only [14% of homes for sale right now](#), October 2013 are affordable to members of the city's middle class. ("Middle-class affordability" here is defined as homes for sale where the monthly payments would add up to less than 31% of the area's median income.) That's compared to 24% and 25% for Los Angeles and the New York metro area. It seems like that would largely be a function of our limited land area and rapidly dwindling housing stock, but to add insult to very expensive homeownership injury: "affordable" homes in San Francisco tend to be smaller than every major metro area aside from New York and Honolulu.

So which town has the most affordable middle class homes? Akron, Ohio of course. Even though San Francisco's median income of \$78,840 is 60% higher than a middle-of-the-road salary in Akron, our median price per square foot is seven times that of Ohio's fifth largest city. As the Chronicle's real estate blog [points out](#), a San Francisco household making a hair shy of \$80,000 per year can only afford to buy a \$409,000 home. Our pals over at [CurbedSF](#), who like to keep an eye on these sorts of things, will be quick to note that San Francisco's median home price passed the \$1 million mark months ago and you'll be hard-pressed to find something more spacious than a 1-bedroom or a cottage for [under \\$500,000](#).

[\[Trulia\]](#)

[\[On The Block\]](#)

[\[Curbed\]](#)

Contact the [author](#) of this article or email [tips@sfist.com](mailto:tips@sfist.com) with further questions, comments or tips.  
By [Andrew Dalton](#) in [News](#) on Oct 25, 2013 12:30 PM

And another:

[http://sfist.com/2013/11/18/middle\\_class\\_screwed\\_in\\_current\\_hou.php](http://sfist.com/2013/11/18/middle_class_screwed_in_current_hou.php)

## Middle Class Screwed In Current S.F. Housing Market



At the new [Nema](#) development, for instance, studios start at \$2,500. Can you afford that?

As we all know and have talked endlessly about for several years, getting a decent apartment in San Francisco is damn near impossible unless you make a six-figure income, preferably upwards of \$150,000, which in San Francisco still qualifies you as middle class. A [new piece in the Ex](#) outlines just how true this is, noting how many above-market-rate apartments and below-market-rate (BMR) apartments have been built recently or are under construction, but just how few "middle income apartments" are among them.

Basically if you're a freelance designer, bartender, massage therapist, decently paid non-profit worker, or copy writer (the example San Franciscan they use), you probably can not qualify for most of the BMR units that come available by lottery because you make too much money. For example, if you look at the [current listings from the Mayor's Office of Housing](#), you'll see that a block of 14 BMR units at the new [Venn](#) development just came up for lottery last week, and residents will be selected at random today for 1- and 2-bedroom units renting for \$1066 to \$1192 a month. In order to qualify for those you would have had to be earning less than 55% of area median income, which for S.F. means less than \$39,000 for a single person, or less than \$44,500 if you're a couple. (See the breakdown of percentages [here](#), and note that income limits vary between developments and lotteries.)

There are 1,182 more of these BMR units currently under construction, but you can't qualify for them unless you're, like, supporting a spouse and child on a teacher's salary. But there are some 10,000 more units permitted or under construction that will arrive on the market for luxury or just-below-luxury prices, and good luck qualifying for any of those if your income is below \$80,000 or \$100,000.

By the Mayor's Office's count, only 360 "middle-income" units were entitled in the last five years, and such middle income units make up roughly a quarter of the city's housing stock. So, when people go insane and show up by the hundreds for an open house on craigslist, it's because that unit is reasonably priced and in a good neighborhood and is therefore like a comet that comes around every 70 years. Thus the Census now ranks San Francisco as having [the highest rents in the country](#).

Supervisor Scott Wiener took to Facebook this a.m. to comment on the *Examiner* piece, saying:

San Francisco's crazed and unsustainable housing market is another example of the predicament middle-class people face all too often: they don't earn enough to afford things and earn too much to receive help. We need to correct our structural housing imbalance by producing much more housing over the long-term - there's no easy

or quick fix. We must also address zoning standards that are so overly restrictive that they discourage production of the kind of non-luxury housing that middle class earners can afford. We can respect the character of our neighborhoods while also making it possible for people to find housing and make lives for themselves. The two are not, and cannot be, mutually exclusive.

So yes, it's true that by allowing more development to happen, the city has helped create more affordable units. Well over 3,000 of them in the last five years. But "affordable" means affordable to those with small and fixed incomes. And when many of us talk about wanting more affordable housing, we probably mean "affordable to us," which is a whole different story.

[Examiner]

[Mayor's Office of Housing and Community Development]

*Previously:* [New Census Numbers Confirm That Yes, In Fact, Rents In S.F. Are Ridiculous](#)

Contact the [author](#) of this article or email [tips@sfist.com](mailto:tips@sfist.com) with further questions, comments or tips.

By [Jay Barmann](#) in [News](#) on Nov 18, 2013 10:14 AM

-----

Residents who make \$42,000 - \$56,000 have the least options. Those making \$85,000 or less cannot find "affordable" housing. Read this SF Examiner article:

<http://www.sfexaminer.com/sanfrancisco/san-francisco-housing-trends-make-it-difficult-for-modest-earners-to-find-a-place-to-live/Content?oid=2629169>

-----

R30  
-49  
(Cont.)

## San Francisco housing trends make it difficult for modest earners to find a place to live

by Jonah Owen Lamb @jonahowenlamb  
November 18, 2013



• EVAN DUCHARME/SPECIAL TO THE S.F. EXAMINER

- The City requires developers to help fund affordable-housing units, which middle-income earners often aren't eligible for.

By most accounts, Andrew Hajjar is middle class.

The 26-year-old copy writer's salary at DDB, a downtown ad agency, tops the nation's median income and is even above San Francisco's per capita income of \$44,373.



But he considers himself lucky when it comes to his apartment. The \$1,200-a-month studio near Bush and Grant streets would be a nearly impossible find in today's market.

"I don't know where I'd be able to live on my own" at that price, he said.

Like many San Franciscans with middle incomes, Hajjar makes too much money to be eligible for The City's limited affordable housing and too little to pay for market-rate apartments. While a hard number to pin down, roughly a quarter of The City's households could be called middle income in terms used by San Francisco housing authorities.

"They are really stuck in the middle and I think have the fewest real options," said David Sobel, the nonprofit San Francisco Housing Development Corp.'s CEO. That means San Franciscans making roughly \$42,000 to \$56,000 a year, he said. But, added Sobel, anyone making \$85,000 or less in San Francisco "has a huge problem finding and retaining affordable housing."

The City's economic boom — in part driven by the influx of high-paid tech workers — has pushed up rents and made it hard for people with middle incomes to find housing. Still, while the building boom is mainly creating expensive apartments and condos, it's also delivering new low-income housing.

That's a point Mayor Ed Lee has stressed when questioned about the impacts of the building boom — any large residential construction, even luxury condos, will create more affordable housing because of requirements imposed on developers by The City.

R30  
-49

(Cont.)

Development in The City is mostly creating above-market-rate units — 7,457 were entitled from 2007 to 2012, according to the Planning Department. But it has also included a sizable chunk of affordable units, 3,313 in that period.

What's more, according to the Mayor's Office, there are 6,168 units of housing under construction in San Francisco and about 20 percent — 1,182 — are affordable. There are another 3,902 units with approved permits.

But that means little to people like Hajjar. From 2007 to 2012, only 360 middle-income units were entitled.

Most middle-income residents looking for affordable housing are directed to first-time homeowner programs, Sobel said. But many are turned away since they can't get credit or raise enough money for a down payment.

The mayor has made housing one of his priorities, the Housing Trust Fund being an example of that, said Lee's spokeswoman Christine Falvey. And the best way to help middle-income San Franciscans, she added, is to increase the housing stock and stabilize prices.

"The most impact we can make is to get these housing units online," she said.

So far the first \$20 million allotment of the \$1.5 billion, 30-year Housing Trust Fund and the \$37.6 million collected from development impact fees from the past two years have started the ball rolling, but maybe not fast enough.

Most of the first projects funded from the recently passed Trust Fund and development fees won't start breaking ground until 2014 or 2015, said Falvey. But, she added, there are 8,050 affordable units in the pipeline that will be ready in the next five to 10 years.



By 2014, The City needs to build more than 30,000 units to meet overall housing demand, according to the Planning Department. "The needs of The City are much greater than anybody has been able to provide," Sobel said of ongoing efforts to alleviate the demand for affordable housing.

But whenever that housing is built, it won't be open to the likes of Hajjar.

The Austin, Texas, native said most of his friends back home are buying homes and settling down. But for him, "here, it's a perpetual college life."

### **Developing homes in The City**

*Code requirements on projects with more than 10 units:*

Pay affordable housing fee — amount varies

Make 12 percent of on-site units affordable

Build equivalent of 20 percent of units as affordable off-site

*Funds collected in past two years from developers:* \$37 million

*Number of affordable units those fees could finance:* 3,955

*Voter-approved Housing Trust Fund:* \$1.5 billion over 30 years, starting 2012

*What Trust Fund money will do:* Provide 9,000 affordable units and help provide 30,000 units overall

*The first allotment:* \$20 million, to be used for multifamily development, funds first-time buyers, eviction prevention, housing stabilization and more

*Source: Mayor's Office*

R30  
-49  
(Cont.)

-----

The lower income "middle class" who thought they could continue to live in SF are now squeezed. This is because of the policies in the Housing Element which directs certain areas of SF to develop housing but that housing is not equally made for different income levels and certain protections are not in place for the income categories like the low/middle class. Look at these articles:

[http://www.mercurynews.com/opinion/ci\\_24470365/plan-bay-area-smart-growth-and-sustainable-communities](http://www.mercurynews.com/opinion/ci_24470365/plan-bay-area-smart-growth-and-sustainable-communities)

-----

## **Plan Bay Area: 'Smart growth' and 'sustainable communities' hurt the poor**

*By Lawrence J. McQuillan*

*Special to the Mercury News*

POSTED: 11/07/2013 10:00:00 AM PST

UPDATED: 11/07/2013 11:05:02 AM PST

△ The Association of Bay Area Governments and the Metropolitan Transportation Commission have approved Plan Bay Area, a master plan for housing, transportation and land use in the San Francisco Bay Area through 2040. The goals of "smart growth" and "sustainable communities" sound noble, but the plan will disproportionately harm the region's poor and minorities. A lawsuit seeks to halt implementation.

Plan Bay Area creates Priority Development Areas throughout the nine counties and 101 cities that are members of ABAG. Eighty percent of the new housing needed in the Bay Area over the next 28 years, as its population grows from 7 million to 9 million, will occur in these areas. The largest are in North and Central San Jose; parts of Alum Rock; Redwood City near Highway 101; the eastern third of San Francisco; and the western Oakland/Emeryville area — neighborhoods with disproportionate populations of minorities, poor and seniors, according to census data.

Under Plan Bay Area, high-density housing will get the green light for building permits by regional planners and city and county officials in these areas. The plan is not a vision statement but literally the road map for housing development through 2040. MTC can withhold some transportation funding if local governments don't abide by the plan, and private groups can sue local governments over housing allotments.

As development occurs in these poorer neighborhoods, land prices and rents will increase, pushing out tens of thousands of poor and elderly residents. Plan Bay Area officials acknowledge this gentrification effect but contend their goals for regional housing production will provide another place in the Bay Area for displaced families to land. But history teaches the only housing goal met in the Bay Area is for upper-income households. The most vulnerable people will become outcasts.

All of Plan Bay Area's development areas are confined to less than 5 percent of the land and clustered near mass transit such as BART, Caltrain and VTA. The plan is uncreative in design and use of transportation money.

It will deploy a transportation budget of \$292 billion, but only 12 percent will fund new capacity. The plan will "stack and pack" people in "transit villages" along already overcrowded transit corridors. In this respect, Plan Bay Area is no different from other "sustainable communities" projects around the world.

These projects share basic features first outlined in the United Nations' Agenda 21 agreement: Build "human settlements" consisting of high-density residential housing integrated with high-intensity commercial businesses ("mixed use") along mass transit lines surrounded by "open space" off limits to development.

Plan Bay Area conforms to this vision. Roughly 75 percent of the land in the Bay Area is already off limits to development, but the plan will jam more people into a smaller area by further restricting land use through "Priority Conservation Areas". This is an elitist, uncreative and heavy-handed approach. Many progressives fought for a more decentralized approach that would have distributed growth more evenly across the region. Unfortunately, they lost.

A group called Bay Area Citizens has filed a lawsuit contending, among other things, planners ignored alternatives that would let people choose for themselves how and where they live. The opening brief is

▽ expected in December. The court should invalidate Plan Bay Area.

Lawrence J. McQuillan is a senior fellow and the director of the Center on Entrepreneurial Innovation at the Independent Institute ([www.independent.org](http://www.independent.org)) in Oakland. He wrote this for this newspaper.

-----  
And this article in the Jan. 5, 2014 SF Examiner:

## Residents concerned about homes, rent as S.F. complex undergoes changes

by Joshua Sabatini



• MIKE KOOZMIN/THE S.F. EXAMINER

- Mary Watkins, left, and her son Rufus are worried about the proposed market-rate housing and possible rent increases at their Western Addition housing complex.

Mary Watkins has lived in the same Western Addition apartment for 47 years. At 68, she still works full time, at a hotel, and shares her three-bedroom unit with her son Rufus Watkins. It's also where she raised her other three children. Scattered around the place, on walls and tabletops, are framed family photos.

"You couldn't ask for a better place to live," said Mary Watkins, who declined to say what she pays in rent. "This is a community. We've lived here a long time. They are having a lot of problems with the housing. We don't want to lose our housing.

"I call it the changing of the guard. Every day I don't know what's going to happen."

Some residents of the decades-old Midtown Park Apartments community, in the heart of the Western Addition, are worried about displacement after recent city actions. Those include proposed rent hikes and the termination, just days before Christmas, of a lease with Midtown Park Corp., the nonprofit tenant group that oversees operations of the low-income apartment complex at the corner of Geary Boulevard and Divisadero Street.

The City owns the 139-unit, six-building complex and the property on which it sits. The complex composed of one- to three-bedroom apartments was built in the 1960s and has served as below-market-rate housing for low- to moderate-income tenants.

The future of Midtown Park Apartments has been debated ever since a 40-year-old Federal Housing Administration mortgage was paid off on the property in 2008, giving The City the option to terminate its agreement with the nonprofit tenant group.

In partnership with below-market-rate developer Mercy Housing, The City is moving forward with plans to renovate the entire property and add more units, including some at market rates.

The proposal is to renovate four residential buildings containing 96 below-market-rate units that front Scott, O'Farrell and Divisadero streets. Two buildings containing 44 below-market-rate units that front

▲ Geary Boulevard would be demolished to make way for residential buildings containing up to 114 more such units, according to a Planning Department document from October.

The project would add 70 units to the site, and "a minimum of 188 units would be affordable." Plans include "a new building for seniors since there currently are no accessible units at the property," said Teresa Yanga, director of housing development for the Mayor's Office of Housing.

"We are a community of San Francisco that's about to be dispersed," said Marchell Johnson, a 40-year tenant and president of Midtown Park Corp.

Tenants are understandably wary after living through the urban renewal efforts of the 1960s by the now-defunct Redevelopment Agency that displaced much of the area's black community. Add to that the current housing climate of soaring rents and evictions.

Rufus Watkins, 50, who sits on the board of the nonprofit management group, said residents' fears of losing their homes are exacerbated by the economic pressures surrounding them.

"At Divisadero and Geary, a lot of people see the Google buses and the Genentech buses right across the street," Rufus Watkins said. "So people wake up in the morning and see that, and people start worrying and asking, 'What's going on?'"

In a series of tense meetings, city officials and tenants have debated their future. But relations have become strained after the Mayor's Office of Housing terminated the lease with Midtown Park Corp. effective at the end of January.

"How arrogant and disconnected they could possibly be to terminate our relationship, and to do it two days before Christmas," Johnson said, adding that, "We're hurt; we're beyond not happy."

With the termination, she worries about tenant representation as residents face rent increases. The site also is slated to undergo major renovations.

The Mayor's Office of Housing stands behind the most recent rent increase proposal, which would be tied to the current below-market-rate income levels, as being fair and said tenants have no need to fear displacement.

"There will be no displacement; there will be no rent increases for at least three months or longer," Yanga said. "If there are any, it would be prorated over a five-year period."

The City will soon begin certifying the incomes of tenants, a process that would take up to three months. No formal rent increase would be proposed until that process is complete, Yanga said.

For those who refuse, their rents would go to the market rate, as would those of the tenants who do not qualify for subsidized rents. Also, tenants would be moved into "size-appropriate units." The lowest rent currently paid at the property is \$381 per month for a three-bedroom apartment, Yanga said.

"We haven't been monitoring the property as well as we should, but we're trying to correct that now," she said, noting that The City needed to cut ties with the nonprofit since it wouldn't qualify for the low-income-housing tax credit to help pay for the site's development plans.

There have been \$750,000 in repairs identified by the property manager, the John Stewart Co., Yanga said. But the company is leaving the job because it was unable to secure liability insurance due to the property's condition, including mold and leaky roofs, city officials said.

R30  
-49  
(Cont.)

△ The situation is politically challenging for Supervisor London Breed, who represents the neighborhood where the complex is located. Breed said she is supportive of moving forward with rent increases and the termination of the lease with the nonprofit management group, which she said would lead to better-run and maintained housing. Breed said the nonprofit was not doing everything it should have been doing to manage the site, such as ensuring people were in the right-size units, weren't occupying units illegally and weren't subletting properties.

"I don't want anyone to be homeless as a result of what we need to do," Breed said. She said that in cases where rents do go to market rate, she wants to ensure there are city subsidies so people can continue to afford those units.

[More Neighborhoods »](#)

[Neighborhoods](#) [Western Addition](#) [San Francisco housing](#) [Midtown Park Corp.](#) [Midtown Park Apartments](#) [Mary Watkins](#) [Rufus Watkins](#)



## JOSHUA SABATINI

jsabatini@sfxaminer.com

R30  
-49

(Cont.)

Adding to this issue of providing middle-class income housing, no money from the affordable housing fund is to be touched per Peter Cohen of the SF Council of Community Housing Organizations per the SF Examiner article below.

If the middle class has only loans, they will be saddled with even more debt. There has to be a mechanism to have the low income housing and middle class housing meet halfway. The HERAA does not solve this issue and only exacerbates the situation for the middle class. This divides the middle class community which was established for a long time. The policies and implementation measures in the HERAA and the state laws and ABAG do not require the City to build housing equitably for every income levels. Worse, there is NO penalty except that for the income categories for which the housing is NOT built, those people are not going to live in SF anymore. Family members are torn away from all living in SF even though they may want to do so.

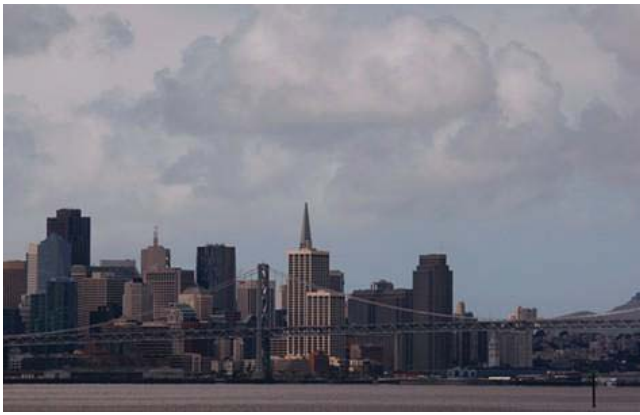
Here's a Feb. 5, 2014 SF Examiner article where one group does not want any part of funding for any middle-class housing is to be taken from the affordable housing fund nor any city land that is available for the very low income affordable housing projects. What analysis has been done and what recent data gathered for this HERAA to ensure that there is equity for each income level in housing units?:

<http://www.sfxaminer.com/sanfrancisco/new-sf-housing-agenda-calls-for-more-below-market-rate-units-protections/Content?oid=2696735>

February 05, 2014

## SF group's housing agenda calls for more below-market-rate units, protections

▽ by Jonah Owen Lamb @jonahowenlamb



• BEN MARGOT/2010 AP FILE PHOTO

R30  
-49  
(Cont.)

Another ambitious blueprint to address housing in San Francisco has come through the pipeline, this time courtesy of the San Francisco Council of Community Housing Organizations.

The plan comes on the heels of Mayor Ed Lee's own vision for a crisis that affects all San Franciscans, as laid out in his mid-January State of the City speech.

In many details, the 2014 Balanced Housing Agenda echoes Lee's proposals to guarantee that people at the bottom of the income ladder have a place to live. But in other ways, it goes much further.

The agenda includes a tax on corporate suites and Airbnb to pay for more housing. It calls for passing anti-speculation legislation, increased transit fees on tech firms and developers, and a hike in fees for builders who opt out of on-site below-market-rate units. And perhaps most crucially, while the plan agrees that more housing needs to be built, it is wary of a policy shift away from the neediest.

"To achieve this, we need to commit City resources and public sites to the production of new low-income housing, rebuild our public housing with the needed resources, work to take our most at-risk rent-controlled stock out of the speculative market, make sure 'the market' meets its obligations to moderate-income residents by building inclusive mixed-income communities, and ensure complete neighborhood infrastructure and a bus system that works for all," notes the agenda.

Like the mayor's plan, it calls for building housing on under-utilized city-owned land. But it also wants to make sure that any city land used should be prioritized for below-market-rate units.

"What we don't want to end up happening," said the council's co-director, Peter Cohen, is using city land as a "subsidy for middle-income housing."

The Mayor's Office has said such projects could include a mix of incomes.

Also, like the mayor's plan, the agenda calls for mixed-income developments to be prioritized to accelerate production, but additionally it calls for a "dedicated ombudsman" to help each project through the approval process.

Another plank of the agenda calls on officials to make sure the housing trust fund, Proposition C, goes to building new below-market-rate housing and not to fix public housing, which it says The City should find additional funds to cover.

The agenda also wants San Francisco to raise new revenue for housing through an extension of the hotel tax to the likes of Airbnb and corporate suites.

The agenda backs the mayor's plans to implement a 5-year-old program that gives no-interest loans to nonprofits to buy small buildings and prevent condo conversions, Ellis Act evictions and demolition that leads to speculation.

It also wants to define tenancy-in-commons, or TICs, in the planning code to keep track of them and further understand how they are impacting The City.

Legislation should be passed, contends the agenda, to give tenants in small buildings for sale a “first right” to buy the building, and a waiting period to allow them to secure financing.

Also, it advocates an anti-speculation transfer tax to discourage evictions and house- flipping.

The document agrees that secondary units should be increased — both Supervisor Scott Wiener and Board of Supervisors President David Chiu have such legislation pending — but as rent-controlled units with restrictions on condo conversions.

Also, businesses should chip in to pay for the housing of their increasing workforce through down-payment assistance loans.

To make sure that any new housing is served by transit, the mayor should update the Transit Impact Development Fee program by making sure new tech firms and developers pay their way.

R30  
-49

(Cont.)

The agenda also calls for the implementation of a development-tracking system showing levels of affordability, which is already an ordinance but is not in place.

Finally, it wants a guarantee that a third of all new housing production is targeted to people making below 120 percent of median area income.

On Tuesday, the Mayor’s Office had no comment on the agenda.

### **Highlights of 2014 Balanced Housing Agenda**

1. Use public sites for low-cost housing only
2. Rebuild public housing but take no funds from below-market-rate construction
3. Reclaim rent-controlled buildings from speculators
4. Make the market build mixed-income communities
5. Ensure equity in transit and neighborhood services to expand housing locations
6. Guarantee balanced housing development

-----

Per the SF Apartment Association News, the City apparently makes a LOT of affordable housing for the very low income. It has a lot of funding even from 2002-2003 and 2010-2011...almost \$2 billion:

### **SF Apartment : February 2013**

*SFAA News — February 2013*

### **Nearly \$2 Billion for SF Affordable Housing**

A new study makes the argument that, contrary to conventional wisdom, San Francisco produces an impressive amount of affordable housing. Between fiscal year 2002-2003



and fiscal year 2010-2011, nearly \$2 billion was allocated to affordable housing, including \$356 million from state sources, \$829 from federal sources and \$725 in city sources, according to a report by the Poverty and Race Research Action Council and the National Housing Law Project.

R30  
-49  
(Cont.)

All efforts, initiatives and policies combined, San Francisco has 500 residential hotels with 19,120 rooms and more than 200,000 “price-controlled” housing units that comprise 53% of its entire housing stock.

[http://www.sfaa.org/february2013/1302\\_news.shtml#news5](http://www.sfaa.org/february2013/1302_news.shtml#news5)

(San Francisco Apartment Association News, SF Apartment: February 2013)

26. The Revised Alternatives Analysis does not show the need for adding 1 million more people into the City. It does not analyze what would be the cumulative effect of continuing the implementation of any of these alternatives. It is also causing economic discrimination for the middle class and the barely middle-class. Many articles were run in the SF Public Press and the SF Examiner on whether the City can accommodate the 1 million new people:

<http://sfpublicpress.org/news/2012-06/can-san-francisco-add-150000-more-people>

R30  
-50

## Can San Francisco add 150,000 more people?

By  
**Alison Hawkes**

SF Public Press

— Jun 19 2012 - 10:55am

***Land’s carrying capacity under stress as Bay Area expected to add 2 million***

In 1968, biologist Paul Ehrlich wrote the best-seller “The Population Bomb,” warning of mass starvation in the face of uncontrolled human population growth. Taken as alarmist at the time, the book nevertheless started a debate about the world’s limited natural resources and the human race’s voracious appetite.

Of course, we didn’t all starve, thanks in part to advancements in agriculture. But more than 40 years later, with the doubling of the world’s population, we’re faced with a different doom-and-gloom scenario: climate change. Ehrlich, now a population studies expert at **Stanford University**, hasn’t backed down. He says the government should actively discourage childbearing. “If you’re a patriotic American, you stop at two, and if you’re super-patriotic you stop at one,” he said.

That’s certainly not how most city planners, let alone Americans, are thinking. In places like **San Francisco City Hall**, officials enthusiastically embrace a pro-growth strategy to expand the city’s tax base, and create vibrant communities in blighted or underdeveloped areas. Most of that growth will come from new people moving into the city, since San Francisco has the smallest percentage of children of any major metropolitan center in the country — 13 percent.

4 But a larger population stretches resources, even in a dense, efficient metropolis. People create waste, and consume water, food and energy. They pollute the air with cars. And they encroach on the last vestiges of natural habitat.

Environmental resources begin to deteriorate when San Francisco's natural ecosystems — and those of the larger Bay Area — reach their limit, or "carrying capacity." The accepted regional projections over the next 25 years show the region increasing air pollution, exceeding water supplies, battling sea-level rise, and consuming more power — all due, in large part, to population increase.

"There's not only a carrying capacity in terms of water and space," said Tina Swanson of the **Natural Resources Defense Council** and former executive director of the **Bay Institute**, an environmental group focused on protecting the bay. "There's also a quality-of-life carrying capacity. We don't want to grow to a point where it isn't a beautiful area, because then people won't want to live here."

Net growth in the city continues to rise, despite the shrinking average family size and the ups and downs of the economy.

R30 -50 (Cont.) The **Association of Bay Area Governments** predicts San Francisco will reach 969,000 people by 2035 — a nearly 20 percent jump above today's 815,400.

The Bay Area, now nearly 7.2 million, would reach 9.3 million people by 2040 under that growth scenario. That amounts to 2.1 million more people at a growth rate of nearly 30 percent.

A **California Department of Finance** report in early May found that the Bay Area is the state's fastest-growing region, thanks to the booming tech economy in Silicon Valley.

As the Bay Area struggles to meet sustainability goals, double-digit population growth presents a clear challenge to reducing the region's ecological footprint. Residents must use resources more efficiently to counteract the addition of more than a million new residents. In many ways, it mirrors a challenge the planet is facing. Can population growth in San Francisco and the Bay Area be sustainable?

Planners argue that sustainable growth can be achieved if new development is funneled to the right places. Indeed, they say that the urban core — notably San Francisco, Oakland, San Jose and any other cities along **BART** or other rapid-transit lines — are the ideal places to put new people. They need fewer cars and the basic infrastructure is already in place.

**Plan Bay Area**, the growth blueprint approved in May by regional agencies, calls for San Francisco to create 92,410 new housing units by 2040 — 14 percent of all the new housing in the region. That's a 29 percent increase over the city's current housing numbers. If they are coming, the hope is, they might as well be coming to San Francisco.

But some environmentalists say population growth will inevitably deepen the effect on a local ecosystem. The region's vulnerability to earthquakes and sea-level rise only heighten the economic and safety risk to those living along the coastlines and seismically weak ground.

"We may not want to face up to this, but the truth is we're going to grow, because the human population is growing and the economy is growing," said Richard Walker, a geographer at the **University of California, Berkeley**. "Then there's the much larger question of why do we have to grow so much? The system we live in demands endless growth, and in that sense we're trapped."

## GROWING PAINS

San Francisco has dealt with a sudden population explosion before. In 1848, the Gold Rush turned a small Pacific outpost with fewer than 1,000 residents into a boomtown of 40,000 in just over a year, putting San Francisco on the map as a major commercial hub.

After World War II, returning servicemen in search of shipyard jobs brought their families to the city, leading to a housing boom that developed the sand dunes west of Twin Peaks. During the 1940s, the city grew more than 20 percent.

The new people and their industry left a deep footprint on the San Francisco Bay: Imported sand and moored ships created new land and a waterfront on top of mudflats. Sediment from gold mining destroyed wetlands, while toxic contaminants from mining and other industries polluted the waters. Invasive species were unleashed and changed the bay ecosystem.

These days San Francisco's population growth is attributed to some of the same underlying causes. People migrate here internationally and from other parts of the country in search of jobs because the Bay Area is a desirable place to live. The city isn't just passively letting them come — it has adopted a pro-growth strategy to strengthen its economic competitiveness with other cities. That strategy includes accommodating more people by increasing housing. That said, San Francisco has precious little open land, so new development opportunities are limited.

Ted Egan, San Francisco's chief economist, said adding housing, particularly affordable housing, is wrapped up in the city's strategy and its attempt to stabilize an unstable tax base. A tight housing market drives up wage inflation, he explained, without putting the cash in the pockets of the workers who are paying high rents.

"The money goes to those who they bought the house from, or to landlords," he said. "To the extent that the city expands the housing supply, it will reduce housing prices in San Francisco. That's the goal of the strategy."

R30  
-50  
(Cont..)

### BUILDING BOOM

Guided by the city's encouragement and direction, massive new housing redevelopment projects will be popping up on Treasure Island, Hunters Point Shipyard and Parkmerced over the next decade. Nearly 750 other projects, mostly residential or with a residential component, are in the planning and construction phases. They are expected to add almost 43,000 new housing units, according to the city's **2012 Pipeline Report**.

At the same time, San Francisco is trying to realize another goal: to become the "greenest city in America." To that end, it adopted a "zero waste" policy to send virtually nothing to the landfill. Its climate action plan would reduce the city's greenhouse gas emissions to 20 percent below 1990 levels by 2020. City agencies are increasing water and energy efficiency and are encouraging bicycling and walking.

To city officials, high growth and sustainability are not mutually exclusive. In a 2010 interview, Jack Sylvan, then director of the Treasure Island **redevelopment project** under Mayor Gavin Newsom, reacted strongly to questions about the sustainability of adding more than 7,000 people to the man-made Treasure Island, constructed on bay shallows landfill. The Treasure Island plans call for remaking the former military base into a high-density "eco-city" with high-rises clustered near a high-speed ferry terminal.

"The notion that this is going to happen somewhere else that's better, I think, is fundamentally flawed," Sylvan said. "You're talking about fringe people who think that a back-to-the-land movement is our solution to an environmentally sustainable built environment."

### BIG FOOTPRINT

Yet some environmentalists see the city's pro-growth agenda as anything but sustainable. The debate centers on "smart growth," an urban planning concept that advocates building high-density neighborhoods, preferably in the urban core, and getting people out of cars to use public transit and start walking and bicycling.

Smart growth is seldom challenged, especially in the Bay Area, since it represents a progressive change in planning from the massive suburban sprawl of previous decades. But in certain environmental circles, smart growth is quietly criticized for ignoring population growth's destructive effect on nature. Critics say smart growth will reduce the damage, but cannot erase it entirely.

"The notion of smart growth is an oxymoron," said Dick Schneider, an activist in the San Francisco chapter of the Sierra Club since the 1970s. "San Francisco is already unsustainable, so further growth is only going to imbalance the situation even further."

A 2005 white paper, "**Unsustainable City,**" produced by local planning and design firm **MKThink**, reasoned that San Francisco had an ecological footprint of 18 acres per person. That means 18 acres of land are needed to sustain the basic consumptive needs of an average city resident. Compared with the Bay Area's 20.9 acres and the U.S. average of 23.6 acres, San Francisco doesn't look so bad. The footprint analysis was based on a 2004 study by the Oakland-based think tank Redefining Progress.

MKThink takes San Francisco to task for not being "smart growth" enough in its housing density and independence from cars.

Schneider has a different reaction. Multiply 18 acres by the city's population and that's far greater than the size of San Francisco.

"That's over 15 million acres of land and water to support the current population of San Francisco," he said. "San Francisco's acreage is about 150,000. So clearly, the San Francisco population is living beyond its means and is therefore unsustainable by any reasonable interpretation of the word."

### IS GROWTH INEVITABLE?

Smart-growth advocates counter that halting population expansion isn't a path to sustainability.

"If you look at Northern California, and if we care about issues like climate change and the environment, in fact, the best place to live is the San Francisco Bay Area," said Egon Terplan, the regional planning director for the **San Francisco Planning and Urban Research Association**.

Terplan said San Francisco's temperate climate requires less power for air conditioning and heating, while the city's residents have a smaller environmental effect than those in outlying areas.

"What's your feeling about the environmental impact that's going to happen in the Central Valley and in Northern Sonoma County?" Terplan asked. "If the growth doesn't come here, it's going to be happening in other places. You can't look at it in isolation."

But is it San Francisco's responsibility to solve the Bay Area's sustainability problems? When considering sustainability, should improving local conditions take precedence?

"Every time I hear it's going to grow this much, I want to challenge the premise," said Swanson of the Bay Institute. "The idea that we have to grow, when in fact natural resources may be limited and we have additional impacts ... I think should be reevaluated."

Regional smart-growth planning does sometimes work, said Sam Adams, the mayor of Portland, Ore., one of the best-planned cities in the country.

“Portland’s last city plan, developed over 30 years ago, focused on limiting sprawl, urban renewal, light rail (instead of highways), and helping to inspire new business sectors, including cleantech,” he wrote in an essay on **Grist.org**, an environmental news website. “As a result, we have lowered total carbon emissions 6 percent while the rest of the U.S. has increased by more than 10 percent. And we’ve done it while growing our population and jobs.”

### OPTIMISTIC VISION

In the face of constant environmental pressures in the Bay Area, the smart-growth movement is sounding optimistic, the criticism about its blind spots notwithstanding. A shrinking region is a worse outcome, said Jeremy Madsen, executive director of the **Greenbelt Alliance**, a San Francisco-based anti-sprawl advocacy group.

“If you look at the alternatives, we could end up like Cleveland or Detroit,” Madsen said. “We’d rather be what we are.”

Madsen said growth can spur innovative planning and infrastructure investment. That is happening in Oakland and San Jose, where strip malls and auto body shops — not high on any sustainability index — are being torn down and replaced with high-density housing and businesses.

“If it’s done right, you use development as a tool to develop,” Madsen said.

Greenbelt Alliance mapped out the underdeveloped land within the Bay Area’s urban footprint and found that as many as 800,000 new homes, virtually all the new growth in the next 25 years, could be accommodated without treading onto open space.

Perhaps the most hopeful note for environmentalists is the Bay Area’s historical success in digging out of environmental crisis while growing: the campaign to save San Francisco Bay.

“The bay was a cesspool when I was a kid,” said Walker, the Berkeley geography professor. “There was no fishing to speak of in the bay, so some things are better. The sea otters and seals have made a comeback after being nearly extinct. There’s so much parkland that wasn’t there.”

Walker said “utopian goals” are sometimes achievable, with diligence, as the population booms: “You wouldn’t believe the changes that have been made even in my lifetime. The bay is so much more livable in so many ways, despite tripling in size.”

Read full coverage of Bay Area smart growth in the **San Francisco Public Press Summer 2012 print edition**, on sale at retail outlets around San Francisco and **online**.

## San Francisco at 1 million: City's population is booming once again

by Dan Schreiber



R30  
-50  
(Cont.)

Most U.S. cities have only just begun to crawl out of the trenches of the Great Recession, but San Francisco has been charging back to the front lines.

Reverberations from the 2008 housing market collapse put a four-year hold on most local projects, creating a colossal backlog of stalled buildings and renovations. But looking at The City these days, signs of a sustained boom are on the horizon -- quite literally.

Any clear view of the skyline is strewn with gangly construction cranes as developers scurry to build more housing and offices that can accommodate the labor needs of cash-heavy companies in San Francisco and Silicon Valley alike.

In less than four years, following the largest fiscal crisis since the Great Depression, San Francisco's downright depressing 10.1 percent unemployment rate in January 2010 has been nearly halved to 5.2 percent, according to November numbers from the U.S. Bureau of Labor Statistics.

The City's impressive rebound outpaces the 8.3 percent jobless rate across California, the 8.5 percent level in New York City and the 9.4 percent of workers unemployed in Los Angeles.

Unsurprisingly, San Francisco's population has skyrocketed, especially for an already-dense 47-square-mile metropolis with little horizontal space left to grow. The City added 28,500 new residents between 2000 and 2010, for a grand total of 805,263. Then, in just the following two years alone, an additional 20,600 folks wedged themselves into The City's superlatively expensive living space.

And although the City by the Bay now appears poised to become an economic recovery model for the Western world, big questions remain on whether it can prove nimble enough for such rapid growth and ultimately avoid becoming a victim of its own success.

R30  
-50  
(Cont.)

### **MARCH TO 1 MILLION**

The population of roughly 825,000 in 2012 will have steadily increased to a milestone by 2032, when a projected 1 million people will make their home inside city limits, according to an upcoming report from the Association of Bay Area Governments. By 2040, the report speculates that the growth rate will begin to level out at 1,085,700.

Sounds crowded for just the upper tip of a narrow peninsula, right? If the sidewalks and buses seem busier even now, and it begins to feel like San Francisco just can't get any more crowded, doubters need look in only one direction -- up.

"The future is tall," said Richard DeLeon, a San Francisco State University political science professor and close observer of The City's "anti-Manhattanization" movement of the 1980s and '90s. "There has been a shift from the anti-high-rise movement. ... These new progressive politicians, they have no problem with going tall and vertical."

If the current population projections hold steady, The City will have grown in population by 35 percent between 2010 and 2040 -- the fastest 30-year rate of increase in nearly a century. San Francisco has not seen droves like this since the post-agrarian period between 1920 and 1950, over which the population grew by 53 percent before abruptly losing tens of thousands of residents to the 1950s suburban boom.

The forthcoming population report also estimates that 190,000 more jobs will need to be created before 2040, when 759,500 people will work here. The projected population growth is assumed to be greatest in the denser eastern side of The City, where tech businesses continue to fill out former warehouses in South

of Market and residential developments are being aggressively pitched -- and combated -- in the bustling and diverse Mission district.

### **'GOOD PROBLEMS'**

The expansion -- and its inevitable challenges -- fill urban planners with nervous excitement.

"The Bay Area job creation engine is the envy of the entire world," said Gabriel Metcalf, executive director of SPUR, the region's most active urbanist think tank. "But it has created its own set of problems for us -- problems that don't solve themselves. Still, it's better to have the problems we have than the problems of not enough jobs."

Metcalf, and just about everyone else in town, can quickly identify the top conundrum: the cost of housing. It's an old and contentious discussion that rears its head with each boom time, and solutions to the hard facts of supply and demand aren't getting any easier.

Ellis Act evictions, which landlords can use to rid their units of tenants as long as the properties are taken out of the rental market, jumped by 170 percent between 2010 and 2013. Evictions overall are up 38 percent in that three-year period, according to recent city legislative reports.

The City's rent median -- the midpoint on the spectrum of prices -- outpaces all other U.S. cities at \$1,463 per month, according to recent U.S. census figures. Currently, nearly 40 percent of San Francisco rental properties demand at least 35 percent of tenants' total income. At last glance on the Trulia real estate listings website, the median cost of buying a home was \$850,000, nearly \$200,000 more than it was five years ago and more than double what it was in 2000.

### **WHAT SAN FRANCISCO MAY NEED**

Despite the cost of living's torrid upward pace, projections indicate people will come anyway. And all of this, no doubt, will lead to an increased burden on The City's aging transit system, as workers dash to tens of thousands more jobs that they will hold increasingly dear in order to pay the rent or mortgage.

The San Francisco Municipal Transportation Agency has long identified a multibillion-dollar funding shortfall for capital improvements such as street fixes and hundreds of new vehicles over the coming decades. Mayor Ed Lee wants to patch a \$6.3 billion funding hole with increases in vehicle license fees and by going to voters with general-obligation bonds, but an early sour response in a public poll suggests the effort will require politicians to restore faith in the much-maligned system's ability to improve.

One bright spot is that, by most accounts, officials believe The City's utility infrastructure can handle the increased burden. San Francisco runs California's most pristine water reservoir system, with its main source at Yosemite National Park. The San Francisco Public Utilities Commission is undertaking a strategy of water recycling, green building requirements and more efficient home fixtures that officials believe will actually keep water demands flat over the next 20 to 25 years.

But there's no dignified way to put it -- more people means more sewage, and the current system will need a smattering of conservation efforts to deal with wastewater, which is periodically pumped into the Pacific Ocean. Parts of The City's 1,000-mile sewer system date back to the Gold Rush era of the mid-1800s, and the wastewater system as a whole is currently in need of \$250 million in annual maintenance, according to SFPUC spokesman Tyrone Jue.

Jue said more green space needs to be created in order to capture heavy stormwater runoff. It shares the same effluent pipes as The City's treated sewage, and is therefore dumped into the ocean with all other wastewater when the system becomes overloaded. A new pilot project in the Sunset district is encouraging residents to replace impervious concrete surfaces with lawns.

"The idea is that the stormwater goes into the ground instead of down the streets," Jue said. "That does benefit the overall system."

While often billed as a childless city, the San Francisco Unified School District is still charged with educating 56,000 students. Estimates vary on what a major population increase will mean. With only 13.5 percent of the population under 18 years old, San Francisco has the fewest minors of any major city in the U.S. The SFUSD's statistics show that after more than two decades of declining school enrollment beginning in the late 1980s, The City will return to its 1985-level of approximately 65,000 students by about 2021. Anecdotally, private-school enrollments appear to be rising, most notably in the Mission district.

More people would also require more police on the streets, and that's exactly what Police Chief Greg Suhr said he would like to see happen. In 1979, The City set a minimum police force standard of 1,971 officers, which at the time was about one officer per 350 residents. To help keep up with the ratio, Suhr said he hopes have 2,300 to 2,500 cops on patrol by the time San Francisco reaches 1 million residents.

While homicides are down by 50 percent since 1993, The City has seen a recent troubling spike in property crimes -- attributed mainly to thieves preying on pedestrians and transit commuters carrying expensive mobile devices. The Police Department's CompStat crime monitoring database shows that The City is on track to log more than 55,000 crimes in 2013 -- a 22 percent increase from 2012. Nearly 40,000 of those are property crimes.

Despite shifts in trends, Suhr said a fully staffed police force should remain a constant.

"We always act around here like we're in the middle of a crime wave," Suhr said. "Otherwise, you're tempting fate."

### **WORK HARD, PAY HARD**

No matter what the future holds, growth generally means two things for the budgets of The City and citizens alike -- higher revenue and higher expenses. Despite a recent surge in property taxes, San Francisco has yet to keep its spending growth in line with increasing costs. The latest budget grew by more than \$700 million since last year, for an annual \$8 billion. That's more than the annual budgets of 12 U.S. states.

For a middle-class individual between jobs, that same scenario means life in the big city comes with little wiggle room. Metcalf, who moved to San Francisco in 1996, said some positive change has taken place since then. But he fears if the reaction to growth is slow, The City could set itself up for a "super-rich monoculture."

"We have not been nimble enough," he said. "We've done some things right in the last 20 years in terms of public space and bicycling. But economically, we've priced out regular people."

### **San Francisco at 1 million**

*The City is poised to hit the mark in less than two decades. This five-part series will explore the challenges San Francisco faces in handling this population milestone.*

**SUNDAY:** What will San Francisco look like with 1 million residents?

**MONDAY:** Utility operators prepare for the population crush

**TUESDAY:** More people means more work for police and fire personnel



**THURSDAY:** Muni will need big changes to handle big boost in passengers

**FRIDAY:** Housing philosophy of "build more now" sure to be tested in the future

## San Francisco at 1 million: Can utilities handle population boom?

by Dan Schreiber



• MIKE KOOZMIN/S.F. EXAMINER FILE PHOTO

- Although some parts of San Francisco's sewer system date back to the Gold Rush, the SFPUC doesn't anticipate greater repair costs for the 1,000-mile network.

Every major aspect of San Francisco is set to feel daunting strain due to a sustained population surge, but here's some relief: The City's utility infrastructure is ostensibly prepared to shoulder the burden, officials say.

Despite the 35 percent population growth rate between 2010 and 2040 predicted in an upcoming report from the Association of Bay Area Governments, the San Francisco Public Utilities Commission appears confident that it can utilize enough conservation techniques to keep water demand flat for 20 to 25 years. The report predicts the roughly 825,000 current population will balloon to 1 million by about 2032, and that the Bay Area will increase from 7.2 million people to 9.3 million by 2040.

Electric and gas lines are already being replaced, mostly within the eastern half of The City, where PG&E has pledged up to \$1.5 billion to upgrade transmission lines and replace old natural gas pipelines with plastic in some cases to better handle earthquakes.

The City also possesses one of the best and most reliable water systems, with its source from Sierra Nevada snowmelt at Yosemite National Park. Total residential water usage has been dropping as the population has started to increase. San Franciscans used an average of 57 gallons per person per day in 2004 compared to 51 gallons in 2011, according to SFPUC monthly sales data.

Still, more people means total usage could creep up in the future and create an increased need to conserve.

The SFPUC has already tried to set the standard for future buildings in The City with its new \$200 million headquarters, dubbed "the greenest building in the world." It boasts 60 percent less water usage than a normal office building. And last fall, the agency announced it had completed a \$225,000 effort to update The City's Housing Authority units with thousands of efficient showerheads and toilets. San Francisco is even looking into the very early stages of desalinating Bay water.

Currently, the SFPUC is helping to launch a grant program encouraging Sunset district residents to take their concrete front yards and replace them with grass or some other permeable surface in order to cut down on the amount of stormwater runoff that floods sewers during heavy rain. Similar efforts are getting underway for the "Wiggle" bike corridor, according to SFPUC spokesman Tyrone Jue.

▲ A weak spot for San Francisco is that stormwater shares effluent pipes with treated wastewater, so when the skies open so do the pipes that pump liquid waste to its final destination — more than 30 discharge locations along the Bay and Pacific Ocean.

And with more people inevitably comes more, well, poop.

Parts of San Francisco’s 1,000 miles of sewer date back to the Gold Rush era, and wastewater system maintenance accounts for nearly a third of the SFPUC’s \$889 million annual budget.

Still, Jue said he doesn’t anticipate higher sewer repair costs than the 15 miles or so that is either replaced or fixed every year.

“Will more have to be maintained with more people? No, not necessarily,” Jue said.

R30  
-50  
(Cont..)

**San Francisco at 1 million**

*The City is poised to hit the mark in less than two decades. This five-part series will explore the challenges San Francisco faces in handling this population milestone.*

**SUNDAY:** What will San Francisco look like with 1 million residents?

**MONDAY:** Utility operators prepare for the population crush

**TUESDAY:** More people means more work for police and fire personnel

**THURSDAY:** Muni will need big changes to handle big boost in passengers

**FRIDAY:** Housing philosophy of “build more now” sure to be tested in the future

**San Francisco at 1 million: Population boom has cops and fire looking to hire**

by Dan Schreiber



• MIKE KOOZMIN/2012 S.F. EXAMINER FILE PHOTO

- Firefighters battle a blaze at Pier 29 in June 2012. The Fire Department, which currently has 1,450 firefighters, anticipates needing at least 400 more as the population grows.

With San Francisco’s population set to ignite, the days of police and fire hiring freezes are over.

The City’s population is projected to rise by 35 percent between 2010 and 2040, meaning 300 to 500 more cops need to be hired, along with up to 600 more firefighters.



▲ An upcoming report from the Association of Bay Area Governments predicts that San Francisco's roughly 825,000 current population will grow to 1 million by 2032, and 1,085,700 by 2040 — the most rapid three-decade period of growth since 1920 to 1950.

When Police Chief Greg Suhr took over the department in spring 2011, the force was 300 officers below its mandatory minimum of 1,971. At the time the minimum was set in 1979, that was about one officer for every 360 residents. To keep up with the droves of people moving into The City, two annual police academy classes are up and running again, and Suhr said the department should reach full staffing by 2018.

And the chief doesn't expect the new recruits to stop flowing for some time.

"We believe the number of officers, given what's going on with the population growth in The City, is probably somewhere more between 2,300 and 2,500," Suhr said. "Cops do count. There is no one in this town who believes we have enough police officers."

While homicides in San Francisco are down by 50 percent since 1993, The City has seen an uptick in property crimes, attributed mainly to thieves taking advantage of pedestrians carrying pricey smartphones and other mobile devices.

The City, according to the Police Department's CompStat database, is on pace to report more than 55,000 crimes in 2013 — a 22 percent increase over last year. Nearly 40,000 of those are property crimes, prompting police to pass out fliers saying "You've been mugged" to phone-absorbed residents walking in trouble spots like The City's new tech hub in the mid-Market Street neighborhood.

R30  
-50  
(Cont.)

San Francisco also is constructing a \$243 million public safety building in the Mission Bay redevelopment area that will include a restored 1920s-era fire station, the Fire Department's 44th. No new full-fledged fire stations are currently planned. But Lt. Tom O'Connor, the president of San Francisco Firefighters Local 798, estimated that the current level of 1,450 firefighters will need to return to the standard staffing level of 1,840 — and then some — to deal with both fires and mounting paramedic calls.

"We can already feel it that the population is increasing," O'Connor said. "And you couple that with the widespread use of cellphones — everyone is a 911 Samaritan when it comes to things that happen on the streets. Calling about almost anything has never been easier."

O'Connor said ending the department's widespread use of overtime to cover the shortage of personnel would require 250 to 300 more firefighters at present, and even more when the population increases.

"We'd have to hit 2,000 [firefighters and paramedics] between fire and ambulance," O'Connor said. "We're going to need more ambulances more than anything. That's sort of our Achilles' heel."

## **San Francisco at 1 million**

*The City is poised to hit the mark in less than two decades. This five-part series will explore the challenges San Francisco faces in handling this population milestone.*

**SUNDAY:** What will San Francisco look like with 1 million residents?

**MONDAY:** Utility operators prepare for the population crush

**TUESDAY:** More people means more work for police and fire personnel

**THURSDAY:** Muni will need big changes to handle big boost in passengers



**FRIDAY:** Housing philosophy of “build more now” sure to be tested in the future

-----  
January 2, 2014

## San Francisco at 1 million: Focus turns to Muni reliability and funding as population swells

by Dan Schreiber



• MIKE KOOZMIN/S.F. EXAMINER FILE PHOTO

An upcoming report from the Association of Bay Area Governments predicts 200,000 additional passengers will be riding Muni within two decades.

Justified or not, complaining about Muni is a time-honored San Francisco pastime. Commentary — whether on social media, in a bar or on Muni itself — generally focuses on three major themes: arrival times, speed and odor.

The perpetual grouching shouldn't be much of a surprise, however, considering the unavoidable problems that come with an ostensibly underfunded system carrying 700,000 daily riders through one of the densest urban landscapes in the U.S.

Though some routes might seem slow and crowded even now, Muni appears to be in for a steep spike in users. Based on a new regional projections report, The City will grow by 35 percent — around 280,000 more people — between 2010 and 2040, a period of buildup unseen since the 1950s. In less than 20 years, 1 million people will live inside San Francisco's borders, according to upcoming numbers from the Association of Bay Area Governments.

If Muni's ridership increases in proportion with the current 825,000 population, that could mean more than 200,000 additional people on buses and Metro light-rail cars — every day.

The potential surge is not lost on the San Francisco Municipal Transportation Agency or Mayor Ed Lee. The mayor is in the beginning stages of pitching an increase in vehicle license fees and wants general obligation bonds on future ballots to fill a projected \$6.3 billion funding gap that he says is needed to maintain the current system.

If approved, the money is slated for street fixes and hundreds of new transit vehicles by 2040. A transportation task force recently formed by the mayor recommends 260 new light-rail vehicles — 151 to replace aging cars, 24 new cars for the Muni Metro's Central Subway extension and 85 more to accommodate additional ridership. The task force also recommended that the current fleet of 810 buses be enlarged by 118, including several larger models to replace smaller versions.

If the funding doesn't come through, SFMTA officials fear more “rider discomfort” and increased “bunching” of slower buses that notoriously clog the streets during rush hour.

“Without a new investment, transit crowding is projected to get worse in the future, expanding to more routes at the busiest times of the day,” said Paul Rose, a spokesman for the SFMTA. “Gridlock and traffic would discourage new jobs from locating in The City.”

Rose said the agency is striving for a 50-50 “mode shift” wherein half of commuters are taking transit, walking, bicycling or using taxis, and the other half travel by personal vehicle. Currently, 60 percent of commuters in The City use their own cars, according to SFMTA estimates.

Gabriel Metcalf, executive director of the think tank SPUR and a member of a recent special committee to identify Muni’s funding issues, said no such shift to transit will happen without significant improvements to the system, including widening the gaps between bus stops to improve Muni’s dismal 8 mph average travel time.

“If we don’t make a major reinvestment, we’re going to see more breakdowns, more vehicles going out of service, and ultimately we’ll see a vicious cycle of declining ridership,” Metcalf said. “We’re still one of only a small number of American cities where our transit service is for everyone; the problem is that it’s too slow. I think this is the single most important thing we could do to improve livability.”

Considering The City’s other rising expenses, SFMTA Transportation Director Ed Reiskin said that for some people public transit is the major difference between being able to live in San Francisco or not.

“What makes the quality of life here so great has to do with the ease of how people can get around,” Reiskin said. “It’s one of the things that offsets the higher cost of housing.”

Supervisor Scott Wiener, who also works on regional transit issues with the Bay Area’s Metropolitan Transportation Commission, said municipal infrastructure updates often fall low on a list of priorities because the failure to keep pace with long-term deterioration almost never presents short-term political consequences.

Still, he said, the projected population increase presents a “crisis” for Muni and the Bay Area transportation system in general.

“Muni is not meeting the needs of current San Francisco residents, much less the 200,000 people who are yet to come,” Wiener said.

### **San Francisco at 1 million**

*The City is poised to hit the mark in less than two decades. This five-part series will explore the challenges San Francisco faces in handling this population milestone.*

-----  
27. Page VII-12: Alternative C: “4. Allowing height and/or density bonus for 100 percent affordable housing in all areas of the City except in RH-1 and RH-2 zones.”

Different neighborhoods have different height and zoning. Most RH-1 and RH-2 have height limits of 40 feet except a few special areas per Planning Code which have less than 40 feet height limits. When one allows height and zoning variances to increase height and density just because units are “100 percent affordable” impacts the neighborhood for what the people bought their homes in the area in the first place – that of single-family or duplex homes with pre-determined heights per the Planning Code at the time. Redefining what is allowed in RH-1 and RH-2 without changing the nomenclature is still “rezoning” via the change in definition of what is allowed.

Although it is good to keep RH-1 and RH-2 zones to not be part of the height and/or density bonus for 100 percent affordable, so should the lots that abut these parcels when in a RESIDENTIALLY-

zoned area (e.g. RH-1, RH-2, RH-3, RM-1, RM-2, RM-3). Otherwise, you are still impacting the residential neighborhood instead of having units on the transit corridors and that respect the adjacent neighborhood. The city assumes people who live on the transit corridors will NOT own or drive cars and because the transportation infrastructure is woefully needing more capacity to carry them to work (Muni, BART), Google buses, private ferries, new shuttles of all sorts from SFMTA and private and shuttles from various institutions as well as Uber, Lift, "private taxi" services will try to plug the capacity needs. These will add to the GHGs because the funding is not going to fix the transportation system first. You cannot build and THEN fix the transit.

Refer to my separate section on **issues on Muni incapacity** at the end of this comments document.

Below is an article on the introduction of a new private ferry service so that all the workers will not be on the streets and highways in vehicles (pollute the waters instead?). What data has the HERAA analyzed with the environmental impacts of such additional new transit as this?:

[HTTP://SFAPPEAL.COM/2014/02/GOOGLES-PRIVATE-EAST-BAY-TO-MOUNTAIN-VIEW-SHUTTLE-BOAT-PAYING-275-PER-LANDING/](http://sfappeal.com/2014/02/googles-private-east-bay-to-mountain-view-shuttle-boat-paying-275-per-landing/)

## GOOGLE'S PRIVATE EAST BAY TO MOUNTAIN VIEW SHUTTLE BOAT PAYING \$275 PER LANDING

by [Bay City News](#) | February 3, 2014 8:59 am | in [Bay Area](#) | [0](#)



Google is beginning today a weeklong private ferry service trial from the East Bay to Silicon Valley for its employees, according to the Water Emergency Transportation Authority.

During the five-day trial period, which ends Friday, Google vessels will leave Harbor Bay in Alameda each morning and ferry passengers to Redwood City, according to the transportation authority, which oversees San Francisco Bay Ferry service.

Last month, Google started a similar trial ferrying its employees between San Francisco and Redwood City. That five-week trial also ends this Friday.

WETA executive director Nina Rannells said in a statement that the transportation authority "has a long-term strategic plan for expanding ferry service in San Francisco Bay," and that the Google ferry service will complement the public ferry services.

Based on how smoothly the service runs, the private ferry has the potential to become a permanent option for Google employees living in the East Bay and commuting to the company's headquarters in Mountain View.

Google has agreed to pay WETA \$275 per landing. In an effort not to disrupt regular commuters, Google ferry riders will also not be allowed to park in the Harbor Bay ferry parking lot or on adjacent neighborhood streets.

Google will provide off-site parking and a shuttle service for its employees.

R30

-51

(Cont.)

The Google ferry service is not expected to impact the normal San Francisco Bay Ferry schedule, WETA officials said.

The ferry services come as Google and other tech companies have faced criticism for private commuter buses in San Francisco that housing advocates say have led to higher costs of living in the city and cause delays for public bus service.

*Hannah Albarazi, Bay City News*

28. Page VII-13: Alternative B: ~~“Policy 1.7: Encourage and support the construction of quality, new family housing.”~~

Why was this stricken? Middle class family housing and middle class housing for single people are not made as readily available based on the number of units built for the very low income and the above market rate units. If the goal is to get rid of the lower middle class and middle class, then the city can continue to not build for these income levels. It has been doing so for many years and the trend must reverse or the city is not allowing an equal distribution of housing for each housing income category. The income categories for which the city feels it will not get enough money out of will continue to decline and that is economic injustice and depending on the group of people affected, it could be injustice to certain groups of people in other categories.

R30

-52

29. Page VII-14: No Project Alternative (Policy 1.5) AND Alternative B (Policy 1.5): “Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households.”

The new housing for secondary units is not supported by all neighborhoods in RH-1 and RH-2 zoned areas. Newly installed “affordable” units will not remain “affordable” as there is no mechanism to enforce the units from becoming “market-rate.” What does it mean to allow these “secondary units in areas where their effects can be **‘dealt with’**”?

R30

-53

Without the proper health, safety, and infrastructure in place (rolling blackouts from PG&E? lack of water? excess energy consumption? lack of transit options to replace vehicle use and travel?), one has more impacts to the environment without having to build the excess capacity in SF. What happens to the 25,000+ units that are left vacant by property owners? These should be looked into instead of destroying more of the environment.

30. Page VII-14: Alternative B: “Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit.”

R30

-54

Where is the data in the HERAA to show where these places are located? Secondary units in or adjacent to RH-1 zoned homes or RH-2 zoned residential lots even if “in close proximity to neighborhood commercial districts” would impact the livability of neighborhoods such as Jordan Park (see Page 1 of this comment document on unique nature of Jordan Park).

△ It appears that many ordinances and policy measures are adopted prior to the city having a certified Housing Element document. The ordinances and Planning and Building Code changes subsequent to the Housing Element documents including this HERAA being certified should all be put on hold as it clearly is the method to proceed with development even without analyzing the needs and analyzing the data which prove other than the conclusions stated in these documents. Where is the thorough recent data, the identified needs and the full and accurate analysis with the HERAA?.

Getting back to Jordan Park, it is small 4-block residential area between California Street (supposedly a TEP street) and Geary (Transit Corridor) between Palm and Parker Avenues inclusive. This is area of primarily RH-1(D) and RH-2 zoned lots and is stuck now between these arbitrarily assigned “transit” streets of some magnitude. Many of the Jordan Park homes abut the Geary NC-3 zoned lots. Many more will be impacted with increased units from “additional in-fill units” on RM-zoned California Street with higher heights. If Alternative B or C from this HERAA is used, this will be disastrous for all the residential lots of low-density in this Jordan Park area. It is requested that these blocks be carved out of future legislation for “secondary” or “additional” units and “in-fill” housing to preserve the neighborhood character and conform with Residential Design Guidelines which have kept Jordan Park’s ambiance for the last almost century for some and more than a century for other lots. Jordan Park does not want this impact to devalue their quality of life and character of their enclave. It is an established community of a unique area of SF and the residents purchased their homes with reliance on the set housing density and other objective zoning criteria in Planning Code and Design Guidelines. See the 2004 Housing Element Data Needs & Analysis, Page 35, for Densities information. The HERAA does not analyze this harm to the Jordan Park area. If it did, there is not any analysis of this unique situation because the HERAA takes a broad brushstroke approach and applies it citywide.

R30  
-54  
(Cont.)



**TABLE I-27**

**Generalized Housing Densities Allowed by Zoning**

Density Level	Zoning District	Average Units per Acre	Population Density	General Locations
Low Density	RH-1	14	32	Mostly single-family housing located primarily in the southern and western parts of the City
	RH-1(D)			
Moderately Low Density	RH-2	36	83	Smaller multi-family housing such as duplexes, triplexes, and flats located around the City's central hills areas of Diamond Heights, Twin Peaks, and Potrero Hill; also around Golden Gate Park in the Richmond, and the northern part of the Sunset districts, the Marina and edges of Mission Bay bordering open space areas.
	RH-3			
Medium Density	RM-1	54	124	Non-residential commercial and industrial districts; certain areas adjacent to commercial zones; also in the central areas of Mission Bay
	C-1			
	C-2			
	M-1			
	M-2			
NCDs				
Moderately High Density	RM-2	91	209	More intensively developed northeastern part of the City; along major transit corridors such as Van Ness Avenue, Upper Market Street and Columbus Avenue; in major redevelopment areas such as the Western Addition, Golden Gateway; in Nob Hill, Chinatown, North Beach, edges of Mission Bay bordering commercial and industrial areas.
	RM-3			
	RC-2			
	RC-3			
High Density	RM-4	283	651	Downtown districts, parts of the northeastern section of the City; heavy commercial districts.
	RC-4			
	C-3			
	C-M			

R30  
-54  
(Cont.)

Jordan park is the ONLY low-density area of SF impacted by BOTH the TEP (California St) and the Transit Corridor (Geary) designation. It seeks relief from the already sped up development all around it.

Another small residential area on the other side of Geary is called Francisco Heights. It is primarily RH-1 that abuts the Geary NC-3 zoned lots. These residential homes will also be impacted from the infill housing and densification using the HERAA proposed. What analysis has been done for this low-density area and CEQA impacts to that small area?

Only a few small other areas of SF fall into a similar situation. They include in the Richmond District between 15<sup>th</sup> Avenue to 18<sup>th</sup> Avenue (RH-2's) and 10<sup>th</sup> Avenue to 18<sup>th</sup> Avenue (NC-3) on opposite sides of Geary (NC-3). If those people are fine with having the densified building and have not commented, maybe that is what they want.

What is the current number of single-family homes with NO "secondary units" in SF? Where is the data analysis for the HERAA? Maybe there are enough units since some of these have "illegal" second units. RH-1 areas in San Francisco made up 76% in 2004. What has happened to the zoning for some of these since for the HERAA? All of the RH-1 areas will not be impacted like Jordan Park with transit lanes on both sides of their area, again because of the City's arbitrary designation of the transit streets. Here's Page 34 of 2004 Housing Element Data Needs & Analysis for the above info:

Some homes may have been built larger originally, but a number of these have since been subdivided into smaller units similar in size to units built today. According to Assessor's data, between the years 1900 and 2000 the average unit ranged in size from 1,000 -1,200 square feet. The Assessor's database does not allow correlation between a specific year built and unit size because the data are based on the size of the unit today, not when it was originally built.

Almost 50% of San Francisco's housing stock was built prior to 1940. New construction since 1990 accounts for slightly more than 3% of the City's total housing stock. Housing added in the last 20 years represents approximately 7% of all units. Although older, most of the housing stock is in sound condition. Table I-26 details other differences in housing characteristics according to households' tenure status.

Approximately one-half of San Francisco's developable land is devoted to residential use.

Of the residentially zoned acreage, a majority of the area (76%) is zoned for single family and two unit housing, at a housing density of approximately 10 to 29 units per acre.

Other residential areas with higher housing densities, such as the Van Ness corridor and neighborhoods north of Market Street, bring average housing density citywide to 15 net dwelling units per acre.<sup>3</sup> Table I-27 offers a listing of the City's zoning categories that permit residential development, grouping these by generalized housing density levels.

Map I-2 provides a generalized illustration of housing densities citywide.

<sup>3</sup> Not including right of way and streets.

31. Page VII-14: Alternative B: "Implementation Measure 1.8.3: "On-going planning will propose Planning Code amendments to encourage secondary units where appropriate."

△ This Implementation Measure casts a wider net on where secondary units can be installed since it now says not only in “new buildings ... in close proximity to neighborhood commercial districts and public transit” as in Implementation Measure 1.8.1 above, but now it says “where appropriate.”

R30  
-55  
(Cont.) This implies they can be installed anywhere in the city. Where is the data to show the locations of these units, the total number of units being planned to be built in these locations, the number of people they will accommodate and for which income categories will they be built? Are these units needed?

32. Page VII-15: No Project Alternative: “Policy 2.3: Allow flexibility in the number and size of units within permitted volumes of larger multi-unit structures, especially if the flexibility results in creation of a significant number of dwelling units that are permanently affordable to lower income households.”

R30  
-56 If one looks at the building permits for remodels in larger multi-unit structures in SF, more bedrooms are being created in the same unit that had fewer bedrooms previously so that the rent could be increased or the sales price of condos can be increased. One-bedroom units are now two- and three-bedroom units. More people bring with them more potential environmental impacts. The people will use more water (or use the same amount of water and shower less?), use more products and services than if there are fewer people. The additional people will increase the noise and noise impacts to existing neighborhoods, especially those in the low-density neighborhoods where additional units are being stuffed. Again, more people, more shopping trips for food, goods and services; increased demand for water and more sewer outflows that may impact marine life, air quality; increased garbage hauling and forcing the city to purchase or lease more land for over-capacity landfills; more recycling services requiring additional cost to consumers; transportation congestion due to lack of parking (people circling and polluting more) and gridlock (idling vehicles polluting air) and due to lack of transit capacity. Increasing transit capacity would require more buses, trains, trolleys, ferries, cabs, etc. -- all add to the GHG total.

Not all of the increased bedroom units are “permanently affordable to lower income households” either. That is the argument used to approve many of the projects but the record of the number of units for the other income categories in between “low” and “market rate” are not being built at the rate to keep these people in the city. These are the middle-class regular people who are getting to be “endangered species” in SF.

33. Page VII-15: Alternative C: “1. Allowing for limited expansion of allowable building envelope for developments meeting the City’s affordable housing requirement on site with units of two or more bedrooms.”

R30  
-57 This allowance basically goes contrary to the zoning and use criteria set up in Planning Code and will compromise the neighborhood in terms of the people living in denser environment than has been traditionally been accepted by the people living there. Additional units and bedrooms will also make it even less affordable for families to purchase starter homes and shut middle-income families from residing in the city. Rents in these units will also not be on the lower end for the lower middle class people. In addition, the promotion of building only units with two or more bedrooms to qualify for the expansion of building envelopes is not the greenest method and it has additional implications on private open space which is in itself being compromised by conversion of it to shared or public open space utilization since the increase in the number of people looking for open space respite is out of kilter with less open space per capita. This broad brushstroke approach to allow such expansions is not something that people in established low-density

↑ neighborhoods purchased their homes for. What is not taken into account are the voices of the established neighborhoods, especially those in RH-1 and RH-2.

R30  
-58 34. Page VII-16: No Project Alternative: “Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character.”

The prevailing neighborhood character of certain areas of SF is single-family or two-family. The densities have already been in place and people need the respite from a highly dense urbanized feel since the open spaces are being developed into stack-and-pack housing. Setting other standards or parking schemes in these neighborhoods which cause people in vehicles to circle the blocks due to lack of parking and adding to air pollution, wear and tear on the vehicles.

R30  
-59 35. Page VII-16: Alternative B: ~~“Alternative B: Implementation 11.7.1: The Planning Department will work to reduce parking in older neighborhoods through a Better Neighborhoods type planning process with the support and input from local neighborhoods.”~~

Although this item was stricken, it is the SFMTA/SFCTA which has adopted this tactic to make it harder for people to take care of business and of members of their family. Meters are put into residential neighborhoods so that the employees and users of services circle the blocks creating additional congestion on streets that have been “traffic calmed” to the point where nobody is moving. They cannot jump onto a Muni bus that is degraded. The elimination of parking spaces also impacts businesses that cater to people who buy bulky items which cannot be easily carried on Muni which, due to degradation, does not show up or is too packed to get on. SFMTA can have buses show up and statistics can be kept on the total time it takes to get from one end of town to another but if the buses do not have the capacity to move the people, it is a failed system. The environmental impact of implementing this – which SFMTA/SFCTA has already – is causing more GHG issues, noise and vibration issues (since more cars are trying to get places without the parking available).

R30  
-60 36. Page VII-16: Alternative B: ~~“Policy 11.9: Set allowable densities and parking standards in residential areas at levels that promote the City’s overall housing objectives while respecting neighborhood scale and character.”~~

Tying residential densities to the parking standards without analyzing the predominant method of transportation of each neighborhood is undermining the supposed goal of creating a livable neighborhood. What works in the downtown area does not work for families living in single-family home-zoned or duplex-zoned areas. Where is the data analysis to determine the impact of a “one size fits all” transit policy for a city that has different traffic and vehicle and transportation use patterns? What current analysis has been done for the HERAA to determine the transit impact? Please provide this analysis that was completed for this document and for the 2004-adjudicated and 2009 Housing Elements which guided the revision for the alternatives.

R30  
-61 37. Page VII-17: 2004 Housing Element Comparison: “the 2004 Housing Element also promotes...reducing parking requirements (Policy 11.7), (which can reduce the amount of space per parcel devoted to parking and increase the amount of space available for housing units); and support for secondary units (which could increase the number of second housing units in San Francisco) (Policy 1.8) and flexible land use controls (Policy 11.6). The anticipated increase in the density of residential housing under the 2004 Housing Element is detailed under Impact LU-2 in *Section V.B, Land Use and Land Use Planning*. Together or individually, these housing policies could introduce higher density development in certain areas of the City. However, because the adoption of the 2004 Housing Element does not include any changes to allowable land uses or building heights and bulk – and new residential projects would continue to be constrained by

these existing controls – total development potential under the 2004 Housing Element would not be substantially greater than that under the 1990 Residence Element policies. Rather, 2004 Housing Element policies would support and encourage development concentrated in certain areas, rather than distributed throughout the City pursuant to the 1990 Residence Element policies.”

The text stating that the promotion of “reducing parking requirements...which can reduce the amount of space per parcel devoted to parking and increase the amount of space available for housing units” and the text stating “the 2004 Housing Element does not include any changes to allowable land uses or building heights and bulk – and new residential projects would continue to be constrained by these existing controls” run counter to each other. When projects reduce the parking spaces and include an additional housing unit in this manner or when the city decides to “increase the number of second housing units in San Francisco,” if the second units go into lots not currently zoned for that use, that is a change. In addition, when the city legislates that a “secondary unit” is NOT just a second unit but an “additional unit,” that will eliminate the definition under current Planning Code to restrict the number of units according to the use zones established (e.g. RH-1(D), RH-1, RH-2, RH-3, RMs). This change in the definition and subsequent passage of such ordinances go counter to the statement that the “total development potential under the 2004 Housing Element would not be substantially greater than that under the 1990 Residence Element policies.” When people are given a green light to install additional units with no regard to the current Planning Code requirements which dictate the number of units allowed per square footage of lot or per floor-to-area ratios, e.g., that allowance changes the definition of the allowed uses that increase density and changes the amount of environmental impacts. Height and bulk are normally granted “variances” by the Zoning Administrator and that invites changes to the character of existing neighborhoods with added noise, pollution, vibrations, service increases, supply increases, impacts to older neighborhood properties, e.g.. The entire city residential and mixed use housing count can be greatly increased under this scheme. A full analysis of the environmental impacts has not been addressed.

In addition, the summary states that the “2004 Housing Element policies would support and encourage development concentrated in certain areas, rather than distributed throughout the City pursuant to the 1990 Residence Element policies.” From what I have seen, the “secondary units” or “additional units” (more than just another unit will be allowed in upcoming legislation) or “in-fill units” are not relegated to only certain areas of the city but ARE distributed throughout the City. Where is the data which shows where all the new units, additional bedrooms have been installed thus far since the 2004 Housing Element? Where are all the new units and additional bedrooms in the pipeline that have been relying on the 2009 Housing Element? What permitted and unpermitted projects since 2004 have relied on proceeding with the 2004/2009 Housing Element and the revised alternatives from the December 2013 documents? How many total units and where?

Without all the data for the above, it cannot be that a full, accurate and thorough CEQA environmental analysis on the impacts from these policy changes has been done. It is almost as if the current trend of development projects is already implementing the 2009 Housing Element since the changes are already being dispersed throughout the city. It appears that the environmental impacts have been summarily dismissed rather than analyzed.

38. Page VII-17 & 18: 2009 Housing Element Comparison: “In sum, for purposes of this EIR alternatives analysis, it is assumed that new housing development under Alternative A would generally result in patterns of residential development that are relatively dispersed throughout the City, consistent with existing land use and density patterns, particularly as compared to the 2004 Housing element or the 2009 Housing Element.”

Again, as stated in the point previous to this, the result in patterns of residential development will not be “consistent with existing land use and density patterns” because the rules of land use for each zoning area will change the definitions and in effect be changing the density and use limits for each of the zoning categories in Planning Code. To say it will be “consistent” is not true. So in order for the city to ensure that this statement is “accurate,” it will change laws and definitions to fit this so it comes to fruition. Community and established neighborhood planning should not be dictated on new rules and then conforming to them when it is against the existing Planning Code and existing neighborhood character. The residents of these existing and mature neighborhoods lived in their areas and purchased homes in their areas due to the existing laws which helped maintain that quality of life. One size does not fit all. Where is the needs data to state that these established neighborhood residents want to insert all the additional units into their existing homes? Where is the data which shows that each and every resident want the 2009 Housing Element policies to be adopted with less open space of rear yard and side yards? With less parking for families while the transit network does not accommodate the demands from all the additional growth in these areas? With additional noise increases? Where is the data which indicate that all the residents of the established neighborhoods voted to approve all the changes outlined in the 2009 Housing Element? None of this was done. People in the new areas buy into the areas if they are fine with no parking, additional noise increases, no reliance on transit (bike or walk), do not have family-related needs for automobiles, etc. Doing so in fully mature neighborhoods is like uprooting a mature tree and removing it from the environment it was accustomed to. People paid a good sum of their income for homes they thought were for single-family or duplexes and then to have that all go by the wayside in the 2009 Housing Element is not right. Again, where is the data and needs analysis to show these mature neighborhoods all want them? Where is it broken down in terms of homeowners associations? In terms of density per acre to have the diverse neighborhood characters we have in this city which makes the city so special? Having a homogenous town to all look and feel like a C-3 Downtown Financial District or a commercial strip in between two residential associations is not what many residents I know want.

39. Page VII-18: “...measures included in the 2004 Housing Element but eliminated under Alternative B, density would not increase to the same extent under this Alternative. As shown in Table VII-1, Policies and Implementation Measures eliminated from Alternative B include Implementation Measure 1.1.1 (provide a framework for higher density development), Implementation Measure 1.3.1 (changes to floor to area ratio exemptions), Implementation Measure 1.6.2 (increasing height limits, reduced parking requirements), Policy 11.6 and Implementation Measure 11.6.1 (promote housing density near transit), and Policy 11.7 and Implementation Measure 11.7.1 (reduce minimum parking requirements). As a result, residential density could increase under Alternative B compared to existing densities, but potentially less so than under the 2004 Housing Element. However, the reduction in density is expected to affect the density of individual buildings rather than the number of buildings constructed. In other words, under both the 2004 Housing Element and Alternative B, similar numbers of buildings are likely to be constructed; however, policies in the 2004 Housing Element would encourage each building to include more units.”

The same problem still exists with Alternative B since the densities are being increased in opposition to the existing Planning Code for each use zone (e.g. units per sq. ft. of lot, floor-to-area ratio). They are being violated. When that is done, the same issues brought up earlier in this document exist: where is the data to show that increasing density does not impact infrastructure needs, additional emissions of GHGs, lessen driving or use of services that use vehicles, lessen energy use and associated pollution from that, etc. Alternative B, even with the elimination of above-mentioned policies, marches forward with in-fill units which still undermine the existing

R30  
-63  
(Cont.)

neighborhood character and zoning protections of single-family and duplex structure environment with more people and its associated impacts.

40. Page VII-18: Alternative B: 2004 Housing Element – Adjudicated: 2009 Housing Element Comparison: “Thus, the overall effect of Alternative B, as compared to the 2009 Housing Element, is housing development that could be relatively less dense because housing would not be encouraged in new commercial and institutional projects, near major transit lines, or in community plans.”

But these projects have already gone in. Please list the projects that relied on developing housing in new commercial and institutional projects, near major transit lines, or in community plans. Where are the data and statistics for the number of additional units built for the conclusions arrived at in this HERAA?

Is there a need for the additional units if there is already at least 25,000 vacant units in the city prior to building new units? Where is the data showing in re vacant units (no law to force property owners to move tenants into them). It is hard to believe the GHG emissions is the reason for the intense development without having a real need for the units nor the resources to support them. There are too many people per acre in this small 49-square mile city which sits on a major earthquake fault and has infrastructure deficiencies, lack of resources (e.g. water which is now blended rather than 100% Hetch Hetchy for 95% of the city residents), additional strain on ecosystems (biological resources). Creating more pollution and then forcing people to plant greenery to try to overcome the pollution will not take care of the air quality issues.

See also Comment #4 above, Table V.I-4 (GHG’s).

Where is the data for this HERAA which shows the how much the trees or green areas will impact the GHGs being emitted by all the additional people and services of SF? How many tons of emissions are being generated by San Francisco? How many tons of emissions are being ameliorated with densifying housing? Where is the current data needs and analysis on this for this HERAA which made all the conclusions that GHG’s would not be increased nor be of any significant impact even with the goal of adding 1 million more residents to SF? Without the data to determine the impact on the environment, the policy documents cannot be approved and certified and adopted to be the blueprint for San Francisco without such complete, accurate and thorough analysis which has not occurred for this HERAA.

41. Page VII-19: “In sum, ... Additionally, Alternative B would encourage increased housing in neighborhood commercial districts and mixed-use districts near Downtown, but to a lesser degree than the 2004 or 2009 Housing Element.”

What Alternative B does not take into consideration, nor does Alternative C, is that there is no consideration for established neighborhoods with single-family and duplex zoned lots immediately adjacent to these areas being targeted for increased housing. This is the situation with Jordan Park and the homes between Palm and Parker (inclusive) between Geary and California Streets. When the lot zoned NC is abutted against a lot that is RH-2 or RH-1, those single-family and duplex families will now be living with a very dense building with residential units vs. what used to be a commercial entity with set business hours and no or only one or two residential units next to them. This adds to the increase in all manner of ways – transportation (vehicles, taxis, private limos, shuttles, buses), noise increase, vibration increase (from construction of additional units), wear and tear and taxing the sewage and water systems, everybody having to pay for all of the increase in population and units being packed into these established areas next to Neighborhood Commercial (NC) areas.

- R30  
-65  
(Cont.)
42. Page VII-19: Alternative C: 2009 Housing Element – Intensified: “..the intensified development concepts ...provided under Alternative C would promote increased density and building mass to a greater extent than the 2004 and 2009 Housing Elements. Total new housing units would remain within ABAG projections.
- R30  
-66
- Alternative C development concept 1 would promote intensified site development that meets specified affordable housing requirements...concepts 2 and 3...direct growth along transit lines, while concepts 4 and 5 direct growth more generally throughout the City.”
- There already exists development projects that have been approved “along transit lines” that “meet specified affordable housing requirements.” Where is the data analysis on the number of units built thus far since the 2004 Housing Element? Which of these projects relied on the 2009 Housing Element? Where is the data which shows that total GHG emissions have dropped with these developments in place since 2004? Since 2012? For this HERAA study?
43. Neither the developer nor the residents affected by a proposed development has any certainty when “community planning efforts” are relied on since these are often subjective rather than objective. No objective criteria laid out in advance, especially for Alt A for potential and current Historic Resources that are not all identified.
- R30  
-67
- See also “Executive Summary” (Comment No. 1) above.  
See also comment for Page VII-88 below.
- For Alt B & Alt C, a “significant” impact on the Transit Network can be exacerbated to “way beyond significant” when the City decides under PRC Sec. 21002 to just go forward despite the significant impacts even if economic, social or other conditions make a project infeasible. What social, economic, health, or environmental impacts have been occurring since the implementation of many of the TEP, SCS, PlanBayArea / OneBayArea policies? What percentage of the middle-class have left the city? What percentage of minorities and from which groups? What percentage of the very low, low, moderate and market-rate housing has been built thus far with TEP, SCS, PlanBayArea / OneBayArea policies since 2004? Since 2009? Without TEP, SCS, PlanBayArea policies how would the data be different for each? Where is the data and analysis before marching forward with more alternatives which could exacerbate the existing livability of people in SF?
- R30  
-68
44. Page VII-19: “Similar to the 2004 HE, policies provided under Alternative C would encourage housing on public lands and in secondary units.” “Similar” is not the equivalent of “same.” What are the differences? Where is the data and analysis for the locations of potential housing on public lands and in secondary units? Where is the survey that was done which would identify all the lots of where such housing would be encouraged? Why is this survey not done?
- R30  
-69
45. Page VII-20: “Similar to the 2004 HE, new development under Alt A would be subject to the controls in existing Area Plans and Redevelopment Plans...Additionally, the policies in Alt A would not conflict with any regional land use policies,...or prevailing local plans, including...MTA Strategic Plan, Bicycle Plan, and the Urban Forest Plan) for reasons substantially similar to those discussed in this EIR under Impact LU-1 in *Section V. B, Land Use and Land Use Planning.*”



The Urban Forest Plan has not even been adopted yet. Final public comment on it is not due until February 21, 2014 (**AFTER this HERAA comments are due**). So how is it already known with certainty that it has no conflict with Alt A? Including this UFP in this HERAA and concluding that it is in line with the UFP is pre-mature and dismissive of any comments being gathered for the HERAA. Until the UFP is adopted, one does not know what will be in it due to potential revisions. Mention of the UFP should be stricken from this HE alternatives document. This manner of adopting policy and implementation measures in the HERAA is a fait accompli. Input is taken but is meaningless because the City and whoever will gain from implementing the HERAA will continue to conduct business as usual regardless of significant impacts to CEQA categories and whether or not there is any recent data needs or analysis to prove otherwise.

R30  
-69  
(Cont.)

46. Page VII-20: "Land Use: "Alternative A.....Areas for future housing development would occur primarily as infill development on individual underutilized or vacant parcels, and most future housing development would take place in established neighborhoods, with the exception of recently rezoned plan areas where such rezoning as substantially increased redevelopment capacity (e.g., Bayview/Hunters Point Redevelopment Project and Treasure Island)...As with the 2004 and 2009 Housing Elements, under Alternative A there would be *no impact* on land use from physically dividing an established community."

When the city allows "infill development" everywhere in the city, that will change the definitions to the zoning use of all parcels and thus although the nomenclature of the lots will not change, it is in effect a change in use for a denser category of planning zone use. Inclusion of another unit into an RH-2 (two-family) zoned lot means it turns into an RH-3 (three-family) zoned lot. Inclusion of another unit in an RH-1 zoned lot means it turns into an RH-2 (two-family) zoned lot. In many areas of the Housing Element Alternatives document, it states that there will be NO rezoning but in actuality, the provisions are basically rezoning through the change in definitions for each category of land use (e.g. RH-1, RH-2, RH-3, etc.).

R30  
-70

Forcing more units into a building will mean it will sell for more. A two-unit building with more units and more square footage than a small one-unit building will be more expensive for people to purchase or to rent. People who used to be able to live in their old communities will no longer be able to afford to live there. They will be split up. Family members will have to even move out of the city. More and more middle class regular workers are moving out. They have to travel from outlying areas to see their families and friends. This WAS their established community. It has now become divided. These new Housing Element policies divide these established communities not just physically but also economically.

Where is the data and analysis and needs that show for this HERAA that proceeding with the new alternatives will result in the same impacts as those found from 2004 and 2009 Housing Element when the new data is not even used?

47. Page VII-22: "...new taller, high density buildings tend to have more sources of light at higher elevations, thereby increasing the visibility of that light, and larger expanses of glass compared to typical residential uses, Alt A could result in less additional light and glare from new residential sources than the 2004 HE."

What is the percentage of light and glare calculated from the residential buildings for the 2004 HE? What is the percentage of light and glare calculated from the taller residential buildings built since 2004 HE? Where is the data and analysis on this?

R30  
-71

R30  
-72 People turn on their interior lights with no window coverings. This will still attract birds on the Pacific flyway. All use more energy. During daytime hours, at sunrise, sunset, e.g., taller buildings cause shadows and impair visibility for drivers to yield more pedestrian collisions.

See also Page VII-95 comment.

R30  
-73 48. Page VII-23: "...and there would be no impact to the City's jobs/housing balance (Impact PH-1)." How many new jobs have been lured into SF since 2004? What was the ratio of jobs to housing in 2004? What was the ratio of jobs to housing in 2009? What would be the new ratio of jobs to housing with each of the alternatives A, B, and C? Where are the supporting data to support the answers to my above questions under this new HERAA?

R30  
-74 49. Page VII-23: 2009 Housing Element Comparison: "...policies of the 2009 Housing Element promote housing at limited locations in the City Alternative A would not result in substantial impacts related to the displacement of existing housing or creating demand for housing (Impact PH-2), or substantial impacts related to displacement of people (Impact PH-3), for similar reasons provided in Section V.D. Population and Housing under the impact analysis of these issues for the 2009 Housing Element. As noted in that section, similar to the 2009 Housing Element, compliance with existing Planning and Building Code requirements would minimize the potential to displace housing or people."

R30  
-75 50. Page VII-24: "In addition to impacts on individual properties, cumulative impacts could arise in certain areas over the course of time thereby diminishing the historic significance of the area."

Areas with working class structures are easy targets for redevelopment. What surveys have been done to show the number of older structures demolished (year built e.g. 1870s-1880s, 1880s-1890s, 1890s-1910s, 1910s-1920s) and types (e.g. duplexes, single-family) and square footages of properties where facades were altered to diminish historical significance potential?

Since 2004, is there a count? In what districts? How many have been done in areas where "official" city surveys have not yet been conducted?

Without this data, the cumulative impact cannot be ascertained for this HERAA. What were the Historic Preservation Commission's comments on this HERAA? With historical cultural and paleontological impacts being SIGNIFICANT, it is hard to believe that everything in this HERAA was blessed and moved forward.

Where may I see the Historic Preservation Commission comments for this HERAA since the deadline for this comments document is February 18, 2014 and the Historic Preservation Commission has not agendized this HERAA and do not meet until at least Ash Wednesday, March 5, 2014. Would the HERAA comment period be extended after the Historic Preservation Commission gets a chance to comment?

R30  
-76 51. Page VII-25: No substantial accurate historic resource survey of the ENTIRE city has begun. Without it and the data used to determine if historical resources will be compromised, one cannot say which Alternative has a more or less impact in hard numbers. Thus cannot choose an alternative without the historic resource survey for the rest of SF, and without it, there are potential significant impacts to cultural and paleontological resources yet undiscovered and could pose further delays to development. Such a citywide survey is needed prior to make an informed decision on what alternative to choose. See the map from the DEIR Part 1, Fig. V.E:



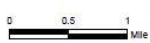
CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT

**Figure V.E-2  
Potential Housing Units:  
Capacity and Pipeline within  
Sites Surveyed for Potential  
Historic Resources**

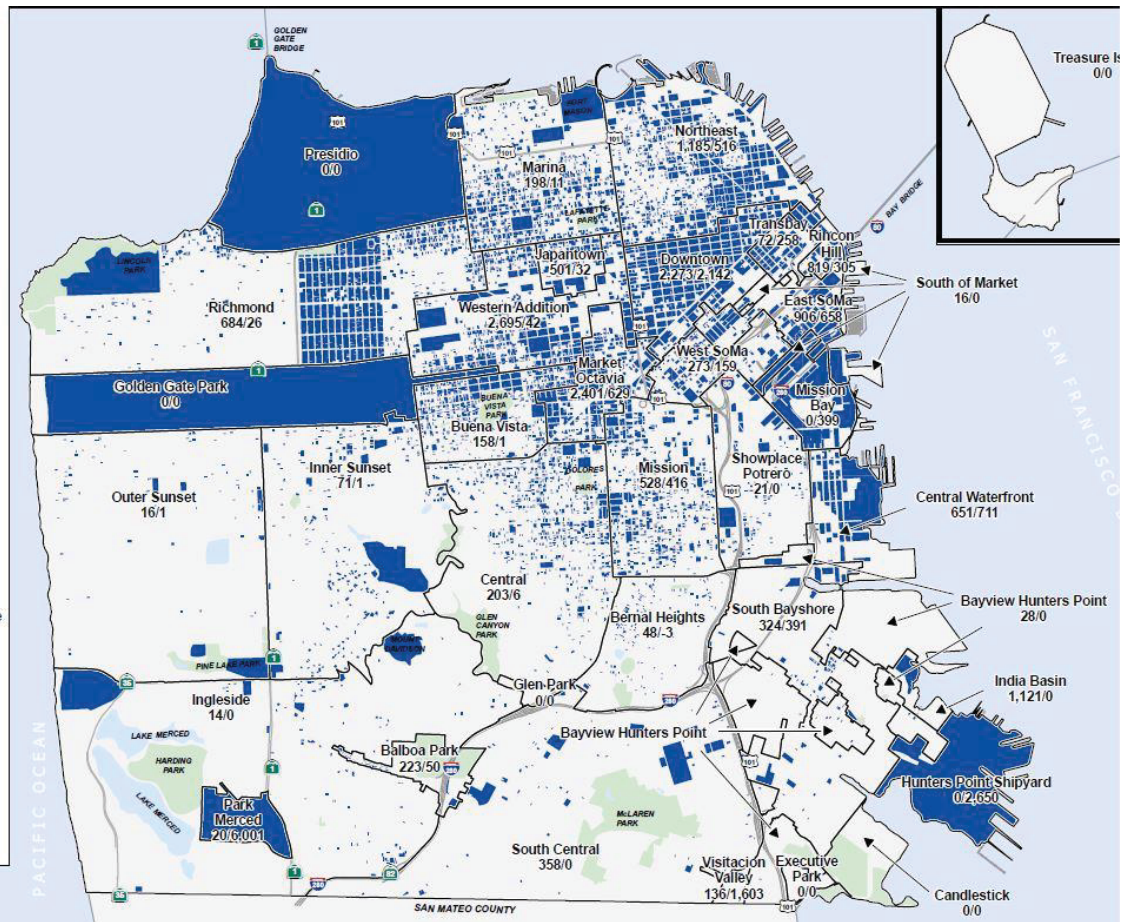
- Sites Surveyed for Potential Historic Resources
- Parks

**Notes:**

1. Numerical values represent housing capacity within sites surveyed for potential historic resources followed by net pipeline units within these sites (Housing Unit Capacity/ Pipeline Units), except as noted below.
2. Within the Mission Bay, Hunters Point, Candlestick Point, Visitation Valley, and Treasure Island Redevelopment Areas, as well as the Park Merced area plan, the specific locations of housing units are unknown, therefore total net units anticipated under those plans are indicated.
3. "Sites surveyed for potential historic resources" refer to sites that have been surveyed as part of the 1968 Junior League Here Today survey, the 1976 Department of City Planning Architectural Survey, the Unreinforced Masonry Building Survey, or Heritage Surveys. This designation does not include sites evaluated through other past or ongoing surveys or other sites 50 years or older that may be historic resources.



Sources:  
Pipeline and Capacity: CCSF Planning Department, Q1 2009.  
Sites Surveyed for Potential Historic Resources: CCSF Planning Department, May 2010.



R30  
-76  
(Cont.)

In addition, many very old pre-1920 buildings are given Categorical Exemptions with no Historic Resource Evaluation Reports written at all. Where is the new data for this HERAA which shows how many potential historic resource structures have been demolished, how many have been remodeled, how many units were in each, how many units were put into each or will be in some pipeline projects yet to hit? Where is this data for the HERAA so one can determine the change in need for the units, the impact to the historical resources, the cultural and paleontological resources, etc.?

There appears to be no serious consideration given to the historic resources of SF or potential historic resources because the city wants to develop the properties for income generation. No determinations or even Historic Resource Evaluation Reports (HRERs) are made available to the public prior to demolitions or remodels. With this kind of lax regard for an important CEQA category which is deemed to be impacted to a SIGNIFICANT level, more focus is needed to ensure there is some oversight. What listings have been analyzed and how many HRERs have been done for all the buildings which fit into this category from 2004 to present? Where is the data analysis on this for this HERAA?

For everybody's review, the following is the criteria for historic resources under CEQA per Page 38 of DEIR, Part 1 V.E:

resource listed in, or determined to be eligible for listing in, the California Register. All National Register-listed or eligible resources qualify for listing in the California Register. The Public Resources Code defines "substantial adverse change" as "demolition, destruction, relocation or alteration," activities that would impair the significance of an historical resource (Public Resources Code Section 5020.1q and State CEQA Guidelines Section 15064.5 (b)(1) and (2)).

CEQA also defines activities that would impair the significance of an historical resource:

The significance of an historical resource is materially impaired when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historic Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historic resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historic Resources as determined by a lead agency for purposes of CEQA.<sup>57</sup>

According to CEQA, "Generally, a project that follows The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or The Secretary of the Interior's Standards for Rehabilitating Historic Buildings...shall be considered as mitigated to a level of less than a significant impact on the historical resource."<sup>58</sup>

CEQA requires that the effects of a project on an archaeological resource shall be taken into consideration and that if a project may affect an archaeological resource that it shall first be determined if the archaeological resource is an "historical resource", that is, if the archaeological resource meets the criteria for listing in the California Register of Historical Resources (CRHR). To be eligible for listing to the CRHP under Criteria 1, 2, or 3, an archaeological site must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or exemplary of a type, period, or method of construction (CEQA Guidelines § 15064.5(a)(1) and (3) and (c)(1) and (2)). To be eligible under Criterion 4, an archaeological site need only show the potential to yield important

<sup>57</sup> State CEQA Guidelines Section 15064.5 (b)(2)(A)(B)(C).

<sup>58</sup> State CEQA Guidelines Section 15064.5 (b)(3).

At least the City acknowledges and admits the loss of potential historic resources while demolishing and altering for denser and more costly buildings which will forever be out of reach for the lower income people to rent or own (see below Page 41, DEIR Part 1, V.E):

New construction could result in impacts related to potential historic districts through inappropriate alterations/alterations, inappropriate new construction, and demolition by neglect, which are further discussed below. While an individual future project may not have an impact to a larger historic district, cumulative impacts may occur with the demolition and/or new housing construction over time. Impacts resulting from policies that would allow for demolition and/or new construction could have direct or indirect impacts on historic resources.

The term “directly affected” refers to work, alterations or replacement that demolishes or materially alters that specific building, structure or object. In addition, the term “directly” refers to work, alterations or replacement of material in the vicinity of the building, structure or object. The 2004 Housing Element and the 2009 Housing Element would not have any direct impacts related to historic resources. The term “indirectly” refers to policies that could ultimately lead to direct effects on historic properties. As an example: policies that encourage the demolition or alteration of an existing building resource that is considered underutilized and is potentially a resource, in order to build a multi-unit residential building would be an indirect impact of the Housing Elements, not only for the individual resource but potentially a historic district if the resource is a contributor to such a district.

Implementation of the 2004 Housing Element and the 2009 Housing Element could have a significant impact or a substantial adverse change on historic resources by promoting inappropriate alterations and/or additions, inappropriate new construction, and demolition by neglect. CEQA defines "substantial adverse change" as "demolition, destruction, relocation or alteration," activities that would impair the significance of a historical resource either directly or indirectly. Although the proposed 2004 and 2009 Housing Elements would not directly result in the construction of residential units, they would direct housing to locations where residential growth is deemed appropriate, promote the retention of existing housing, and encourage development in accordance with the City’s needs. Policies that encourage new construction within Article 10 and Article 11 areas, or other areas of the City with known or potential Historic Resources could result in indirect impacts upon these resources through demolition, removal of character-defining features, alteration or inappropriate new construction.

The following potential impacts are organized and defined as:

- Inappropriate Alterations/Additions = alterations or new construction that demolishes, alters, removes or conceals those character defining features that convey the historic significance of a historic resource and thereby substantially alters the property's integrity.

R30  
-76  
(Cont.)

R30  
-77

R30  
-78

52. Page VII-26: States here that the units without parking reduce construction cost and price of units than those units with parking. The problem is that people move into the units near transit corridors or wherever and then rent or lease a garage for their vehicles elsewhere. It does not guarantee that the person will not use a car. This human behavior has not been accounted for in the analysis. Look at the “want ads” for garages. Look at the prices for them as they increase. Just because the units without parking may be “affordable” does not mean that the residents in them will not use or access vehicles. How do Alternatives A, B & C deal with this issue?

53. Page VII-27: “...shift modes of transportation to transit, bicycling or walking.”

If all vehicle parking is being minimized, are we to assume that no parking lots will be built? Is this the goal of reduced GHGs? If there is a project that allows the construction of a parking lot for multiple vehicles, will that be against policy for the project? Would that project be denied?

54. Page VII-27: "...increased residential density is correlated with reduced auto ownership and reduced VMT, resulting in overall beneficial impacts to the City transportation network. Therefore, the 2004 Housing Element would provide more beneficial impacts to the City transportation network by promoting greater increased density compared to Alternative A."

People with sufficient financial means will use or own a vehicle regardless of living on a transit line. If a unit on a transit line is \$2 million, that does not mean the poor soul that purchased or rented / leased the unit does not have the will and means to drive or be driven. More people on the transit lines does not necessarily equate to no vehicle use or ownership. If there are no parking spots in these units along the transit corridor, they will find a private vehicle parking place because they can afford it. People will not get out of their vehicles for certain tasks.

55. Page VII-36: "...water demand would be *less than significant*, and would not differ substantially from the 2004 and 2009 Housing Elements."

This assumes there is no drought and normal rainfall. We are in a drought. We are already using blended water instead of 100% Hetch Hetchy. We will be drinking treated groundwater. Aquifers will get drained and the salt water will intrude and more problems from that will arise as the population grows. Check out this article on drought:

<http://sfappeal.com/2014/01/droughtwatch-2014-deliveries-to-california-department-of-water-resources-customers-cease/>

## **DROUGHTWATCH 2014: DELIVERIES TO CALIFORNIA DEPARTMENT OF WATER RESOURCES CUSTOMERS CEASE**

by [Bay City News](#) | January 31, 2014 6:52 pm | in [Environment](#) | [1](#)

The California Department of Water Resources announced today that there will be no water deliveries to customers in the wake of a statewide drought.

Customers of the State Water Project will get no deliveries in 2014 if the current dry conditions continue, according to department officials.

Deliveries to agricultural districts may be cut by 50 percent.

According to department officials, the water project has never before agreed to zero allocation for all of the 29 public water agencies that buy from it.

Carryover water stored by local agencies and bought by water agencies will still be delivered, officials said.

Department of Water Resources director Mark Cowin said in a statement today, "Simply put, there's not enough water in the system right now for customers to expect any water this season from the project."

△ The zero percent allocation of freshwater from the Sacramento-San Joaquin Delta was made to preserve stored water that may be needed later in the year for health and safety needs, officials said.

The State Water Project supplies water to 25 million Californians and 750,000 acres of irrigated farmland. The water is transported to urban and agricultural communities in Northern California, the Bay Area, the San Joaquin Valley, the Central Coast, and Southern California.

This year is looking to be the driest year in state history with reservoir storage at its lowest since 1977.

The snowpack is only at 12 percent of average for this time of year.

To get back to average rain and snowfall levels it would need to rain and snow heavily every other day from now until May, according to department officials.

Earlier this month Gov. Jerry Brown declared a drought state of emergency as water shortages loomed. Today he commented on the Department of Water Resources decision.

“Today’s action is a stark reminder that California’s drought is real. We’re taking every possible step to prepare the state for the continuing dry conditions we face,” he said.

The California Farm Bureau Federation, which represents nearly 78,000 family farmers and ranchers, responded to the zero allocation decision, calling it a “terrible blow” that was not unexpected.

In a statement today, federation president Paul Wenger said there will be “severe economic problems in our rural regions—loss of jobs and economic activity...” as drought conditions persist.

The governor said there have been 125 additional Cal Fire firefighters hired to help with increased fire threat and the state Department of Public Health is offering assistance to water districts at risk of drinking water shortages.

The cities of Cloverdale and Healdsburg in Sonoma County and the Lompico Water Department in Santa Cruz County are on a list of vulnerable rural drinking water systems, according to the state Department of Public Health.

The San Francisco Public Utilities Commission is asking for customers of the Hetch Hetchy Regional Water System to voluntarily cut water consumption by 10 percent.

Gov. Brown has asked residents for a 20 percent reduction in water use, but according to San Francisco water officials, their customers are already reducing consumption at higher rates.

The water department said residents use 49 gallons per day on average, one of the lowest daily consumption rates in the state.

The water system serves 2.6 million residents and businesses in the Bay Area.

San Francisco Mayor Ed Lee is expected to issue an executive order for city departments to cut back on municipal water use in the next two weeks, according to the SFPUC.

R30  
-80  
(Cont.)

The water department is offering customers free water-saving devices. Showerheads and other supplies are available. More information can be found at

<http://www.sfwater.org/index.aspx?page=140>.

Other water conservation tips include taking shorter showers, only running the dishwasher with a full load and purchasing water-efficient appliances.

The National Weather Service provided data on some Bay Area cities that recorded the driest January in decades.

In downtown San Francisco there were .06 inches of rainfall.

Previously, the record was in 1920 with .26 inches of precipitation. In Oakland, a record set in 1976 with .31 inches was beat this month with only .04 inches.

A site in San Jose recorded only .12 inches this month. A 1920's record there still stands at .10 inches.

*Sasha Lekach, Bay City News*

56. Page VII-45: "...the 2009 Housing Element specifically emphasizes development in a manner that does not present conflicts with existing neighborhood character."

But the implementation measures indicate that "community planning" will be used rather than the neighborhood input – the local neighborhood association members' viewpoints. This takes away from not conflicting with "existing neighborhood character."

57. Page VII-61: "Policies included in Alternative B include policies that advocate for zoning changes in many areas of the City that have undergone area planning processes, measures that call for rezoning of the City's industrial and commercial districts to provide mixed use neighborhoods, and encouraging housing along transit for specialized housing types (See Table VII-2)...The analysis of the 2004 and 2009 Housing Elements under Impact TR-1 found that impacts to transit would be potentially significant under Cumulative Conditions in the year 2025...Given that Alternative B could potentially encourage increases in transit ridership, potentially above Muni's capacity utilization standard of 85 percent, and that SFMTA's fiscal emergencies may not allow for expanded transit service, adoption of and development of housing under Alternative B may result in a potentially significant impact on the City's transit system."

Although it has been stated that the 2004 and 2009 Housing Elements will not have any rezoning, it is clear there are and will be more of it as stated elsewhere in this comments document.

Although the transit impact is said to be potentially significant in 2025 with Muni's capacity standard of 85 percent, it has been over capacity for some time already as indicated by Muni riders complaining about not even being able to board. The conclusion is based on fiction rather than fact.

At the end of this comments document is a section only on Muni incapacity – many news articles and anecdotal evidence (e.g. Yelp and blogs). This is the reality of Muni. It is in a crisis mode NOW and HAS BEEN for some time. It will not be able to handle the 1 million additional people.



From the San Francisco Transportation Plan, we have admission of transit network impact and congestion:



growth is expected in the downtown core, southeast, and southwest (Figure 9). This would mean adding about 9,800 new residents each year for the next thirty years, compared to about 4,200 residents that have been added per year over the prior thirty years.

These projections reflect expectations for robust regional growth and regional policy stemming from Senate Bill 375 (2008), which required regional governments to reduce greenhouse gases from transportation. To meet the SB 375 target, the Regional Transportation Plan, known as Plan Bay Area, calls for concentration of growth in densely developed areas with good transit access especially in San Francisco, San Jose, and Oakland (Figure 10)—a pattern that supports less driving and produces fewer greenhouse gases.

**INCREASED TRANSIT CAPACITY AND SERVICES ARE NEEDED TO ACCOMMODATE GROWTH**

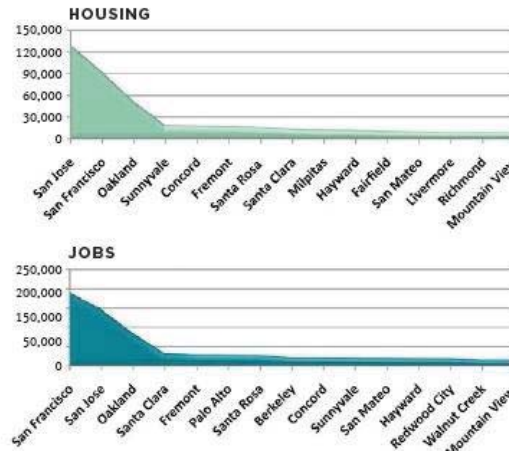
Concentrating jobs and housing in San Francisco is good for the city's economy as well as the environment, but will also increase congestion and transit system crowding in downtown San Francisco and Eastern neighborhoods. By 2040, new growth will re-

sult in about 300,000 new transit trips per day on a local and regional system that is already strained by crowding and reliability issues. The San Francisco Planning Commission has adopted land use plans that direct much of the city's projected growth in the central and eastern neighborhoods, where crowding is already acute. Figure 11 compares transit crowding today and in 2040,

By 2040, new growth will result in about 300,000 new transit trips per day on a system that is already strained by crowding and reliability issues.

Not really less driving if people now are driving INTO the City

FIGURE 10. POPULATION AND EMPLOYMENT GROWTH PROJECTIONS IN THE TOP 25 BAY AREA CITIES (2010-2040)



SOURCE: METROPOLITAN TRANSPORTATION COMMISSION, PLAN BAY AREA (2013)

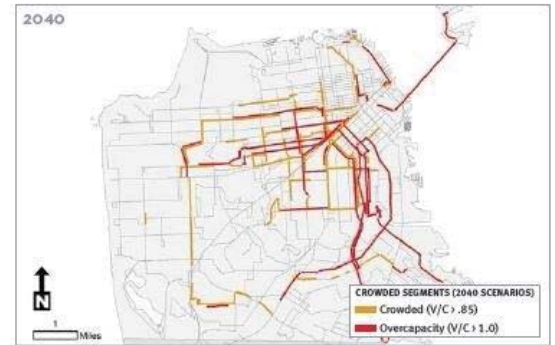


FIGURE 11. CROWDING\* ON MUNI IN 2013 (TOP) AND IN 2040 (BOTTOM)

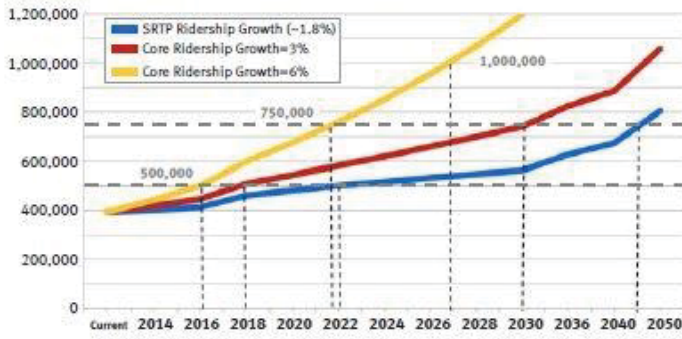
SOURCE: SFCTA, SF CHAMP

\* Crowding is defined by the percent of person-hours traveled in crowded (passenger-volume-to-vehicle-capacity ratio is 85% or higher) or over-capacity conditions (volume to capacity ratio is more than 100%).

Also more on increased transit crowding & BART incapacity and the findings to show there is going to be a transit meltdown from the San Francisco Transportation Plan (Dec. 2013):

R30  
-82  
(Cont.)

FIGURE 12. BART STATION CAPACITY CONSTRAINTS



SOURCE: BART

and shows that crowding will grow most on the lines expected to serve these areas and the new development areas, such as the southeast waterfront, Treasure Island, and Parkmerced.

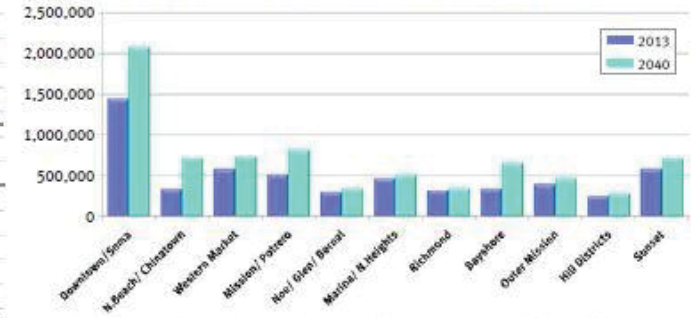
Many regional bus and rail operators already face peak-period crowding and would also see that increase significantly by 2040. BART ridership to, from, and within San Francisco is projected to grow by 37%, and as such, the system's two most crowded stations, Embarcadero and Montgomery, are forecast to hit limits in their person-carrying capacity. BART estimates that at 500,000 daily system riders, stations will be at capacity in 2016, and at 750,000 system riders, the stations will experience significant backups at escalators and overcapacity platforms (Figure 12).

**CAPACITY NEEDS MOST ACUTE IN THE CORE: DOWNTOWN, SOUTH OF MARKET, MARKET/OCTAVIA, AND EASTERN NEIGHBORHOODS**

36% of trips to, from, or within San Francisco begin or end in the downtown and South of Market neighborhoods, more than any other neighborhood (Figure 13). Expected growth will significantly increase transit crowding and street congestion downtown. With projected growth and no new investment beyond already-planned projects, increased traffic will slow speeds to gridlocked conditions for cars and buses alike during peak hours. A nearly 30% reduction in projected private vehicle traffic would be necessary to avoid this condition (see Appendix C for detail). Strategies

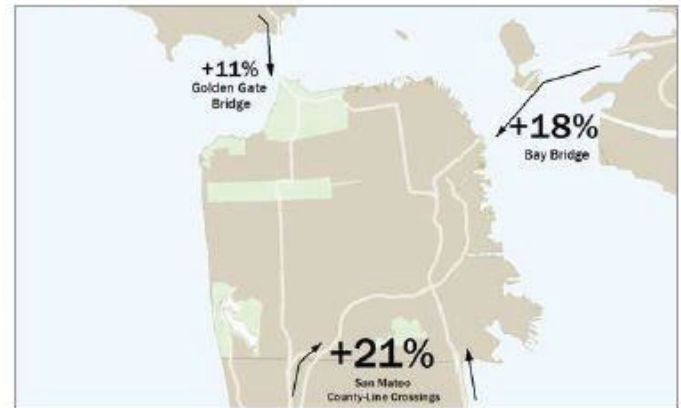
CHAPTER TWO  
 PAGE 15

FIGURE 13. DAILY PERSON TRIPS BY SAN FRANCISCO NEIGHBORHOOD



SOURCE: SFCTA, SF CHAMP. EACH BAR INCLUDES ALL TRIPS TO, FROM, AND WITHIN THE NEIGHBORHOOD.

FIGURE 14. CHANGE IN DAILY COUNTY LINE CROSSINGS BY AUTOMOBILE, 2012-2040



SOURCE: SFCTA, SF CHAMP

recommended to achieve this reduction are discussed on pages 29–30, and are incorporated into the SFTP Investment Plan, SF Investment Vision, and associated policy recommendations.

**NETWORK DEVELOPMENT AND MANAGEMENT NEEDED FOR THE SOUTHEAST AND PENINSULA CORRIDORS**

Over the SFTP period, daily automobile trips entering San Francisco from the South Bay are expected to grow by 21% (Figure 14). This results in worsening congestion on Highway 101 and 280. The planned extension of Caltrain to the new Transbay Transit Center would help accommodate this growth and provide access

R30  
 -82  
 (Cont.)

Why is this not considered in the HERAA?

SF Controller's report on transit route incapacity:

- Transit crowding will get worse

Muni serves over 700,000 riders daily; regional transit services provide an additional 370,000 riders with daily trips in and out of the City. At peak travel times, these riders crowd buses and trains. SFCTA models (shown in Figure 4) predict that without new investment, transit crowding is projected to get worse in the future, expanding to more routes and lines at the busiest times of day.

**FIGURE 4: ROUTES OVER CAPACITY GIVEN LEVELS OF EXISTING INVESTMENT, 2012 AND 2040**



Beyond rider discomfort, crowding has a serious impact on service reliability. A crowded bus has a longer dwell time at stops, moving slower and creating undesirable bunches in service. This bunching leads to increased congestion for all roadway users that can instigate a cycle of further slowing transit and therefore increasing street congestion.

Recently, Muni buses with fewer seats and more standing room were ordered. This was specifically done to deal with the incapacity of the buses in the fleet today. Where is the analysis done in this HERAA to show any of this was needed when it said there is not a significant impact? If it was not so dire and is insignificant, why bother ordering these buses where the disadvantaged communities (“communities of concern”) will not be able to sit due to not enough seats for the disabled and elderly? Most of the population will be older. Where is the data in the HERAA to accommodate for these people in its policies? That is discriminatory against these people and the HERAA is fueling this through its policy and implementation measures.

Here’s a StreetsBlog article on this:

## Muni to Test Seat Reconfiguration

Posted September 19, 2013



Photo via [StreetsBlog](#)

Muni is looking to reconfigure the forward- and backward-facing seats on the light rail train cars to accommodate more riders and speed up boarding, reports [StreetsBlog](#).

According to StreetsBlog:

The SFMTA plans to run a trial starting in January by putting one reconfigured prototype car into service, which would be monitored over six months before reconfiguring other train cars.

The pilot is moving forward at the behest of Supervisors Scott Wiener and London Breed, who called a hearing held yesterday on how the agency can increase capacity on its metro system while Muni riders await a new, larger train fleet due to arrive in 2017. ([more...](#))

Written by [eugenia](#) [6 comments](#)

58. Page VII-62: "...the housing element policies do not result in population growth."

The premise of building all of the units was to house the population growth that is expected in the city. What do you mean the policies do not result in population growth? There will be population growth that is "directed" to certain parts of the city with the policies that "encourage" density and building for certain economic brackets.

This is based on the principle of "if you build it, they will come." If you do not build, there will not be anywhere for new people to reside.

R30  
-83  
(Cont.)

59. Page VII-79: “Since it (Alt B) does not contain the policies from the 2004 Housing Element that encourage increased density in established neighborhoods or reduction in parking (which would increase the ability to provide density and reduce the cost of new housing), the effectiveness of Alternative B at increasing the affordability of the city’s housing supply and in turn achieving RHNA goals at all income levels would be reduced compared to the 2004 or 2009 Housing Element.”

Where, specifically, is the data and analysis that was completed to support this HERAA?

R30  
-84

60. Page VII-81: When height and density bonuses are given out under Alternative C, more units are built whereas if they were not given out, they would not be so attractive to build. These are for 100% affordable unit projects but how many of them have been built? How many units thus far? How many people would this house? Why are there not new policies and programs to also house “low” and “moderate” income housing? The people in the “low” get pushed down into the “very low” and the “moderate” income folks could easily end up in the “low” category with no relief from housing and other costs in a very expensive city which does not look to meet the needs of a diverse economic need. How do each of the Alternatives A, B and C address these “low” and “moderate” income people?

<b>San Francisco County</b>	Extremely Low	23,750	27,150	30,550	33,950	36,650	39,400	42,100	44,800
4-Person	Very Low Income	39,600	45,250	50,900	56,550	61,050	65,600	70,100	74,650
Area Median Income:	Lower Income	63,350	72,400	81,450	90,500	97,700	104,950	112,200	119,450
<b>\$103,000</b>	Median Income	72,100	82,400	92,700	<b>103,000</b>	111,250	119,500	127,700	135,950
	Moderate Income	86,500	98,900	111,250	123,600	133,500	143,400	153,250	163,150

See also Pages 9-10 of this comment document on SF’s AMI.

R30  
-85

61. Page VII-88: Alt C could have “cumulative impacts...arise in certain areas over the course of time thereby diminishing the historic significance of the area.” Individual projects with remodels and demolitions prior to having a true historic resource or potential historic resource inventory will already diminish the historical fabric of SF. Where are the surveys for the rest of the city first? Without it, the City does not know if a building, while on its own may not be of merit, may be part of a historic area or use or peoples and the building could be important to the development pattern of the city but would be dismissed as unimportant without such a thorough, accurate and complete analysis of all buildings in the area which have not yet been surveyed. As a part of the Historic Preservation Commission, such a citywide survey needs to be undertaken since neighborhood character will be impacted. Also, under City Planning Code Sec. 101.1 under the “Master Plan Consistency and Implementation” which was added via Proposition M passage in 1986, neighborhood character, cultural and economic diversity of our neighborhoods are to be conserved and protected. What alternatives given fulfill this section of the Planning Code and in what ways for each alternative? It is not thoroughly discussed.

For all 3 alternatives, this part of the CEQA requirement about potential historic resources being impacted has not been studied. In fact, for the entire 2004 Housing Element and for the 2009 Housing Element, it has not been analyzed and thoroughly completed. A citywide survey of ALL properties of potential historic resource has not been done. What percent of the city has not been in any official city-approved survey?

See Page VII-18 above.

62. Page VII-95: "Because Alt C promotes some increased building heights compared to the 2004 and 2009 Housing Elements, an incremental increase in the potential for shading of parks or other protected locations could occur. This could result in a (sic) significant shadow impacts (sic) that would not otherwise occur." There is a statement which says that the impacts to shadow will be mitigated to "less than significant" by having the Planning Department oversee any issues with shadows on a project-by-project basis. However, this oversight idea does not guarantee adherence to the criteria in Planning Code for shadow impacts nor for cumulative shadow impact as I mention next.

Alt C can potentially have cumulative shadow and wind impacts depending on what else gets built around such protected locations. There are also wind impacts with the tall buildings around shorter buildings and at street level. The impacts to light and shadow on parks and other protected locations may also be injurious to pedestrians who will have difficulty walking e.g., during a rain storm or during extreme high wind days when the wind gets funneled and the wind pressure builds between buildings to the point where some corridors will be whistling or when the sun is situated to blind pedestrians and drivers and bicyclists from window reflections. Where is the current data and analysis done for these situations?

See Page VII-22 above.

63. Page VII-95: "City has not established a citywide target ratio of parkland to residents..." Without this, we do not have an accurate open space availability of the parklands to residents. Without a thorough inventory of parkland to residents, the impact to Recreation cannot be thoroughly and accurately analyzed under the alternatives. Where is the data and analysis so that the alternatives can be analyzed accurately for recreation and potential creation of new parks if the data is not existent?

64. Page VII-96: Alt C "would result in larger buildings, which could create greater density, potentially resulting in a greater number of people requiring water or wastewater treatment service as compared to the 2004 HE and 2009 HE."

What is the added increase based on the projected number of units and people count for each of the 3 alternatives? Where is the data analysis? Also, today, the majority of SF population is drinking 10% blended water (except for the Marina District or Twin Peaks) rather than the 100% Hetch Hetchy water.

When is the projected date of people having to drink groundwater sources and in what percentages by when for each of the alternatives? Where is the analysis on that? Where is the data and analysis to show the environmental impact of the salt water intrusion when the groundwater in the aquifers dries up for each of the alternatives? What studies have been done and the data to back up feasibility of each of the alternatives based on regular rainfall years vs. drought years? Where is the data and analysis on that for each alternative?

See Page VII-101 below.

65. Page VII-101: Alt C "would also result in construction of new housing could require dewatering or result in groundwater drawdown."

Is there not enough groundwater supply and thus the need in Planning Code, Building Code and Public Works Code to have installation of permeable pavement? When the groundwater gets depleted, the salt water intrusion can get in which will be the end of SF's groundwater source. How does this Alt C and the other Alternatives impact the groundwater supply? Where is the

R30 -89 (Cont) current data analysis and comparisons for number of gallons of impact for each of the Alternatives for this HERAA?

See Page VII-96 above.

66. Page VII-107: Table VII-4: **ALL** 3 Alternatives show “impact greater than proposed Housing Elements” for “Cultural and Paleontological Resources.”

Surveys of cultural and paleontological resources need to be conducted to figure out if projects in the pipeline and those approved since 2009 (at minimum) be vetted through the Historic Preservation Commission. Many are Categorically Exempted (Cat Ex'd) but a thorough survey has not been conducted.

It is the **ONLY** CEQA category which stands to be impacted to this degree.

What say the Historic Preservation Commission on this Dec. 13, 2013 DRAFT EIR on the 2004 & 2009 Housing Element Revised Alternatives Analysis document?

It is hard to believe that the GHG is not impacted to significant levels with the “2009 Housing Element – Intensified.”

In fact, where is the data and analysis for this Table VII-4 that was done specifically for this HERAA, especially knowing that the population target number that is expected to live in SF?

R30 -90 Other considerations not studied to arrive at the conclusions in the HERAA:

Have there been any studies on the following issues prior to concluding that the Alternatives are the same (shown by equal sign (=)) for “Public Services”?

Residential deliveries via UPS, United States Postal Service, DHS, FedEx, vehicles of all kinds including trucks, vans, shuttles and limos for private and business uses, use of public facilities, maintenance increases, gardening and home services, congestion management personnel and their vehicles, added big rig truck deliveries for increased demand of food and supplies to all the residents, increase in safety workers and their vehicles and added pollution, generation of energy and added pollution from it to meet the demands of all the new people.

I do not see the data on this. Where was this analyzed for the alternatives and for the 2004- adjudicated and 2009 Housing Element documents? Please provide the data and analysis for the projected increase in units, density, population growth, job commuting, services and goods utilization, transport, energy production and creation of supporting infrastructure for the increase in population for this Dec. 2013 DEIR on the alternative analysis.

Where is the data for the added materials for maintaining all the additional units? How much environmental impact from the production of items and materials for those and the total GHG emissions? What is the carbon footprint of the city now? What will it be for the projected increase in population and jobs? How many more family outings in vehicles is factored into the analysis (e.g. after school sports and social events, driving to functions and taking vacations in an airplane or by vehicle or by cruise ship, driving to buy bulky items, driving. How many metric tons of GHGs were being released in SF in 1990? In 2004? In 2009? Today? What is the projected decrease in metric tons of GHGs that will be saved by densifying the city to the maximum buildout per all zoning in place today (Alternative C)? What about based on Alternative B? Massive development logically cannot reduce GHGs as they all produce GHGs. Even if data is given to show that GHGs have not come

down but have gone up, will the city continue to develop? This may not at all be about reduction of GHGs but rather a financial scheme to generate revenue for the city and for the non-profit organizations which in turn promote further densification and revenue for the city but not necessarily for all the income levels (as the middle class is disappearing and will continue to do so) because the units built do not have to be for the middle class. If the lower income housing units are built, that will help the city and the development community the most. This works because there are no penalties for not building for the low/moderate middle income levels.

Where is the data that proves that having higher density or high-density development along transit corridors or near mass transit reduces the GHG emissions per person in San Francisco? When New York built out, has the GHG emissions gone down or up since 2004?

R30  
-90  
(Cont.) I would think that Alternative C there would be significant impact and need for more safety personnel i.e. a plus sign (+) in the column.

Overall, the alternatives provided and the impact statements drawn from them are conclusory. This "2004 and 2009 Housing Element, Revised Alternatives Analysis" document dated Dec. 2013 states that it draws the same conclusions even with the revisions when there is not the current analysis done for the state of the City with recent data to prove otherwise. It even says it is in line with the Urban Forest Plan (UFP) which has NOT even been approved yet by the Planning Commission. Still, the "alternative document" already concludes, prior to finding out if the public input will change anything in the UFP that it is in alignment with it. This policy document is driving all the SUBSEQUENT city ordinances, code changes, etc. when it should be the other way around for the public to opine first before heading full steam ahead as it is doing with no regard to the real-life consequences to the fragile neighborhoods that afford the charm and diversity. Something is amiss on the Barbary Coast.

\*\*\*\*\* HERE is the information on **Muni INCAPACITY** \*\*\*\*\*

**Muni Overcapacity, etc. News Articles / Blog Entries**

The 2004 & 2009 Housing Element Revised Alternatives Analysis (HERAA) document of December 2013 does not show the reality of the state of Muni and the riders (if they can even get on to ride!). The HERAA ends with conclusory remarks of a fictional transit world.

R30  
-91 The below links show the real-world problems with transit impact and the Housing Element policies which were allowed to continue since 2004 and still go on with no relief except to add buses and shuttles to patch the hole in the dam while adding more people to the City without getting the infrastructure fixed first before the housing (but city wanted the grant money so went ahead with the scheme).

- Geary line overcrowded, slow and unreliable (Feb. 1, 2010)
- Mayor Lee says Muni is doing fine (Feb. 17, 2011)
- New Express Bus for N-Judah to increase capacity & overcrowding (May 28, 2011)
- Nx Judah Service Starts Monday (Jun 9, 2011)
- N-Judah rush hour express bus trimming trip times, overcrowding (Aug 1, 2011)
- With packed vehicles people opt for private cars, SFMTA says (Jan 29, 2013)
- SF Mayor Pledges to fix Muni (Feb. 19, 2013)
- New shuttle mimics crowded Muni route (Leap Transit private shuttle) (May 30, 2013)
- Nearly 2.7 Billion Trips Taken on US Public Transportation in 2<sup>nd</sup> Quarter (Sep 23, 2013)



- Muni Ridership Increases over Past Two years (Oct 15, 2013)
- SFMTA: New Fulton Bus Line to Provide 20-30% More Capacity During Rush Hour (Oct 17, 2013)
- Some progress seen in Muni's on-time numbers (Nov 6, 2013)
- SF at 1 million: Focus turns to Muni reliability and funding as population swells (Jan 2, 2014)
- Yelp anecdotal evidence from postings 2009-2013 on Muni overcrowding, cannot board, etc.

<http://www.spur.org/publications/article/2010-02-01/learning-muni>

## Learning From Muni

On the bright side: What's working at the SFMTA

Article

February 1, 2010

**It's easy to forget** all that is good about public transportation in San Francisco. Every day, the number of boardings on Muni buses and trains is nearly equivalent to the entire population of the city, and per-capita transit use is higher here than anywhere else in America but New York. One-third of local commuters take transit to work—during rush hour, fully two-fifths of trips to and from downtown are on transit—and Muni riders are more economically diverse than those on other U.S. transit systems. Atypically for an American transit system, Muni is a viable transport option for many, if not most, of the people who live and work here. In addition, it is widely used by the middle class and essential to the everyday functioning of the city.

Of course, Muni's reputation for dysfunction also is grounded in reality. It is unique among large U.S. transit systems in that the overwhelming majority of its riders must travel by bus and not train. Even Muni's light rail vehicles often mix with other street traffic, and as a result, Muni is the slowest major transit system in America—and among the least reliable and most overcrowded. In recent months, a few high-profile accidents and criminal incidents also have made headlines, although data suggest Muni hasn't actually gotten noticeably less safe.

While there are lessons both good and bad that other cities might draw from Muni and its parent organization, the San Francisco Municipal Transportation Agency, a few recent highlights may be most noteworthy.

Muni's busiest corridor, Geary, is served exclusively by buses—relatively slow, unreliable and overcrowded buses

-----

<https://www.baycitizen.org/news/transportation/new-sf-mayor-muni-not-priority/>

## New SF Mayor: Muni Not a Priority



**Zusha Elinson**

Ed Lee says his administration will not focus on fixing the beleaguered transit agency

by [Zusha Elinson](#) — February 17, 2011, 7:00 a.m.<sup>8</sup>

When new San Francisco mayor Ed Lee [outlined his priorities](#) Tuesday, Muni was not among them.

At a Bay Citizen editorial meeting, Lee essentially said that Muni — plagued by lateness and budget woes — is doing fine.

“I think Muni has been on its way to improvement for a period of time,” said Lee. “It’s still got hiccups, but when you look at the on-time performance it’s still, over a period time — and maybe not the last quarter uptick, if you will — it’s still on it’s way to improvement.”

Muni’s on-time performance [fell to 72 percent](#) last quarter after reaching an all-time high of 75 percent in the first three months of 2010.

The things that Lee is putting ahead of Muni are the city’s budget deficit, dealing with the cost of pensions, finding a new police chief, local hiring and the America’s Cup. You can read about all that [here](#).

Lee said that he had supported Proposition G, a ballot measure passed by San Francisco voters in November that takes away bus drivers’ automatic pay raises. Lee said Prop. G will give Muni more leverage with bus drivers in upcoming contract negotiations.

“I think Muni has the tools,” said Lee. “I am supporting them.”

Greg Dewar, who follows Muni closely on his blog, the [N-Judah Chronicles](#), called Lee’s comments “very disappointing” in an e-mail.

“It was hoped by many that after 7 years of press conference politics and backroom deals that derailed Muni by the previous Mayor, Mayor Lee would represent someone who'd put aside politics and help make a critical service work for the owner/riders,” Dewar wrote.

Dewar has [invited Lee](#) to ride Muni with him and see the problems firsthand, but Lee has yet to take him up.

Dewar was also critical of Lee’s suggestion that Prop. G alone will solve Muni’s problems.

“The fact that Mayor Lee refused to acknowledge, or doesn't seem to be aware of the looting of Muni by other departments as well as the state of California (illegally) which has created Muni's current fiscal crisis, is very troubling,” wrote Dewar.

Given San Francisco residents' general animus toward Muni, fixing the transit agency might seem like a politically popular endeavor. But politicians in the city rarely make it the focus of their campaigns or administrations.

“Put simply, hard work and long term solutions don't make for good quotes in a piece of junk mail crammed in the voters' mailboxes,” Dewar said.

-----

<http://www.californiabeat.org/2011/05/28/express-bus-relief-for-n-judah-muni-metro-passengers/2>

## Express bus relief for N-Judah MUNI Metro passengers

By [Beat News Service](#) May 28, 2011



Courtesy SFMTA

Outer Sunset commuters in San Francisco who have grown accustomed to crowded cars and long delays aboard the N-Judah MUNI Metro streetcar line can expect some relief come June 13 — for a six-month trial period — in the form of a bus.

MUNI will begin a pilot project to increase capacity on the busy Metro line during weekday commute hours by instituting an N-Judah Express bus line, which the transit agency says will relieve severe overcrowding.

During morning commute hours, the N-Judah Express buses will pick passengers up at 11 Outer Sunset stops on Judah Street between the 48th and 19th Avenues, then travel nonstop into the Financial District via Lincoln Way, the Panhandle, Masonic Ave. and Bush Street.

In the afternoon, the line will pick up passengers at Sutter and Sansome Streets and operate via Sutter St., Geary Blvd. and Park Presidio Blvd. to 19th Avenue, from where it will run as a local route to a terminal at the Great Highway.

Buses will operate at 10 minute intervals on weekday mornings between 6 a.m. and 9 a.m. and in the afternoon between 4 p.m. and 6:30 p.m.

R30  
-91  
(Cont.)



Beginning June 13, MUNI will begin operating a commute hour express bus route that will supplement existing N-Judah MUNI Metro service between the Outer Sunset and the Financial District.

**WEEKDAY MORNING SERVICE (6 a.m. - 9 a.m.)**

Bus service will operate every 10 minutes from 48th Avenue to 19th Avenue then express to Sutter and Sansome Sts.



**WEEKDAY AFTERNOON SERVICE (4 p.m. - 6:30 p.m.)**

Buses will operate every 10 minutes from Sutter and Sansome Streets then express to 19th Avenue where local stops will be made to 48th Avenue & Judah St.



COURTESY GRAPHICS: SFMTA

R30  
-91  
(Cont.)

MUNI will paint up to 15 buses pulled from its reserve fleet in special colors and apply “N-Judah Express” decals to the outside of the vehicles. Scrolling head signs on the front of the bus will also give passengers information about the first and last stops in on the route’s express zone.

The agency also plans on putting up route maps inside the bus to give passengers stop information.

**Crushing problem**

Regulars of the N-Judah have complained bitterly for decades about capacity and reliability issues with the route. At 38,000 boardings every weekday, the route is the busiest rail line in the city, serving as a direct link between San Francisco’s downtown core and the Cole Valley and Sunset Districts.

Despite two-car trains scheduled to run every five minute during commute hours, riders still complain about being left behind at stops because of full trains.

The problem is especially pronounced on the Cole Valley portions of the line during morning commute hours, when downtown-bound trains are often fully loaded with passengers who boarded the train in the Sunset District.

For years, MUNI has attempted to address capacity and reliability issues with their most popular rail line, including exploring a “skip-stop service” where trains would serve every other stop and major transfer points. The concept was never implemented, but nonetheless, destination signs on older Metro streetcars retain markings for N-Judah trains serving “A-Stops” or “B-Stops.”

The agency also built a raised trackway on Judah Street between 9th and 19th Avenues to provide a quasi-exclusive right-of-way for trains along the often congested corridor.

However, plans to expand the raised median trackway for the entire length of Judah Street were scrapped after neighbors complained that they were unable to make U-turns and access their driveways because of the elevated roadbed.

The implementation of an N-Judah Express bus is MUNI’s latest attempt at finding a lasting solution to improve transit service on the line.

R30

## -91 Capacity, not speed

(Cont.)

The transit agency admits that the “Express” buses won’t be too much speedier for riders than the existing train line. MUNI estimates that an end-to-end trip on the bus during the morning commute will take 39 minutes, as opposed to 40 minutes on the train during the same time.

In the afternoon, a bus trip from the Financial District to the 48th Avenue terminal will take 38 minutes, versus 40 minutes on a streetcar traveling through the underground subway.

The \$1.8 million project hopes to expand capacity on the route and reduce “dwelling” at stops — the amount of time MUNI vehicles spend stopped to allow passengers to alight and board crowded trains.

The issue is especially significant for the N-Judah line, since 70 percent of its stops are located at street level — without an elevated platform — which means passengers need longer to hop on and off trains from the sidewalk.

By giving riders in the Outer Sunset another option to get downtown, the agency hopes to create room for passengers hoping to board further down the line in Cole Valley.

## Quicker rides elsewhere?

The question other long-frustrated MUNI riders have been asking: will I get express service on my route?

In 2008, riders who responded to the agency’s Transit Effectiveness Project overwhelmingly told MUNI that they wanted faster service from parts of the city where long rides on bus and train lines were the norm.

One of the project’s recommendations was to implement a new 5L-Fulton Limited line to speed up notoriously sluggish service on the existing 5-Fulton corridor. The new line would provide limited stop service through the Richmond and Western Addition into Downtown.



4 However, funding for the service expansion is proving to be a major obstacle for the agency. With the Municipal Transportation Agency facing serious budget woes, a speedier ride from other parts of the city on specially marked Express buses seems unlikely in the near future.

Contact the Beat at [news@californiabeat.org](mailto:news@californiabeat.org).

-----  
[http://www.masstransitmag.com/press\\_release/10281193/sfmta-nx-judah-muni-service-starts-monday](http://www.masstransitmag.com/press_release/10281193/sfmta-nx-judah-muni-service-starts-monday)

## SFMTA Nx Judah Muni Service Starts Monday

Source: **San Francisco Municipal Transportation Agency (SFMTA)**

Created: June 9, 2011

### Peak-hour Nx Judah Express Bus service to help ease overcrowding on Muni's busiest rail line

The San Francisco Municipal Transportation Agency (SFMTA), which oversees all surface transportation in the city, including the Municipal Railway (Muni), today reminds Muni customers that on Mon., June 13 it will implement a new strategy to increase capacity on Muni's most popular light rail line, the N Judah. With a daily ridership of nearly 40,000, the N Judah carries almost 30 percent of all Muni's rail customers. The weekday, peak-hour Nx Judah Express Bus service will operate in addition to existing N Judah Rail service, which will not be affected.

"I am pleased to see the SFMTA working on a real solution to the concerns of Muni customers," said Carmen Chu, supervisor for District 4. "The N Judah Express pilot will be an improvement for the many riders in the outer Sunset but also for those all along the N Judah line who haven't been able to get on overcrowded trains." "We hope this pilot will prove to be a solution for the overcrowding on the N Judah," said Tom Nolan, chairman of the board of directors. "The N Line is a real workhorse for Muni and we want to make sure that we can accommodate the large ridership."

"We are continually looking for opportunities to improve the Muni system," said Nathaniel P. Ford Sr., executive director/CEO. "As a pilot, this program will show us if this is a feasible solution, and whether any further changes need to be made. In the absence of additional rail vehicles, we want to provide some much-needed expanded capacity along this major commuting corridor."

The pilot program will use buses traveling between the Financial District and Ocean Beach to alleviate overcrowding and improve reliability on the N Judah Line during the morning and afternoon commutes. The service, dubbed the Nx Judah Express, will operate locally between 48th and 19th avenues and travel express between 19th Avenue and the Financial District. Thus, it will provide N Judah customers in the outer avenues a choice between express bus service, with limited stops, into and out of downtown approximately every 10 minutes during morning and afternoon rush hours or regular rail service.

Nx Judah Express buses will be easily recognizable by a distinctive blue stripe around the roof line and windshield, purple colored lights and the Nx Judah Express logo featured prominently on the bus exterior. The overhead destination signs will read:

4 ▽ inbound: JUDAH EXP

Financial Dist  
 Last Stop 19th Ave.  
 Outbound: JUDAH EXP  
 Ocean Beach  
 First Stop 19th Ave.

Maps displaying local Nx stops and the express service route will be posted inside each vehicle. A detailed route map is available on the SFMTA website. There will be no additional fare for Nx Judah Express Bus service. The annual cost of the pilot is \$1.8 million.

SFMTA Ambassadors will be on hand in the Outer Sunset the mornings of Thursday and Friday this week to let customers know about their options prior to the start of the pilot. Beginning Mon., June 13 through Wed., June 15, SFMTA Ambassadors will also be in the field in the mornings and afternoons providing further assistance to customers as they learn about the new service.

R30 -91 (Cont.) The initial proposal for the Nx Judah service would have required removing parking spaces on the Great Highway. In response to community feedback, the plan was revised to avoid parking removal.

The Nx Judah service was developed as part of the Service Restoration Working Group (SRWG), a joint effort between the Mayor's Office, board of supervisors president David Chiu, the Office of the Controller and the SFMTA, last fall. After the SFMTA restored most of last May's service cuts in September, the SRWG worked to identify plans for restoring the remaining five percent of service hours left from the May service cuts. The Working Group evaluated the funding needed to restore service and identified possible expenditure reductions and revenue sources to accomplish the restoration of service.

-----  
<http://sfpublicpress.org/news/2011-08/n-judah-rush-hour-express-bus-service-trimming-trip-times-overcrowding>

N-Judah overcrowding, passengers unable to get on

## N-Judah rush hour express bus service trimming trip times, overcrowding

By

**Jerold Chinn**

SF Public Press

— Aug 1 2011 - 1:40pm

The apparent success of Muni's Nx-Judah express bus service could offer hope to riders on other crowded streetcar lines.

Municipal Transportation Agency spokesman Paul Rose said other express buses could be possible, but the agency will look at community needs before adding buses to other lines. For now, riders seem to be enjoying the added service to the N-Judah line.

Ridership on the express bus, which started in June, has grown from 938 passengers to 1,282 a day during the first four weeks, according to the transit agency. Muni projected an average daily ridership of 1,000 to 1,500 passengers. Riders have asked Muni to extend the hours during the evening and to add express buses for other rail lines.

David Nuffer, a regular on the express bus, gives the new service an A. "I don't know what I'd do without it," said Nuffer.

With 38,000 daily boardings, the N-Judah train was becoming a nuisance for riders who board in the western part of the city during peak hours. Riders complained to the transit agency that they were unable to get on the first set of trains and had to wait until they could board a train that was not packed.

To address this concern, the agency created the \$800,000 Nx-Judah Express bus pilot project to combat the crowding on the trains. The bus makes stops between 19th and 48th avenues and makes one stop in the Financial District in the morning and evening commutes. The agency hoped it would lessen the crowding on the train so passengers further down the line could board the train.

Although some trains remain crowded, Rose said that through customer input and inspector observations, riders at Carl and Cole streets are able to board the first set of trains that arrive during the commute instead watching packed trains pass them by.

Crowd relief is just one of the benefits of the express bus. Riders have also said that their trip from downtown has been faster by an average of three to six minutes, according to the agency.

Figures provided by Muni had the average trip on the light rail N-Judah taking 43 to 44 minutes while the express buses make the run in 33 to 36 minutes.

In mid-July, SF Public Press reporter Jerold Chinn and photographer Jason Winshell observed the express bus for about an hour and half and took the 5:20 p.m. bus. Because of the bus consistently leaving every 10 minutes with another bus arriving, nearly all passengers were able to get a seat, something that's not the case when riding the N-Judah train at peak hours. On their trip from downtown to 48th Avenue, only two riders stood.

Ghada Ghassan-Berry, who lives on 34th Avenue, rides both the N-Judah train and express bus. She prefers riding the express bus. "It's definitely much faster, since there are not that many stops," she said.

One member of the agency's board of directors, a frequent rider of the express bus, tweets about how fast he gets to downtown and even teases N-Judah train riders that he will beat them getting to downtown.

"It's back to the grind on a Muni Nx Judah express. Just left 19th Ave. & Judah at 8:12 AM. Who wants to bet we beat you cats on the N?," tweeted Muni Director Joel Ramos on a recent ride. He said later that it took him 28 minutes to get to downtown.

A trip to downtown taking the N-Judah train can take longer, depending on delays, particularly at the Church and Duboce intersection where the train enters the underground tunnel and switches from being operated by the driver to a computer. The intersection has been the center of many delays, but the express bus completely avoids the area.

The express bus pilot will continue for approximately more four months at which time the agency will decide whether to keep the service. The agency is still asking riders for their **feedback** on the express bus.

-----

<http://www.sfexaminer.com/sanfrancisco/with-packed-vehicles-people-opt-for-private-cars-sfmta-says/Content?oid=2320004>

Jan. 29, 2013

With packed vehicles people opt for private cars, SFMTA says





• ANNA LATINO/SPECIAL TO THE S.F. EXAMINER

- Crowded buses push riders to take more car trips, worsening congestion, one Muni official said.

From funding shortfalls to aging and inefficient facilities, Muni faces myriad entrenched issues. But the top priority now for the transit agency is dealing with its overcrowded vehicles.

Muni's capacity problem — particularly its crowded buses — is creating a "vicious cycle" of transportation choices in which travelers eschew public transit in favor of private automobiles, which in turn creates more traffic congestion, according to Timothy Papandreou, deputy director of planning at the San Francisco Municipal Transportation Agency, which operates Muni.

"The No. 1 goal is increasing supply and capacity and managing demand," Papandreou said during the board of directors' annual workshop Tuesday.

With the number of housing units in The City projected to increase by 15 percent over the next 22 years, the capacity issue is only going to become more acute for Muni, which is considering several remedies.

Over the next five years, the agency plans on purchasing 700 new buses that will be more reliable and capable of carrying larger passenger loads, according to John Haley, director of transit at Muni. Over the next 20 years, Muni plans to increase the size of its total transit fleet — including light-rail vehicles, cable cars and historic streetcars — by 20 percent to meet the demand.

In addition, there is talk of enhancing the NextMuni smartphone application — which provides real-time transit schedules — to include information about which scheduled buses may be overcrowded. That type of tool is likely a few years away.

Papandreou said the transit agency is also working hard on promoting bicycling and walking as alternatives to short transit trips. Car-sharing systems, which are more efficient than private automobiles, could be moved into residential neighborhoods as another way to change travel patterns, said Jay Primus, who manages the agency's parking policies.

While the agency's goals are all lofty, the major barrier, as always, is funding. Over the next five years, the agency is facing a shortfall of \$1.7 billion for bike, pedestrian, traffic and transit improvements. Simply keeping its network in a state of good repair — not accounting for the capacity improvements — requires \$260 million a year that the agency lacks.

Despite the funding issues, there are reasons for optimism, according to Ed Reiskin, head of the transit agency.

4 Mayor Ed Lee announced he will convene a panel of experts to discuss possible revenue solutions for Muni's long-term needs. Reiskin noted that a similar task force proved effective in overhauling San Francisco's beleaguered public pension system.

But without prompt suggestions from the yet-to-be-named panel, Muni passengers are going to continue to experience uncomfortable rides.

Malcolm Heinicke, a member of the agency's board of directors, said capacity problems have surpassed reliability issues as the top concern among the riders who have contacted him.

"We have to face it," Heinicke said. "We're not ready now for more passengers."

R30  
-91

[wreisman@sfxaminer.com](mailto:wreisman@sfxaminer.com)

(Cont:)-

<http://www.wnyc.org/story/285388-sf-mayor-pledges-to-fix-muni/>

## ↑ TRANSPORTATION NATION

### SF Mayor Pledges to Fix Muni

Tuesday, February 19, 2013 - 10:55 AM

By [Isabel Angell](#)



A crowded Muni bus (photo CC by Flickr user Art Siegel)

When he came into office last year, San Francisco mayor Ed Lee said fixing Muni [wasn't a priority for him](#).

But in his 2013 [State of the City](#) address, Mayor Lee devoted almost ten minutes of his speech to the often-reviled public transit system.

Muni's cars and buses are often overcrowded, sometimes to the point where they can't stop to take on new passengers. And about 40 percent of Muni vehicles run late, according to an [independent analysis by the Bay Citizen](#) published last June. It's a system so hated by some riders, it even provokes poetry (read ["Ode to \(Not](#)

[Muni\) Transit](#)" from [Muni Diaries](#)). Lee said he sympathized with a ridership plagued by overcrowded chronically late buses, and he promised that changes to Muni are coming soon.

"I know it's frustrating to push your way onto an overcrowded train or watch an overloaded bus go by," said Lee. "And I understand the anxiety that comes with being late to work, late to pick up your kids or late to school because you were on time, but your bus wasn't. I am very pleased to report that positive changes are underway, and with the full support and leadership of the MTA Board of Directors, the nation's seventh largest public transit agency is once again focused on operations and investing in infrastructure, in maintenance and in safety."

He concluded by unveiling the "San Francisco Transportation 2030 Task Force," a group designed to tackle the city's transportation problems.

But San Franciscans won't have to wait for the task force to report back to learn what some of these changes are going to be. In 2008, the San Francisco Municipal Transportation Agency (SFMTA) started a project called the [Transit Effective Program](#). Known as the TEP, the project began as a comprehensive effort to overhaul the Muni system. It's focused on two major issues: making changes that minimize delays on the Rapid Service lines and restructuring regular bus routes to reduce crowding and tardiness.

So far, the TEP has proposed some major changes to Muni. Of Muni's 79 lines, 32 will have changes to their routes and 40 will have changes to their stop frequency. Six lines will have entirely new routes and three will be eliminated. Designed around the city's changing commute patterns and congested areas, the SFMTA hopes that these changes will streamline the system and increase Muni's reliability.

The TEP also proposes some changes to Muni's Rapid Network corridors. The Rapid Network is a group of 12 exceptionally busy lines that officials have identified as routes they'd like to make faster and more frequent. These are so-called "engineering changes," or improvements that physically change the structure of certain intersections and transit stops. Think adding "Muni-only" traffic lanes, building new boarding islands, and replacing stop signs with traffic lights.

There are already a couple of TEP pilot projects going on right now. One is taking place along a three-block stretch of Church Street, a busy road in the city's center. SFMTA has made one of the lanes "transit-only," meaning only buses and taxis can use it. It lets Muni bypass the usual traffic and should reduce delays, according to the SFMTA engineers.

Currently, the SFMTA's Planning Department is busy making sure the rest of the TEP proposals meet California's environmental standards. The final draft of the Environmental Impact Report is expected in about a year. After that, the SFMTA will implement as many proposals as they can get funding for.

Now riders will just have to wait and see whether these changes are really going to be effective.

Follow Isabell Angell on Twitter: [@IsabeltheAngell](#)

<http://www.sfgate.com/bayarea/article/New-shuttle-mimics-crowded-Muni-route-4562532.php>

## **New shuttle mimics crowded Muni route**

**Ellen Huet**

Updated 4:47 pm, Thursday, May 30, 2013

A startup that runs a shuttle service for commuters in San Francisco has debuted on a schedule and route that some riders may find very familiar.

Leap Transit, which began May 13, is a private shuttle service that mimics Muni's 30X Marina Express line, with a few differences the founders hope will lure riders into paying \$6 a trip versus \$2 a ride on Muni.

Leap's bus - called the Chestnut Express - has leather seats, air conditioning, Wi-Fi and a guaranteed seat for all riders. It also has fewer stops, runs only once an hour and for a smaller window of time during the morning and evening.

Leap hopes to attract riders who find owning a car too expensive and don't want to ride a bike or take public transportation, said [Kyle Kirchhoff](#), 28, one of the company's founders.

R30 "We love Muni, but sometimes it's overcrowded, and it's problematic for some people," Kirchhoff said.

-91 "Obviously, taking a taxi as an everyday thing can be expensive. We wanted to provide something that's in  
(Cont.) between."

Riders who download Leap's app can see the 36-passenger bus in real time as it travels downtown between 7 a.m. and 10 a.m. and back toward the Marina between 4 and 7 p.m. weekdays. The bus averages about 20 to 22 minutes to make each trip, Kirchhoff said. Riders can also pay through the app.

"The 30X route is one of Muni's routes that has too much demand and not enough supply," said Kirchhoff, who lives near the Presidio. "We're starting in a small niche area to better position ourselves to be able to scale to more people."

The company has one bus that makes all the trips, which is why Leap can't run more frequently. Leap gets its drivers through a charter bus company, so their licenses for commercial transportation are in order, Kirchhoff said.

Kirchhoff and his co-founders began building the app last year, and the company now has five employees. The app has 1,000 downloads, including 700 users who have created an account with credit card information, he said.

Leap's bus picks up passengers at Muni stops, a common practice among longer-distance private commuter shuttle buses that has already angered city officials.

"We do use the Muni stops, but we try to stop for less than 30 seconds and will yield to Muni," Kirchhoff said. "We look forward to working with the community to be unobtrusive and have it be an asset to the city."

Supervisor [John Avalos](#), who has fought against private companies' use of Muni stops, called Kirchhoff's comments "very disingenuous."

"What a crock," Avalos said. "How does blocking a Muni stop make the city more efficient? You're trying to make money, and you're creating a two-tiered transportation system in San Francisco."

A 2011 study from the [San Francisco County Transportation Authority](#) showed private commuter buses used by companies including Google and [Apple](#) tend to idle at Muni stops for around three to six minutes during peak commute hours. The fine for non-Muni vehicles using Muni stops is \$253.

San Francisco has at least one other private shuttle, the Jess Losa Caltrain-depot-to-Market jitney service that has run for decades.

*Ellen Huet is a San Francisco Chronicle staff writer. E-mail: ehuet@sfgchronicle.com. Twitter: @ellenhuet*

[http://www.apta.com/mediacenter/pressreleases/2013/Pages/130923\\_2nd-Quarter-Ridership.aspx](http://www.apta.com/mediacenter/pressreleases/2013/Pages/130923_2nd-Quarter-Ridership.aspx)

#### Transit News

9/23/2013

#### Contact:

Virginia Miller  
202-496-4816  
vmiller@apta.com

### Nearly 2.7 Billion Trips Taken on U.S. Public Transportation in Second Quarter

Nationally, nearly 2.7 billion trips were taken on U.S. public transportation in the second quarter of 2013, according to a report released today by the American Public Transportation Association (APTA). Compared to the second quarter of 2012, this year's second quarter increased by 1.2 percent, with nearly 31 million more trips taken from April through June. In comparison, vehicle miles traveled (VMT) on our nation's roads was up by 0.5 percent.

Noting that in 8 of the last 10 quarters, ridership on U.S. public transportation has increased, APTA President and CEO Michael Melaniphy said, "In big and small communities, demand for public transportation continues to grow. Public transit ridership has increased in 8 of the last 10 quarters. I anticipate that this trend of transit ridership growth throughout the United States will continue."

In the second quarter, some cities saw ridership increases due to economic recovery. They include: Birmingham, AL; Los Angeles, CA; San Francisco, CA; Miami, FL; Denver, CO; Champaign-Urbana, IL; Chapel Hill, NC; Ithaca, NY; Houston, TX; Hampton Roads, VA; and Seattle, WA.

"As the local economy continues to recover, public transportation ridership continues to increase in those communities where jobs are increasing," said Melaniphy. "Since nearly 60 percent of trips taken on public transportation are for work commutes, it makes sense that ridership goes up when employment goes up."

To see the complete APTA 2013 second quarter ridership report, go to:

<http://www.apta.com/resources/statistics/Documents/Ridership/2013-q2-ridership-APTA.pdf>

#### **2013 Second Quarter Ridership Breakdown**

Nationally, heavy rail ridership increased by 2.5 percent as 8 out of 15 heavy rail systems (subways and elevated trains) experienced ridership increases in the second quarter of 2013 over the same period in 2012. The heavy rail systems with the highest increases in ridership for 2013 were in the following cities: Miami, FL (16.8%); San Francisco, CA (6.7%); New York, NY (3.8%); and Philadelphia, PA (3.7%)

Nineteen out of 28 commuter rail systems reported ridership increases as commuter rail ridership grew by 0.9 percent. Commuter rail ridership saw a triple digit increase in Salt Lake City, UT (110.1%) due to a new commuter rail line opening in December 2012. Five commuter rail systems saw double-digit increases in the second quarter in the following cities: Austin, TX (37.1%); Lewisville, TX (30.4%); Stockton, CA (22.0%); Anchorage, AK (18.3%); and Minneapolis, MN (15.6%). Other commuter rail systems showing large increases were located in the following cities: San Carlos, CA (7.7%); Pompano Beach, FL (7.0%); Baltimore, MD (6.8%); and Seattle, WA – Sound Transit (6.1%).

Nationally, bus ridership rose by 0.5 percent from April through June of 2013, with some of the highest bus ridership increases in large cities were reported in: Houston, TX (5.1%); Washington, DC

(3.9%); Minneapolis, MN (3.8%); and Seattle, WA – King County Department of Transportation (2.8%).

Light rail ridership decreased by 0.5 percent in the second quarter, as 14 out of 28 light rail systems reported an increase in ridership from April through June 2013. Light rail systems saw double digit increases in the second quarter in two cities: Hampton, VA (21.4%); and Denver, CO (12.2%). Other light rail systems with significant increases were in the following cities: Seattle, WA – Sound Transit (8.5%); Los Angeles, CA (7.5%); San Jose, CA (6.3%); Philadelphia, PA (6.3%); Baltimore, MD (4.6%); Phoenix, AZ (3.3%); Dallas, TX (3.1%); and Pittsburgh, PA (2.9%).

Demand response (paratransit) ridership decreased in 2013 by 0.5 percent and trolleybus ridership decreased by 0.9 percent.

# # #

*The American Public Transportation Association (APTA) is a nonprofit international association of 1,500 public and private sector organizations, engaged in the areas of bus, paratransit, light rail, commuter rail, subways, waterborne services, and intercity and high-speed passenger rail. This includes: transit systems; planning, design, construction, and finance firms; product and service providers; academic institutions; transit associations and state departments of transportation. APTA is the only association in North America that represents all modes of public transportation. APTA members serve the public interest by providing safe, efficient and economical transit services and products. More than 90 percent of the people using public transportation in the United States and Canada ride APTA member systems.*

-----  
<https://www.sfmta.com/news/press-releases/muni-ridership-increases-over-past-two-years>

## Muni Ridership Increases over Past Two Years

Tuesday, October 15, 2013

[Download Press Release \(PDF\)](#)

The San Francisco Municipal Transportation Agency (SFMTA), which manages transportation in the city, including the Municipal Railway (Muni), today announced that over the past two fiscal years, July 1, 2011—June 30, 2012 and July 1, 2012—June 30, 2013, trips taken on Muni have increased by more than four percent. The national increase for calendar years 2011 and 2012 was just under four percent. Along with the growing economy, several major initiatives by the Agency coincided with this increase.

“As ridership continues to grow, so does the need to expand service to keep pace with the growing demands of the city,” said Tom Nolan, Chairman of the SFMTA Board of Directors. “The SFMTA Board will continue to explore ways to provide a transit system that will serve our current customers and our new customers as well.”

Over the past two years average weekday boardings have increased 4.16 percent and annual boardings have increased 4.31 percent. The total annual customer boardings for fiscal year 2012 was 222,125,944, a 3.92 percent increase over the year before. The fiscal year 2013 annual boardings total was 222,991,005, a .39 percent increase over FY 2012. The average weekday customer boardings tell a similar story. In fiscal year 2012, weekday trips increased by 3.13 percent over the year before; in FY 2013, they increased by 1.03 percent. The SFMTA is seeing a slow, but steady increase that mirrors the national trends of increased use of public transportation along with the recovering economy.

Recent statistics from the American Public Transportation Association (APTA) show that the second quarter of calendar year 2013 is up 1.2 percent over the previous year, nearly 31 million more trips taken from April through June. This is in comparison to a 0.5 percent increase in vehicle miles traveled on U.S. roads. In fact eight of the last 10 quarters saw increased transit ridership.

“The more people choose public transit, the better it is for San Francisco’s overall transportation network,” said Ed Reiskin, Director of Transportation. “While this is encouraging news, we have to continue the work to improve Muni efficiencies, while simultaneously planning for its future growth.”

Increasing ridership comes as the Agency implemented improvements to Muni service including:

- Nx Judah rush hour express bus, which provides near-term improvement to Muni’s most heavily used light rail line
- The innovative red transit-only lanes on Church Street between Duboce Avenue and 16th Street that are helping to speed up the slowest section of the J Church Line and the 22 Fillmore Route
- All-door boarding, which helps Muni reliability and speed as riders can board at any door of their bus or train.

Other initiatives such as the regional payment card, Clipper, the low income Lifeline Pass and Free Muni for Low and Moderate Income Youth, help make taking Muni more accessible and affordable.

<http://sfappeal.com/2013/10/sfmta-new-fulton-bus-line-to-provide-20-30-more-capacity-during-rush-hour/>

## **SFMTA: NEW FULTON BUS LINE TO PROVIDE 20-30% MORE CAPACITY DURING RUSH HOUR**

by [Bay City News](#) | October 17, 2013 7:56 am | in [News](#) | [Q](#)



The San Francisco Municipal Transportation Agency’s board of directors has approved a new pilot project to provide additional limited-stop bus service on a crowded bus line that runs from the city’s Richmond District to downtown.

The board on Tuesday approved the new 5L-Fulton line, which is expected to provide between 20 and 30 percent more capacity during peak periods, SFMTA officials said.

The new line, which will require the reconfiguration of lanes and bus stops along certain stretches of the route, is expected to begin operating sometime this fall, agency spokesman Paul Rose said.

On weekdays until 7 p.m., buses on the 5L-Fulton line will make all stops between La Playa and Cabrillo streets and Fulton and Sixth Avenue, then limited stops between there and Market and McAllister streets, SFMTA officials said.

"With this pilot, we're making a smart investment in the 5-Fulton that will make it easier for riders to get from one end of the city to the other on one of the city's most utilized routes," SFMTA board chairman Tom Nolan said in a statement.

*Dan McMenamin, Bay City News*

<http://www.sfgate.com/bayarea/article/Some-progress-seen-in-Muni-s-on-time-numbers-4962217.php>

## Some progress seen in Muni's on-time numbers

**Michael Cabanatuan**

**Published 5:43 pm, Wednesday, November 6, 2013**

Muni's on-time performance continues to lag far below its voter-mandated goal of 85 percent, according to the latest quarterly performance report, but the number of extended delays has dropped and more Muni Metro cars have been put into service.

The report, released Wednesday, covers June through August, and marks the first full quarter since the [Board of Supervisors](#) ordered that the report include estimates by the city economist of the financial impact caused by Muni delays. For the quarter, that was about \$2.5 million, based on lost hours and productivity.

During the three-month period, Muni's on-time performance continued to hover just above or just below the 60 percent mark. It was 59.6 percent in June, 59.8 percent in July and 60.1 percent in August. The average so far this budget year is 60 percent, compared with averages of 58.9 percent in the 2013 budget year that ended in July and 60.1 percent in the 2012 fiscal year.

Muni has never met, or really come close to achieving, the 85 percent goal imposed by voters in a 1999 proposition.

Supervisor [Scott Wiener](#), a frequent Muni critic who called for the economic impact numbers to be added to the report, said decades of neglecting maintenance and underfunding Muni mean that significant improvements in on-time performance aren't likely to happen quickly. Muni riders will need to be patient, as if waiting for a train during the commute.

"We've spent decades putting Muni into a bigger and bigger hole by not investing, which has led to older vehicles" that often break down and prevent the transit agency from providing the level of service scheduled, he said.

"It's going to take year-in and year-out investment and a commitment to funding," maintenance and vehicle replacement, he said. "It's not going to change in two or three months."

Both Wiener and Muni spokesman [Paul Rose](#) said the report shows a significant improvement in the number of light-rail - Muni Metro - vehicles available for service. The number of days on which enough rail cars were available has been embarrassingly low in recent reports - none last December and 9.1 percent in April. But it climbed as high as 87 percent in July and averaged about 73 percent for the quarter.



▲ "It's not where it needs to be, but it's a big improvement," Wiener said.

Rose said a rehabilitation program for Muni Metro cars as well as 112 new hybrid buses - 62 that are on the streets and 50 more on order - should continue to boost the number of Muni vehicles available, increase reliability and reduce crowding.

"We're really seeing more reliable service throughout the system," he said.

Mario Tanev, a spokesman for the [San Francisco Transit Riders Union](#), found the report disappointing, saying it underscored the city's lack of investment in its public transportation system.

"Even with the improvements, it's still very volatile," he said. "Muni doesn't have the vehicles it needs to provide the service it puts out."

R30 Wiener credited the [Municipal Transportation Agency](#) for its "laser-like focus" on maintaining and replacing buses and rail cars. Tanev said that without an infusion of money, Muni will never really see its performance  
-91 improve.

(Cont.) "It's rejiggering the deck chairs," he said. "It is not going to make a significant improvement in on-time performance."

Rose said the report shows Muni is headed in the right direction with its emphasis on maintenance.

"The numbers show some areas of improvement," he said. "But there's much more work to be done."

*Michael Cabanatuan is a San Francisco Chronicle staff writer. E-mail: [mcabanatuan@sfchronicle.com](mailto:mcabanatuan@sfchronicle.com)  
Twitter: @ctuan*

-----

<http://www.sfexaminer.com/sanfrancisco/san-francisco-at-1-million-focus-turns-to-muni-reliability-and-funding-as-population-swells/Content?oid=2663290>

January 2, 2014

## San Francisco at 1 million: Focus turns to Muni reliability and funding as population swells

by Dan Schreiber



• MIKE KOOZMIN/S.F. EXAMINER FILE PHOTO



- An upcoming report from the Association of Bay Area Governments predicts 200,000 additional passengers will be riding Muni within two decades.

Justified or not, complaining about Muni is a time-honored San Francisco pastime. Commentary — whether on social media, in a bar or on Muni itself — generally focuses on three major themes: arrival times, speed and odor.

The perpetual grouching shouldn't be much of a surprise, however, considering the unavoidable problems that come with an ostensibly underfunded system carrying 700,000 daily riders through one of the densest urban landscapes in the U.S.

Though some routes might seem slow and crowded even now, Muni appears to be in for a steep spike in users. Based on a new regional projections report, The City will grow by 35 percent — around 280,000 more people — between 2010 and 2040, a period of buildup unseen since the 1950s. In less than 20 years, 1 million people will live inside San Francisco's borders, according to upcoming numbers from the Association of Bay Area Governments.

R30

-91

(Cont.)

If Muni's ridership increases in proportion with the current 825,000 population, that could mean more than 200,000 additional people on buses and Metro light-rail cars — every day.

The potential surge is not lost on the San Francisco Municipal Transportation Agency or Mayor Ed Lee. The mayor is in the beginning stages of pitching an increase in vehicle license fees and wants general obligation bonds on future ballots to fill a projected \$6.3 billion funding gap that he says is needed to maintain the current system.

If approved, the money is slated for street fixes and hundreds of new transit vehicles by 2040. A transportation task force recently formed by the mayor recommends 260 new light-rail vehicles — 151 to replace aging cars, 24 new cars for the Muni Metro's Central Subway extension and 85 more to accommodate additional ridership. The task force also recommended that the current fleet of 810 buses be enlarged by 118, including several larger models to replace smaller versions.

If the funding doesn't come through, SFMTA officials fear more "rider discomfort" and increased "bunching" of slower buses that notoriously clog the streets during rush hour.

"Without a new investment, transit crowding is projected to get worse in the future, expanding to more routes at the busiest times of the day," said Paul Rose, a spokesman for the SFMTA. "Gridlock and traffic would discourage new jobs from locating in The City."

Rose said the agency is striving for a 50-50 "mode shift" wherein half of commuters are taking transit, walking, bicycling or using taxis, and the other half travel by personal vehicle. Currently, 60 percent of commuters in The City use their own cars, according to SFMTA estimates.

Gabriel Metcalf, executive director of the think tank SPUR and a member of a recent special committee to identify Muni's funding issues, said no such shift to transit will happen without significant improvements to the system, including widening the gaps between bus stops to improve Muni's dismal 8 mph average travel time.

"If we don't make a major reinvestment, we're going to see more breakdowns, more vehicles going out of service, and ultimately we'll see a vicious cycle of declining ridership," Metcalf said. "We're still one of only a small number of American cities where our transit service is for everyone; the problem is that it's too slow. I think this is the single most important thing we could do to improve livability."

Considering The City's other rising expenses, SFMTA Transportation Director Ed Reiskin said that for some people public transit is the major difference between being able to live in San Francisco or not.

What makes the quality of life here so great has to do with the ease of how people can get around," Reiskin said. "It's one of the things that offsets the higher cost of housing."

Supervisor Scott Wiener, who also works on regional transit issues with the Bay Area's Metropolitan Transportation Commission, said municipal infrastructure updates often fall low on a list of priorities because the failure to keep pace with long-term deterioration almost never presents short-term political consequences.

Still, he said, the projected population increase presents a "crisis" for Muni and the Bay Area transportation system in general.

"Muni is not meeting the needs of current San Francisco residents, much less the 200,000 people who are yet to come," Wiener said.

**San Francisco at 1 million**

*The City is poised to hit the mark in less than two decades. This five-part series will explore the challenges San Francisco faces in handling this population milestone.*

R30  
-91  
(Cont.)

\*\*\*\*\* MUNI BLOGS EVIDENCE \*\*\*\*\*

**MUNI - 29 Sunset**

41 reviews [Rating Details](#)

Category: [Public Transportation](#) [\[Edit\]](#)

Inbound From Bayview to the Presidio via the Sunset

Outbound toward Monster Park

San Francisco, CA 94124

Neighborhood: Bayview-Hunters Point

Sort by: [Yelp Sort](#) | [Date](#) | [Rating](#) | [Elites'](#)

**41 reviews in English**

- **Review from Rayson H.**



- 7 friends
- 3 reviews
- [Rayson H.](#)

San Francisco, CA

7/6/2013

I normally take this bus to SFSU & anywhere around the Sunset District.

PROS:

-It's one LONG Muni line that goes almost everywhere in SF besides Downtown. Inbound starts from the Bayview District -- Portola -- Excelsior -- Ingleside -- Merced Heights -- Outer Sunset -- Richmond -- Baker Beach.

-It goes lightening fast at night! I had to take this bus from SFSU to Geneva & Mission at 9 PM after my night class. Took nearly 14-17 minutes.

CONS:

-Always packed from August-May at 6-10 AM & 2:30-6:30 PM, no really it is... Lots of students from middle & high schools, SFSU, & CCSF entirely filled up the bus even on 5 stops. The most annoying thing about the crowded 29 is when they purposely skip your stop when you're waiting with over 4 people. What an uncomfortable ride that frustrates passengers!

IMPROVEMENT:

-Like really, when can MUNI start running their 60 foot articulated buses for this line during rush hours so that way it wouldn't be that crowded? In my perspective it wouldn't be that bad for a 60 foot bus to run up on MANSELL AVE & try making a right turn on BEVERLY ST. I think they should really test it out, just once!

-I would say make the 29 run more often like in every 5 minutes; however, they don't have that many buses to do so.

If you're trying to get to 19th Ave. & Irving from Ingleside for instance, you're better off catching the 28 Nineteenth Ave line if you're in a hurry. Soo stay safe!

Was this review ...?

• **Review from Wanda M.**



- 64 friends
- 85 reviews
- [Wanda M.](#)

Daly City, CA

9/28/2013

I get so much anxiety taking this bus. I usually catch the 29 on Mission and Geneva going inbound and it's usually already full when I board. Gets worse after Balboa Park Station. It gets better after stones town.

I usually take the 29 in the morning and sometimes it sooo stuffed that I cannot breathe. I am not clausterphobic or anything like that but imagine being shoulder to shoulder with 50 strangers breathing down your neck. The bus makes sudden stops and turns and everyone bumps into each other. Then you have 1/2 of those people talking loudly on the phone. The 29 makes me hate people.

Seriously Muni, would it kill you to get the double-length bus for this route?? After all the damn tickets you collect now, i'm sure funding is not the issue. This should be a crime (having so many people on a bus). What if there's an emergency? we're all fucked. Instead of spending money on a new, fancy bus can you just make them bigger??and fit more people??

Oh, and it takes 40 damn minutes sometimes to get from Mission and Geneva to Stonestown. [that's like what, 3 miles?] I can walk faster than that...but who the hell wants to walk 3 miles to school, especially after I already have to walk .7miles to get to the bus stop.

I hate you 29. So so so much.

Was this review ...?

• **Review from Richard T.**



- [Elite '14](#)
- 226 friends
- 260 reviews

- Richard T.

Carlsbad, CA

9/12/2013

29 Sunset was a nightmare bus line when I was a kid and is the Walking Dead of SF public transportation today.

Gee, you know, a funny thing happened not too long ago. 29 Sunset buses that were behind schedule or off duty were taking unauthorized shortcuts through the quiet residential streets of the SF Richmond District. Many of them were speeding where kids played and where elderly and disabled people were trying to cross the street. The drivers clearly knew they were breaking the law and many had smirks on their faces because, no matter how many times you reported them, they still got away with it.

Fast forward a few years and the SF DPW and PG&E have several blocks in the area closed for weeks and completely torn apart due to collapsed sewer lines and damaged underground cables. Sinkholes had formed and large areas of asphalt were warped. Hmm, do you think that continuously driving a multi-ton public transportation vehicle that's supposed to be on a 4-6 lane road had anything to do with it?!?!?!?!?

I'd give this bus line 1 star but MUNI has been doing a better job of curbing the off-route 29 Sunset drivers...for now.

Was this review ...?

- **Review from Bryanna W.**



- 0 friends
- 1 review
- [Bryanna W.](#)

San Francisco, CA

1/15/2013

This bus route is a nightmare during peak hours!!

My commute is short compared to the length of this route from Baker Beach all the way Bayview, but I have to deal with the kids going to Balboa, the commuters going to Balboa Bart Station, people going to CCSF and SFSU, along with the other kids going to Lowell and AP.

aka this bus is always crowded before and after school.

aka you'd be blessed to find a seat and not be pushed up against the back door during these times

Was this review ...?

<http://www.yelp.com/biz/muni-29-sunset-san-francisco>

- 615 reviews
- [Ben P.](#)

Miami, FL

4/9/2008

I can remember the day I decided I would no longer be taking the 1 as my main means of transit to and from work. I was standing at Clay and Hyde at about 8:00 a.m. one day, when the 1 pulled up, packed to the gills. Both doors opened, no one came out (because, seriously, who's getting out there at that time of day?). The small Chinese woman who had been standing next to me waiting walked up the the rear door---or rather, she walked until she was lined up with the rear door, but still about 3 steps away from it. Then, she took 3 quick steps and rammed into the pile of bodies. I lost sight of her for a second, but then she fell backwards out of the door, caught herself with an outstretched leg, stood on the sidewalk for 2 second, gathered herself, and vaulted into the bus again. A split-second after she vaulted, the rear door slammed closed and the bus went back on its merry way.

Paraphrasing Danny Glover in my head, I said to myself "I am WAY too rural for this shit." By which I meant that I would have objected to traveling to work with a Chinese woman wedged in my colon. Or any other nationality of woman. Or any man. Or a tranny, pre- or post-op. For clarity's sake, let's just say this: Ben no want no one wedged in colon. Ergo, Ben no fit in on 1.

So, I started commuting via cable car. The same monthly Muni pass covers cable cars. Here's what I found:

- A. I didn't overheat, because I could chose to be outside or inside, and could switch at will;
- B. The trip was just about the same duration, maybe 3 minutes longer;
- C. At least in the morning, the cable cars run on a more reliable schedule; and
- D. I no longer arrived at work in a homicidal mindset.

So, no more 1 for me, thanks. I've had enough.

Was this review ...?

---

• **Review from Michael A.**

---



- 5 friends
  - 26 reviews
  - [Michael A.](#)
- 

San Francisco, CA

8/19/2007

Pros:

Frequent  
Every mile electrified (trolleybus)  
One way street running (east of Gough)  
Dedicated bus lane east of Van Ness during rush hour

Cons:

Not enough capacity (overcrowded)  
Too many stops (basically every block east of Gough - MUNI policy dictates this based on the grade)  
No signal pre-emption  
Dedicated bus lane only operates for a few hours per day

Would I trade it for most other MUNI bus lines? No. So I give it 3 stars for a MUNI line. But I'd give it only 2 stars if I were judging it against what it should be. The 1-Cali carries about 30,000 riders per day, whereas a single lane on Sacto or Clay carries perhaps 3,000-4,000 cars per day. Giving the bus a dedicated right-hand lane plus the ability to pre-empt traffic signals should be a no-brainer (and prohibit righthand turns from those two streets...it's not like you can make them on a bunch of the streets anyway), but I doubt it will ever happen...welcome to the tyranny of the minority. Sigh.

---

Was this review ...?

<http://www.yelp.com/biz/muni-1-california-san-francisco>

- **Review from Jando S.**



- Elite '14
- 1259 friends
- 2541 reviews
- [Jando S.](#)

Queens, NY

9/18/2012

2 check-ins here

I loathe SF public transit, more specifically anything MUNI. But when I'm forced to bite the bullet, I find myself more often than not on the 38L Geary bus. Whether I'm hanging out downtown, relaxing in the Richmond, or frolicking in the Tenderloin / City Center, this bus is the one to take. Plus, it's way faster than the regular 38 Geary.

When traffic is flowing, its only feels like minutes before this bus hits the downtown area from its starting point. Not all buses are created equal. I can name far too many buses that have their share of frequent shady characters, shoddy bus routes, and infrequent times. Thankfully for the 38L, these things aren't ever really an issue.

There is one issue. Because everyone loves the 38L, it tends to be one of the more crowded buses. Getting a seat is near impossible during rush hour and many of the stops are stacked with eager commuters. Listen to the automated Spanish and Cantonese prompts while holding onto the rail straps for dear life. Ignore the delinquent teens and give your seat up to the elderly Chinese woman. She probably rides the bus way more than you do.

Was this review ...?

- **Review from John G.**



- 1 friend
- 190 reviews
- [John G.](#)

San Diego, CA

1/17/2013

Very crowded bus line - we NEED more Fare/ticket Inspectors(Police)!!

So many people (they know who they are) board the line WITHOUT Paying! Or even pretending to pay, then have the nerve to take a seat on a full bus. Or even more crazy -- claim she can't stand so asks people to give up a seat for her (A freeloader).

More Police. We saw the Muni inspectors board a 38 and arrest/fine 5 people! All got huge tickets! Love it. The second time these thieves get caught -- the fine should Double!

The Automatic announcements on the bus should say -- IT's ILLEGAL to not pay for a ride! (not the stupid - it's time ""to pay your fare share". Such a stupid Muni marketing campaign. It's ILLEGAL not to pay. All these Freeloaders hurt ALL of us. And cause all of regular payers to pay more!

More MUNI Police and arrest these people and keep them overnight in Jail! That'll stop these thieves.

Was this review ...?

- 
- 226 reviews
- Erica A.

Berkeley, CA

10/12/2010

Gets me downtown faster than any other bus in richmond.

BUT DAMN, how crowded can a bus really get?!?!?! If you're taking this bus from downtown out to richmond, you KNOW it stays crowded until like.. 25th ave..

One time a homeless man who smelled like poop sat next to me and I got so scared that I ran through everyone on the bus all the way to the front. Ugh. -\_-

Was this review ...?

<http://www.yelp.com/biz/muni-38l-geary-limited-san-francisco?start=40>

-----  
Here is a copy of my letter outlining my personal experiences with Muni (also under separate cover):

Ms. Sara Jones, ERO  
Planning Commissioners  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

February 18, 2014

Subject: 2004/2009 Housing Element – Revised Alternatives - Transit System Incapacity – Muni

Dear Ms. Jones and Planning Commissioners:

In the 2004/2009 Housing Element Revised Alternatives Analysis (HERAA) document of December 2013, it is assumed that everybody will take public transit to combat air pollution and reduce GHG emissions if they live in housing next to transit corridors. This assumption is not reality. Now that many units have been created since the 2004 Housing Element, many more people are trying to get transported via Muni, e.g. The problem is that Muni was at over-capacity some time ago. And it is trying to fix itself but adding shuttles to the N-Judah service, adding more buses for all the riders, adding private shuttles, ferry services, etc. only creates more pollution just to get people moving but increases GHGs in doing so. See my Comments to HERAA under separate cover.

R30  
-91  
(Cont.)



Muni is over-capacity. I have personally experienced the following breakdowns in Muni "service":

1. **No buses arrive (missing)** even though the sign says "arriving" or "15 minutes"
2. **The "sardine cans" (buses) come but are jam-packed so nobody is allowed to board** so the hordes waiting are **stranded at the bus stops** & the people think the arrival predictions are accurate when not
3. My recent experiences of Muni over-capacity or not showing up:
  - a. Tue., Dec. 17, 2013 4pm – 5:40pm (1 hour + 40 min.)  
Entire trip from Richmond District to Bayview Area took this long with 2 buses  
And in general, the time on the bus is 300% the time it takes to drive anywhere
  - b. Wed., Jan. 15, 2014 6pm – 6:50pm  
GEARY / VAN NESS – Outbound: Overcrowded, no boarding; wait 15 min for next bus, too jammed to get on; 5 min later, squeeze on to 3<sup>rd</sup> bus. Lady says she is buying a car.
  - c. Fri., Jan. 17, 2014 6:15pm – 6:35pm  
GEARY / VAN NESS – Outbound: Overcrowded, cannot get on; wait 13 min for next bus, very crowded, squeezed on only because one person got off
  - d. Fri., Jan. 31, 2014 10:50am – 12:35pm  
GEARY / PARK PRESIDIO – Outbound: long wait, got on Geary which was crowded; Transfer to 28-19<sup>th</sup> Ave bus stop with many San Francisco State students waiting; jam-packed, squeezed on after a long wait. It takes way too long to cross from the Richmond to the Sunset District and vice versa.
  - e. Wed., Feb. 5, 2014 5:10pm – 5:25pm  
GEARY / POWELL – Outbound: Overcrowded, cannot get on; wait for next bus, crowded cannot get on; wait for next bus, got on but was not a 38-L which was preferable since the 38-Geary is slow since it stops at every stop (unless jam-packed, they skip you).

The only riders who are assured of getting on Muni are at the starts and ends of the lines. Overcapacity Muni and even overcapacity BART force East Bay commuters to park near Muni line starting points to get to work. This adds to the overcapacity on Muni and causes even more congestion by drivers circling to park vehicles near terminal bus stops.

Rose Hillson  
Member, Jordan Park Improvement Association  
115 Parker Avenue  
San Francisco, CA 94118-2607

cc: Steve Smith, Planner  
Jonas Ionin, Commissions Secretary, Planning  
John Rahaim, Director of Planning

February 18, 2014

Ms. Sara Jones, ERO  
 Planning Commissioners  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

via email & hand-delivery

Subject: 2004/2009 Housing Element – Revised Alternatives - Transit System Incapacity – Muni

Dear Ms. Jones and Planning Commissioners:

In the 2004/2009 Housing Element Revised Alternatives Analysis (HERAA) document of December 2013, it is assumed that everybody will take public transit to combat air pollution and reduce GHG emissions if they live in housing next to transit corridors. This assumption is not reality. Now that many units have been created since the 2004 Housing Element, many more people are trying to get transported via Muni, e.g. The problem is that Muni was at over-capacity some time ago. And it is trying to fix itself but adding shuttles to the N-Judah service, adding more buses for all the riders, adding private shuttles, ferry services, etc. only creates more pollution just to get people moving but increases GHGs in doing so. See my Comments to HERAA under separate cover.

Muni is over-capacity. I have personally experienced the following breakdowns in Muni “service”:

1. **No buses arrive (missing)** even though the sign says “arriving” or “15 minutes”
2. **The “sardine cans” (buses) come but are jam-packed so nobody is allowed to board** so the hordes waiting are **stranded at the bus stops**
3. My recent experiences of Muni over-capacity or not showing up:
  - a. Tue., Dec. 17, 2013 4pm – 5:40pm (1 hour + 40 min.)  
 Entire trip from Richmond District to Bayview Area took this long with 2 buses  
 And in general, the time on the bus is 300% the time it takes to drive anywhere
  - b. Wed., Jan. 15, 2014 6pm – 6:50pm  
 GEARY / VAN NESS – Outbound: Overcrowded, no boarding; wait 15 min for next bus, too jammed to get on; 5 min later, squeeze on to 3<sup>rd</sup> bus. Lady says she is buying a car.
  - c. Fri., Jan. 17, 2014 6:15pm – 6:35pm  
 GEARY / VAN NESS – Outbound: Overcrowded, cannot get on; wait 13 min for next bus, very crowded, squeezed on only because one person got off
  - d. Fri., Jan. 31, 2014 10:50am – 12:35pm  
 GEARY / PARK PRESIDIO – Outbound: long wait, got on Geary which was crowded;  
 Transfer to 28-19<sup>th</sup> Ave bus stop with many San Francisco State students waiting; jam-packed, squeezed on after a long wait. It takes way too long to cross from the Richmond to the Sunset District and vice versa.
  - e. Wed., Feb. 5, 2014 5:10pm – 5:25pm  
 GEARY / POWELL – Outbound: Overcrowded, cannot get on; wait for next bus, crowded cannot get on; wait for next bus, got on but was not a 38-L which was preferable since the 38-Geary is slow since it stops at every stop (unless jam-packed, they skip you).

The only riders who are assured of getting on Muni are at the starts and ends of the lines. Overcapacity Muni and even overcapacity BART force East Bay commuters to park near Muni line starting points to get to work. This adds to the overcapacity on Muni and causes congestion by drivers circling to park vehicles near terminal bus stops.

Rose Hillson



February 14, 2014

RECEIVED

FEB 18 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

N/S

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

Transit services in the City and particularly along Union Street are already difficult. The 41 Union adds extra-length buses each morning to handle high volume at the eastern end of the line. These buses are too long to fit into standard bus stops and consequently stick out into the adjoining travel lane, causing congestion/gridlock on Union Street as morning traffic increases. The SFMTA takes these extra-length buses off line later in the morning, presumably to keep auto traffic flowing.

R32-1

If Union Street or other narrow two-lane neighborhood streets were converted to “major transit lines,” and extra-length buses are allowed, traffic would be impossible. I am concerned about the quality of life that my family and I would experience if Union Street became a “major transit line” and experienced high-rise development. On O’Farrell Street an entire lane of traffic has been removed to allow for extra-length bus transit. O’Farrell is a wide, three-lane street with parking along the curbs. During heavy transit hours, when double parking exists in the left lane and the bus-only traffic is allowed in the right lane, the resulting one-lane for automobiles is very slow to impractical on good days. On bad days or during rush hour, traffic stops.

Our city streets are not designed for heavy bus, auto, bike, and delivery traffic all at the same time. Before experiencing another 30,000 to 50,000 added to the population, alternate and combined methods of travel should be studied for all sections of the city to prevent unintended consequences from poorly planned housing increases. The EIR should consider alternative combinations as well as public responses as well as the possible addition of long-term garages at critical transit junctures; all to reduce traffic congestion.

Thank you for your consideration.

N/S

Sincerely,

Malcolm Kaufman  
2485 Union Street #2  
San Francisco, CA 94123

Jeff Leimbach  
San Francisco, CA  
94114

415 Union Street  
San Francisco, CA

San Francisco, CA  
415 Union Street

February 11, 2014

N/S

Sarah B. Jones  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, #400  
 San Francisco, CA 94103

RECEIVED

FEB 18 2014

CITY AND COUNTY OF SAN FRANCISCO  
 PLANNING DEPARTMENT

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

Transportation, utility, police protection and other services available in urban settings such as the City of San Francisco, are generally more costly to modify, repair and service than similar services in suburban settings. The myth of locating additional residents into these heavily populated areas because the services are already there, is no longer justifiable. Services in San Francisco, as in most cities, are now heavily impacted. New urban development requires the same additional service build-out required in the suburbs. In fact, when the true unit cost difference is added, the impacts may be greater upon the families and residents of the city.

R33-1

For example, adding a 40 unit apartment building on a suburban street might require the same additional services, but if added in the urban setting, construction data tell us that the urban building requires a greater unit cost to build because of its greater number of floors, more compact design and requirements for earthquake protection. Plus, changes to the utilities and other building services would likely come at a greater cost and greater disruption to the surrounding public than in the suburban setting. The impacts and cost from greater density already present in the urban setting, such as greater crime, violence, homicides and homelessness are important factors in urban health. These impacts should be included in the re-focused EIR.

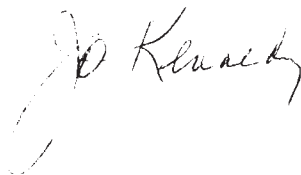
Furthermore, it is a critical failure of the new Housing Element EIR not to examine and compare the suitability and cost of housing. Housing in San Francisco is more expensive than anywhere else when the cost of all environmental influences are fully included. This adds up to greater unit costs for urban units versus the same units built in outlying areas connected by transit to the city. We have discovered recently that the commute *from* the city has grown to the size of the commute *into* the city, jeopardizing another myth that people will live and work in the same city. Working from the home is just as likely to happen in the suburbs as in the denser city.

As these issues critically impact families and single residents of San Francisco, the EIR should consider all these factors at no-build and partial build out levels.

N/S

Thank you.

Sincerely,



RECEIVED

FEB 18 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

February 11, 2014

N/S

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

I live in Cow Hollow, one of the many low-rise and single-family neighborhoods in San Francisco. Our neighborhood is a wonderful one because it is a balanced mixture between single family housing and small condo/apt structures and neighbors easily talk to one another. Higher density limits, particularly those that allow another or more levels above their present level could significantly impact our neighborhood and significantly change it to one in which neighbors become strangers.

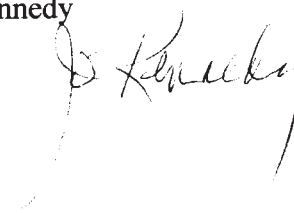
R33-2

Without sensible density limits that are spelled out in city housing policy, the changes from multiple garage conversions (impacting parking space) to height and mass increases which the new Housing Element allows, could cause irreversible damage to the residential character of Cow Hollow and other residential neighborhoods in the city. Even now the availability of spaces is very limited. The Density level should be very, very specifically studied in each <sup>block</sup> area. In my block and in most of the area, most of the homes were built 100 years ago so some of the homes don't have garages and the ones that do have space for only one car and the presence of the Russian Consulate compounds the problem during the day. I see the chaos it causes every day.

N/S

Sincerely,

Josephine Kennedy



RECEIVED

FEB 18 2014

CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT

N/S

February 11, 2014  
Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

R33-3

Transit services in the City and particularly all along Union Street are already impacted. The 41 Union line adds over-length busses each morning to handle the high volume at the eastern end of the line. These buses are too long to easily park in standard bus stops and consequently stick out into the adjoining travel lane, causing near gridlock as the morning traffic along Union Street increases. The SFMTA takes these over-length buses off-line later in the morning to prevent this condition and to keep auto traffic flowing.

However, if Union Street or other narrow two-lane neighborhood streets were converted to "major transit lines" allowing these over-length buses, traffic would be impossible. I am concerned about the quality of life that my family and I would experience if Union Street became a "major transit line" and saw major high-rise development. On O'Farrell Street an entire lane of traffic has been removed to allow for over-length bus transit. This is a wide three lane street with parking at either curb. During heavier transit hours, double parking in the left travel lane and the bus-only lane in the right travel lane create a one-lane auto transit corridor that on good days is very slow to impractical. On bad days or during rush hour, traffic stops.

The present city streets are not designed for heavy bus, auto, bike and delivery traffic all at the same time. Before adding 30,000 to 50,000 people arbitrarily to the present San Francisco population, impacting the present traffic network, Alternate and combined methods of travel should be studied for all sections of the city to prevent unintended consequences of a poorly planned housing increase. The EIR should consider each of these alternative combinations and public response to each as well as adding additional long-term garages at critical transit junctures to reduce auto traffic.

N/S

Thank you.

Sincerely,



RECEIVED

FEB 18 2014

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

February 11, 2014

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

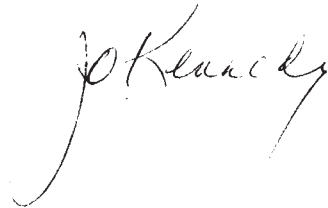
N/S

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

R33-4

Sorry, but I had to smile at this one - re "further accommodate housing near transit". Will this happen in the Sunset? The residents there will gladly accommodate mother-in-law apartments, particularly because the houses are providentially built to house them, but you will have war if you try to allow multi-story apartments there because, like in my area, we like a "neighborhood". I don't think this one will work very often. And then I think of the 1989 earthquake that decimated a lot of those houses that were built on old creek beds - who would have known there was such a critical issue?



**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: Creating more of a mess?  
**Date:** Tuesday, February 18, 2014 11:03:15 AM

---

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** nancy leavens [<mailto:nancyp.leavens@gmail.com>]  
**Sent:** Tuesday, February 18, 2014 9:57 AM  
**To:** Jones, Sarah  
**Subject:** Creating more of a mess?

NANCY P. LEAVENS  
2729 Filbert Street  
San Francisco, Ca. 94123

February 17, 2014

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

Transit services in the City and particularly along Union Street are already impacted. The 41 Union line adds over-length busses each morning to handle the high volume at the eastern end of the line. These buses are too long to easily park in standard bus stops and consequently stick out into the adjoining travel lane, causing near gridlock as the morning traffic along Union Street increases. The SFMTA takes these over-length buses off-line later in the morning to prevent this condition and to keep auto traffic flowing.

N/S

R34-1



However, if Union Street or other narrow two-lane neighborhood streets were converted to “major transit lines” allowing these over-length buses, traffic would be impossible. I am concerned about the quality of life that my family and I would experience if Union Street became a “major transit line” and saw major high-rise development. On O’Farrell Street an entire lane of traffic has been removed to allow for over-length bus transit. This is a wide three lane street with parking at either curb. During heavier transit hours, double parking in the left travel lane and the bus-only lane in the right travel lane create a one-lane auto transit corridor that on good days is very slow to impractical. On bad days or during rush hour, traffic stops.

R34-1  
(Cont.)

The present city streets are not designed for heavy bus, auto, bike and delivery traffic all at the same time. Before adding 30,000 to 50,000 people arbitrarily to the present San Francisco population, impacting the present traffic network, Alternate and combined methods of travel should be studied for all sections of the city to prevent unintended consequences of a poorly planned housing increase. The EIR should consider each of these alternative combinations and public response to each as well as adding additional long-term garages at critical transit junctures to reduce auto traffic.

Thank you.

N/S

Sincerely,

Nancy Leavens

R34-2

PS. Can’t you work WITH the reality of cars in SF (even if only transiting through) instead of trying to impede vehicular transportation?

NANCY P. LEAVENS  
 2729 Filbert Street  
 San Francisco, Ca. 94123

February 17, 2014

N/S

Sarah B. Jones  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, #400  
 San Francisco, CA 94103

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

Transportation, utility, police protection and other services available in urban settings such as the City of San Francisco, are generally more costly to modify, repair and service than similar services in suburban settings. The myth of locating additional residents into these heavily populated areas because the services are already there is no longer justifiable. Services in San Francisco, as most cities, are now heavily impacted. New urban development requires the same additional service build-out required in the suburbs. In fact, when the true unit cost difference is added, the impacts may be greater upon the families and residence of the city.

R35-1

For example, adding a 40 unit apartment building on a suburban street might require the same additional services, if added in the urban setting, but construction data tell us that the urban building requires a greater unit cost to build because of its greater number of floors and more compact design. Plus, changes to the utilities and other building services would likely come at a greater cost and greater disruption to the surrounding public than in the suburban setting. The impacts and cost of greater density already present in the urban setting such as greater crime, violence, homicide and homelessness is an important factor in urban health and may be a big factor in causing middle-class family exit from the city. These impacts should be included in the re-focused EIR.

Furthermore, it is a critical failure of the new Housing Element EIR not to examine and compare the suitability and cost of housing more of the expected Bay Area population growth in suburban settings. Housing is not cheaper in the city, when the cost of all environmental influences is fully included. This adds up to greater unit costs for urban units versus the same units built in outlying areas connected by transit to the city. We have discovered recently that the commute *from* the city has grown to the size of the commute *into* the city, jeopardizing another myth that people will live and work in the same city. Working from the home is just as likely to happen in the suburbs as in the denser city.

As these issues critically impact families and single residents of San Francisco, the EIR should consider all these factors at no-build and partial build out levels.

N/S

Thank you.

Sincerely,

Nancy Leavens

R35-2

PS How did you determine the projected population growth figures for your calculations?

R35-3

Another earthquake is a reality. Have you factored this into your analyses?

Francis J. Martin  
160 San Fernando Way  
San Francisco, CA 9417

N/S

Re: Input on *2004 & 2005 Housing Elements, Revised Alternatives Analysis*

Dear Ms Jones:

We are writing as life-long residents of San Francisco. We own two single-family homes in our neighborhood, where our parents, and grandparents were raised. We highly value single-family neighborhoods in our City. Although we understand the City's legitimate interest in increasing housing options for its residents, we believe the *2004 & 2005 Housing Elements, Revised Alternatives Analysis* is flawed by allowing infilling of private open space with secondary units throughout the city. We believe this revision would effectively eliminate RH-1 zoning and are adamantly opposed to such a change.

Respectively,

Francis J. Martin

R36-1

N/S

**From:** [Janet Monfredini](#)  
**To:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Cc:** [Smith, Steve](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillisf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#)  
**Subject:** Comments--Housing Element  
**Date:** Tuesday, February 18, 2014 12:42:10 PM

---

Dear Ms. Jones, et al,

N/S

I was born and raised in San Francisco, attended all of my schooling through a masters degree in the City, live on San Francisco's western side and have an office downtown in the Mills Building. San Francisco is very important to me and that makes the housing element issues personal. I am not naive to the challenges faced by a City like ours and I appreciate the complexity of strategic planning, but our City is still a jewel and I hope we can do our best to protect that, not destroy it.

R37-1

I am so disappointed and frustrated at the potential implications of the housing element document. I live in a historic neighborhood, St. Francis Wood, and we go to extremes to protect our integrity and beauty. The proposals made in this document seem to be all about City revenue and nothing about our quality of life. The western side of the City has always been about the middle class and people that are earnest about living in San Francisco. In fact, there have always been varied options to accommodate families of different income levels. I grew up on Vicente Street, and my childhood was very blue collar. I know with fine detail the benefits and challenges of this area. In my current neighborhood, we work hard to preserve and maintain parks which we allow anyone to enjoy, care for our trees and other green areas and value our single family home neighborhood with a strong sense of community. Our architecture is historic and the value of that is impossible to quantify. In fact, it holds national importance. We also support all of the neighborhoods around us. There are many and each has its own ambiance and beauty.

Developers are always looking for any foothold they can get to shoehorn in developments that maximize the opportunity to make money. We have dodged a couple of bullets near us over the last few years, but the threat is never gone. The Market Street corridor is overladen with cranes and building, and the South Beach area is full of new developments. I have no doubt developers would be delighted to be supported in their efforts to accomplish the same out in the middle class residential City's west side.

R37-2

Relating to public transit, as it is, our streets are clogged. Public transportation is inadequate and what we do have is sloppy and often causes congestion rather than facilitates the improved flow of life. I, personally, have been on muni to experience a knife attack, a threat to do harm, others being sick, fondling, all in addition to the unpleasant environment of filthy trains and unexplained delays. Such experiences hardly foster fondness for the system. In addition, all of our trains run above ground, which only serves to impede traffic flow and will continue to compound with added residential volume. In fact, the poor planning regarding muni refurbishment drives traffic through neighborhoods rather than keeping it on what should be main thoroughfares. I challenge you to get adequate traffic calming to residential areas. It is a painful process. Intersections are ridiculous with their timing to accommodate muni flow.

R37-3

Neighborhoods like ours deserve to be preserved and our integrity respected.

R37-3  
(Cont.)

Setting any other possible option is offensive and short sighted, and treads on the quality of life for thousands of people in this City. I thank you for taking the time to read my comments and I would appreciate being apprised of future action.

N/S

Sincerely,

Janet Monfredini  
130 Santa Monica Way  
94127

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: zoning  
**Date:** Tuesday, February 18, 2014 11:34:25 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

I think you've already gotten this one.

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Secretary, Commissions  
**Sent:** Tuesday, February 18, 2014 8:26 AM  
**To:** Bill Sugaya; Cindy Wu; Gwyneth Borden; Kathrin Moore; Michail Antonini; Rich Hillis; Rodney Fong  
**Cc:** Gerber, Patricia; Jones, Sarah  
**Subject:** FW: zoning

N/S

FYI

*Jonas P. Ionin*  
*Director of Commission Affairs*  
*Commissions Secretary*  
*Custodian of Public Records*

Planning Department | City & County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-558-6309 | Fax: 415-558-6409

[jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)  
[www.sfplanning.org](http://www.sfplanning.org)



**From:** Patty Murphy [<mailto:mac4murph@gmail.com>]  
**Sent:** Monday, February 17, 2014 1:18 PM  
**To:** Secretary, Commissions  
**Subject:** zoning

R38-1

I strongly feel that this idea of re-zoning the neighborhoods to allow multi unit buildings is very misguided. Here are my concerns:



R38-1  
(Cont.)

△ The Balboa Terrace area was designed with garages behind and narrow streets in front of the houses. As it stands now we have so many cars parked on the streets that you often can not drive down the street because of a car coming from the other direction. Some of these parked cars come from illegal in-law-units, others just from lack of garage parking. If you add more units and take away more garages for people to convert the space to units, the area will be so congested no one including emergency services will be able to get by.

San Francisco has a horrible public transportation system. I have taken public transport all over the country and some foreign cities and Muni is the worst. We have no ability to transport all the people that these extra units will bring to this area. I take Muni as needed, and prefer BART for its timely arrivals and lack of break downs. We cannot continue to over populate this city until we have a well running under ground system in place.

R38-2

Decreasing single family homes and increasing homes in multi unit buildings will finish driving young families out of the city. None of them dream of raising children in a multi unit building. Most families with children still want to buy a single family house. The few Houses that are left will price most of the middle class out of the housing market. There will be no stable population and no one who lives and works in the city. It will be a transient population with very few people who are in it for the long run.

N/S

---  
*Patty Murphy*  
*235 San Fernando Way*  
*San Francisco Ca*  
*94127*



**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: ReZoning  
**Date:** Tuesday, February 18, 2014 9:23:06 AM

---

N/S

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Lynn & Neil [mailto:norris.ransick@comcast.net]  
**Sent:** Monday, February 17, 2014 11:33 AM  
**To:** Jones, Sarah  
**Subject:** ReZoning

R39-1

Please do NOT change the zoning in our RH-1 residential neighborhoods. We live at 212 Teresita Blvd in Miraloma Park and we specifically bought here because it was zoned RH-1. Changing the zoning will affect our quality of life. We already have too many cars and traffic in the neighborhood.

N/S

Thank you.  
Lynn Norris and Neil Ransick

I, along with my neighbors, are alarmed at the idea that the City would even contemplate changing the zoning in St Francis Wood and our neighbors in Lakeside, Forest Hill, West Portal, Parkside and a good portion of the Sunset

R40-1

We have a beautiful, historical area with many architecturally significant homes, which we have spent considerable effort and money to maintain. Our area adds to the livability of the City, many people enjoy our parkways and fountains. We pay to maintain these areas at no cost to the City. We pay property taxes and bond taxes and use very few City services.

Speaking of services, Muni is strained to during commute time now. Thousands will be moving into additional housing at Park Merced, how is Muni going to accommodate all these new riders?

Traffic in this area has increased dramatically. Most afternoons cars are backed up two or more blocks on St Francis trying to cross Junipero Serra.

Quality of life must be considered, not just quantity of housing units.

Christine O’Gara  
135 San Fernando Way  
San Francisco

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: Case No. 2007.1275E  
**Date:** Tuesday, February 18, 2014 11:12:44 AM

---

**Sarah Bernstein Jones**  
**Environmental Review Officer**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

---

**From:** Vincent O'Gara [mailto:vogara@gmail.com]  
**Sent:** Tuesday, February 18, 2014 11:11 AM  
**To:** Jones, Sarah; Secretary, Commissions  
**Cc:** csqueri@sbcglobal.net  
**Subject:** Case No. 2007.1275E

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

[sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
[Commissions.Secretary@sfgov.org](mailto:Commissions.Secretary@sfgov.org)

This letter is to comment on the pending changes in zoning laws for the City and County of San Francisco. Case No. 2007.1275E

I object to Alternative C. The express purpose of this Alternative is to increase residential density and to restrict zoning protections for RH-1 and RH-2 residential districts.

If this alternative is selected, it will destroy the backbone of San Francisco – single-family residences. As you are aware, single-family residences provide most of the housing for middle class families. Allowing increased height and density, eliminating off street parking, and allowing liberal (over-the-counter) variances, will profoundly change quality-of-life in single-family residence neighborhoods. Increased density will not solve San Francisco’s transportation problems. Rather, Alternative C will increase traffic and create more stress on public transportation.

N/S

R41-1

R41-2

R41-2  
(Cont.)

The City and County of San Francisco should reject all housing alternatives which increase density and fail to provide realistic solutions to San Francisco's public and private transportation problems.

N/S

Vincent O'Gara  
135 San Fernando Way  
San Francisco 94127  
[vogara@gmail.com](mailto:vogara@gmail.com)

**From:** [Jones, Sarah](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: 2004 & 2009 Housing Element revised Alternatives Analysis  
**Date:** Tuesday, February 18, 2014 9:11:55 AM

---

Sarah Bernstein Jones  
Environmental Review Officer  
Director of Environmental Planning

Planning Department!City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9034!Fax: 415-558-6409  
Email: sarah.b.jones@sfgov.org  
Web: www.sfplanning.org

-----Original Message-----

From: Francie Pasquini [<mailto:franciepasquini@gmail.com>]  
Sent: Monday, February 17, 2014 9:18 PM  
To: Jones, Sarah  
Cc: Smith, Steve  
Subject: 2004 & 2009 Housing Element revised Alternatives Analysis

Ms. Jones:

I find it hard to believe that the revised Environmental Impact Report is even being considered!

How can you so blatantly choose to change the very character of San Francisco. All the diverse neighborhoods are a part of our city. Single dwelling homes are a necessity: important for keeping the middle class in San Francisco; giving homeowners the opportunity to have their own homes, achieved by hard work and often sacrifice, and then to enjoy with family and friends. This in the neighborhood of their liking and choice.

There is a definite quality of life to be had living in a single- family neighborhood, perhaps not for everyone, but to those who have chosen it, they are there for the neighborhood character, the people, parks, weather, and other such amenities. It is not realistic to invade such a neighborhood with secondary units and "infill" of private open space, thereby eliminating RH-1 zoning.

I am a native San Francisco, born and raised. Naturally I expected to have seen many changes through the years, but what is being proposed now is too drastic.

Let us hope that such a plan as this will not pass.

Frances Pasquini  
175 San Leandro Way, San Francisco, CA 94127

N/S

R42-1

N/S

**From:** [Carolyn Squeri](#)  
**To:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Cc:** [Smith, Steve](#); [planning@rodneyfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Rahaim, John](#); [elizabeth@doingcollege.com](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Monday, February 17, 2014 11:50:54 PM  
**Importance:** High

---

Sarah B. Jones  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103-2479

Dear Ms. Jones,

I am submitting these comments in the hope that you, the Planning Department, and the Planning Commission will listen to sincere concerns regarding the city's approach to the Housing Element, pushing through measures that would have an unknown and potentially very negative impact on the quality of life for San Franciscans.

Enabling the densification of the city without improving the city's infrastructure in advance is irresponsible. We are already in a drought, and your reports have admitted that if there were to be a drought, your analysis about San Francisco's capacity to adequately meet future water demands would be severely impacted. How can the analysis imply otherwise?

Just this week we received news of BART's inability to handle rush hour capacity and needing an additional tube. Everyone knows Muni is woefully unable to handle rush hour with the normal 20 minute ride from West Portal to Montgomery taking 45 minutes or longer, each way, with the trains stopping between stations for 5 to 10 minutes at a time, between each station, because the tunnel cannot handle the number of trains required NOW. Often the trains are too full to pack one person in. As I mentioned in my public comment at the hearing, my husband has fainted twice on Muni in the tunnel.

The reverse commute has gotten to be worse in the last three years. Where a trip to Belmont from San Francisco took 30 minutes three years ago, it can now take an hour and twenty minutes each way. There are a huge number of people already living in the city who work down the Peninsula. ABAG should look at densifying Mountain View, not San Francisco, if global warming is the concern.

One alternative you should consider is looking to re-do rent control. It has become so onerous for some landlords that I hear they have taken their places off the market. I help my sister manage a little three-unit apartment in the Haight. She is a single mother working for minimum wage trying to put two children through college. Income from the apartment is supposed to help her, but she has one long-term tenant in the nicest unit in the building, paying just \$1100/month while he has a high-paying job at Stanford and travels around the world half the year. He has told me he is never leaving. Why should he, with such a sweet deal? Or the couple from Woodside who keep their rent-controlled pied-a-terre in San Francisco so they can go to the opera six times a year. Rent control should be tied to income and be used to benefit those who need affordable housing. The current system is a joke. I bet if you took a survey of vacant apartments and of the incomes of those who rent way below market rate, you would be shocked.

Secondary units where zoning already allows them are fine, but your citywide plan cuts right into the heart of San Francisco's single-family neighborhoods. The effective elimination of RH-1 zoning and dealing with all of San Francisco as if it is "developable" completely misses the enormously negative impact such a policy would have on the quality of life in our neighborhoods and on the middle class families who want to live in them. Even all the singles living downtown may one-day want to buy a

N/S

R43-1

R43-2

R43-3

R43-4

R43-4  
(Cont.)

home in a single-family neighborhood when it comes time to raise their families. They may even need a car when they've got a baby and groceries to bring home. My three sons tremendously value the life they had growing up in San Francisco with neighborhood parks and friends – and all the neighbors knowing them. We live down the street from their grandparents and they aspire to raise their children in San Francisco, too. They have friends from all over the city, but what they all want is to one day have a single family home with a garden, trees, neighbors who all know and support each other, easy access to downtown, community pool (Larson) and tennis courts (McAteer), Junipero Serra playground, baseball diamond and basketball courts, like they've grown up with. They don't need the suburbs. A good example of the value of RH-1 neighborhoods in SF, is the experience we have had with our neighbors on our block and adjoining block. They watch out for each other. One night about 10:30 pm, I got a call. A neighbor from another block had seen a patio doorway wide open at my mother's house (she's 90 year old). The neighbor knew an older lady lived there alone and we had had some recent break-ins, so he called a person he knew on our block, who called me because he knew us, so I could go down and make sure my mother was OK. It had been during our heat wave and she had been taking in the sun, and hadn't gotten the door fully closed. Another elderly neighbor found upon her return from a hospital stay night-after-night of meals delivered to her home by her neighbors. I do not think you could over-estimate the value of the quality of life that a single-family neighborhood affords its residents. Families are a critical component of the fabric of the city and should not be so easily dismissed in favor of piling more people into every corner of the city willy nilly. Be planners with vision. Rather than threatening to ruin the neighborhoods, why don't you emulate them. Try building transit villages with amenities and neighborhood character in other corners of the city that need help rather than ruining the neighborhoods. (I support your plans for Park Merced, Treasure Island, Third Street, Bayview and Hunters Point projects.) People need open space and connection with nature to thrive. Please evaluate that before taking it away with changes to our setbacks, and come up with alternatives that would help San Francisco families, not chase them away.

R43-5

For neighborhoods that have CC&Rs and Design Guidelines, your analysis of the alternatives is particularly disappointing. St. Francis Wood, for example, has endured for over 100 years as one of the city's distinctive neighborhoods, with an extraordinary collection of early 20<sup>th</sup> century architect-designed homes, some by the likes of Julia Morgan, Angus McSweeney, John Galen Howard, Gertrude Comfort, and Henry Gutterson, to name a few. These neighborhoods should be protected not threatened with "residential development that includes inappropriate alterations or additions to existing housing that could diminish their historic significance." (Alternative A). Why do that? You'd be destroying a wonderful asset of the city.

R43-6

You have many generations of families living on the west side in neighborhoods they are committed to and involved in, just as they are committed to their city: paying property taxes, supporting the Giants, 49ers, Warriors, and local businesses. You need to understand that you are talking about where people live, have invested in the purchase of a home, are raising their families, and love their city. Just my family for example has roots in South of Market, the Castro, Bayview, Harrison Street, Geneva, the Mission, West Portal, near SF State, and now St. Francis Wood (I'm 4<sup>th</sup> generation; husband 2nd). Planning could do a better job of truly listening to homeowners and not playing games. The ends do not justify the means. Certainly there must be alternatives that could allow the city the number of affordable units it needs without ruining the neighborhoods and the lives of the people who pay their taxes that pay your salaries.

R43-7

I do not understand your alternatives' analysis. The analysis seems to admit major environmental and quality of life impacts, and then dismisses them as insignificant. Insignificant to whom? Certainly not to the people who live here. Please explain.

R43-8

In closing, I'd like to say that I am not against development. In fact, there is much of the city that would benefit from an influx of capital. Market Street is improving, as is South of Market, Mission Bay, and the Third Street corridor. However, I do not consider it smart development to try to avoid process when it comes to the neighborhoods, and to disregard the interests of those who have something to lose by your policies. Using a broad brush to make it easier for you in the future is not the way to earn the respect of your constituents. Nor is making it so difficult for us to try to figure out what you are

R43-8  
(Cont.)

doing. I have been trying to follow these Housing Element issues for ten years now. It is all very confusing. I do not understand why single-family neighborhoods cannot be protected. I do not understand why you say most future housing will be in established neighborhoods. Shouldn't you be looking to develop some new neighborhoods? I consider Mission Bay a real triumph – lots of housing and renewed life along with the ballpark.

N/S

Thank you for your service. Your job is not an easy one. I fervently hope that you and the Planning Commission find a way to honestly ease of the minds of those of us in the neighborhoods who are so concerned.

Very truly yours,  
Carolyn Squeri  
12 San Leandro Way  
San Francisco, CA 94127



**From:** [Pamela Stone](#)  
**To:** [Jones, Sarah](#)  
**Cc:** [Smith, Steve](#); [planning@rodnevfong.com](mailto:planning@rodnevfong.com); [cwu.planning@gmail.com](mailto:cwu.planning@gmail.com); [wordweaver21@aol.com](mailto:wordweaver21@aol.com); [plangsf@gmail.com](mailto:plangsf@gmail.com); [richhillissf@yahoo.com](mailto:richhillissf@yahoo.com); [mooreurban@aol.com](mailto:mooreurban@aol.com); [hs.commish@yahoo.com](mailto:hs.commish@yahoo.com); [Rahaim, John](#)  
**Subject:** Housing Element, Revised Alternatives Analysis  
**Date:** Tuesday, February 18, 2014 1:46:44 PM  
**Attachments:** [Planning Dept ltr.docx](#)

---

Good Afternoon,

I have attached my comments to your Housing Element.

I am vehemently opposed to changing the character of St. Francis Wood by the introduction of secondary housing and infill. There is inadequate infrastructure to take care of planned growth; this would open the door to virtual gridlock.

Thank you,

Pamela A. Stone

N/S

R44-1

N/S

1395 Portola Drive  
San Francisco, CA 94127  
February 18, 2014

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: *2004 & 2009 Housing Element, Revised Alternatives Analysis*

Dear Ms. Jones,

I am herewith submitting my comments.

I am extremely disappointed with the proposal to increase housing stock by allowing secondary units and “Infill” of private open space. As a resident of the West Side of San Francisco, many of us have chosen to live here to be able to have gardens, and a single family residence. Many streets are teeming with vehicles, particularly in the Sunset, as the garages are inadequate and there are too many vehicles. To add additional units will only create more parking problems.

There is no need to increase density by adding secondary units – presently there are new townhomes being built on Brotherhood Way, and there is the proposal which would substantially increase the density of ParkMerced. There is not enough infrastructure to presently handle these developments – the advent of secondary units would make the situation worse.

The infrastructure on the West Side of San Francisco is substantially different from other areas, which have a much higher density. There is inadequate public transportation the further west and south one travels. Thus, an increase in housing would result in an increase in traffic. Traffic is already gridlocked. For example, in traveling from Kaiser Hospital at Geary near Divisadero, I usually take Geary to Masonic, to Fell, and then to Lincoln, before turning on 7<sup>th</sup> Avenue. Driving home, I have experienced gridlock before I leave Masonic. Cars are backed up on Lincoln. It takes forever to drive 7<sup>th</sup> Avenue – some times you cannot get through an intersection because the street has inadequate capacity. The effect that the gridlock has caused can readily be seen. An examination of the houses on Lincoln between Kezar and 7<sup>th</sup> Avenue show that they are all caked in black dust which results from the automobiles.

19<sup>th</sup> Avenue serves as a major North-South arterial. That street cannot handle more traffic. It has a history replete with accidents and pedestrian fatalities. It is inadequate to handle the increase from ParkMerced – any further increase in density in the West Side would result in an impossible situation being made much worse.

N/S

R44-2

R44-3

With regard to “infill”, all private land which is presently undeveloped should go through a permitting process. Just because one owns land does not necessarily mean that the land can be developed. San Francisco is replete with hills with sparse development. There is a simple reason for it: possibility of landslides, inaccessibility in the event of fire, difficulty of construction. The present system works well – there is no need to rush into anything.

Additionally, I live in the historic St. Francis Wood development. Like other areas, such as Forest Hills, Monterey Heights, and Merced Manor, the area is specifically for single family homes, many of which are historic in their architecture. These homes have yards, both front and rear. These are neighborhoods which have less crime and are safe places for the children and elderly to live. Many of these areas have CC&R’s restricting the use of the real estate, as well as its configuration. The reason that these neighborhoods are historic and well regarded is that the original standards for their creation have not been torn asunder by speculators or increase in density. It has been recognized that the historic character of St. Francis Wood, which has been in existence for 100 years, as well as other historic neighborhoods, would be affected. This is clearly unsatisfactory.

There are complaints that children are leaving San Francisco. That is true – but as a mother, who wants to raise children in an area where there is no safe place to live or play. What I have noticed in St. Francis Wood is that as long time residents die or leave, the new residents are more likely to have young children.

If the residents of the West Side of San Francisco wished to live a more urban lifestyle, they could readily move to various neighborhoods that have condominiums or apartments in large buildings.

What makes San Francisco unique is the various neighborhoods, which each have a different character. Don’t make them all Manhattan, as you are doing in SoMa. To Manhattanize all areas of San Francisco would eliminate what makes the City unique.

Thank you for listening to my concerns,

Pamela A. Stone

R44-4

N/S

Re Case # 2007.1275E

Letter R45  
RECEIVED

SF 2004 & 2009 Housing Element

Revised Alternatives Analysis

FEB 19 2014

Comments from Wallace and Virginia Wells at 240 Santa Clara Avenue, SF:

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.F.A.

We were married in 1949 and both graduated from colleges and began careers in education. In 1962, when the San Francisco Unified School District started bussing children from their neighborhoods to schools outside their neighborhoods, the quality of education diminished. This caused many families to move out of San Francisco. At this time we had 2 young daughters but decided not to leave San Francisco, rather to purchase a home in a "good" area, one that was designated as "single-family home". And so, we bought our present home in 1965 and continue to live here happily. We would NOT want to see our area, or any others in San Francisco that are designated "single-family home", changed in any way and create another mass exodus of San Francisco families.

N/S

R45-1

Virginia Wells  
~~Wallace Wells~~

Feb. 17, 2014

N/S

**From:** [Rosilyn Young](#)  
**To:** [Jones, Sarah](#); [Secretary, Commissions](#)  
**Cc:** [Smith, Steve](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [plangsf@gmail.com](#); [richhillisf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commiss@yahoo.com](#); [Rahaim, John](#)  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Sunday, February 16, 2014 7:08:14 PM

---

Dear Ms. Jones – I understand that the planning department is considering eliminating the RH-1 category of residential zoning in San Francisco. My family has lived in the same house in St. Francis Woods for almost the entire 100 years that the housing district has been in existence. My grandparents bought the house in the '20s and raised their children there (in a middle class life) and we have raised our family there, as well. There are few places left in San Francisco where families are welcome and encouraged, where there are even small gardens for children to play in and neighbors all know each other because there is a real feeling of community. Changing zoning to allow apartment buildings or storefronts within the neighbourhood would change everything. Increased traffic because of more density, the anonymity of apartment living would completely destroy what makes St. Francis Woods and other similar neighbourhoods unique and a distinctive part of San Francisco. Residential neighbourhoods like St. Francis Woods, Forrest Hill and Sea Cliff are an important part of San Francisco's history – they were created for families and have kept families in San Francisco for all these years. People in these neighbourhoods pay property tax, work in the city, participate in the cultural and charitable life of San Francisco on all levels and are actively involved in their city and communities. There is significant value in keeping these citizens. Is it necessary to have the whole city filled with single or childless dot com high earners? Why can't there be a place in SF for families to live in single family homes, know their neighbors and be able to know that some developer isn't going to buy the house next door and put up a 6 story apartment building that will block community interaction, increase congestion and change the character of neighbourhoods that have been in existence for a hundred years?

Please retain the RH-1 zoning category for St. Francis Woods.

Best Regards,  
 Rosilyn Young  
 130 San Fernando Way  
 San Francisco CA 94127

N/S

R46-1

N/S

**From:** [Rosilyn Young](#)  
**To:** [Smith, Steve](#)  
**Subject:** FW: Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis  
**Date:** Monday, February 17, 2014 3:47:13 PM

---

---

**From:** Rosilyn Young [mailto:rozgilyoung@gmail.com]  
**Sent:** Sunday, 16 February, 2014 7:36 PM  
**To:** 'sarah.b.jones@sfgov.org'; 'Commissions.Secretary@sfgov.org'  
**Cc:** 'Steve.smith@sfgov.org'; 'planning@rodnevfong.com'; 'cwu.planning@gmail.com'; 'wordweaver21@aol.com'; 'plangsf@gmail.com'; 'richhillissf@yahoo.com'; 'mooreurban@aol.com'; 'hs.commish@yahoo.com'; 'john.rahaim@sfgov.org'  
**Subject:** Case No. 2007.1275E SF 2004 & 2009 Housing Element, Revised Alternatives Analysis

Ms. Jones – please don’t change the RH-1 zoning for St. Francis Woods. We have lived here for many years and my wife’s family has lived in the same house for over 90 years. We feel that allowing in-law apartments, apartment buildings or other non single family structures would change the historic tradition and value of the neighbourhood to the history of San Francisco. The neighbourhood has always lived within CC&R’s and all residents who live here value the consistency it has given our community. People who live here have chosen to stay in San Francisco in spite of high property prices, foggy weather, difficult schools, etc. because St. Francis Woods and other unique residential neighbourhoods like it offer a feeling of community that other more multi use areas of the City do not offer. We don’t live in a transit corridor, we live in a neighbourhood where we know our neighbors, watch out for each others’ children and elderly residents and work together for the betterment of our community. How often do you hear the residents of Bush street say that? Do residents on Geary know all their neighbors and have block get-togethers? Does the Western Addition have a garden club to raise money to re-plant the public areas or do the residents organize clean up days or volunteer to raise money to repair the neighbourhood playground? Let’s preserve our family neighbourhoods. They’re increasingly rare. RH-1 zoning keeps family neighbourhoods strong. Keep the apartment buildings and storefronts out of historic San Francisco neighbourhoods – there are too few of them left in San Francisco. This isn’t LA or Houston. Proper zoning keeps our city vibrant and unique. Please reject “Alternative A” - the city should respect and value historic neighbourhoods, such as St. Francis Wood, Forest Hill, etc., not destroy them.

Respectfully,  
Gilbert V. Young  
130 San Fernando Way  
San Francisco, CA 94127

N/S

R47-1

N/S

RECEIVED

FEB 21 2014

CITY OF SAN FRANCISCO  
PLANNING DEPARTMENT

February 15, 2014

Cynthia Gissler  
2727 Baker Street  
San Francisco, CA 94123

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103


Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

I take the bus to work everyday and regularly travel on lines 45, 41, and 43 during my weekly activities. I primarily take public transportation or walk. Occasionally, I drive the single car that my family of four owns. Transit services in the City and particularly along Union Street are already impacted. The 41 Union line adds over-length buses each morning and afternoon to handle the high volume at the eastern end of the line. These buses are too long to easily park in standard bus stops and consequently stick out into the adjoining travel lane, causing near gridlock as the morning and afternoon traffic along Union Street increases. Several times a week, I need to back up my car as I leave Baker Street onto Union, so that the extra long 41 can make the turn in front of me off of Union onto Baker. It cannot make the turn onto Baker if a car is legally waiting to turn left onto Union.

If Union Street or other narrow two-lane neighborhood streets were converted to "major transit lines" allowing these over-length buses, traffic would be impossible. I am concerned about the quality of life that my family and I would experience if Union Street became a "major transit line" and saw major high-rise development.

The present city streets are not designed for heavy concurrent bus, auto, bike and delivery traffic. Before adding 30,000 to 50,000 people to San Francisco's population, impacting the present traffic network, alternate and combined methods of travel should be studied for all sections of the city to prevent unintended consequences of a planned housing increase. The EIR should consider each of these alternative combinations and public response to each as well as adding additional long-term bike and parking garages at critical transit junctures to reduce auto traffic.

Sincerely,  
  
Cynthia Gissler

N/S

R48-1

N/S

February 15, 2014

Cynthia Gissler  
2727 Baker Street  
San Francisco, CA 94123

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

N/S

Re: Critical Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

I live in Cow Hollow, one of the many low-rise and single-family neighborhoods surrounding the downtown area of San Francisco. My family enjoys our neighborhood because of the residential nature, open green spaces within the blocks, and the lower scale of the single-family homes and duplexes that populate the streets. Changes made to the 2009 Housing Element were not properly studied or noticed under the EIR as they were added later. Density limits were haphazardly removed allowing higher density from garage conversions and larger and higher buildings in some ill-defined areas. These changes could significantly impact our neighborhood forcing single families out of the city, or significantly changing the lives of those who want to remain in the city.

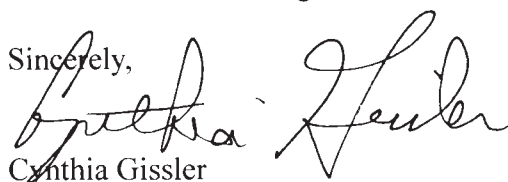
R48-2

Without sensible density limits that are spelled out in city housing policy, the changes from multiple garage conversions and from height and mass increases, which the new Housing Element allows, could cause irreversible damage to the residential character of Cow Hollow and other neighborhoods in the city. Unless the density limits are restored to the Housing Element, the impact of the loss of garage space on each residential street must be adequately studied under a new EIR.

R48-3

Our family of four has a single car which we park in our garage. Converting garages into living space would put additional cars on our already crowded streets. There is not enough parking in our neighborhood already. These impacts must be considered in any EIR where city-wide density limits are ill-defined or removed as was done under the 2009 Housing Element.

Sincerely,



Cynthia Gissler

N/S



February 11, 2014

Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, #400  
San Francisco, CA 94103

RECEIVED  
FEB 18 2014  
OFFICE OF THE ENVIRONMENTAL REVIEW OFFICER

N/S

Re: Critical Urban Issues Not Studied Adequately in 2009 Housing Element EIR.

Dear Ms. Jones,

R49-1

Transportation, utility, police protection and other services available in urban settings such as the City of San Francisco, are generally more costly to modify, repair and service than similar services in suburban settings. Services in San Francisco, as most cities, are now heavily impacted. New urban development requires the same additional service build-out required in the suburbs. The myth of locating additional residents into these heavily populated areas because the services are already there, is no longer economically justifiable.

For example, construction data tell us that urban buildings require a greater unit cost than suburban buildings to build because of the greater number of floors and more compact design. In addition, changes to the utilities and other building services would likely come at a greater cost and greater disruption to greater numbers of surrounding public than in the suburban setting. The impacts and cost of greater density already present in the city such as greater crime, violence, homicide and homelessness is an important factor in urban health and most likely is a big factor in causing middle-class family exit from San Francisco. These impacts and costs should be included in the re-focused EIR. The new ABAG Housing Policy, fails critically in not examining and comparing the suitability and cost of housing more of the expected Bay Area population growth in suburban settings.


R49-2

Observers have discovered recently that the daily commute *from* the city has grown, approaching the size of the commute *into* the city. This fact challenges another myth that people will live and work in the same city. In addition, working from the home is an increasing phenomenon that may become the major employee location in the next decade. Neither of these impacts was properly evaluated in the initial EIR and need to be properly studied.

R49-3

These issues critically impact families and single residents of San Francisco, the EIR should consider impacts of these factors at no-build and partial build-out levels.

N/S

Sincerely,  
  
Geoff Wood  
2760 Baker Street  
San Francisco, CA 94123



## SECTION III

---

### Responses to Comments

#### A. Organization of Responses to Comments

This chapter presents responses to the substantive comments received on the Revised EIR. The responses are presented sequentially, in the order that they appear in the public hearing transcript and comment letters as presented in Section II. Many comments pertain to the same or similar topics. A detailed response to such comments is provided once. Responses to subsequent comments that pertain to those same or similar topics reference those detailed “master” responses.

Response numbers noted throughout this section correspond to comment numbers provided in the letter or transcript brackets in Chapter II. Comments are not reproduced in this chapter but instead are provided in full in Chapter II.

#### B. Responses to Individual Comments

##### ***Response to R1-1: (Leonard Gregory Scott, Pacific Heights Residents Association)***

The commenter requests a continuance of the public hearing on the recirculated Revised EIR. A continuance of the public hearing is at the discretion of the Planning Commission, and not required under CEQA. The Planning Commission did not continue the public hearing. However, as noted below, the public comment period was extended from February 3, 2014 to February 18, 2014.

Similar comments requested an extension of the public comment period on the recirculated Revised EIR. The Notice of Availability was issued on December 18, 2013, and indicated that a hearing at the Planning Commission would take place on January 23, and that the comment period would end on February 3, 2014. On January 23, 2014, the comment period was extended until February 18, 2014, for a total comment period of 62 days. Under CEQA Guidelines section 15088.5(d), a lead agency shall provide public notice of the availability of a recirculated Draft EIR in the same manner as proscribed in Guidelines section 15087. Notice must be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by either publication in a newspaper of general circulation, posting on the project site or direct mailing. The Notice of Availability of the Revised Section of the DEIR was published in the San Francisco Examiner, a newspaper of general circulation, on December 18, 2013 and was mailed to the City’s Housing Element distribution list, which includes those who previously commented on the DEIR (published in June 2010), members of the San Francisco Planning Department’s DEIR distribution list, and neighborhood groups registered with the San Francisco Planning Department. A Notice of the Extension of the Public Comment Period on the Revised EIR was also published in the San Francisco Examiner on January 29, 2014, and mailed to the same list of individuals and neighborhood groups as the original Notice of Availability of the Revised DEIR, in addition to the San Francisco Planning Department’s Historic Preservation DEIR list.

When a DEIR is revised only in part and the lead agency is recirculating only revised chapters or portions of the DEIR, CEQA Guidelines section 15088.5(f) indicates that the lead agency may request that reviewers limit their comments to the revised chapters or portions of the DEIR. The lead agency’s notice of recirculation must indicate whether new comments may be submitted only on the

recirculated portions of the DEIR or on the entire DEIR, in order to be considered by the agency. The Notice of Availability of the Revised EIR, and the Notice of Extension of the Comment Period, indicated that comments should be limited to the recirculated portions of the DEIR. Additionally, both notices summarized the revisions made to the previously circulated DEIR. Neither CEQA nor the CEQA Guidelines require that the notice indicate the number of pages of the recirculated portion or section of the DEIR, or that the notice indicate whether other sections or documents are referenced in the recirculated portions or sections and may be relevant for review.

Some commenters state that the notice must be corrected, that they did not understand the notices, or that the noticing and/or document distribution requirements were accelerated or “pushed through” the environmental review process. No evidence is provided to support such claims. As discussed above, the Department complied fully with all provisions contained in CEQA and CEQA Guidelines associated with the publication, notification, and distribution of the Revised EIR. To the extent that comments relate to the amount of time necessary prior to approving the Housing Element, it should also be noted that the 2004 Housing Element was adopted by the Planning Commission in May 2004 (Motion 16787), and the 2009 Housing Element was released for public review in March 2011.

---

***Response to R1-2: (Leonard Gregory Scott, Pacific Heights Residents Association)***

The commenter’s opinion that middle-class housing should be prioritized is noted. Many comments were received regarding the ability of the Housing Element to meet its RHNA affordability targets in all categories. The Draft EIR analyzes the environmental impacts of the proposed project and changes to the built and natural environment that would result from approval of the 2004 or 2009 Housing Element. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

Housing affordability is largely a socio-economic impact. As noted in Response to 10-9 and 10-10 of Chapter VIII of the 2004 and 2009 Housing Element EIR dated March 24, 2011 (hereafter referred to as “2011 Responses to Comments”), socio-economic impacts of the Housing Elements that do not have secondary environmental impacts are outside the scope of the Draft EIR. According to CEQA Statute Section 21100(b)(1), the environmental impact report shall include a detailed statement setting forth all significant effects on the environment of the proposed project. Additionally, according to CEQA Statute Section 21060.5, “Environment” is defined as the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance.

Thus, socioeconomic impacts are only addressed by CEQA if there would be secondary physical environmental impacts that result from socioeconomic implications. Additional information regarding the relationship between the Housing Elements and future residential development is provided below in Response to R1-15. No further response is required and no change to the EIR is warranted.

### **Response to R1-3: (David Bisho, Westwood Highlands Association)**

Multiple commenters state that implementation of the 2004 and/or 2009 Housing Elements would have an adverse impacts on the capacity and effectiveness of local transit systems, particularly Muni. Some commenters note that existing Muni service is deficient, that they often have to wait a long time for a particular bus or light rail, that buses and trains are crowded and uncomfortable, that it takes too long to get to a particular destination, and that eliminations of specific bus routes over the last few years have only intensified such impacts. These comments are on existing conditions and not on the adequacy or accuracy of the analysis of Alternatives contained in the in the Revised EIR. The Superior Court concluded that the Final EIR's discussion of impacts, including transportation impacts, was adequate and complied with CEQA. However, the following response is provided for informational purposes.

Comments that generally state that the EIR is inadequate because it does not properly address transportation, specifically the capacity and effectiveness of the local transit system (Muni), were previously responded to in Response to F-18 in the 2011 Responses to Comments document. As noted in that response, the Draft EIR found that the 2004 and 2009 Housing Element policies do in fact encourage a greater use of the City's transit network and that any mode shift towards transit could result in an exceedance of Muni's capacity utilization standard of 85 percent. Therefore, the impact of encouraging transit ridership was determined to be potentially significant. The Draft EIR discussed a number of approved and proposed plans and projects that would increase the efficiency of the City's transportation network (see pages V.F-15 to V.F-18). Specifically, the Draft EIR noted a number of plans and projects related to transit improvements including the Transit Effectiveness Project, the Van Ness and Geary BRT, the Better Streets Plan, the Bicycle Plan, Central Subway, the Transbay Terminal, Caltrain Electrification, and High Speed Rail. All of these would either directly or indirectly increase the efficiency of the City's transit network. The Draft EIR concluded that the City should implement the transportation plans and programs identified on pages V.F-15 to V.F-18, which would reduce congestion and decrease transit travel times. However, the Draft EIR determined that it is unknown whether implementation of these measures would provide a sufficient decrease in travel time to carry all of the projected riders. The Draft EIR discussed that the second approach would be to increase capacity by providing more buses, but found, given that this would increase costs for SFMTA and funding has not been identified for such actions and that given SFMTA's budget shortfalls, that securing additional funding would require new revenue. The Draft EIR noted uncertainties surrounding the implementation of the identified mitigation and ultimately determined **impacts to the City's transit network to be significant and unavoidable.**

As discussed in the Revised EIR, housing policies under Alternative A (No Project) would reduce the contribution to the significant cumulative impact on transit to a less than significant level, whereas adoption of Alternatives B or C would result in a cumulatively considerable (significant) contribution to the significant cumulative transit impact. As noted in the Revised EIR, this is because Alternative A would not encourage a mode shift to transit or alternative transportation options as strongly as either the 2004 or 2009 Housing Element. This impact under Alternative B or C would be similar to the 2004 and 2009 Housing Elements, although Alternative B, 2004 Housing Element – Adjudicated, might reduce the impact below the level expected with either the 2004 or 2009 Housing Elements as proposed. As discussed throughout the Draft EIR, the Housing Elements do not propose new housing development projects and do not result in the construction of residential units. Rather, they are policy-level and programmatic documents that ensure that there is adequate land available to meet future housing needs, that could result in physical changes related to the location and type of future housing development.

Regarding comments that additional Muni service should be funded to accommodate anticipated increases in population, this comment is noted. However, this comment does not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted. For a response to comments regarding the adequacy of the public notice of the Revised EIR, please see Response R1-1, above.

---

***Response to R1-4 (David Bisho, Westwood Highlands Association)***

The commenter requests that the Revised EIR include an alternative that prioritizes middle class housing for families. Consistent with the CEQA Statute and Guidelines, and as concurred with by the Superior Court, the Revised EIR analyzes a reasonable range of project alternatives. As further explained below, no additional alternatives are required to be analyzed, as there is no requirement in CEQA that all feasible alternatives are analyzed in an EIR.

CEQA requirements for alternatives analysis in an EIR are described in Section 15126.6 of the CEQA Guidelines. As stated in that section, “[t]here is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible.”

The general process for identifying alternatives for consideration in the Revised EIR is described on page VII-2 of that document. The first step is identifying alternatives that can feasibly attain most of the project objectives, including ensuring sufficient residential development capacity to meet the RHNA at all income levels. Additional steps taken to develop the alternatives include: reviewing the EIR analysis for any significant effects resulting from the proposed Housing Elements and identifying possible strategies to avoid or lessen impacts; reviewing the California Court of Appeal decision regarding the Negative Declaration prepared for the 2004 Housing Element; reviewing ideas and alternative concepts suggested during the Notice of Preparation Public Scoping Period or at other points during the 2009 Housing Element and DEIR preparation process; and selecting and refining a final set of alternatives for CEQA analysis. Two alternatives in addition to the No Project Alternative required under CEQA, were selected for further evaluation. In addition, each of the 2004 and 2009 Housing Elements is considered an alternative to the other Housing Element. This set of four alternatives to each Housing Element represents a broad range of options for the public and decision-makers consideration in terms of shaping how new residential development should occur. Thus, it is considered adequate for the purposes of CEQA and no additional alternative is required.

The commenter provides no information as to how an alternative that prioritizes middle class housing for families might differ from the 2004 Housing Element, the 2009 Housing Element, or any of the alternatives analyzed in terms of physical impacts.

The commenter's general opinion that middle-class housing for families should be prioritized is noted. However, this comment does not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R1-5 (Michael Russom, Park Merced Action Coalition)***

Please see Response to R1-3. It is also noted that the EIR did analyze cumulative impacts associated with increased transit ridership and found them to be significant and unavoidable.

---

***Response to R1-6 (Michael Russom, Park Merced Action Coalition)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R1-7 (Michael Russom, Park Merced Action Coalition)***

The comment requests that the Housing Element reconsider increasing densification on the west side of the City due to transit, pollution and other issues. This is a comment on the proposed project and not on the adequacy or accuracy of the Draft EIR. However, it is noted that the Housing Elements do not propose any changes that would enable a greater number of new residential units than would otherwise result from ongoing development activities that are largely consistent with the Planning Code. The Housing Element policies would not increase overall growth in the City beyond that already assumed by regional growth projections. Further, Housing Element policies generally promote changes in the density of a given area or planning district through a community-based planning process. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Regarding the capacity of the local transit system, please see Response to R1-3.

---

***Response to R1-8 (Charles Ferguson, Presidio Heights Association of Neighbors)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R1-9 (Kathy Devincenzi, San Franciscans for Livable Neighborhoods)***

Please see Response to R1-1 and Response to R16-17.

---

***Response to R1-10 (Kathy Devincenzi, San Franciscans for Livable Neighborhoods)***

The commenter states that the notice is inadequate and should be recirculated. Please see Response to R16-1, below, regarding the commenter's claim that the City abused its discretion by rejecting alternatives in conclusory findings and that the EIR's discussion of alternatives was also unlawful

and conclusory. As stated in Response to R1-1, above, the Notice of Availability complies with all CEQA requirements.

---

***Response to R1-11 (Kathy Devincenzi, San Franciscans for Livable Neighborhoods)***

The commenter states that production of excess housing should be eliminated. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Please also see Response to R16-15.

---

***Response to R1-12 (Steven White)***

Please see Response to R1-1.

---

***Response to R1-13 (Steven White)***

The commenter notes concerns about “major changes in the quality of our neighborhoods.” However, the commenter has not provided any information to support or clarify the claim, and does not identify the specific physical changes to neighborhoods would result from implementation of the Housing Elements. Please see Response to R1-15 for an additional discussion about the perceived relationship between the 2004 and 2009 Housing Elements and future rezoning. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R1-14 (Steven White)***

This comment is in regard to transportation issues but lacks specificity; therefore, no further response can be provided. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on traffic congestion is provided in Response to R32-1.

---

***Response to R1-15 (Rose Hillson)***

This comment, and other similar comments, relate to the perceived impact of the Housing Elements on single-family or two-family (i.e., RH-1, RH-2) zoning districts or neighborhoods, or what is construed to be “middle class” (middle income) housing. It should be noted that there is no connection or correlation between low density housing and middle income housing. Moreover, since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes.

To the extent these comments suggest a need for an alternative that includes policies that specifically address the expressed concerns, see Response R1-4. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR.



These comments are noted; however, no additional response is required and no change to the EIR is warranted.

For informational purposes, the following response from Planning Department's Citywide group (the project sponsor) is provided:

Thank you for the opportunity to respond to some of the comments you have received during the public comment period on Chapter VII Alternatives (Revised), specifically comments regarding the proposed 2009 Housing Element and its relationship to, and effect on RH-1 and RH-2 zoning, middle-income housing, and family housing.

As part of the development of the 2009 Housing Element policies, the Department conducted a review of San Francisco's housing stock. Based on that review, the Department, with guidance from the Community Advisory Body and input from City agencies and community members, developed updated Housing Element policies to facilitate opportunities for the City to meet various Citywide housing policy objectives. The identified and articulated housing policy objectives include: maintaining the existing stock (Objective 2 and related policies), meeting affordable housing goals (Objectives 1, 2, 3, 7, 8, & 9 and related policies), and providing equal access to housing opportunities (Objectives 4 & 5 and related policies).

San Francisco has roughly ten<sup>2</sup> residential zoning districts, and 43<sup>3</sup> districts which allow residential uses. However, approximately 72<sup>4</sup> percent of all existing land parcels, and 50<sup>5</sup> percent of the City's developable acreage (meaning non-open space or land that is not federally owned) is zoned RH-1 or RH-2. Combined, these two districts regulate the vast majority of residential parcels. Although the majority of parcels are within these low-density districts, the purpose of the Housing Element is to provide guidance for residential districts throughout the City, from areas with detached single-family homes to areas with high-rise residential uses, such as in the Downtown.

The City's housing policy is presented in two ways. In addition to the Citywide goals contained in the Housing Element, the City's General Plan includes numerous smaller area plans or specific plans. These area or specific plans are consistent with the overall General Plan's goals and objectives, but provide more detailed objectives and policies tailored to a specific area, including objectives and policies related to housing. Consistent with this approach, the 2004 and 2009 Housing Elements include a framework for including more detailed housing policies and objectives on a community or neighborhood level, where there is an opportunity for greater community input and more detailed analysis of the neighborhood context. The 2004 and 2009

---

<sup>2</sup> This includes RH, RM, and RTO – which are classified as residential districts.

<sup>3</sup> This includes RH, RM, RTO, NC, DTR, Mixed Use, and C districts which all allow residential uses and are projected to absorb future growth during the housing element planning period.

<sup>4</sup> As of March 2014 there are 110,720 parcels zoned RH-1 or RH-2; There are 153,827 parcels in the city (this does not include multiple condos mapped to a single parcel). Source: SF Planning Department Zoning Map

<sup>5</sup> As of March 2014 8113 acres of land is zoned RH-1 or RH-2; Less than 17,000 acres of land in San Francisco has other a zoning designation other than RH-1 or RH-2. Of the 17,000 some smaller parks, public lands, and zoning districts that do not allow housing have been included. For this reason, the ratio is presented as an approximate number to frame the relative ratio of land. Source: SF Planning Department Zoning Map

Housing Elements both support community driven policy changes that include neighborhood input, and advise that proposed zoning changes refer to existing zoning regulations and built form.

Numerous comments on the Revised EIR claimed that the 2004 or 2009 Housing Element would eliminate RH-1 and RH-2 zoning. This is incorrect. If a community planning process is proposed for a specific area, neither the 2004 or the 2009 Housing Element would require changes to regulations for any residential districts, including RH-1 or RH-2 zoning districts. For example, recent community plans (Market and Octavia and Eastern Neighborhoods) did not make changes to parcels zoned RH-1 and RH-2 within the applicable study area. Those area plans – and the policy determinations imbedded in them, including the determination to not change RH-1 and RH-2 zoned parcels – were made through a multi-year collaborative planning process, which included community stakeholders in the specific neighborhoods. However, because RH-1 and RH-2 constitutes 72 percent of all parcels and 50 percent of developable acreage in San Francisco, changes to RH-1 and RH-2 are not precluded by the Housing Element.

Neither the 2004 or 2009 Housing Element, or any of the alternatives analyzed in the EIR Revision, call for changes to the density of RH-1 and RH-2 districts, either on a neighborhood or Citywide level. Instead, various policies in the Housing Elements discuss specific planning tools that can be used in future community or area planning efforts to address residential regulations such as those regarding secondary units, density limits, and parking maximums. However, all versions of the Element call for changes only with neighborhood support or through a community planning process, and advise that changes must be consistent with the existing neighborhood character. The Department notes that Policy 11.4 of the 2009 Housing Element requires the City to “continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan” and that zoning amendments should conform generally to the existing zoning districts as noted on Map 6 “Generalized Permitted Housing Densities by Zoning District.” (See Part I Data and Needs Analysis). This policy, table and map are substantially similar to those found in the 1990 Residence Element, particularly with regard to RH-1 and RH-2 zoning.

The Department also notes that the 2004 Housing Element does not specifically reference RH-1 or RH-2 anywhere in the document. The 2009 Housing Element calls out RH-1 and RH-2 districts in the discussion of certain policies (e.g. Policy 1.6 and 11.5), but those discussions relate to the need to respect and maintain existing elements of these districts, particularly the height and bulk patterns. Although previous drafts of the 2009 Housing Element did reference the density in RH-1 and RH-2 districts, the final draft was amended to instead refer to height and bulk patterns with language that mirrors the 1990 Residence Element. The 1990 Residence Element included a similar Policy 12.5 which stated: “Relate land use controls to the appropriate scale for new and existing residential areas.” The interpretive text for that policy refers not to density, but to the *zoning envelope*: “In recognition of the special character of single family and two family neighborhoods, zoning envelopes should be tailored to the prevailing built pattern to maintain the low density character. In all other new and existing residential areas, the zoning envelope should be of an appropriate scale and form to encourage residential development and diversity of housing choice.”

The nuanced language in 2009 Housing Element Policy 1.6 and 11.5 was developed in response to multiple community comments. On the one hand, some community members asserted that the

Housing Element should not suggest special considerations for any districts, including the RH-1 and RH-2 districts. Other community members, however, asserted that the Housing Element should strongly direct that community planning processes should not consider any changes to RH-1 and RH-2 districts. The language in Policy 1.6 and 11.5 melds these two concerns, allowing for changes through the community planning process for all residential districts, but requiring special consideration to the existing building envelope for RH-1 and RH-2.

In sum, Housing Element policies do not eliminate RH-1 or RH-2 zoning districts (or existing single-family, low-density or “middle income” neighborhoods) or preclude the development of single-family or low-density projects in the future. Housing Elements are policy-level documents intended to guide future residential development throughout San Francisco. Adoption of the Housing Element would not directly result in any amendments to development controls that would lead to the changes in RH-1 or RH-2 zoning. Neither the 2004 nor the 2009 Housing Element includes any changes to zoning controls, changes in height limits, or revisions in policies that would directly result in new development. Moreover, any future proposals that may result in changes to development controls would require additional policy review, including environmental review.

Numerous comments were made regarding the need for policies supporting “middle income” housing. The Department shares this concern. Thus, the 2009 Housing Element includes Policy 7.7 “Support housing for middle income households, especially through programs that do not require a direct public subsidy”. That policy notes that “the City should support innovative market-based programs and practices that enable middle income housing opportunities. Creating smaller and less expensive units that are “affordable by design” can assist in providing units” to middle income households.

Similarly, Policy 7.8 also addresses middle income households: “Develop, promote, and improve ownership models which enable households to achieve homeownership within their means, such as down-payment assistance, and limited equity cooperatives.” That policy calls for the City to continue its homeownership assistance programs, including counseling, down payment assistance, silent second mortgages and programs that support teachers.

Numerous comments were made regarding the City’s need for “family housing.” The Housing Element also addresses “family housing” in Policy 4.1 “Develop new housing, and encourage the remodeling of existing housing for families with children.” Policy 2.2: “Retain existing housing by controlling the merger of residential units, except where a merger clearly creates new family housing;” and Policy 11.3 “Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character” which ensures that existing neighborhoods with “family-housing” continue to attract and be suitable for families with children.

Numerous comments appear to equate “middle income housing” with housing found in RH-1 and RH-2 districts. However, the Department’s analysis shows that RH-1 and RH-2 neighborhoods are not often affordable for middle income households. The Mayor’s Office of

Housing considers households (of 4) making \$77,700 to \$145,000 as middle income.<sup>6</sup> Households in roughly this income bracket can afford (defined as spending roughly 30 percent of household income on housing) housing at \$316,000 to \$600,000 purchase price.<sup>7</sup> Generally San Francisco's housing market does not deliver multi-bedroom units at this price point; on average there is an affordability gap of \$352,000 to \$68,000 for these households. Furthermore, the average cost of a single family dwelling in RH-1 zoning districts is generally much higher than in the more dense neighborhoods. For example, the 2011 State of the Housing Market found that households earning 80 percent of the AMI could only afford one quarter of the for sale units in only one neighborhood (the Bayview). Households at 120 percent of the AMI could afford to purchase homes in far more districts – however predominantly in the higher density districts. The single family construction type is generally at a premium in San Francisco and does not contribute to meeting the needs of new middle income households.

Finally, other comments appear to equate “family-housing” (meaning, households with children) with RH-1 and RH-2 neighborhoods. Although low-density neighborhoods may be desirable for families with children, the Department's analysis shows that many children also live in denser neighborhoods, such as the Tenderloin or Chinatown neighborhoods. In any event, as noted above, the policies in the Housing Elements do not call for the rezoning of any existing neighborhoods, and RH-1 and RH-2 neighborhoods constitute 72 percent of all parcels in San Francisco.

As previously noted, comments on the perceived loss of middle income neighborhoods represent comments specifically on the socioeconomic impacts of the Housing Elements; CEQA does not require the analysis or discussion of a particular project's socio-economic implications. As stated in Response to 1-20 in the 2011 Responses to Comments document, economic impacts that do not have potential environmental impacts to property owners are outside the scope of the EIR. According to CEQA Public Resources Code (PRC) Section 21100(b)(1), the environmental impact report shall include a detailed statement setting forth all significant effects on the environment of the proposed project. Additionally, according to CEQA PRC Section 21060.5, “Environment” is defined as the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance. Section 15064(e) of the CEQA Guidelines discusses the role of socioeconomic issues in the context of physical environmental effects. In sum, socioeconomic effects are only significant if there are associated physical environmental effects. The Draft EIR, including the Revised EIR, considers the secondary physical environmental impacts from socioeconomic effects where applicable.

---

<sup>6</sup> This range represents 80 to 120 percent of the Area Median Income (AMI); the exact incomes for these AMIs is updated annually. A consultant study commissioned by MOH in November 2011, called State of the Housing Market Study 2011, identified this range as the moderate income range.

<sup>7</sup> A consultant study commissioned by MOH in November 2011, called State of the Housing Market Study 2011, identified this range as the moderate income range. Assumes 33% of income is spent on housing.

It is noted that the above response is provided for informational purposes, as the speaker's comments do not address the adequacy of the Draft EIR, including the Revised EIR, or the proposed project's compliance with CEQA. No further response is required, and no change to the EIR is warranted.

---

***Response to R1-16 (Rose Hillson)***

In response to the comment regarding the capacity and effectiveness of the local transit system, please see Response to R1-3.

Regarding the comment on how the how the City intends to pay for the general obligation bonds, this comment is outside of the scope of CEQA, and not applicable to the 2004 and 2009 Housing Element EIR. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R1-17 (Paula Romanovsky)***

Please see Response to R1-1.

---

***Response to R1-18 (Paula Romanovsky)***

A response to comments concerning the perceived impacts of the Housing Element on zoning is provided in Response to R1-15, above. As noted previously in Response to R1-15, there is no connection or correlation between low density housing and middle income housing. Moreover, since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes.

In regard to the project's impact on prosperity of public schools, this comment is outside the scope of CEQA, and not applicable to the analysis provided in the Revised EIR. To the extent that the policies contained in the Housing Element would have physical effects on public services, these have been considered in the Housing Element EIR. Moreover, this comment does not address the adequacy or accuracy of the Revised EIR; therefore, no additional response is required and no change to the EIR is warranted.

---

***Response to R1-19 (Alex Romanovsky)***

Please see Response to R1-1 regarding the commenter's request for an extension of the public comment period. Please see Response to R1-3 in response to the comment regarding the capacity and effectiveness of the local transit system. These comments do not address the adequacy or accuracy of the Revised EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R1-20 (Patricia Vaughey, Marina Cow Hollow Neighbors and Merchants)***

Please see Response to R1-1.

---

**Response to R1-21 (Patricia Vaughey, Marina Cow Hollow Neighbors and Merchants)**

Please see Responses to R1-2 and R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-22 (Diane Meiswinkel, Francisco Heights Neighborhood Association)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-23 (Kathleen Rawlins, Miraloma Park Improvement Club)**

Please see Response to R1-1.

---

**Response to R1-24 (Kathleen Rawlins, Miraloma Park Improvement Club)**

Please see Response to R1-1 regarding the commenter's request for an extension of the public comment period. Please see Response to R1-3 in response to the comment regarding the capacity and effectiveness of the local transit system. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R1-25 (Kathleen Rawlins, Miraloma Park Improvement Club)**

Regarding comments concerning the perceived impacts of the Housing Element on zoning, please see Response to R1-15, above. It is also noted that this comment is not on the adequacy or accuracy of the Draft EIR pursuant to CEQA; therefore, no additional response is required and no change to the EIR is warranted.

Regarding the comment pertaining to potential decreases in light and increase in shadow, shadow impacts for the proposed project are discussed under Impact WS-2 on page V.J-26 through V.J-28 (Wind and Shadow) of the Draft EIR. Shadow impacts for the alternatives are analyzed in the Revised EIR. Shadow impacts associated with both the Housing Elements and the alternatives were determined to be less than significant. There is no evidence that any incremental increases in shadow would substantially affect the amount of available light.

Moreover, future proposed projects that could result in shadow impacts will be evaluated in the relevant CEQA documentation as specific development proposals are put forth. Further, a determination regarding shadow impacts are made on a case-by-case basis. It is speculative to conclude that Housing Element policies would result in construction of buildings that block substantial sunlight. No further response is required and no change to the EIR is warranted.

---

**Response to R1-26 (Kathleen Rawlins, Miraloma Park Improvement Club)**

Please see Response to R1-1.

---

**Response to R1-27 (Dan Liberthson, Miraloma Park Improvement Club)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-28 (Dan Liberthson, Miraloma Park Improvement Club)**

Please see Response to R1-1 regarding extension of the public comment period and Responses to R1-2 and R1-15 regarding the perceived effects of the proposed Housing Elements on zoning. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R1-29 (Tom Ross)**

Please see Response to R1-1.

---

**Response to R1-30 (Tom Ross)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-31 (Tom Ross)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-32 (Tom Ross)**

As discussed on page V.F-63 (Transportation and Circulation) of the Draft EIR, the Planning Department does not consider parking supply as part of the permanent physical environment, and therefore does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month. Hence, the availability of parking spaces (or lack thereof), is not a permanent physical condition. Instead, parking supply, or the lack thereof, changes over time as people change their modes and patterns of travel in response to parking constraints or availability.

---

**Response to R1-33(Tom Ross)**

Please see Response to R1-1.

---

**Response to R1-34 (Carolyn Squeri, St. Francis Homes Association)**

Please see Response to R1-1.

---

**Response to R1-35 (Carolyn Squeri, St. Francis Homes Association)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-36 (Carolyn Squeri, St. Francis Homes Association)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-37 (Bernard Choden, San Francisco Tomorrow)**

Please see Response to R1-1.

---

**Response to R1-38 (Bernard Choden, San Francisco Tomorrow)**

Please see Response to R1-4. The commenter notes that the document does not consider the cumulative impact associated with limited amount of land. However, cumulative analysis was prepared fully in accordance with Section 15130 of the CEQA Guidelines.

---

**Response to R1-39 (Hiroshi Fukuda, Coalition for San Francisco Neighborhoods)**

In response to the comment that Housing Elements did not meet their objectives of providing housing for all income levels, please see Response to R1-2. The commenter recommends the Department maintain a tally of how far behind the City is in developing affordable housing units and make this information available to the public every 5 or 10 years. The City monitors and reports on housing production throughout the Housing Element planning period, including a quarterly pipeline report which details ongoing entitlements, Building Department approvals, and projects under construction. The Planning Department publishes a more comprehensive census of the City's housing supply and production in the annual Housing Inventory which is presented to the Planning Commission and posted on the Department's website. Finally, Part I of the Housing Element (Data Needs and Assessment) includes an extensive reporting of the City's housing stock. Additionally, the Mayor's Office of Housing regularly reports to the Board of Supervisors and the public on the production of affordable housing, including a detailed 5 year document called the Comprehensive Plan. This comment is not on the adequacy or accuracy of the Draft EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---



**Response to R1-40 (Hiroshi Fukuda, Coalition for San Francisco Neighborhoods)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-41 (Timothy Armour, Miraloma Park Improvement Club)**

Please see Response to R1-1.

---

**Response to R1-42 (Timothy Armour, Miraloma Park Improvement Club)**

Please see Responses to R1-2 and R1-15 regarding the perceived effects of the proposed Housing Elements on zoning. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R1-43 (Timothy Armour, Miraloma Park Improvement Club)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-44 (Risa Reitelbaum, Liberty Hill Neighborhood Organization)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments concerning the perceived effects of the Housing Element on affordable housing is provided in Response to R1-2, above. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-45 (Shari Steiner, Liberty Hill Neighborhood Organization)**

Please see Response to R1-1.

---

**Response to R1-46 (Shari Steiner, Liberty Hill Neighborhood Organization)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-47 (Shari Steiner, Liberty Hill Neighborhood Organization)**

Please see Response to R1-1.

---

### **Response to R1-48 (Mari Eliza, Coalition for San Francisco Neighborhoods)**

Water supply was addressed in *Section V.L (Utilities and Service Systems)* of the Draft EIR. The conclusions in the EIR as they relate to water supply are based upon the SFPUC's Water Supply Assessment. The Water Supply Assessment was prepared in 2009 to provide updated information on the availability of water supply in San Francisco until the next update of the Urban Water Management Plan. This update was required to reassess water supply in light of amendments to the Water System Improvement Program, or WSIP, and to account for currently planning conditions. The Water Supply Assessment is based on growth projections that are largely consistent with ABAG's growth projections. As discussed in Response to Comment L-17, on page C&R 220 of the 2011 Responses to Comments document, the Water Supply Assessment concludes that in years with average or above average precipitation, the SFPUC has sufficient supplies to serve 100 percent of normal, single dry and multiple dry year events up to year 2030. Only during a multiple dry year event beginning in 2030, is it possible that the PUC may not be able to meet 100 percent of its retail water demand. Additionally, to address any shortages in water supply, the SFPUC has in place a Retail Water Shortage Allocation Plan that allows the PUC to reduce water deliveries to customers during periods of water shortage. Given that the Water Supply Assessment's growth projections are consistent with the Housing Element EIR growth projections and that the Water Supply Assessment concludes that there is sufficient water supply for the 2007-2014 planning period of the Housing Element and that a water shortage allocation plan is in place to address any water shortfalls, the EIR concludes that there is sufficient water to supply the City's projected population growth and any impact on water supply is less than significant.

As discussed in Response to L-4 of the 2011 Responses to Comments document, SFPUC's WSIP addresses water reliability issues that come with increased service demands and potential water shortage conditions, such as a drought. The upgrades to this service would be provided by the SFPUC, and any increase in service costs would be determined by the SFPUC. The improvements planned for in the SFPUC WSIP are for the entire system to improve not only the available water supply to meet increased demands but to improve reliability of the system and infrastructure. These improvements are not directly related to any particular housing project, or the proposed Housing Elements, but rather improvements planned for by the SFPUC. These improvements, along with any associated costs, would be implemented with or without approval of the proposed Housing Elements.

Regardless, the neither the 2004 nor the 2009 Housing Element policies would result in an increase in the City's population growth projections. The Housing Elements are policy-level documents that are intended to provide a vision to guide the anticipated future increase in population and subsequent housing. The Draft EIR determined that the City has adequate water supply to meet the existing needs of the population and that policies set forth in the Housing Elements would not create the need for construction of new water delivery infrastructure. Some policies within the Housing Elements would minimize the impacts of growth on water supply by encouraging increased density, because the promotion of multi-family residential housing units in downtown and underutilized commercial and industrial areas would decrease per capita water demand as compared to single family residential units. In addition, as noted in Response to 1-8 of the 2011 Responses to Comments document, all new projects will be analyzed individually and the topic of water consumption would be addressed.

**Response to R1-49 (Kathleen Courtney, Housing and Zoning for the Russian Hill Community Association)**

Please see Response to R1-1.

---

**Response to R1-50 (Catherine Howard, Open Space Committee for Coalition for San Francisco Neighborhoods)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. Concerning the comment regarding “tall, dense buildings on our parks, our gardens, and our public open space,” the Revised EIR concluded that impacts related to shadow would be less than significant, similar to the 2004 and 2009 Housing Elements. Regarding the portion of the comment concerning Muni, please refer to Response to R1-3. The remainder of this is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-51 (Catherine Howard, Open Space Committee for Coalition for San Francisco Neighborhoods)**

The commenters request that “Commission give serious consideration to the policies of Alternative A, that better mitigate the impact of development of open space” are noted. No further response is required and no change to the EIR is warranted. It is noted, that Alternative A is the No Project Alternative under which the 1990 Residence Element policies would remain in effect and the proposed 2004 and 2009 Housing Elements would not be implemented.

---

**Response to R1-52 (Catherine Howard, Open Space Committee for Coalition for San Francisco Neighborhoods)**

Please see Response to R1-1.

---

**Response to R1-53 (Chris Schaeffer)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. Regarding the portion of the comment concerning Muni, please refer to Response to R1-3. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-54 (Robert Gee)**

Please see Response to R1-2.

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-55 (Robert Gee)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-56 (Robert Gee)**

Please see Response to R1-1.

---

**Response to R1-57 (Jean Barish)**

Please see Response to R1-1.

---

**Response to R1-58 (John Bardis)**

Please see Response to R1-1.

---

**Response to R1-59 (Judy Berkowitz, Coalition for San Francisco Neighborhoods)**

In response to the comment that states that the City is over-producing market rate housing and under-producing middle-class housing, please see Response to R1-2. The Housing Elements themselves do not propose any changes to development controls and would not directly enable construction of new housing. Rather they shape how new residential development should occur and ensure that there is adequate land available to meet future housing needs at all income levels. Moreover, as noted previously in Response to R1-15, there is no connection or correlation between low density housing and middle income housing. Since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R1-60 (Judy Berkowitz)**

The commenter requests extension of the public comment period and states that the notice was inadequate. The end of the public comment period was extended from February 3, 2014 to February 18, 2014. Additional information on this is provided in Response to R1-1. No further response is required.

---

**Response to R1-61 (Planning Commissioner Bill Sugaya)**

The commenter states that the Revised EIR should be heard before the Historic Preservation Commission (HPC). It is noted that the 2004 and 2009 Housing Elements would not have a significant impact on historic resources, as documented in the EIR. However, the No Project Alternative A was determined to have a potentially significant impact on historic resources. Section 31.14 (1)(B) of the San Francisco Administrative Code requires that EIRs be brought to the HPC for comment if the

project will impact historical resources. This requirement does not apply to EIRs that identify alternatives that might result in a significant impact on historical resources. However, at the request of Commissioner Sugaya, an invitation to present the 2004 and 2009 Housing Element EIR at the HPC was sent to the president of the HPC, however the Revised EIR was not placed on the agenda<sup>8</sup>. Regardless, the Notice of Availability for the Revised EIR was sent to the HPC members. No comments on the EIR were received from any HPC member.

---

***Response to R1-62 (Planning Commissioner Bill Sugaya)***

The commenter supports extending the public comment period. The public comment period was subsequently extended to February 18, 2014. Additional information on this subject is provided in Response to R1-1. No further response is required.

---

***Response to R1-63 (Planning Commissioner Kathrin Moore, Planning Commissioner Gwyneth Borden, Planning Director John Rahaim, Environmental Review Officer Sarah Jones, Planning Commissioner Cindy Wu, City Attorney Audrey Pearson)***

The Planning Commissioners discussed the public's requests to extend the public comment period and requested that the Environmental Review Officer extend the comment period. The public comment period was extended until February 18, 2014. Additional information on this subject is provided in Response to R1-1. No further response is required.

---

***Response to R2-1 (Ken Chiang, California Public Utilities Commission)***

The commenter requests that language be added to the Housing Element so that any future development adjacent to or near the railroad/light rail right-of-way is planned with safety of the rail corridor in mind. This comment is noted; however, it is on the proposed project and not on the Revised EIR. Any potential environmental effects associated with traffic volumes or pedestrian/bicycle circulation patterns near railroad crossings will be considered as part of the environmental review process for all future projects. No further response is required and no change to the EIR is warranted.

---

***Response to R3-1 (Richard Sampson, Department of Forestry and Fire Protection)***

This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R4-1 (Libby Benedict, Francisco Heights Neighborhood Association)***

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

---

<sup>8</sup> Email from Sarah Jones to Karl Hasz dated January 24, 2014. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400.

**Response to R5-1 (Dan Liberthson, Miraloma Park Improvement Club)**

In response to the comments concerning the perceived “diluting” of RH-1 zoning designation and the perceived impacts of the Housing Element on zoning, please see Response to R1-15.

The commenter requests that the Revised EIR not be approved and also requests specific changes to policy language. These comments are noted; however, they are not on the adequacy or accuracy of the Draft EIR; therefore, no additional response is required.

---

**Response to R5-2 (Dan Liberthson, Miraloma Park Improvement Club)**

For a response to comments concerning the capacity and effectiveness of the local public transit system, please see Response to R1-3. For a response to comment concerning the potential effects on the available water supplies, please see Response to R1-48. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R6-1 (Hiroshi Fukuda, Richmond Community Association)**

The commenter request that the Planning Commission reject all alternatives with the exception of a 2009 Housing Element alternative that “limited growth and densification” to areas adjacent to heavy rail and light rail; this comment is noted but it’s not clear what alternative this comment refers to. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. Consistent with the CEQA Statute and Guidelines, and as determined by the Superior Court, the Revised EIR analyzes a reasonable range of project alternatives. No additional alternatives are required to be analyzed, as there is no requirement in CEQA that all feasible alternatives are analyzed in an EIR. Also see Response to R1-4. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R6-2 (Hiroshi Fukuda, Richmond Community Association)**

The comment is on ABAG’s RHNA methodology and not on the adequacy or accuracy of the revised Chapter VII Alternatives. Because the comment is not on the adequacy or accuracy of the EIR, no further response is required and no change to the EIR is warranted.

---

**Response to R6-3 (Hiroshi Fukuda, Richmond Community Association)**

Please see Response to R1-2. Regarding the commenter’s data request on the buyers of market-rate housing and how the new units are being used, the requested information is outside the scope of the EIR. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R6-4 (Hiroshi Fukuda, Richmond Community Association)**

As stated in Response to 5-20 in the 2011 Responses to Comment document, both the 2004 and 2009 Housing Elements include policies that encourage housing among different income levels and at

different tenure levels. These income levels and housing targets are specified by ABAG when they prepare the RHNA. The RHNA is not prepared by the Planning Department or the City. However, the Planning Department is required to prepare a Housing Element that is designed to meet those housing targets at each income levels. The income levels do not distinguish between rental and ownership housing units. In general, the RHNA is intended to provide housing (rental and for sale) at various income levels. The Draft EIR analyzes physical environmental impacts of the Housing Element policies, which would not change as a result of housing tenure. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-5 (Hiroshi Fukuda, Richmond Community Association)***

Please see Response to R1-2. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-6 (Hiroshi Fukuda, Richmond Community Association)***

Please see Responses to R1-2. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-7 (Hiroshi Fukuda, Richmond Community Association)***

Please see Response to R1-48. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R6-8 (Hiroshi Fukuda, Richmond Community Association)***

Seismic hazards are discussed in *Section V.O (Geology and Soils)* of the Draft EIR. The commenter does not specifically state how these analyses are deficient. The availability of acute hospital care during disasters is beyond the scope of the CEQA analysis. No further response is required and no change to the EIR is warranted.

---

***Response to R6-9 (Hiroshi Fukuda, Richmond Community Association)***

Please see Response to R1-3 and R1-32. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R6-10 (Hiroshi Fukuda, Richmond Community Association)***

This comment appears to be on the Housing Element itself and not on the adequacy of the CEQA review. Moreover, the commenter does not specify exactly how the alleged misunderstanding of the research and theory of transit-based housing and process of community building translates to

inadequacy or inaccuracy of the Draft EIR; therefore no further response can be provided and no change to the EIR is warranted.

---

***Response to R6-11 (Hiroshi Fukuda, Richmond Community Association)***

Analysis of a project on diversity is beyond the scope of CEQA. In response to comment regarding affordable housing, please see Responses to R1-2 and R1-15.

---

***Response to R6-12 (Hiroshi Fukuda, Richmond Community Association)***

The commenter suggests various strategies to increase the number of affordable housing units. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-13 (Hiroshi Fukuda, Richmond Community Association)***

The commenter emphasizes the importance of One Bay Area (Plan Bay Area) efforts and requests that Muni (SFMTA) be involved in approvals of any large land use project or plan dependent on Muni. These recommendations will be provided to the decision-makers; however, they are not comments on the adequacy or accuracy of the CEQA documents.

In response to the comment that Plan Bay Area makes the 2009 Housing Element obsolete, please see Responses to R16-6i and R16-6d. In response to the comment regarding affordable housing, see Responses to R1-2 and R1-15. In response to the comment regarding Muni capacity, please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-14 (Hiroshi Fukuda, Richmond Community Association)***

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R6-15 (Hiroshi Fukuda, Richmond Community Association)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. In response to comments concerning the capacity of the local transit system, please see Response to R1-3.

---



**Response to R7-1 (Kathleen Courtney, Russian Hill Community Association)**

Please see Response to R1-1.

---

**Response to R7-2 (Kathleen Courtney, Russian Hill Community Association)**

Please see Response to R1-1.

---

**Response to R8-1 (Edward V. Anderson)**

The commenter quotes text from the Revised EIR that residential development under Alternative A could include inappropriate alterations or additions to existing housing that could diminish their historic significance. It is noted that Alternative A is the No Project Alternative, under which the 1990 Residence Element policies would remain in effect and neither the 2004 Housing Element nor the 2009 Housing Element policies would be implemented. The Revised EIR, concluded that Alternative A could have a potentially significant impact on historic resources. Please also see Response to R16-9c.

As noted in Responses to A-15 and A-16, Section VIII of the 2004 and 2009 Housing Element EIR, *Section V.E (Cultural and Paleontological Resources)* and *Section V.C (Aesthetics)* of the Draft EIR discuss environmental issues associated with the preservation of landmarks and historic buildings. The Draft EIR concludes that new development and effects to historic resources are most appropriately addressed at the project level and that project level review includes an evaluation of compliance with the Secretary of Interior’s Standards for the Treatment of Historic Properties, CEQA, Section 106 of NEPA, San Francisco Preservation Bulletins 1-21, the Urban Design Element and Residential design guidelines and therefore neither the 2004 or 2009 Housing Elements would result in significant impacts to historic resources.

---

**Response to R9-1 (David P. Bancroft)**

Opportunities for public input are provided throughout the CEQA process and were provided during the environmental review of the 2004 and 2009 Housing Elements, as required by CEQA. However, “canvassing a representative number of resident groups from the neighborhoods where these growth policies will be effected” is beyond the scope or requirements of CEQA and this EIR. Moreover, this type of public engagement (to shape the proposed project) typically occurs during the development phase of the project, or during the community-planning process in support of Area Plans, and is not required during the environmental review of a policy-level project such as the Housing Element that does not specifically affect any individual neighborhoods or locations. However, the policies of the 2004 and 2009 Housing Elements call for such community-based planning efforts during future planning efforts, such as Area Plans. No further response is required and no change to the EIR is warranted.

---

**Response to R10-1 (John Bardis)**

This comment is noted. Please also see Response to R1-1. No further response is required and no change to the EIR is warranted.

---

**Response to R10-2 (John Bardis)**

Please see Response to R1-1. The Revised EIR has been revised in direct response to the decisions of the Superior Court, which include both oral and written rulings. The City was not required to delay compliance with the Court's decisions until after January 15, 2014.

---

**Response to R10-3 (John Bardis)**

The Notice of Availability of the Revised EIR complied with CEQA. Please see Response R1-1. The Notice of Availability was not required to disclose the entirety of the Court's decisions, particularly decisions regarding findings required by CEQA, which occur at the project approval stage, not during review or recirculation of a draft EIR. See also Response R10-2.

---

**Response to R10-4 (John Bardis)**

The Revised EIR has been revised in direct response to, and complies with, the decisions of the Superior Court, which include both oral and written rulings. Consistent with those decisions, the City did not, and was not required to recirculate the entire 2004 and 2009 Housing Element EIR. Please see also Response to R1-1.

---

**Response to R10-5 (John Bardis)**

Please see Response to R1-1.

---

**Response to R11-1 (Christopher L. Bowman)**

The comment mischaracterizes 2004 and 2009 Housing Elements by indicating that they would implement major increases in density, thereby adversely affecting the quality of life for City residents. Rather, Housing Elements are policy-level documents that would guide future residential development in San Francisco through application of various policies in certain areas of the City. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to development controls, such as those listed above. Further, future proposals that may result in changes to development controls would require environmental review.

Comments regarding the effects of Housing Element policies on home values are speculative and are not supported by any evidence. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR and concern socio-economic impacts, which are outside of scope of CEQA. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Please also see Responses to R1-2 and R1-15.

---

**Response to R11-2 (Christopher L. Bowman)**

The potential for the 2004 and 2009 Housing Elements policies to affect service and infrastructure systems are addressed in *Sections V.M (Public Services)* and *V.L (Utilities and Service Systems)* of the Draft EIR and take into account the City's population growth projections. The Draft EIR determined that public services and utilities would be adequate under current growth projections. Future major developments would also undergo environmental review prior to approval and, as such, the potential need for additional services or infrastructure due to a specific development would be addressed within those reviews. All relevant communication and infrastructure information is included in Appendix H to this EIR. Please also see Response to R1-48.

---

**Response to R11-3 (Christopher L. Bowman)**

The commenter requests that a moratorium be placed on new proposed developments that require exemptions to existing zoning requirements. Please see Response to R1-15. Housing Elements would not exempt any future development from zoning requirements. This comment is noted and will be forwarded to the decision-makers; however, it is not on the adequacy or accuracy of the Draft EIR. Thus, no additional response is required and no change to the EIR is warranted.

---

**Response to R12-1 (Jim Buick)**

The commenter's opposition to the Revised EIR is noted. Regarding comments concerning the perceived impacts on single-family neighborhoods, please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R12-2 (Jim Buick)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R12-3 (Jim Buick)**

A response to comments concerning the perceived impacts of the Housing Elements on single-family neighborhoods is provided in Response to R1-15. No further response is required and no change to the EIR is warranted.

---

**Response to R13-1 (Phyllis M. Charlton)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R14-1 (Bernard Choden)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. The commenter is incorrect in stating that a review of prior Housing Elements shortcomings is required under CEQA; no such requirement exists. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R14-2 (Bernard Choden)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. The commenter is incorrect in stating that a review of land resources controlled by the City is required under CEQA; no such requirement exists. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R14-3 (Bernard Choden)**

The commenter is incorrect in stating that the Housing Element must include measures to mitigate housing development costs. The RHNA, which is generated by ABAG, take into account housing costs, among other factors (including water and sewer capacity, available suitable land, distribution of household growth and market demand for housing, and employment). Further, the Housing Element is formulated based on a primary objective of ensuring sufficient development capacity to meet the RHNA, at all income levels. However, housing costs are considered socio-economic impacts and are outside the scope of CEQA. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R14-4 (Bernard Choden)**

The 2004 and 2009 Housing Elements addresses infrastructure systems in *Sections V.M (Public Services)* and *V.L (Utilities and Service Systems)* of the Draft EIR and take into account the City's population growth projections. The Draft EIR determined that public services and utilities would be adequate under current growth projections. Future major developments would also undergo environmental review prior to approval and, as such, the potential need for additional services or infrastructure due to a specific development would be addressed within those reviews. Please also see Response to R1-48. No further response is required and no change to the EIR is warranted.

---

**Response to R14-5 (Bernard Choden)**

Please see Response to R1-4. Consistent with the CEQA Statute and Guidelines, and as concurred with by the Superior Court, the Revised EIR analyzes a reasonable range of project alternatives. In response to the comment concerning cumulative impacts, the Revised EIR addresses cumulative for all applicable environmental topics. No specific detail is provided by the commenter as to how the Revised EIR is deficient in this respect; therefore, no further response can be provided. No further response to this comment is required and no change to the EIR is warranted.

---

### **Response to R15-1 (Bill Criss)**

To the extent that “quality of life” impacts noted by the commenter would result in physical effects on the environment, these have been considered in the DEIR for all environmental topics. Regarding perceived impacts of the 2004 and 2009 Housing Elements on zoning, please see Response to R1-15. The comment concerning “tax base and property tax base” pertains to a socioeconomic issue. As discussed above, in R1-15, socioeconomic effects are only significant if there are associated physical environmental effects. The Draft EIR, including the Revised EIR, considers the secondary physical environmental impacts from socioeconomic effects where applicable. No further response is required and no change to the EIR is warranted.

---

### **Response to R15-2 (Bill Criss)**

Consistent with the CEQA Statute and Guidelines, and as concurred with by the Superior Court, the Revised EIR analyzes a reasonable range of project alternatives and contains an explanation of the alternatives that were considered but rejected. The Housing Elements objectives are to provide direction for how and where new residential development in the City should occur; however, they do not propose (but do not preclude) changes to the public transit network. Please also see Response to R1-4. No additional response is required and no change to the EIR is warranted.

---

### **Letter R16 Introduction**

The Planning Department received a comment letter from Kathryn DeVincenzi, counsel to the petitioner in *San Franciscans for Livable Neighborhoods v. City and County of San Francisco*, San Francisco Superior Court no. 513-077. The points raised in the letter are addressed by topic below. In addition, a general response to the comment letter as a whole is provided, and further supports the discussions in the topic-by-topic responses.

General Response to Letter R16: The comment letter conveys the impression that the Housing Element and the various Area Plans prepared by the Planning Department are inextricably connected, and therefore the implementation of the Area Plans should be considered as part of the Housing Element Project and included in the Housing Element analysis. The comment letter further implies that the previously adopted Area Plans, or ongoing Area Plan efforts, are a direct result of, and dependent upon, the policies of the Housing Element. However, this is not the case. Area Plans are prepared for portions of the City subject to potential or ongoing change, where a comprehensive consideration of policies and land use controls is warranted to respond or shape development in a manner that addresses such change appropriately. Examples are the Eastern Neighborhoods (conversion of historically industrial areas to other uses); Market/Octavia (major changes in transportation infrastructure and resulting land use opportunities); and the Transit Center area (development of a major new regional transportation hub). The content of the plans primarily results from input of the local community and other affected stakeholders. Area Plans are developed in response to issues specific to the planning area location. The fact that Area Plans accommodate new housing and include strategies consistent with strategies in the Housing Element does not mean the Area Plans are a result of the Housing Element. Area Plans processes consider the desirability of housing in discrete locations, and in some cases, incorporated policies limiting residential development in favor of other uses.

Although Area Plans cannot be inconsistent with the General Plan, or conflict with any mandatory policy therein, including the Housing Element, the development framework (e.g., zoning changes) resulting from an Area Plan process (e.g., the community planning process), is and was independent of the adoption of Housing Element policies. Under State Housing Element law (Government Code section 65584, et seq.), the Housing Element is a mandatory element of the General Plan, and thus a given Area Plan cannot directly conflict with Housing Element policy. However, the comment letter directly links the various Area Plans described in the 2004 and 2009 Housing Element EIR to current and prior Housing Element policies. These Area Plans were separate efforts, independent of the City's need to comply with State law and update the Housing Element. As noted by the Superior Court in its December 19, 2013 Order:

“[T]he project description in the EIR was not required to include the rezoning efforts that were ongoing at the same time as the Housing Element, or that had been approved after adoption of the 2004 Housing Element. The Court finds that these ongoing efforts – such as Treasure Island, Hunters Point, Parkmerced, and prior efforts, such as the Eastern Neighborhoods Area Plan and the Market and Octavia Area Plan – were not a part of the Housing Element project, nor were they a consequence of adopting the Housing Element. Instead, these were separate projects, independent of the Housing Element efforts.”

In sum, while the adopted Area Plans and ongoing area plan efforts are formulated to be consistent with the overall goals and policies of the City's General Plan, the EIR is not required to include those efforts as part of the environmental review of the Housing Element itself. To the extent that the development potential within areas subject to Area Plans changed as a result of the adoption of those plans, that increased potential was included in the impact analysis of the Housing Element project, and noted in the EIR in *Section V.A Plans and Policies*.

Regardless, the description of project alternatives included in the Revised EIR is based on the proper assumption that the Area Plans already adopted at the time of issuance of the Notice of Preparation for the EIR constitute existing conditions for the purposes of CEQA. Thus each Housing Element alternative, including the 2004 and/or 2009 Housing Element, would result in similar residential development patterns within the adopted Area Plans. However, while each of the Housing Element alternatives are subject to existing Area Plans, the unique policies contained in each alternative provide the basis for the description provided in the Revised EIR under Development Assumptions by Alternative. This description of anticipated development patterns under each alternative focuses on the differences that would result in future residential development, particularly at locations outside of adopted Area Plans, as opposed to the similar residential development that would result within the adopted Area Plans, which each Housing Element alternative has in common.

---

### **Response to R16-1 (Kathryn DeVincenzi)**

The 2004 and 2009 Housing Element EIR, Section VII, Alternatives, has been revised in direct response to the decisions of the Superior Court, and the Revised EIR recirculated on December 18, 2013 complies with all provisions of the Court's decisions. The Revised EIR did not result in any change to the analysis or conclusions regarding impacts resulting from the 2004 or 2009 Housing Element as provided in the sections of the EIR that were not recirculated; the analysis of those impacts was found to comply with CEQA by the court.

The commenter states that “the City must recommend to the Board of Supervisors an alternative Housing Element that contains policies which would reduce or eliminate the proposed project’s significant impact on transit and the other effects that the EIR should have deemed significant.” However, the Court did not conclude that the EIR improperly identified significant impacts or omitted a reasonable range of alternatives. The Court’s decision compelled the City to remedy the lack of factual support in the EIR’s discussion of alternatives, and reconsider adoption of the Housing Element based on the new support, as provided in the Revised EIR. CEQA requires only that feasible project alternatives, which would reduce or avoid significant impacts, be adopted. No additional alternatives need to be analyzed under the Court’s decision.

After re-certification of the EIR based on the Revised EIR, pursuant to the San Francisco Charter, the Planning Commission may recommend to the Board of Supervisors the adoption of an updated Housing Element, which could include either the 2004 or 2009 Housing Element, or one of the Alternatives analyzed in the Revised EIR. Adoption of any of the Housing Elements would require adoption of the appropriate findings under CEQA.

---

***Response to R16-2 (Kathryn DeVincenzi)***

This comment refers to a letter, originally submitted by San Franciscans For Livable Neighborhoods on the 2004 and 2009 Housing Element Draft EIR, published on June 30, 2010, to which formal responses were provided in the 2011 Responses to Comments document. The 2004 and 2009 Housing Element FEIR is available at the San Francisco Planning Department and on the Planning Department’s website at <http://www.sf-planning.org/index.aspx?page=1828>. No further response is required.

---

***Response to R16-3 (Kathryn DeVincenzi)***

The comment summarizes the Court Order related to the Housing Element EIR. It is noted that all Attachments and Exhibits referenced in this comment letter are included in this RTC document as part of Appendix A.

---

***Response to R16-4a (Kathryn DeVincenzi)***

Consistent with the Public Resources Code and CEQA Guidelines, and as concurred with by the Superior Court, the originally published EIR Section VII Alternatives analyses a reasonable range of project alternatives. The Revised EIR includes all the previously analyzed alternatives, and therefore also analyzes a reasonable range of project alternatives. One of the Alternatives (Alternative A: No Project), avoids the significant unavoidable impact to transit. Per the Public Resources Code and CEQA Guidelines, following certification of the EIR, the City may adopt a project or project alternative that results in a significant and unavoidable impact on the environment, if the City finds that the alternatives are not feasible and adopts a Statement of Overriding Considerations (CEQA Guidelines Section 15093).

It is noted that the EIR concludes Alternative A: No Project would have greater impacts on historical resources than either the 2004 Housing Element or the 2009 Housing Element.

---

***Response to R16-4b (Kathryn DeVincenzi)***

A detailed response to this comment is provided by the responses to comments on the referenced Golick Letter, which is included as Letter R17 of this RTC.

---

***Response to R16-5 (Kathryn DeVincenzi)***

This introductory comment quotes text from the Revised EIR. However, the comment erroneously states that each of the Housing Element Alternatives “seek to produce” housing. As noted throughout the EIR, the quantity of new housing developed would respond to demand, and the housing element policies would affect where and how that market-driven housing development would occur. Each of the Housing Element alternatives, including the 2004 and 2009 Housing Elements, contain policies to ensure that the City has the capacity to accommodate its Regional Housing Needs Allocation. However none of the Housing Elements, or the alternatives, will themselves “produce” housing. Housing production is a function of factors that include but are not limited to the availability of financing, location and ownership of lots, the real estate market, regional housing market, regional economy and job market, labor pool, entitlement permit process, personal preference, and neighborhood input.

---

***Response to R16-6a (Kathryn DeVincenzi)***

As noted in the comment, Alternative A would encourage residential development patterns “relatively dispersed throughout the City, compared to the 2004 or 2009 Housing Element.” The comment accurately refers to Objective 2 of the 1990 Residence Element as part of the reasoning behind this statement. The comment disputes the conclusion that under Alternative A development patterns would be “relatively dispersed,” because Alternative A would be subject to the existing Area and Redevelopment Plans, where most of the City’s capacity for new development is located.

The existing Area and Redevelopment Plans the comment references are applicable to all the Alternatives analyzed, including Alternatives A through C and both the 2004 and 2009 Housing Elements. Thus, the applicable Area and Redevelopment Plans constitute the existing environment described in the EIR. Given that residential development within these areas would be substantially similar under all project alternatives, the analysis of impacts from policies in Alternative A focus on development outside these areas, and correctly notes that overall housing development patterns under Alternative A would be “relatively dispersed throughout the City” (i.e., compared to the other project Alternatives, including the 2004 and 2009 Housing Elements).

As noted in the Revised EIR, development of residential housing under Alternative A will be relatively dispersed throughout the City due in part to Objective 2 of Alternative A (To increase the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods), as well as Policy 2.4 (Adopt specific zoning districts which conform to a generalized residential land use and density plan and the Master Plan), Policy 12.5 (Relate land use controls to the appropriate scale for new and existing residential areas) and Policy 2.1 (Set allowable densities in established residential areas at levels which will promote compatibility with prevailing



neighborhood character). Taken together, these 1990 Residential Element objectives and associated policies promote residential development that would generally harmonize with existing density patterns.

In contrast, both the 2004 and 2009 Housing Elements include policies that promote concentrated housing development in targeted areas, such as near transit corridors or within existing mixed-use areas (as described in the Revised EIR under Development Assumptions by Alternative).

Figure IV-5 of the EIR illustrates the potential residential unit capacity of the City by area. Several areas of the City not part of an Area Plan adopted at the time of EIR preparation have substantial capacity for additional residential development, including Western Addition (5,292 units), South Bayshore (4,374 units), Downtown (3,384 units), South Central (3,033 units), Northeast (2,736 units), and Richmond (2,575 units).

The commenter's statement that 90 percent of the additional housing production is expected in plan areas is noted. Alternative A does not promote any residential development in plan areas at all, and thus would not direct housing toward these areas. In comparison, the 2004 and 2009 Housing Elements both emphasize area plans and contain housing policies that direct new residential development towards locations addressed in Area Plans, while Alternative A does not contain such policies.

Thus, to the degree that the Housing Element influences the location of residential development, Alternative A would not support a pattern of development whereby residential development is concentrated within plan areas, but instead would result in new residential development that is dispersed throughout the City according to each area's capacity. See also the General Response to Letter R16 above.

---

***Response to R16-6b (Kathryn DeVincenzi)***

The comment accurately reflects the statements provided in the Housing Element EIR related to adopted Area Plans, ongoing Area Plan efforts, and the expected increase in housing capacity that would result from implementation of the Area Plans. However, the project assessed in the EIR is the update to the City's Housing Element, and not the adoption or implementation of the Area Plans, which were separate efforts, independent of the Housing Element, and which underwent their own environmental review. Unlike the Housing Element, which provides City-wide policy direction regarding housing, area plans are developed at a smaller scale, and are based on goals and objectives specific to a targeted area. In any event, a description of the anticipated build-out under each applicable Area Plan is provided in the EIR in *Section V.A Plans and Policies*. Existing Area Plans and on-going Area Plan efforts are addressed in the EIR in one of two ways: either as part of the existing environment and thus part of residential development patterns expected under each Housing Element alternative (including the 2004 and 2009 Housing Elements), or as part of development assessed under the cumulative impacts analysis. Thus, the information requested by the commenter is already included in the EIR.

**Response to R16-6c (Kathryn DeVincenzi)**

It is accurate to note that some of the area plans adopted since 2004 have sought to locate housing near transit, and that proposed Housing Element policies promote the concept of locating denser housing near transit corridors. However, while the Housing Element articulates a vision for the location and character of new housing as a strategy for responding to the RHNA and particularly the income categories, the Housing Element is not sufficient to result in concentration of future residential development along transit corridors. Similarly, the policies contained in the Housing Element are not required to support the adoption of Area Plans, which are prepared in response to the planning conditions, needs, and opportunities in the locations they address. The Area Plans referenced in this comment are not identified. Regardless, the goals and objectives of adopted Area Plans are varied, and each was found consistent with the City's General Plan, including the then applicable Housing Element, as required by State and local law. This comment also quotes the 2009 Housing Element Policy 1.4, which is noted for the record. No further response is required and no change to the EIR is warranted.

---

**Response to R16-6d (Kathryn DeVincenzi)**

The statements in this comment regarding Priority Development Areas (PDA's) are noted for the record. The Exhibits referenced in this comment are provided in Appendix A of this document. It is noted that this comment erroneously compares anticipated growth through the year 2035 associated with the PDA's, and the planning period of 2007 through 2014 addressed in the EIR. Regardless of the relative amount of new housing that occurs within the PDA's through the year 2035, such estimates would not directly conflict with the shorter-term estimate of housing development provided in the EIR, which projects and analyzes future housing development through the year 2014. In addition, please refer to Response R16-6a regarding the Development Assumptions by Alternative and the relation of each project Alternative to applicable Area Plans. No further response is required, and no change to the EIR is warranted.

---

**Response to R16-6e (Kathryn DeVincenzi)**

The comment references an introductory paragraph in Section VII, Alternatives of the Revised EIR that compares Alternative A to the 2004 Housing Element and 2009 Housing Element land use impacts, and which specifically mentions the large planned developments at Hunters Point and Treasure Island. This paragraph further explains that division of an established community would not be expected under any of the alternatives. The distinction that the commenter makes between plan areas and established neighborhoods is not germane to the discussion in the paragraph. As stated in the comment, the Revised EIR notes that "future housing development would take place in established neighborhoods *with the exception of recently rezoned plan areas* where such rezoning has substantially increased development capacity." (Emphasis added). Thus, consistent with the assumptions in the Revised EIR, "most," but not all future development would take place in plan areas rather than non-plan area neighborhoods. See also Response R16-6a regarding the Development Assumptions by Alternative and the relation of each project Alternative (including the 2004 and 2009 Housing Element) to applicable Area Plans and the General Response to Letter R16 provided above.

---

### **Response to R16-6f (Kathryn DeVincenzi)**

The comment notes that the Revised EIR's conclusions are "generalized." However, as noted in the EIR and the Revised EIR, the adoption of an updated Housing Element would not result in any direct impacts; under CEQA Guidelines section 15146 and 15146(b), "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR," and "an EIR on a project such as the adoption or amendment of a . . . local general plan should focus on the secondary effect that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."

The Revised EIR explains that Alternative A does not include policies that promote residential development in historically nonresidential areas. Conversely, as explained on page VII-20, "[t]he 2004 Housing Element encourages new housing in Downtown, in underutilized commercial and industrial areas, and increased housing in neighborhood commercial districts and mixed-use districts near Downtown", and therefore might result in potential land use conflicts through the addition of residential uses in mixed use or previously non-residential areas. Please refer to Response R16-6a above for an explanation of the relation between each project Alternative (including the 2004 and 2009 Housing Element) and applicable Area Plans. Thus, compared to the 2004 Housing Element, Alternative A would not encourage development that might result in conflicts between existing uses (such as noisy entertainment venues) and new residential uses; under Alternative A, residential development would be promoted in residential areas. Residential development within existing residential areas would not result in land use conflicts.

Similarly, relatively dispersed residential development anticipated under Alternative A could increase the frequency of land use conflicts, when compared to the 2009 Housing Element, because the 2009 Housing Element limits the areas targeted for new housing. That is "compared to the 2009 Housing Element, Alternative A could incrementally increase the likelihood of potential land use conflicts due to the encouragement of housing in more locations" (Revised EIR page VII-21). Thus the Revised EIR correctly concluded that Alternative A could incrementally increase land use conflicts compared to the 2009 Housing Element. Regardless, the potential impacts to land use under each Housing Element alternative would be less than significant; the incremental difference in land use impacts among the alternatives is not substantial, and would not require mitigation or the adoption of a feasible alternative.

---

### **Response to R16-6g (Kathryn DeVincenzi)**

Permit applications that propose new construction or building alterations within an R (Residential) District are subject to the review per the Residential Design Guidelines (RDGs). The legal basis of the RDGs resides in Section 311(c)(1) of the Planning Code, which states that Residential Design Guidelines shall be used to review plans for all new residential construction and alterations. Specifically, Section 311 states: "The construction of new residential buildings and alteration of existing residential buildings in R Districts shall be consistent with the design policies and guidelines of the General Plan and with the 'Residential Design Guidelines' as adopted and periodically amended for specific areas or conditions by the Planning Commission. The Planning Director may require modifications to the exterior of a proposed new residential building or proposed alteration of an existing residential building in order to bring it into conformity with the Residential Design Guidelines and with the General Plan. These modifications may include, but are not limited to, changes in siting, building envelope, scale texture and detailing, openings, and landscaping."

The RDGs have been specifically developed to address compatibility of new construction with existing neighborhood character. The Residential Design Guidelines articulate expectations regarding the character of the built environment and are intended to promote design that will protect neighborhood character in its physical manifestation, enhancing the attractiveness and quality of life in the City. The Guidelines address basic principles of urban design that will result in residential development that maintains cohesive neighborhood visual identity, preserve historic resources, and enhances the unique setting and character of the City and its residential neighborhoods. The Guidelines also suggest opportunities for residential designs to further San Francisco's goal of environmental sustainability.

Likewise, the Urban Design Element contains policies regarding the visual character of new residential development, and compatibility with those policies (which is required by law) will reduce the potential for new development to have aesthetic impacts. For example, new development must be consistent with Policy 3.5 "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development," and Policy 3.6 "Relate the bulk of building to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." Finally, Urban Design Element Policy 4.15 "Protect the livability and character of residential properties from the intrusion of incompatible new buildings," notes that "in residential areas of lower density, the established form of development is protected by limitations on lot coverage and requirements for yards and front setbacks. These standards assure provision of open space with new buildings and maintenance of sunlight and views. Such standards, and others that contribute to the livability and character of residential neighborhoods, should be safeguarded and strengthened." Chapter 35 of the City's Administrative Code requires that the Planning Department and Planning Commission consider the compatibility of residential and industrial uses when approving residential uses adjacent to or near existing industrial uses. The Department and Commission must "take all reasonably available means through the City's design review and approval processes to ensure that the design of such new residential development projects is sensitive to both the existing industrial uses and the future residents of the new development. Compliance with Chapter 35, as required by the Administrative Code, reduces the potential for land use conflicts.

The Commenter's statement that the RDG's have been modified to facilitate infill development is unclear. The RDG's were adopted in December 2003.

---

### ***Response to R16-6h (Kathryn DeVincenzi)***

Regarding the relatively dispersed pattern of new housing anticipated under Alternative A, and the relation of Area Plans to each of the Housing Element alternative, please refer to Response to R16-6a and the Introduction response to this comment letter.

The comment regarding the relative difference in impacts on land use and aesthetics across Alternative A and the 2004 and 2009 Housing Elements is noted. However, the Revised EIR concludes that impacts under Alternative A on land use and aesthetics would not be significant, and only incrementally different than the impacts under the 2004 or 2009 Housing Elements. As documented in the Revised EIR, under both Alternative A as well as the 2004 and 2009 Housing Elements, land use and aesthetic impacts would be less than significant, and no mitigation is required. The reasoning behind the incremental differences in impact as concluded in the Revised

EIR relates to associated differences in policies among the alternatives regarding residential density and building envelopes. Because the alternatives will have a similar demand for housing, the lack of policies under Alternative A that direct residential development to certain areas (e.g., transit corridors) is reasonably expected to result in each residential project maximizing the development potential of a given site (i.e., building height and envelope) to meet the unvarying housing demand. Regardless, the incremental difference in both aesthetic or land use impacts among Alternative A and the 2004 and 2009 Housing Elements is not substantial (i.e., all such impacts are less than significant). Further, the commenter has not provided substantial evidence supporting a conclusion that replacement of the term “maintain” with the term “respect” in the Housing Element policies would result in any significant environmental impacts.

---

***Response to R16-6i (Kathryn DeVincenzi)***

The comment offers no evidence to counter the assertion in the EIR that new housing development will occur regardless of the Housing Element policies. As documented throughout the EIR, the policies of a given Housing Element alternative primarily affect the location and type of new housing constructed in the City. Factors affecting the total amount of new housing units constructed are primarily economic, given the existing supply of existing housing opportunity sites identified in the EIR (i.e., estimated new housing potential of 60,995 units in undeveloped and underdeveloped sites, as identified in Table IV-5 of the EIR). The Housing Element is a mandatory requirement of State law, which must demonstrate that the City has the development capacity for a specified amount of new housing at various income levels, as provided for in the Regional Housing Needs Allocation (RHNA).

---

***Response to R16-6j (Kathryn DeVincenzi)***

The analysis properly accounts for existing condition related to the ratio of workers, households and jobs, and then discloses the impact resulting from the expected change to this existing condition as a result of implementing Alternative A.

---

***Response to R16-6k (Kathryn DeVincenzi)***

As noted in Comment 6i and throughout the EIR and the Revised EIR, Housing Element policies influence the location and type of new housing to accommodate the projected increase in population and associated increase in demand for housing (i.e. the RHNA), but would not substantially alter the total amount of housing growth. As with the other Housing Element Alternatives and the 2004 and 2009 Housing Elements, housing development is primarily expected in the Area Plan and Redevelopment Plan areas, however, other areas would continue to be developed as allowed under current zoning. Thus, relative to the 2004 and 2009 Housing Elements, because Alternative A does not promoting targeted or concentrated residential development in certain areas as is done in the 2004 Housing Element and the 2009 Housing Element, Alternative A would not direct residential development to specified areas and would therefore promote new residential development that is relatively dispersed throughout the City.

---

**Response to R16-7a (Kathryn DeVincenzi)**

The comment restates text provided in the Revised EIR, and submits information related to the 2004 Housing Element (provided in Appendix A of this document). With regard to the specifics in this comment relating to the 2004 Housing Element and subsequent Area Plans, please refer to the introductory response to this comment letter clarifying the relationship between the updated Housing Elements and the existing or proposed Area Plans. No further response is provided to the comment, and no change to the EIR is warranted.

---

**Response to R16-7b (Kathryn DeVincenzi)**

The comment that Area Plans were developed and adopted after 2004, and that these Area Plans potentially increase housing capacity, is noted. With regard to the specifics in this comment relating to the 2004 Housing Element and Area Plans adopted after 2004, please refer to the introductory response to this comment letter clarifying the relationship between the updated Housing Elements and existing or proposed Area Plans. No further response is provided to the comment, and no change to the EIR is warranted.

---

**Response to R16-7c (Kathryn DeVincenzi)**

The comment that the 1990 Residence Element and the 2004 Housing Element include policies that differ from each other is noted. These distinctions are reflected in the EIR’s analysis of Alternative A (the 1990 Residence Element) compared to the 2004 Housing Element. No further response is provided, and no change to the EIR is required.

Please refer to the introductory response to this comment letter for clarification between existing and proposed Areas Plans and the updated Housing Element. As noted in the 2004 and 2009 Housing Element EIR, and in the quoted portions of the EIR provided in this comment letter, most new housing development anticipated for the 2007-2014 time period will occur within Area Plans. Further, given the number of potential housing development sites identified in the EIR (i.e., 60,995 units identified in Table IV-5 of the EIR), the total amount of housing developed will occur primarily as a function of economic factors. Thus the total amount of new housing constructed in the 2007 to 2014 period would not substantially differ among the Housing Element alternatives; however, each alternative Housing Element includes policies that could result in differences in terms of the type and location of new housing development. No further response to this comment is required, and no change to the EIR is warranted.

The objective of the Housing Element project includes “ensure capacity for the development of new housing to meet the RHNA at all income levels”. As noted in the comment “new policies that strive to expand land capacity” would be consistent with and supportive of this project objective. As explained above, the updated Housing Elements would not generate new housing, but rather influence the location and type of new housing development necessary to accommodate population growth and the City’s RHNA. No further response to this comment is warranted, and no change to the EIR is required.

---

**Response to R16-7d (Kathryn DeVincenzi)**

The revised Notice of Preparation (NOP) for the project was issued in September 2009. In accordance with the CEQA Guidelines, the existing setting – the baseline conditions established to gauge physical changes to the existing environment – is the setting found at the time the NOP is prepared. Therefore, the assessment of impacts on the existing environment appropriately includes the various Area Plans in effect at the time of NOP issuance. Although not clearly stated, the comment implies that the EIR should consider conditions prior to preparation of the 2004 Housing Element as “baseline”, and explicitly contends that the Area Plans are a result of the 2004 Housing Element. As stated elsewhere in this document, the Area Plans were developed to actively address planning issues separate from the Housing Element and are not part of either the 2004 Housing Element or 2009 Housing Element projects. It would be erroneous to consider conditions in 2004 as a “baseline” for a program EIR initiated in 2009. Further, the EIR’s existing setting, including area plans adopted after the adoption of the 2004 Housing Element, was upheld by the trial court as compliant with CEQA.

---

**Response to R16-7e (Kathryn DeVincenzi)**

The comment regarding Area Plans and their relationship to the General Plan is noted. For further response please refer to the introductory response to this comment letter explaining the relationship between existing and proposed Area Plans and the City’s General Plan, including the Housing Element.

---

**Response to R16-7f (Kathryn DeVincenzi)**

Comment noted.

---

**Response to R16-8a (Kathryn DeVincenzi)**

The comment disputes the assertion in the Revised EIR that the 2009 Housing Element does not promote increased residential density more so than the policies included in the 1990 Residential Element analyzed under the No Project Alternative A. The comment accurately cites the policies of the 2009 Housing Element that could allow for increases in density, but does not account for other policies of the 2009 Housing Element that serve to limit density changes (e.g., Policy 4.1 advocates for family-sized housing units, (larger units in the same building envelope results in fewer units; Policy 11.4 “Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan;” and Policy 11.5 “ensure[s] densities in established residential areas promote compatibility with prevailing neighborhood character”). The 2009 Housing Element does not directly change allowable land uses or increase building height and bulk restrictions, as noted under the land use analysis under Impact LU-2 in *Section V.B. Land Use and Land Use Planning*. Further, the 2009 Housing Element promotes increased densities as a strategy to be pursued during community planning processes, meaning that substantive increases in an area’s residential density should be pursued within the context of a comprehensive, community based planning effort, and not through a generalized citywide effort like the Housing Element. At the same time, the 1990 Residence Element contains policies that would allow for increases in residential density. For example, 1990 Residence Element Policy 2.2 states: “Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing, and in neighborhood commercial districts where higher density will not have harmful effects;” and

Policy 2.3 states: “allow flexibility in the number and size of units within permitted volumes of larger multi-unit structures . . . ” and Policy 1.8 “encourage construction of new single room occupancy residential hotels,” notes that “existing regulation with respect to densities. . . and parking do not facilitate the creation of SRO hotels.”

Thus, because both the 2009 Housing Element and the 1990 Residence Element contain policies that could potentially allow for increases in density, but also contain policies that ensure neighborhood character and/or larger and fewer units, the revised Alternatives analysis reasonably assumes that overall, there would not be a substantial difference in density from implementation of either the 2009 Housing Element or the 1990 Residential Element policies (No Project Alternative A).

The comment also makes reference to both adopted and pending Area Plans, and the associated increase in potential residential development sites in those areas. As noted previously in Response to R16-7d, Areas Plans adopted at the time of NOP issuance are appropriately considered part of the baseline conditions described in the EIR, whereas Area Plans underway but not yet adopted by the City are considered reasonably foreseeable and addressed as cumulative projects. The EIR’s appropriate inclusion of Area Plans in the existing conditions, or as cumulative projects, applies to the environmental analysis of the 2004 and 2009 Housing Elements, as well as Alternative A through C.

The information appropriately contained in the EIR about increased housing potential in Area Plans underway at the time of EIR preparation does not indicate, as the commenter suggests, that these Area Plans are connected to, or results from, the 2009 Housing Element. Part I of the 2009 Housing Element indicates that the City had adequate capacity to accommodate the 2007-2014 RHNA with its existing zoning, and the increased residential capacity that would be provided through the Area Plans would not be needed to meet State-mandated Housing Element requirements.

Lastly, while the City acknowledges the Superior Court Writ as it pertains to use of certain policies in the 2009 Housing Element, the EIR appropriately analyzes all currently proposed policies of the 2009 Housing Element.

---

***Response to R16-8b (Kathryn DeVincenzi)***

Chapter V of the EIR, Environmental Setting and Impacts, provides a separate analysis of the impacts anticipated under the 2004 and 2009 Housing Elements, and combines the impact analysis where no substantial distinction in environmental effects exists. In addition, the distinct impacts of both the 2004 and 2009 Housing Elements are each compared to Alternatives A through C in the Revised EIR Section VII Alternatives. A side-by-side summary of the impacts from the 2004 and 2009 Housing Elements is also contained in the EIR Section II Executive Summary, Table II-1.

---

***Response to R16-8c (Kathryn DeVincenzi)***

Please refer Response to R16-6j, above.

---



### **Response to R16-9a (Kathryn DeVincenzi)**

Please refer to the introductory comment response to this letter describing the relation of existing and proposed Area Plans to the City's General Plan and the adoption of an updated Housing Element, as well as Response 16-6a.

---

### **Response to R16-9b (Kathryn DeVincenzi)**

The 2004 and 2009 Housing Elements were formulated based on the objectives provided in the EIR Chapter IV, Project Description. Consistent with the requirements of the Public Resources Code and the CEQA Guidelines, the Revised EIR also includes an analysis of the No Project Alternative, which represents the continuation of the 1990 Residence Element. Thus, the No Project Alternative A was not formulated based on the project objectives; and as noted in Revised EIR, the Alternative A would be less effective at attaining four of the seven project objectives (p. VII-45).

The commenter does not provide any substantial evidence to support the assertion that 1990 Residence Element policies that "maintain neighborhood character" would have less impact on neighborhood character than 2004 or 2009 Housing Element policies that "respect neighborhood character."

---

### **Response to R16-9c (Kathryn DeVincenzi)**

As explained on page VII-24 of the Revised EIR, "The conclusion that the policies in the 1990 Residence Element were adequate to accomplish the City's RHNA goals reflected the assumption [in the 1990 Residence Element] that historical resources could represent housing opportunity sites." Specifically, as described in footnote 4 of the revised Alternatives analysis, the 1990 Residence Element included "soft sites", which include older vacant building, unsafe buildings and building and uses which underutilize the site, in the definition of "housing opportunity sites." In contrast, the 2004 and 2009 Housing Elements excluded historic resources from the definition of "soft sites." Thus, the policies in the 1990 Residence Element reflected the notion that a greater number of sites were available with the capacity to accommodate housing (and therefore meet the City's RHNA). Therefore, as noted in the Revised EIR "if the 1990 Residence Element policies were in place, the City would either have a decreased ability to meet the RHNA, or there would be greater risk to historical resources if in fact development of these sites were pursued rather than the more targeted sites identified to support the 2004 or 2009 Housing Element documents."

Further, "the policies in Alternative A reflect the historic preservation context of two decades ago, prior to substantial changes in both the City's approach to historic preservation and the requirements for review of historical resource impacts under CEQA." As noted in the Revised EIR, although proposed development under the 2004 and 2009 Housing Elements and Alternative A would be subject to policies designed to protect historic resources, such as the City's Priority Policy to preserve landmark and historic buildings, Alternative A does not contain the more aggressive approach towards protecting historical resources by identifying them through comprehensive survey work and updating the City's Preservation Element. Further, the CEQA requirements for assessment of impacts to historical resources changed in 2002, and the "soft sites" identified in the 1990 Residence Element commonly qualify as historical resources under current CEQA procedures. Therefore, relying on these sites as opportunity sites for new housing puts historical resources at risk.

Policies cited by the commenter that discourage demolition of sound housing would have no bearing on protection of these resources since sites in residential use were not considered housing opportunity sites in the 1990 Residence Element. No further response to this comment is required, and no change to the EIR is warranted.

---

### **Response to R16-10a (Kathryn DeVincenzi)**

The specific policies included in Alternative B that mirror the policies in the 2004 Housing Element are listed in Table VII-1 of the Revised EIR. Several of these policies and implementation measures (e.g., Policy 1.1, IM 1.3.1, IM 1.8.1, IM 1.8.3, Policy 4.4, etc.) promote increased residential density. Similarly, as the comment notes, the policies of the 2004 Housing Element upon which the City could not rely as part of the 2007 Court order are not included in Alternative B, as also shown on Table VII-1. As noted on page VII-49 of the Revised EIR, “the primary difference between the 2004 Housing Element and Alternative B is the 2004 Housing Element’s policies that more aggressively encourage increased density (such as Policies 1.1, 11.6, 11.9 and Implementation Measures 1.3.1, 1.6.2, and 1.7.1 shown on Table VII-1) have been removed. Thus, Alternative B would not increase density to the same degree as the 2004 Housing Element.”

Regarding the encouragement of family-sized units, the text on page VII-49 of the Revised EIR has been edited as follows:

The themes of Alternative B – the 2004 Housing Element Adjudicated – focus on increasing housing supply through higher density, ~~encouraging family sized housing,~~ and reducing parking requirements to make more space available for housing units.

As noted in this comment, the EIR on page VII-49 states that “the 2009 Housing Element includes a number of implementation measures to promote increased density that are not included in Alternative B. This would result in smaller/less dense projects overall.” To clarify, such measures include Implementation Measures 12, 13, 36, and 64 of the 2009 Housing Element (detailed in *Section V.B. Land Use and Land Use Planning*). These 2009 Housing Element measures generally promote density through density bonuses, relief from parking requirements, and other similar measures; thus, because these are not included under Alternative B, the expected result would be smaller/less dense residential projects overall.

---

### **Response to R16-10b (Kathryn DeVincenzi)**

Please refer to the introductory response to this comment letter describing the relation of existing and potential Area Plans to the City’s General Plan and the adoption of an updated Housing Element. In addition, policies and implementation measures included under Alternative B (refer to Table VII-1 of the EIR), would generally promote infill development. For example, Policy 1.4 of Alternative B states “Locate in-fill housing on appropriate sites in established residential neighborhoods”. Alternative B also includes Policy 1.1, which encourages residential development at “underutilized commercial and industrial areas,” and implementation measures promoting residential development along transit corridors (IM 1.6.4), and via secondary units (IM 1.8.1). No further response to this comment is required, and no change to the EIR is warranted.

See also Response 6e, and the introductory paragraph in the Revised EIR under land use impacts that explains that division of an established community would not be expected under any of the alternatives

---

**Response to R16-10c (Kathryn DeVincenzi)**

The description of Alternative B under the discussion of Development Assumptions by Alternative in the EIR Section VII Alternatives (revised) is based on the policies of Alternative B listed in Table VII-1 EIR, which in part mirror the 2004 Housing Element, but differ from the 2004 Housing Element by eliminating policies of the 2004 Housing Element stricken by the 2007 Court order. As noted on page VII-18 of the Revised EIR, due to the absence of policies promoting increased density, under Alternative B “the reduction in density is expected to affect the density of individual buildings rather than the number of buildings constructed.” In other words, under both the 2004 Housing Element and Alternative B, similar numbers of buildings are likely to be constructed; however, policies in the 2004 Housing Element would encourage each building to include more units.” Because the same number of sites would be developed or redeveloped, consistent with existing zoning, under either Alternative B or the 2004 Housing Element, and in generally similar locations, the impacts on land use – such as impacts which stem from the location of housing in non-residential areas – would be similar (and less than significant) for both Alternative B and the 2004 Housing Element. Stated otherwise, land use conflicts result from the interaction of residential uses with other uses that might not be compatible (for example, uses that emit strong odors or involve high noise levels), not from a mixture of residential densities within a neighborhood. If the same number of new residential buildings is constructed under Alternative B as under the 2004 Housing Element, the same level of likelihood for land use conflicts exists. No further response is required, and no change to the EIR is required.

---

**Response to R16-10d (Kathryn DeVincenzi)**

In response to this comment, please refer to the following policies and implementation measures listed in Table VII-1 of the Revised EIR which support the assertion that Alternative B would encourage housing integrated into all new commercial or institutional projects, near major transit lines and through community planning efforts:

- Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households.
- Policy 1.6: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects.
- Implementation Measure 2.4.2: As part of the Planning Department’s current citywide action plan, planning efforts in the eastern neighborhoods of the City, where housing exists in commercial and industrially zoned districts, should address housing retention as new policies and zoning are established. Mixed use should be encouraged where appropriate.

- Implementation Measure 1.6.4: The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit.
- Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit.

No further response to this comment is warranted, and no change to the EIR is required.

---

**Response to R16-10e (Kathryn DeVincenzi)**

Please refer to the introductory comment response to this letter describing the relation of existing and potential Area Plans to the City’s General Plan and the adoption of an updated Housing Element. In sum, while the existing setting of each of the Housing Element alternatives includes existing Area Plans, the unique policies contained in each alternative provide the basis for the description provided in the Revised EIR under *Development Assumptions by Alternative*.

Because Alternative B does not include the density-promoting policies stricken from the 2004 Housing Element Alternative B could result in incrementally smaller buildings. Without the 2004 Housing Element’s density promoting policies, including for example, Policy 11.6 which encourages developers to build to the maximum permitted height and bulk, buildings would likely be built to the prevailing height and bulk. However, in a dense urban setting individual infill development that is consistent with established zoning rarely has the potential to substantially affect scenic vistas regardless of small differences in size; thus the alternatives analysis concludes “*incrementally* (emphasis added) fewer potential impacts to scenic vistas” would result under Alternative B than under the 2004 Housing Element, due to the smaller building associated with Alternative B.

While not directly related to this comment, the following text change corrects errata in the Revised EIR, page VII-50:

As a result, incrementally smaller residential buildings might be constructed under Alternative ~~AB~~, resulting in incrementally fewer potential impacts or scenic vistas than the 2004 or 2009 Housing Elements.

No further response to this comment is required, and no further change to the Revised EIR is warranted.

---

**Response to R16-10f (Kathryn DeVincenzi)**

As noted in the Revised EIR on page VII-51, and Response R16-5 above, the housing element policies do not cause housing growth. Rather, the policies provided in the 2004 and 2009 Housing Elements, as well as Alternatives A through C, would influence the location and type of new housing. The Housing Element is statutory requirement that local governments plan for existing and projected **demand** for housing. It is prepared pursuant to state housing law (Government Code Section 65584, et. seq.) and adheres to a process for determining each jurisdiction’s housing need. This process is a collaboration between the California Housing and Community Development Department (HCD),

regional councils of governments (COGs), and local jurisdictions to craft an equitable regional housing needs allocation (RHNA).

The Revised EIR properly accounts for existing conditions related to the ratio of workers, households and jobs, and then discloses the impact resulting from the expected change to this existing condition as a result of implementing Alternative B. The Alternative analysis properly concludes that no substantial change to the worker-to-household ratio would result, and that impacts related to changes in population would generally be similar across each of the Alternatives (i.e., a less than significant impact). The commenter has not demonstrated how the Housing Element policies themselves would cause growth.

---

### **Response to R16-10g (Kathryn DeVincenzi)**

Please refer to the introductory comment response to this letter describing the relation of the existing and potential Area Plans to the City's General Plan and adoption of an updated Housing Element. In sum, while each of the Housing Element alternatives are subject to existing Area Plans, the unique policies contained in each alternative provide the basis for the description provided in the Revised EIR under *Development Assumptions by Alternative*. More specifically, the elimination of 2004 Housing Element's density-promoting policies from Alternative B would result in less dense housing development overall compared to the 2004 and 2009 Housing Elements, both of which include a greater number of policies promoting dense housing development (see also the discussion Development Assumptions by Alternative provided in the Revised EIR, as well as Response to R16-10e above).

---

### **Response to R16-10h (Kathryn DeVincenzi)**

Please refer to policies of Alternative B contained in Table VII-1 of the EIR, and the related discussion of *Development Assumptions by Alternative* in the Revised EIR, which is based on these policies. Contrary to the assertion in the comment, sample policies and implementation measures from Alternative B that would promote higher density infill residential development, affordable housing, residential development in neighborhood commercial districts and underutilized areas, and near existing infrastructure, include Alternative B Policies 1.1 and 1.4, and Implementation Measures 1.6.4 and 4.1.4 are restated below:

- Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households.
- Policy 1.4: Locate in-fill housing on appropriate sites in established residential neighborhoods.
- Implementation Measure 1.6.4: The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit.
- Implementation Measure 4.1.4: The City will work to identify underutilized, vacant, and Brownfield sites that are publicly or privately owned and suitable for affordable housing

development. The City will work with for profit and non-profit housing developers to acquire these sites for permanently affordable housing.

Alternative B policies related to neighborhood character include Policies 1.1 and 1.4, listed in Table VII-1 of the Revised EIR. Regarding the approach to assessing changes in neighborhood character, the terms “respect” and “maintain” are considered interchangeable for the purposes of the EIR analysis. This is because there is no physical change that can be attributed to the use of either term in a policy context. No evidence of direct or indirect physical impacts from the use of “respect” rather than “maintain” has been provided by the commenter in this or any other comment submitted on the 2004 or 2009 Housing Element EIR.

---

**Response to R16-10i (Kathryn DeVincenzi)**

Please refer to the discussion of *Development Assumptions by Alternative* provided in the Revised EIR for explanation and support as to why Alternative B would not be as effective as the 2004 and 2009 Housing Elements at concentrating new housing development along transit corridors. Generally, the various “density promoting” policies, including parking reduction policies, contained in both the 2004 and 2009 Housing Elements, concentrate density, or promote use of those strategies, near transit corridors.

---

**Response to R16-10j (Kathryn DeVincenzi)**

Please refer to the introductory comment response to this letter describing the relation of existing Area Plans to the City’s General Plan and adoption of an updated Housing Element. Regardless of the total amount of new housing developed under the various adopted Area Plans, Alternative B policies do not promote density or reduced parking to the same extent as the 2004 and 2009 Housing Elements particularly outside of those plan areas. Such policies serve to increase the overall affordability of housing by maximizing the efficient use of land and reducing construction costs. Thus, the Revised EIR accurately concludes that Alternative B would be less effective at meeting the income categories in the City’s RHNA.

---

**Response to R16-11 (Kathryn DeVincenzi)**

Please refer to Response to R16-9c above.

---

**Response to R16-12a (Kathryn DeVincenzi)**

Please refer to the introductory comment response to this letter describing the relation of Area Plans to the City’s General Plan and Housing Element. As further described in the discussion of *Development Assumptions by Alternative* in the Revised EIR, the policies of Alternative A (refer to Table VII-1 the EIR) do not promote dense residential development near transit lines to the same extent as the 2004 and 2009 Housing Elements. For example, the 2004 and 2009 Housing Elements contain Policy 11.6 and (2004) and Policies 12.1 and 13.1 (2009) which specifically encourage new residential development near transit. Similar policies are absent from Alternative A. Proximity to transit is a primary factor in transit use by residents. Transit use is more convenient for people who live in close proximity to reliable, high frequency transit service. Thus, it is reasonable to assume that a relatively

greater number of vehicle (non-transit) trips would occur under Alternative A, compared to the 2004 and 2009 Housing Elements.

---

**Response to R16-12b (Kathryn DeVincenzi)**

Substantiation of the relative density of new housing under Alternative A compared to the 2004 and 2009 Housing Elements is provided under the discussion of *Development Assumptions by Alternative*, beginning on Page VII-6 of the Revised EIR. Further response to this comment is provided under Response R16-6a above, and additional information about housing density under 2004 and 2009 Housing Elements can be found in the discussion under Impact LU-2 in *Section V.B. Land Use*. Regardless, the comment regarding density is a direct reference to the Revised EIR discussion of Alternative A impacts on water demand, which is based the comparative density of housing with the 2004 and 2009 Housing Elements; the impacts related to water demand would be less than significant under each of these Alternatives and no change to the EIR analysis is warranted by this comment.

---

**Response to R16-12c (Kathryn DeVincenzi)**

As outlined in Table VII-1, Alternative B includes various policies that promote housing development in certain areas of the City. For example:

- Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households.
- Policy 1.3: Identify opportunities for housing and mixed-use districts near downtown and former industrial portions of the City.
- Implementation Measure 1.6.4: The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit.

No further response to this comment is provided, and no change to the Revised EIR is warranted.

---

**Response to R16-12d (Kathryn DeVincenzi)**

Alternative B consists of the policies and goals contained in the 2004 Housing Element without the specific language from the 2004 Housing Element that was enjoined by the court. The specific objectives, policies and implementation measures of Alternative B are included in Appendix B to the EIR. The comment argues that additional 2004 Housing Element language should be excluded from Alternative B; however that additional language is not included in the Court's order. In any event, the Revised EIR accurately analyzes Alternative B – as included in Appendix B-4 of the EIR. While it is acknowledged that the 2004 Housing Element is subject to a court order, the formulation of the Alternative B for CEQA purposes is not. No further response to this comment is required, and no change to the EIR is warranted.

To correct errata in Table VII-2 in the Revised EIR, the following text change is made to be consistent with the description of Alternative B policies as correctly listed in Table VII-1:

Policy 4.4: Consider granting density bonuses and parking requirement exemptions for the construction of affordable housing or senior housing.

---

**Response to R16-12e (Kathryn DeVincenzi)**

Alternative B policies that would direct growth to certain areas of the City or advocate for zoning changes are listed in Table VII-2 of the EIR. See also Response to R16-12d.

---

**Response to R16-12f (Kathryn DeVincenzi)**

The commenter does not provide any evidence that directly contradicts the conclusion regarding the potentially significant impact to transit resulting from implementation of Alternative B. As provided in the discussion of *Development Assumptions by Alternatives* in the Revised EIR “Alternative B policies and implementation measures that mirror the 2004 Housing Element would similarly encourage new housing Downtown, in underutilized commercial and industrial areas, in all new commercial or institutional projects, near major transit lines.” Further, “Due to the various policies and implementation measures included in the 2004 Housing Element but eliminated under Alternative B, density would not increase to the same extent under this Alternative.”

It is not feasible to ascertain the specific contribution of the Housing Element to this cumulative significant impact on transit, so the analysis assumes that it could be considerable. Thus, the EIR describes a potential shift to transit and the associated conclusion of a significant transit impact, albeit one in which the incremental impact would be expected to decrease under Alternative B compared to the 2004 Housing Element.

The EIR concludes that growth concentrated near transit would add transit trips, whereas growth that is distributed regardless of transit infrastructure is more likely to add automobile trips. Based on the overall conclusions regarding Alternative B compared to each version of the Housing Element, the EIR reaches consistent conclusions regarding the impact of Alternative B on transit and on the street network. As discussed throughout the responses to this comment letter, the Area Plans are not part of the Housing Element, and they do not change the impacts of the Housing Element or alternatives.

---

**Response to R16-12g (Kathryn DeVincenzi)**

The comment points to an error in the Revised EIR. Errata in the Revised AA that conflates Policies 2.2 and 2.3 of the 1990 Residential Element with the similar Policies 1.1 and 4.5 from the 2004 Housing Element and Alternative B. The text on Page VII-62 in the Revised EIR is corrected as follows:

However, Alternative B includes Policies ~~2.2~~1 and ~~2.3~~4.5 from the 2004 Housing Element could increase residential density more generally throughout the City, as compared to the 2009 Housing Element policies that generally limit encouragement of increased densities to affordable housing projects and through community planning processes.

---



### **Response to R16-12h (Kathryn DeVincenzi)**

Please refer to the introductory response to this letter describing the relation of Area Plans to the City's General Plan and Housing Element. In addition, as noted in the Revised EIR, the impact conclusion related to water supply would be similar under Alternative B compared to both the 2004 and 2009 Housing Elements. Regardless of whether the difference in water demand is incrementally greater or smaller among these Alternatives, the conclusion remains that the impact would be less than significant, with no mitigation required. Thus, no change to the EIR is required.

---

### **Response to R16-12i (Kathryn DeVincenzi)**

As noted in the comment, and as documented in the Revised EIR "under Alternative B new construction, alterations, and demolitions would be required to undergo environmental review to determine if there are any impacts to historic resources, including individual resources and historic districts." The analysis further concludes, "Alternative B could result in smaller/less dense residential projects and includes policies from the 2004 Housing Element that support historic preservation; therefore, for the same reason provided under Impact CP-1 in *Section V.E. Cultural and Paleontological Resources*, similar to the 2004 and 2009 Housing Elements these impacts under Alternative B would remain less than significant." The comment provides no information or evidence that warrants revision to either this conclusion or the rationale for reaching the conclusion.

---

### **Response to R16-13 (Kathryn DeVincenzi)**

CEQA requires that an EIR describe a reasonable range of feasible alternatives to a Project sufficient to permit informed decision making and public participation. An EIR need not consider multiple variations on alternatives that are presented.

As noted in the Revised EIR, the Bayview Waterfront Alternative included the policies and objectives of the 1990 Residence Element as well as the Candlestick Point/Hunters Point Shipyard Project (previously referred to as the Bayview Waterfront project). However, the Candlestick Point/Hunters Point Shipyard Project was reviewed in its own environmental impact report, and later adopted in 2010, and the 2004 and 2009 Housing Element EIR analyses included the Candlestick Point/Hunters Point Shipyard Project as a reasonably foreseeable future project. Therefore, providing a detailed environmental analysis of this alternative would have provided limited information to the public and decision-makers, as the associated environmental impacts from the Candlestick Point/Hunters Point Shipyard Project were already accounted for as part of the cumulative analysis of the project. Likewise, because the Candlestick Point/Hunters Point Shipyard Project was an independent project, and not dependent upon the adoption of policies in the 2004 or 2009 Housing Element, the analysis of Alternative A, (No Project continuation of the 1990 Residence Element policies and objectives), also included the Candlestick Point/Hunters Point Shipyard Project as part of its cumulative scenario. Contrary to the commenter's statements, it is reasonable to assume that Alternative A (No Project) included Candlestick Point/Hunters Point Shipyard Project, as the 1990 Residence Element included policies such as Policy 2.2 "Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing . . .", which would be consistent with the rezoning of Candlestick Point/Hunters Point Shipyard Project to increase capacity of additional housing units. For these reasons, the Bayview Waterfront Alternative was eliminated from further consideration.

---

### ***Response to R16-14 (Kathryn DeVincenzi)***

This alternative concept was developed in response to comments received during the EIR scoping process. The commenter inaccurately describes this concept as allowing growth to occur outside plan areas under existing zoning. As described in the Revised EIR, this alternative would actively direct growth to plan areas, but unlike the Housing Elements or analyzed alternatives, would also need to preclude development outside plan areas by including policies which allowed little or no growth to occur outside of these areas. Specific policies were not described by the public when they suggested the alternative., Since the City is obligated to abide by its own adopted codes and policies, it could only prohibit or limit growth outside plan areas (where approximately 35,427 units could be developed) through downzoning or other similarly effective measures that would prevent development. However, as noted in the Revised EIR, such policies are not considered feasible because they would reduce the City's ability to meet RHNA goals for housing supply and affordability, and would further contradict other policies of the City's General Plan.

With regard to the commenter's suggestion that housing element policies under this alternative "would only involve refraining from rezoning further areas of the City outside of the Plan Areas and limiting new area plan rezonings to those underway", this is not something that housing element policies can or even should do. Area Plans are initiated as a means for the City to address planning conditions or issues in a certain area of the city, in response to issues specific to the planning area location. The Housing Element should not constrain the City's ability to engage in sound and responsible planning efforts for any reason, housing-related or otherwise. Rather, housing element policies must enhance the City's ability to meet the RNHA Goals at various income levels, and do so consistent with other policies of the City's General Plan. Therefore, the alternative was not carried forward for further analysis because, overall, the implementation is not considered feasible.

For additional explanation regarding the relation of Area Plans to Housing Element policies, please refer to the introductory comment response to this letter.

---

### ***Response to R16-15 (Kathryn DeVincenzi)***

As noted in the Revised EIR, the Reduced Land Use Allocation Alternative was rejected because it would contradict state Housing Element law by proactively precluding projected growth, as projected by HCD and ABAG. The information provided in this comment also conflates the number of potential housing sites available, with the actual amount of new housing development projected to occur.

The comment is based on the erroneous assumption that the Land Use Allocation and the RHNA are affected by the Housing Element policies. The RHNA is assigned to the City by ABAG and is itself exempt from CEQA. There are no physical impacts that can be attributed to the RHNA alone. The Land Use Allocation is an analytic exercise that identifies the most likely distribution of total projected growth, based on existing zoning and pipeline development. More specifically, the determination of regional housing need starts with an assessment of existing need based on the state's estimates of current total households plus growth for the year; a vacancy rate is also applied and existing vacancies are subtracted. Projected need is based on estimated population growth and includes a) natural increase (births minus deaths); b) migration, and; c) household formation rates. The state Department of Finance and the Association of Bay Area Governments (ABAG) worked together to determine appropriate headship rates to use with projected population growth forecasts

to determine household growth and consequent demand for housing. The 31,193 units allocated to San Francisco under the RHNA is not any more additional or “greater housing growth” than the projected growth in population and households for San Francisco. The “greater housing growth” is larger only in relation to other jurisdictions in the Bay Area which will not see as much growth.

This alternative was rejected from further consideration because it would not result in any changes to Housing Element policies and would not provide any usable information about the project.

---

***Response to R16-16a (Kathryn DeVincenzi)***

The comment is misleading in its representation of the 2009 Housing Element. This Housing Element suggests that, where conditions require reconsideration of existing policies governing development in an area, any changes to land use controls should be considered in the context of a community-based planning effort. Housing Element policies physically affect the location and type of housing development. However, given the existing available housing sites available for residential development (56,435 potential new housing units identified in Table IV-7 of the EIR), and the population growth projections provided in the RHNA, new housing development would occur independent of the particulars of Housing Element policies. Similarly, current City policies – including Housing Element policies - do not preclude additional residential development – thus, the option “to not build” does not exist. However, without an updated Housing Element, such growth may not sufficiently meet the City’s RHNA at all income levels, and further development may not occur consistent with other goals and policies of the City’s General Plan, as noted in the Revised EIR at page VII-110.

---

***Response to R16-16b***

As noted in the 2004 and 2009 Housing Element EIR, including the recirculated the Revised EIR, to meet the City’s share of the RHNA housing element goals and policies aim to “preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound” (page VII-3), as reflected in the project objective 2: “Maintain the existing housing stock to serve housing needs”, Policy 2.4 of the 2004 Housing Element: “Retain sound existing housing in commercial and industrial areas”, and policy 7.6 of the 2009 Housing Element: “Acquire and rehabilitate existing housing to maximize effective use of affordable.” Such goals, policies, and objectives serve to maintain the baseline housing inventory for the City’s existing population, thereby ensuring that new housing development can be allocated to projected population growth at various income levels, in accordance with the RHNA requirements and affordability goals.

---

***Response to R16-16c***

The subject EIR analyzes both the 2004 and 2009 Housing Elements at an equal (project) level of details, and provides a comparative analysis of impacts of three project alternatives, including the no project alternative, consistent with the CEQA statute and Guidelines. The Comments discussion regarding the Superior Court’s determination is unclear.

---

### **Response to R16-17**

The commenter states that the Notice of Availability of the Revised Draft EIR must be corrected and the Revised EIR must be recirculated for an additional 45 days.

The Notice of Availability was issued on December 18, 2013, and indicated that a hearing at the Planning Commission would take place on January 23, 2014, and that the comment period would end on February 3, 2014. On January 23, 2014, the comment period was extended until February 18, 2014, for a total comment period of 62 days. Under CEQA Guidelines section 15088.5(d), a lead agency shall provide public notice of the availability of a recirculated Draft EIR in the same manner as proscribed in Guidelines section 15087. Notice must be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by either publication in a newspaper of general circulation, posting on the project site or direct mailing. Consistent with this Guidelines, the Notice of Availability of the Revised EIR as published in the San Francisco Examiner, a newspaper of general circulation, on December 18, 2013 and was mailed to the City's Housing Element distribution list, which includes those who previously commented on the DEIR, members of the San Francisco Planning Department's generally applicable DEIR distribution list, and neighborhood groups registered with the San Francisco Planning Department. A Notice of the Extension of the Public Comment Period on the Revised EIR was also published in the San Francisco Examiner on January 29, 2014, and mailed to the same list of individuals and neighborhood groups as the original Notice of Availability of the Revised EIR, in addition to the San Francisco Planning Department's Historic Preservation generally applicable DEIR list.

When a DEIR is revised only in part and the lead agency is recirculating only revised chapters or portions of the DEIR, CEQA Guideline section 15088.5(f) indicates that the lead agency may request that reviewers limit their comments to the revised chapters or portions of the DEIR. The lead agency's notice of recirculation must indicate whether new comments may be submitted only on the recirculated portions of the DEIR, or on the entire DEIR in order to be considered by the agency. The Notice of Availability of the Revised EIR, and the Notice of Extension of the Comment Period, therefore, indicated that comments should be limited to the Revised EIR. Additionally, both Notices summarized the revisions made to the previously circulated DEIR. Neither CEQA nor the CEQA Guidelines require that the Notice indicate the number of pages of the recirculated portion or section of the DEIR or that the Notice indicate whether other sections or documents are referenced in the recirculated portions or sections and may be relevant for review. Therefore, the Notice of Availability complied with CEQA and the CEQA Guidelines.

---

### **Response to R16-18**

This summary comment is responded to in the detailed comment responses provided above.

---

### **Response to R17-1: (David Golick)**

This information is noted. A complete copy of the Golick Statement will be included in the Responses to Comments (RTC) document provided to the project decision-makers.

**Response to R17-2a: (David Golick)**

This comment generally conflates the supply of potential new housing sites, the pipeline of potential housing development, and the actual number of housing units projected to be constructed in the 2007-2014 planning period. The pipeline of projects provided in Table IV-7 does not equate to the amount of housing expected to be built during the 2007 to 2014 period. As noted in the EIR on Page IV-23, “it is possible that some of these projects may not go forward due to shifts in economic and legislative conditions. Three major projects, i.e., Candlestick Point-Hunters Point Shipyard, Treasure Island, and Park Merced, comprise approximately half of the pipeline project units and could be completed by approximately 2020.” Thus the planning period of 2007 to 2014 does not correspond directly to the production pipeline of residential units, and the comment is misleading regarding the quantity of housing likely to be developed during planning period.

Regardless, the Housing Element policies do not directly result in residential production. Rather, as noted throughout the EIR, the Housing Element policies are designed to ensure that sufficient development capacity exists to meet the RHNA goals at various income levels, and does so by influencing the location and type of future housing development. While the Housing Element policies do not directly call for rezoning, such administrative action may be necessary to implement Housing Element policies related to the location and type of future housing development. However, consistent with State Housing Element law and the comment, the City is not required to rezone any property in order to have capacity to meet its RHNA, as would be required under Government Code section 65583.

---

**Response to R17-2b: (David Golick)**

This comment summarizes excerpts from the EIR, the 2004 Housing Element and the 2009 Housing Elements, and does not comment on the adequacy or accuracy of the EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R17-2c: (David Golick)**

This comment relates to the City’s RHNA for the 2007 through 2014 planning period. While the proposed project and project alternatives analyzed in the EIR were each formulated with a primary objective of meeting the RHNA, the methodology behind calculation of the RHNA are not related to the adequacy, accuracy, or completeness of the EIR. The final 2007-2014 RHNA for each jurisdiction within the Association of Bay Area Governments (ABAG) can be found at [http://www.hcd.ca.gov/hpd/hrc/plan/he/abag\\_5rhna022412.pdf](http://www.hcd.ca.gov/hpd/hrc/plan/he/abag_5rhna022412.pdf) . No further response is warranted and no change to the EIR is required.

---

**Response to R17-2d: (David Golick)**

The Housing Element is statutory requirement that local governments plan for existing and projected demand for housing. It is prepared pursuant to state housing law (Government Code Section 65584, et. seq.) and adheres to a process for determining each jurisdiction’s housing need. This process is a collaboration between the California Housing and Community Development Department (HCD), regional councils of governments (COGs), and local jurisdictions to craft an equitable regional housing needs allocation (RHNA).

Determination of regional housing need starts with an assessment of existing need based on the state's estimates of current total households plus growth for the year; a vacancy rate is also applied and existing vacancies are subtracted. Projected need is based on estimated population growth and includes a) natural increase (births minus deaths); b) migration and c) household formation rates. The state Department of Finance and the Association of Bay Area Governments (ABAG) worked together to determine appropriate headship rates to use with projected population growth forecasts to determine household growth and consequent demand for housing.

These RHNA goals are production targets to meet the anticipated growth and demand for housing. That San Francisco is only able to partially meet these production targets, despite increased construction, is a signal that not enough supply is being produced to meet demand.

The San Francisco Planning Department takes the position that the Housing Element, community based plans, and related rezoning efforts are tools to facilitate community input on the vision of how new households will be accommodated. In the absence of these planning efforts, new households will continue to move to San Francisco to seek residence and employment and developers will continue to produce housing. As noted previously, the Housing Element policies generally do not influence the amount of housing produced. Rather, the planning processes, including the Housing Element, provide an opportunity for the community to participate in the vision for new growth, including weighing in on development controls that may result in the types of housing more in line with future needs, including location, size and affordability.

---

### ***Response to R17-3a: (David Golick)***

This comment proposes a Housing Element alternative in which the Japantown area is explicitly excluded from the applicability of Policy 1.2 of the 2009 Housing Element, and where no rezoning to increase capacity for housing would occur in the Japantown area.

As confirmed by the San Francisco Superior Court, the EIR includes a reasonable range of project Alternatives. Regardless of whether the suggested alternative could feasibly meet most of the project objectives, an EIR need not consider all potential alternatives to a project.

The comment indicates that an alternative that eliminates Japantown would mitigate the 2004 and 2009 Housing Element's significant impact to transit. However, the commenter presents no evidence regarding this assertion. The transit impacts identified in the 2004 and 2009 Housing Element would result primarily due to projected growth in San Francisco, which would occur independent of Housing Element policy. The associated impact is the anticipated shift in population toward transit that could result from Housing Element policies that serve to promote transit use, thus contributing to the cumulative transit impact. The Comment also states that an alternative that eliminates Japantown would reduce impacts on land use, visual resources and neighborhood character. However, impacts related to visual resources and land use were found to be less than significant under the 2004 and 2009 Housing Elements as well as Alternatives A through C; alternatives should mitigate or substantially lessen significant, not less-than-significant impacts.

Elimination of Japantown would not result in any substantive change to the Housing Element, and analysis of this alternative would not provide any new or meaningful information about the Housing Element impacts. Furthermore, during the time since publication of the 2004 and 2009 Housing

Element, the Japantown planning effort has evolved into the Japantown Cultural Heritage and Economic Sustainability Strategy (JCHESS). In the fall of 2013, the recommendations of the JCHESS were endorsed by the Board of Supervisors, Planning Commission, and Historic Preservation Commission. The JCHESS does not recommend any changes to existing residential development capacity in Japantown, although it does recognize that there is a community desire to see parcels developed to their potential under current zoning. Thus, with the completion of the JCHESS, there are no foreseeable plans to substantially increase housing capacity in Japantown.

Therefore, no further consideration is provided to this alternative, and no change is warranted to the EIR.

---

**Response to R17-3b: (David Golick)**

This comment notes there are existing problems with MUNI, cites a recent SF Examiner article related to MUNI capacity, and concludes that “MUNI capacity problem is a current impact.” The 2004 and 2009 Housing Element EIR analyses the impacts that would result from adoption of an updated Housing Element. Issues such as existing transit capacity are described as the existing conditions documented in the EIR at in *Section V.F. Transportation and Circulation*. Thus, this comment does not relate to the adequacy, accuracy, or completeness of the EIR, and no change to the EIR is required. Please refer also to Response to R1-3.

**Response to R17-4a: (David Golick)**

The comment proposes an alternative that limits new area plans or community planning processes to those areas listed in 2009 Housing Element Policy 1.2, except for Japantown, which the commenter claims would eliminate the Projects’ significant impact on transit. Please refer to Response R17-3a above, which also applies to this comment. Although the comment correctly notes that the EIR concludes that the 2004 or 2009 Housing Elements, as well as Alternative B and C, would have a significant unavoidable impact on transit, the comment provides no specific evidence or analysis to directly support the claim that the proposed alternative would avoid or lessen the impact on transit.

The description of this alternative misrepresents the content of the 2009 Housing Element. The Housing Element recognizes that existing capacity in combination with zoning changes in progress would provide adequate housing opportunities to accommodate existing demand. Appropriately, the Housing Element does not call for Area Plans to be initiated beyond those already identified or underway. Instead, the Housing Element establishes the expectation that any future substantial changes in an area’s density should be considered in the context of a community based planning process. Therefore, a Housing Element Alternative that specifies that no future area plans should be prepared would not change any direct or indirect physical effects of the Housing Element, and would not avoid the considerable contribution to significant transit impacts. Thus, including such an alternative in the EIR analysis would provide limited value and information.

This proposed alternative would also provide increased notice requirements for new community based planning processes. Increased notice provisions would not have an impact on the environment, or reduce or eliminate any significant impacts. The Housing Element appropriately does not define planning procedures for community-based planning processes. If the Planning Commission wished to expand the scope of the Housing Element, it could consider such a change in its deliberations on

the Project, and the comment is noted. For these reasons, no further consideration is provided to this comment, and no change to the EIR is warranted.

---

***Response to R17-4b: (David Golick)***

The comment correctly notes that the EIR concludes the 2004 or 2009 Housing Elements, as well as Alternative B and C, would contribute to a significant unavoidable impact on transit. However, the comment implies that this impact would not occur under the proposed alternative, that is, there would not be a significant impact on transit if the Housing Element were to preclude future community-based planning efforts. This assumption is faulty for two reasons. First, the EIR recognizes that the Housing Elements and Alternatives B and C would contribute considerably to a cumulative significant impact. That is, the significant impact would exist regardless of any contribution from the concepts of increased density in transit-rich locations embraced by the Housing Element. Therefore, contrary to the commenter’s assertion, the proposed alternative would not avoid an impact.

Second, as discussed in Response R17-4a above, the alternative as presented does not actually reduce the degree to which the Housing Element would encourage development, and therefore the “No Unlimited Area Plan” alternative would not reduce the Housing Element’s contribution to transit capacity impacts.

---

***Response to R17-4c: (David Golick)***

Please refer to the Responses to R1-3 and R17-3b provided above.

---

***Response to R17-4d: (David Golick)***

The comment indicates that the suggested alternative would reduce impacts on air quality, noise, water supply, land use, visual resources, and neighborhood character. However, no evidence or analysis is provided to support this assertion. Furthermore, the Superior Court found that the EIR adequately analyzed these impacts, which were all determined to be less than significant (or less than significant with mitigation). Therefore, no further consideration is provided to this alternative, and no change is warranted to the EIR.

---

***Response to R17-5a: (David Golick)***

This comment notes that the draft 2004 and 2009 Housing Element EIR addressed the June 2010 draft of the 2009 Housing Element, and proposes the June 2010 draft as a feasible alternative. However the draft EIR and the final EIR found that the June 2010 draft and the final draft of the 2009 Housing Element had similar impacts. Therefore, the June 2010 draft would not reduce the significant impact on transit. Further, the Superior Court confirmed that the EIR analyzed a reasonable range of alternatives, and that the draft EIR did not need to be recirculated based on subsequent changes to the June 2010 draft. Regardless, the Planning Commission could consider adopting the June 2010 draft in its deliberations on the Project. No further response is required, and no change to the EIR is warranted.

---



### **Response to R17-5b: (David Golick)**

Regarding the potential change in the number of units produced under the draft or final 2009 Housing Element, this comment does not directly pertain to the analysis or the conclusions of the EIR or the recirculated Revised EIR. The draft and final 2009 Housing Element policies are overall, substantially similar, and thus would result substantially similar impacts as related to changes in the existing physical environment. As the Superior Court confirmed, the draft EIR did not need to be recirculated due to the changes made to the June 2010 draft Housing Element in producing the final 2009 Housing Element. Furthermore, as noted throughout the EIR, the Housing Element policies do not affect the total amount of new housing units produced, but rather the location and type of residential development. As noted above, in any event, the Planning Commission could consider adopting the June 2010 draft in its deliberations on the Project. No further response is required, and no change to the EIR is warranted.

---

### **Response to R17-5c: (David Golick)**

The comment claims that the June 2010 draft Housing Element would mitigate a “significant impact on RH-1 neighborhoods,” which the Planning Department assumes is a reference to the 2009 Housing Element change in Policy 1.6 that the comment claims would “degrade the quality of [RH-1] neighborhoods”. The 2011 Responses to Comments document found that the changes in Policy 1.6 from the draft to final version of the 2009 Housing Element would not have a significant impact on the environment, and that the change in policy language did not require recirculation of the draft EIR, a conclusion confirmed by the Superior Court. See also Response R1-15.

The comment refers to 2009 Housing Element policy revisions applicable to the RH-1 and RH-2 zones, specifically related to maintaining density versus height and bulk, and asserts the “quality” of RH-1 neighborhoods would be affected. No foreseeable physical impacts were associated with the changes to Policy 1.6, because the Housing Element does not contain any recommendations for changes to RH-1 or RH-2 neighborhoods that would increase the population or any aspects of the built environment in these areas. Furthermore, the commenter’s reference to the “quality” of RH-1 single family neighborhoods is unclear and is not connected to any aspects of the physical environment addressed in CEQA and the City’s environmental review.

The commenter misinterprets the use of the term “community based planning process”, and assumes erroneously that such an effort might apply to individual projects to provide flexibility in the number and size of units. As stated in Policy 1.4 of the 2009 Housing Element, “zoning changes that involve several blocks should always be made as part of a community based planning process.” The Housing Element does not encourage application of flexible density requirements on a site-by-site basis.

---

### **Response to R17-5d: (David Golick)**

The comment refers to the Priority Development Areas (PDA’s), which are currently under consideration as part of the City’s participation in the regional planning efforts under Plan Bay Area. However, the planning horizon of 2035 cited in the comment regarding future housing development differs substantially from the 2007-2014 planning period addressed in the EIR. The information cited by the commenter reflects existing development capacity outside of PDAs, and does not require any elimination of density limits in RH-1 areas. Thus, the information provided in the comment does not

directly apply to the analysis of Housing Element impacts provided in the EIR, and no change to the EIR is warranted.

---

***Response to R17-5e: (David Golick)***

The 2004 and 2009 Housing Elements and Housing Element alternatives included in the EIR are considered, in part, for the overall ability to meet the RHNA goals at all income levels, as well as other objectives. More specifically, Housing Element policies are intended to ensure there is adequate development capacity to produce the amount of housing units provided in the RHNA. However, the Housing Element does not result in a readily quantifiable amount of new housing, but instead influences the location and type of new housing. Thus, forecasting a specified amount of housing that would result from one particular Housing Element policy would be speculative. Neither the 2009 Housing Element nor the EIR attribute any additional units whatsoever to the reference to “height and bulk” rather than “density limits” in Policy 1.6. Regardless, the relevant CEQA statement in this comment is the claim that “the June 2010 Draft of the 2009 Housing Element is a feasible alternative that would eliminate the significant impact on the quality of RH-1 neighborhoods”. It is unclear what the commenter means by the “quality” of RH-1 neighborhoods. To the extent that “quality” refers to neighborhood character, impacts to neighborhood character were appropriately analyzed in *Section V.B. Land Use and Land Use Planning* of the EIR, as confirmed by the Superior Court. (See Response R17-5c above for further discussion of this issue.) Thus, no change to the EIR is warranted by this comment.

---

***Response to R17-5f: (David Golick)***

This comment relates to the goals of the project, and is noted for the record. No change to the EIR is required.

---

***Response to R17-5g: (David Golick)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. The policy revision described in the comment relating to maintaining neighborhood character via height and bulk controls (versus density) would not substantially alter the analysis or conclusions of the EIR. There is no evidence to support the commenter’s claim that protection of single-family neighborhoods would support the middle class in the City. The Planning Commission could consider adopting the June 2010 draft, or certain policies therein, in its deliberations on the Project. Refer to Responses R1-15 and R17-5d for further discussion of this issue. No further response is provided, and no change to the EIR is required.

---

***Response to R17-6a: (David Golick)***

This comment submits information related to housing production and the applicable RHNA goals. The comment does not relate to the adequacy, accuracy, or completeness of the EIR, and thus no change to the EIR is required.

---

### ***Response to R17-6b: (David Golick)***

This comment suggests a transit mitigation fee to reduce the anticipated impact to transit resulting from future housing development. Although the comment presents this option as an “alternative”, the suggestion is in fact one for a mitigation measure to reduce the impact on transit of new residential development.

The City is in the process of revising its procedures and requirements for transportation impact assessment and fees. It is not expected that transit impact fees levied on residential development would fully mitigate the impact of new development on the transit system for a variety of reasons. For example, a fee program as suggested in the comment would address only the impacts of market-rate housing, not the impacts of all new housing.

The City charges a variety of impact fees for new development, including a transit impact fee on residential development in plan areas. Nexus determinations support these fees, as authorized through City ordinances. They are not applied as mitigations for impacts under CEQA and are not considered or treated as full mitigation. In some situations, such as the affordable housing fees cited in the comment, the fees are charged to address issues outside of CEQA.

The transit fee suggested in the comment is a worthwhile consideration and one that has already been initiated in the context of area plans and in overall transportation planning. However, it is not something that would fully mitigate the Housing Element’s contribution to the identified transit impact. Moreover, it does not constitute an additional alternative that should be considered in the EIR. This comment is noted.

---

### ***Response to R17-6c: (David Golick)***

This comment makes an observation regarding the location of jobs and housing, but provides no evidence indicating the analysis and the conclusions in the EIR warrant any changes. Thus, no change to the EIR is required by the comment.

---

### ***Response to R17-7a: (David Golick)***

The comment summarizes and quotes information from the San Francisco Transportation Plan 2040 and the Revised EIR, which is noted for the record. Regarding the RHNA process, please refer to Response R17-2d above. In addition to that response, it is noted that the 31,193 units allocated to San Francisco for the 2007 to 2014 RHHA is not any more additional or “greater housing growth” than the projected growth in population and households for San Francisco. The “greater housing growth” is larger only in relation to other jurisdictions in the Bay Area that will not see as much growth. This comment does not relate to the adequacy, accuracy, or completeness of the EIR, and thus no change to the EIR is required.

---

### ***Response to R17-7b: (David Golick)***

The comment generally conflates development sites available for potential housing development, with actual projected housing development (see also Response R17-2a). Further, while Housing Element policies generally influence the location and type of housing development in the City, they do not substantially influence the overall amount of housing developed, which is primarily

determined by economic factors. While the Housing Element has an overarching goal of ensuring there is sufficient capacity to meet the RHNA at all income levels, housing element policies do not directly result in a quantifiable amount of housing that would not otherwise be developed. In general, this comment does not apply to the CEQA analysis provided in the EIR, and no change is warranted.

---

***Response to R17-7c: (David Golick)***

This comment relates to the RHNA process and poses a hypothetical question regarding a scenario where growth in the City results only from natural births and deaths. However, when planning for growth, the normal factors go beyond births and deaths. Births and deaths do not occur in a vacuum, as both in-migration and out-migration are considered, as well as household formation. As noted above in Responses 2d and 7a above, the RHNA projection of 31,193 units for San Francisco is based on estimated population growth that includes a) natural increase (births minus deaths); b) migration and c) household formation rates. The state Department of Finance and the Association of Bay Area Governments (ABAG) worked together to determine appropriate headship rates to use with projected population growth forecasts to determine household growth and consequent demand for housing.

The CEQA projects and project alternatives in the 2004 and 2009 Housing Element EIR are based on such real-world scenarios, and the official growth projections provided by the authorized state and regional planning agencies, which culminate in the RHNA. The comment does not address the adequacy, accuracy, or completeness of the EIR, and no change to the EIR is required.

---

***Response to R17-8: (David Golick)***

Detailed responses to this summary comment are provided in the responses provided above.

---

***Response to R18-1 (Alessandra Luoise Donnici)***

The commenter does “not approve of revising the zoning in the west part of the City.” The commenter mischaracterizes the Housing Elements by suggesting that they propose to rezone parts of the City. As discussed throughout the Draft EIR, the Housing Elements do not propose rezoning. Rather, they are policy-level documents that ensure that there is adequate land available to meet future housing needs. See also Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R18-2 (Alessandra Luoise Donnici)***

The commenter quotes text from the Revised EIR that residential development under Alternative A would include inappropriate alterations or additions to existing housing that could diminish their historic significance. It is noted that Alternative A is the No Project Alternative, under which the 1990 Residence Element policies would remain in effect and the proposed 2004 Housing Element and 2009 Housing Element policies would not be implemented. Further, as provided in the Revised EIR,

Alternative A was concluded to have a potentially significant impact on historic resources. Please also see Response to R16-9c.

As noted in Responses to A-15 and A-16 in Section VIII of the 2004 and 2009 Housing Element EIR, *Section V.E (Cultural and Paleontological Resources)* and *Section V.C (Aesthetics)* of the Draft EIR discuss environmental issues associated with the preservation of landmarks and historic buildings. The Draft EIR concludes that new development and effects to historic resources are most appropriately addressed at the project level and that project level review includes an evaluation of compliance with the Secretary of Interior's Standards for the Treatment of Historic Properties, CEQA, Section 106 of NEPA, San Francisco Preservation Bulletins 1-21, the Urban Design Element and Residential design guidelines and therefore neither the 2004 or 2009 Housing Elements would result in significant impacts to historic resources.

In response to the comment pertaining to the perceived loss of single-family neighborhoods, please see Response to R1-15.

---

***Response to R18-3 (Alessandra Luoise Donnici)***

Please see Response to R1-3.

---

***Response to R19-1 (Mary Louise Donnici)***

Please see Response to R18-1.

---

***Response to R19-2 (Mary Louise Donnici)***

Please see Response to R18-2.

---

***Response to R19-3 (Mary Louise Donnici)***

Please see Responses to R1-3 and R1-15.

---

***Response to R20-1 (Phillip Albert Donnici)***

Please see Response to R18-1.

---

***Response to R20-2 (Phillip Albert Donnici)***

Please see Response to R18-2.

---

***Response to R20-3 (Phillip Albert Donnici)***

Please see Responses to R1-3 and R1-15.

---

**Response to R21-1 (Patrick M. Donnici)**

Please see Response to R1-15. The commenter mischaracterizes the Housing Elements by indicating that they would lead to “infill” of private open space and elimination of RH-1 zoning. The Housing Elements do not propose rezoning or to relax standards for neighborhood consistency or encourage demolition of historic resources. Rather, they are policy-level documents that ensure that there is adequate land available to meet future housing needs. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to development controls, such as those listed above. Further, future proposals that may result in changes to development controls would require environmental review.

These comments do not specifically address the adequacy of the Revised Draft EIR or the proposed project’s compliance with CEQA. Substantive comments related the environmental impacts associated with policies set forth by the Housing Element are addressed throughout Section VIII of the 2004 and 2009 Housing Element EIR dated March 24, 2011, as well as this document. No further response is required and no change to the EIR is warranted.

---

**Response to R21-2 (Patrick M. Donnici)**

Please see Response to R18-2.

---

**Response to R21-3 (Patrick M. Donnici)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on the perceived impacts of the Housing Elements on zoning, please see Response to R1-15. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R22-1 (Marilyn R. Dougery)**

Please see Responses to R1-2 and R1-15 regarding the perceived effects of the proposed Housing Elements on zoning. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R22-2 (Marilyn R. Dougery)**

Please see Response to R1-3. In regard to the comments concerning traffic congestion, as stated in Response to F-1 in the 2011 Responses to Comments document, the “Housing Element is a policy document intended to provide a vision for how new housing in the City should occur as a result of population growth. The Housing Element would not change allowable land uses or result in any other changes to the Planning Code that would **result in additional vehicle trips, beyond those that could occur under current zoning.**” Residential growth within the City would occur regardless of the policies contained in the proposed Housing Elements, and consequently, the Housing Element policies themselves would not generate new trips.

---

**Response to R22-3 (Marilyn R. Dougery)**

A response to comments on the perceived impacts of the Housing Elements on zoning is provided in Responses R1-2 and R1-15. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R22-4 (Marilyn R. Dougery)**

Please see Response to R1-15 regarding the perceived effects of the proposed Housing Elements on zoning. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R22-5 (Marilyn R. Dougery)**

Please see Response to R1-15 regarding the perceived effects of the proposed Housing Elements on zoning. As noted previously in Response to R1-15, there is no connection or correlation between low density housing and middle income housing. Moreover, since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes. These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R22-6 (Marilyn R. Dougery)**

Please see Response to R1-32. The Housing Elements would have no discernable impacts on parking.

---

**Response to R22-7 (Marilyn R. Dougery)**

The commenter does not provide specific information as to how the alternatives are unclear or contradictory; therefore, no response can be provided and no change to the EIR is warranted.

---

**Response to R23-1 (Mari Eliza)**

The Housing Elements would not implement the “vast changes” to the City, as mischaracterized by the commenter. Rather, Housing Elements are policy-level documents that would guide future residential development in San Francisco through application of various policies in certain areas of the City. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to development controls but instead would influence where and how future residential development would occur. Future proposals that may result in changes to development controls would require subsequent public review, including environmental review. For additional responses regarding the perceived loss of RH-1 zoning, please see Response to R1-15.

---

**Response to R23-2 (Mari Eliza)**

Please see Responses to R1-2 and R1-15.

---

**Response to R23-3 (Mari Eliza)**

Please see Response to R1-48.

---

**Response to R23-4 (Mari Eliza)**

Shadow impacts are addressed in *Section V.J (Wind and Shadow)* of the Draft EIR. Shadow impacts associated with project alternatives are discussed in the Revised EIR and were determined to be less than significant for all three alternatives. There is no evidence that any incremental increases in shadow on areas throughout the city would substantially affect existing or future solar panel installations.

As stated in Response to I-7 in Section VIII of the 2004 and 2009 Housing Element EIR dated March 24, 2011, the Housing Elements themselves would not result in increased density, reduced setback requirements, or increased height and bulk. Projects that could result in shadow impacts will be evaluated in the relevant CEQA documentation as specific development proposals are put forth. Further, determinations regarding shadow impacts are made on a case-by-case basis and future projects could, if solar panels are present on a nearby building, consider whether impacts would result. It is speculative to conclude that the updated Housing Element policies would result in developments that block sunlight to rooftop solar powered systems. No further response is required and no change to the EIR is warranted.

---

**Response to R23-5 (Mari Eliza)**

Please see Response to R1-48.

---

**Response to R23-6 (Mari Eliza)**

The commenter presents no evidence to substantiate the inaccurate claim that implementation of the Housing Elements would in any way adversely affect goals related to energy independence. Please also see Response to R23-4. A response to comments on the perceived impacts of the Housing Element on zoning is provided in Response to R1-15, above. As noted previously in Response to R1-15, there is no connection or correlation between low density housing and middle income housing. Moreover, since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes. Regarding comments pertaining to capacity or effectiveness of the local transit system, please see Response to R1-3.

---

**Response to R24-1 (Don Emmons)**

Please see Response to R1-1.

---



**Response to R24-2 (Don Emmons)**

The commenter mischaracterizes the Housing Elements by indicating that they would lead to removal of density limits and would result in garage conversions and height and masses limits. The Housing Elements would not implement major increases in density. Rather, they are policy-level documents that shape where how new residential development should occur and ensure that there is adequate land available to meet future housing needs. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to development controls, such as removal of density limits and others listed above. Further, future proposals that may result in changes to development controls would require environmental review. Please also see Response to R1-15. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. These comments are noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R24-3 (Don Emmons)**

Please see Responses to R1-15, R24-2 and R1-32. The commenter mischaracterizes the Housing Elements by stating that they would convert garages into living space. This is factually incorrect. The Housing Elements do not propose such changes or rezoning in general. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R25-1 (Vincent Finigan)**

Please see Response to R1-1.

---

**Response to R25-2 (Vincent Finigan)**

Please see Responses to R1-2; R1-3; R1-15; R1-32 and R1-48. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R25-3 (Vincent Finigan)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R26-1 (Diane Frankenstein)**

A response to comments concerning the perceived effects of the Housing Element on neighborhood character is provided in Response to R1-15, above. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the

Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R27-1 (Aaron Goodman)***

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. Comments that state the need for rental housing, housing for working class citizens, and note the “existing imbalance of housing” address the existing conditions (baseline) or merits of the project and not the adequacy of the analysis in the Revised EIR. The Draft EIR analyzes the environmental impacts of the proposed project and changes to the built and natural environment that would result from approval of the 2004 or 2009 Housing Element. Housing affordability is largely a socio-economic impact. Socio-economic impacts are only addressed by CEQA should there be secondary physical environmental impacts that result from socioeconomic implications. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. A response to comments on transit and traffic congestion is provided in Responses to R1-3 and R32-1.

---

***Response to R27-2 (Aaron Goodman)***

The comment that a greater number of neighborhoods groups and community organizations should be involved in shaping the future of development in the City is noted. However, this comment is not on the adequacy or accuracy of the Revised EIR. Thus, no further response is required and no change to the EIR is warranted.

---

***Response to R28-1 (Aaron Goodman)***

Please see Responses to R1-2 and R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R28-2 (Aaron Goodman)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R28-3 (Aaron Goodman)***

Please see Response to R6-4. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R29-1 (Susan Hempstead)**

The comment that St. Francis Wood and other neighborhoods deemed historic by the commenter are valuable is noted. However, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-1 (Rose Hillson)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-2 (Rose Hillson)**

This comment expresses concern regarding potential impacts to the Jordan Park neighborhood, in particular noise, traffic (congestion), and land use (neighborhood character). Because of the nature of the proposed project (general Citywide housing policy), assessing impacts specific to a particular neighborhood would be speculative, particularly in the absence of any specific development proposal. However, the EIR includes a comprehensive evaluation of impacts related to various environmental issue areas, including noise, transportation, and land use. No aspects of the Housing Elements would be expected to result in significant noise, traffic or land use impacts in any area of the City. Please also see Responses to R1-15. No additional response is required and no change to the EIR is warranted.

---

**Response to R30-3 (Rose Hillson)**

The 2004 and 2009 Housing Elements addressed in the EIR, as well as the Housing Element alternatives analyzed in the Revised EIR, were formulated with consideration of the objective of ensuring adequate residential development capacity to meet the RHNA at all income levels. The revised Notice of Preparation (NOP) for the project was issued in September 2009. In accordance with the CEQA Guidelines, the existing setting and baseline data established to gauge physical changes to the existing environment is the setting at the time the NOP is prepared. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-4 (Rose Hillson)**

This comment is noted. However, it is not on the adequacy, accuracy, or completeness of the Draft EIR. Thus, no further response is required and no change to the EIR is warranted. Please also see Response to R1-15.

---

**Response to R30-5 (Rose Hillson)**

The comment makes general reference to environmental impacts, such as noise, vibration, and transit. These and other impacts of the housing element alternatives are addressed in the EIR, including the Revised EIR circulated on December 18, 2013. Please also see Responses to R1-2, R1-15, R1-3, and R1-

48. The comment makes further reference to social and economic impacts. As noted in Response to 10-9 and 10-10 of the 2011 Responses to Comments document, socio-economic impacts of the Housing Elements that do not have secondary environmental impacts are outside the scope of the Draft EIR, per the Public Resources Code CEQA Guidelines. No further response is warranted, and no change to the EIR is required.

---

***Response to R30-6 (Rose Hillson)***

The proposed 2004 and 2009 Housing Elements and Housing Element alternatives are based on the RHNA for the period 2007 through 2014. The planning period of 2014 through 2022 is not applicable to the EIR, and no change to the EIR is required.

---

***Response to R30-7 (Rose Hillson)***

The comment implies that the analysis provided in the EIR is not based on current data. However, the commenter provides no suggested alternative information or data source, or other evidence to support this claim. Moreover, as articulated throughout this document, the Housing Elements do not propose new housing development projects. Rather, they are policy-level and programmatic documents that address how to maintain the City's existing housing stock and how and where new housing in the City should be encouraged, with a focus on the affordability of housing. No further response is warranted, and no change to the EIR is required.

---

***Response to R30-8 (Rose Hillson)***

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Please also see Responses to R1-3, R1-15, R1-32, and R1-48.

---

***Response to R30-9 (Rose Hillson)***

The comment raises concerns about parks, specifically significant impacts to open space and recreation. The Revised EIR assesses recreation impacts anticipated under each Housing Element alternative (A through C) and provides a comparison to the impacts expected under the 2004 and 2009 Housing Elements. In response to the specific question in the comment regarding the ratio of parks to people, as noted in the Revised EIR page VII-33, "The City currently has a ratio of 7.0 acres open space per 1,000 San Francisco residents."

---

***Response to R30-10 (Rose Hillson)***

As noted previously, due to the nature of the proposed project (Citywide housing policy), assessing impacts specific to a particular neighborhood would be speculative, particularly in the absence of any proposed development. However, the EIR includes a comprehensive evaluation of impacts related to various environmental issue areas, including land use and historic resources. Moreover, as discussed throughout the Draft EIR, the Housing Elements do not propose new housing development projects and do not result in the construction of residential units. Rather, they are policy-level and

programmatic documents that ensure that there is adequate land available to meet future housing needs. No further response is required and no change to the EIR is warranted.

---

***Response to R30-11 (Rose Hillson)***

The Housing Element alternatives were formulated with consideration of the main project objective of accommodating sufficient development capacity to meet the RHNA at all income levels. The RHNA itself was developed by state and regional planning agencies in concert with affected local jurisdictions. The comment alludes to transit impacts and GHGs (presumed to mean greenhouse gases), which are addressed in the Revised EIR. Regarding the data utilized in the EIR, in accordance with the CEQA Guidelines, the existing setting – the baseline conditions established to gauge physical changes to the existing environment – is the setting found at the time the NOP is prepared. The baseline applied throughout the EIR and Revised EIR corresponds with the timing of the revised Notice of Preparation issued in September 2009. The analysis of alternatives consistently applies the same baseline data in order to provide a meaningful comparison of the impacts resulting under each alternative. Additional responses regarding transit impacts and GHGs are provided in Responses R1-3 and R31-1. No further response is required and no change to the EIR is warranted.

---

***Response to R30-12 (Rose Hillson)***

The EIR evaluates the Japantown area as part of the assessment of potential cumulative impacts. During the time since publication of the Housing Element, the Japantown planning effort has evolved into the Japantown Cultural Heritage and Economic Sustainability Strategy (JCHESS). In the fall of 2013, the recommendations of the JCHESS were endorsed by the Board of Supervisors, Planning Commission, and Historic Preservation Commission. The JCHESS does not recommend any changes to existing development capacity in Japantown, although it does recognize that there is a community desire to see parcels developed to their potential under current zoning. Thus, with the completion of the JCHESS, there are no foreseeable plans to substantially increase housing capacity in Japantown. Regardless, this particular area and any pending Area Plan associated with Japantown are not directly relevant to the impact conclusions associated with the project alternatives A through C assessed in the Revised EIR. No further response to this comment is required and no change to the EIR is warranted.

---

***Response to R30-13 (Rose Hillson)***

The comment poses several questions related to the details of transit planning and infrastructure. This is not the subject of the 2004 and 2009 Housing Element EIR. This comment provides no specifics related to the Revised EIR, which was recirculated for public comment in December 2013. As explained in the Notice of Availability of the Revised EIR dated December 18, 2013, “Comments should be limited to the recirculated sections of the EIR in accordance with Section 15088.5(f)(2) of the CEQA Guidelines. Under CEQA Guidelines Section 15088(f)(2) a lead agency need only respond to comments on the parts of the EIR that are being recirculated.” Namely, the Revised EIR’s Alternatives Analysis. No further response is warranted and no change to the EIR is required.

---

**Response to R30-14 (Rose Hillson)**

The housing element alternatives are formulated with consideration of the project objective of ensuring there is sufficient development capacity to meet the RHNA at all income levels. Thus while the income categories are a consideration in formulating housing element policies, the social and economic impacts resulting from housing element policies are not the focus of the EIR, consistent with the CEQA statute and CEQA Guidelines. Please also see Responses to R1-2 and R16-15 regarding the perceived effects of the proposed Housing Elements on zoning. As noted previously in Response to R1-15, there is no connection or correlation between low density housing and middle income housing. Moreover, since middle income housing is a socioeconomic consideration and does not have direct implications for physical environmental impacts, this Responses to Comments document addresses this and similar comments only if they pertain to density or other physical attributes. No further response is warranted and no change to the EIR is required.

---

**Response to R30-15 (Rose Hillson)**

The comment relates to the cost of housing for the middle class. As noted in the EIR, one of the objectives of the housing element is to “ensure capacity for the development of new housing to meet the RHNA at all income levels.” In addition, regarding the existing housing stock, another project objective is to “Maintain the existing housing stock to serve housing needs.” As discussed throughout the Draft EIR, the Housing Elements do not propose new housing development projects and do not result in the construction of residential units. Rather, they are policy-level and programmatic documents that ensure that there is adequate land available to meet future housing needs. Please also see Response to R1-2. No further response is required and no change to the EIR is warranted.

---

**Response to R30-16 (Rose Hillson)**

The comment relates to the cost of housing for the middle class. As noted in the EIR, one of the objectives of the housing element is to “ensure capacity for the development of new housing to meet the RHNA at all income levels.” In addition, regarding the existing housing stock, another project objective is to “Maintain the existing housing stock to serve housing needs.” As discussed throughout the Draft EIR, the Housing Elements do not propose new housing development projects and do not result in the construction of residential units. Rather, they are policy-level and programmatic documents that ensure that there is adequate land available to meet future housing needs. Please also see Response to R1-2. No further response is required and no change to the EIR is warranted.

---

**Response to R30-17 (Rose Hillson)**

This comment makes reference to the analysis of data and impact statements in the Revised EIR, but provides no further specifics. Thus, no further response can be provided. This comment is noted; no change to the EIR is warranted.

---

**Response to R30-18 (Rose Hillson)**

The revised alternatives analysis concludes that a significant noise impact would result under Alternatives A through C, and includes mitigation that would reduce the impact to a less-than significant level. Housing Elements are programmatic in nature and an analysis of impacts on an

individual neighborhood would be speculative, particularly where no developments are proposed. Site-specific or neighborhood specific impacts are addressed at the time of review of specific development projects, or area plans. Moreover, as discussed throughout the Draft EIR, the Housing Elements do not propose new housing development projects and do not result in the construction of residential units. Rather, they are policy-level and programmatic documents that ensure that there is adequate land available to meet future housing needs at all income levels. In response to the comment that individual residential developments are underway, these projects are subject to separate analysis under CEQA and do not directly relate to the 2004 and 2009 Housing Element EIR or the Revised EIR.

---

***Response to R30-19 (Rose Hillson)***

The comment relates to noticing. All public noticing of the 2004 and 2009 Housing Element EIR has occurred in compliance with the CEQA statute and CEQA Guidelines. Please see Response to R1-1 for additional information.

---

***Response to R30-20 (Rose Hillson)***

As noted in the response to comment R30-18 above, Housing Elements are programmatic documents and individual residential development projects are subject to separate CEQA review and individual permitting processes. Such projects have no direct relation to the analysis provided in the 2004 and 2009 Housing Element EIR; no further comment is required and no change to the EIR is warranted.

---

***Response to R30-21 (Rose Hillson)***

The recently recirculated Revised EIR reflects current analysis and information, including any relevant updates to CEQA. The comments suggesting a change to the process of development housing element policy is noted, but is not applicable to the EIR analysis. As noted in the Notice of Availability of the Revised EIR dated December 18, 2013, "Comments should be limited to the recirculated sections of the EIR in accordance with Section 15088.5(f)(2) of the CEQA Guidelines. Under CEQA Guidelines Section 15088(f)(2) a lead agency need only respond to comments on the parts of the EIR that are being recirculated," namely, the Revised EIR Alternatives Analysis. No further response is warranted and no change to the EIR is required.

---

***Response to R30-22 (Rose Hillson)***

The Revised EIR assesses the environmental consequences of readily foreseeable physical changes to the environment, consistent with the CEQA statute and CEQA Guidelines. In no iteration of the Housing Element is there a call for specific changes to any specific zoning district, nor is there a call to exclude any zoning district from future planning and community work. The remainder of this comment that alludes to the general merits of the project and the existing in-law unit housing stock is noted, but does not warrant any changes to the EIR.

---

**Response to R30-23 (Rose Hillson)**

A summary of the significant impacts and mitigation measures associated with each alternative analyzed in the Revised EIR is provided in the revised pages of the EIR Section II, Executive Summary. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. No further response is warranted and no change to the EIR is required.

---

**Response to R30-24 (Rose Hillson)**

The comment refers to the revised alternatives analysis conclusions regarding historic resources, and erroneously states that mitigation measure M-NO-1 (Interior and Exterior Noise) would reduce those impacts to a less than significant level. This is not the case as this mitigation measure is applicable to noise impacts, not impacts on historic resources. No further response is warranted and no change to the EIR is required.

---

**Response to R30-25 (Rose Hillson)**

Refer to Response R30-11 regarding the appropriate time frame for establishing baseline conditions in an EIR. The Revised EIR analysis of transportation is generally based on the associated policies of each alternative and assumptions regarding the nature of development that would be promoted (e.g., dense residential development near existing transit). The analysis and impact conclusions included in this document are substantiated by the expert opinion of SF Planning staff as well as currently available information. The comment states that the analysis is not “complete, accurate, and thorough” but fails to provide specific evidence or information to support this position.

---

**Response to R30-26 (Rose Hillson)**

The comment makes reference to the TEP, presumed to be the Transportation Effectiveness Project, which is proposed to provide comprehensive overhaul of the City’s transit network. The TEP is currently a draft project that is in the process of formal adoption by the City. Alternative C includes the concept that development along the TEP will be to the full allowable building envelope. Based on this, among other policies, the Revised EIR includes in its Development Assumptions by Alternative, that growth would be directed along transit lines, and would more aggressively encourage increased residential development, which would include both taller and higher density buildings, along transit lines. However, because the TEP is in a preliminary stage, and because the development concept included in Alternative C is necessarily generalized, the specific location of future residential development cannot be stated without undue speculation. Regardless, the Revised EIR provides an analysis of the anticipated impact related to transit that would result under each alternative, and in comparison to both the 2004 and 2009 Housing Element. In addition, the TEP itself is subject to separate CEQA analysis, which has been made available for public review.

---

**Response to R30-27 (Rose Hillson)**

This comment cites portions of the CEQA statute, as well as EIR data related to the pipeline of residential projects. Regarding the relative similarities and differences among the project alternatives, and the relation to the 2004 and 2009 Housing Elements, these are generally described in the Revised EIR under the subsection Development Assumptions by Alternative. The comment also provides



general information related to the cost of housing. While this is not the subject to the EIR, a main project objective of each of the housing element alternatives, including the 2004 and 2009 Housing Elements, is to “Ensure capacity for the development of new housing to meet the RHNA at all income levels.” The commenter’s opinion that middle-class housing should be prioritized is noted. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-28 (Rose Hillson)**

The comment asserts various conclusions related to the impacts of the Housing Element alternatives, but offers not evidence or analysis that substantiates the assertion. No further response is provided, and no change to the EIR is warranted.

---

**Response to R30-29 (Rose Hillson)**

The comment reiterates policies of the 2004 and 2009 Housing Elements, as well as information quotes from portions of the EIR. The comment also poses questions related to Housing Element policies that call for community based planning and the promotion of residential development with limited garage space. The physical changes associated with these and other Housing Element policies are generally captured in the discussion of Development Assumptions by Alternative provided in the Revised EIR beginning on page VII-6. No further response is warranted and no change to the EIR is required.

---

**Response to R30-30 (Rose Hillson)**

The comment generally relates to planning criteria that are not directly related to the analysis provided in the Revised EIR. In addition, the comment poses questions regarding data regarding housing production at various income categories. As has been noted previously, the Housing Element policies do not result in the production of housing, but rather influence the location and type of housing produced. The policies of the Housing Element alternatives, including the 2004 and 2009 Housing Elements, have been formulated based on various objectives, including the objective to “Ensure capacity for the development of new housing to meet the RHNA at all income levels”. Based on the policies of the Housing Element alternatives, the anticipated physical changes described in the discussion of Development Assumptions by Alternative in the EIR page VII-6 provide the basis for determining the associated environmental impacts of each alternative. No further response is warranted and no change to the EIR is required.

---

**Response to R30-31 (Rose Hillson)**

This comment does not relate to the adequacy, accuracy, or thoroughness of the Revised EIR and no further response is provided. Each of the Alternatives include “Part I Data and Needs Analysis” prepared for the 2009 Housing Element update.

---

**Response to R30-32 (Rose Hillson)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Each of the Alternatives include “*Part I Data and Needs Analysis*” prepared for the 2009 Housing Element update

---

**Response to R30-33 (Rose Hillson)**

See Responses R1-4 and R16-1 regarding the Revised EIR’s reasonable range of alternatives. A combined alternative is not under consideration in the EIR, and would not provide any meaningful information to decision makers. Impacts that could result from a combined alternative are within range of impacts described in the Revised EIR. Changes to a proposed project are allowed under CEQA without recirculation of an EIR, provided that the changes are encompassed within the range of alternatives analyzed. Should the decision-makers wish to approve a combination of housing element policies from each of the alternatives, the decision makers would determine whether the EIR was adequate for the changed project. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-34 (Rose Hillson)**

This comment summarizes Alternative C and poses various questions related to land use, parking, and transportation. In response, please refer to the Revised EIR and the associated impact analysis of these topics.

---

**Response to R30-35 (Rose Hillson)**

This comment summarizes Alternative C and poses various questions related to land use, parking, and transportation. In response, please refer to the Revised EIR and the associated impact analysis of these topics. No further response is warranted and no change to the EIR is required.

---

**Response to R30-36 (Rose Hillson)**

The comment makes a general request for data, but provides no clear specifics as to what type of data is being requested. To clarify the general approach to assessing the impacts of the Housing Element alternatives: based on the policies of the Housing Element alternatives, the anticipated physical changes described in the discussion of Development Assumptions by Alternative in the EIR page VII-6 provide the basis for determining the associated environmental impacts of each alternative. No further response is required and no change to the EIR is warranted.

---

**Response to R30-37 (Rose Hillson)**

The comment makes a general request for data, but provides no clear specifics as to what type of data is being requested. CEQA Guidelines 15204(a) states: “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant

environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” To clarify the general approach to assessing the impacts of the Housing Element Alternatives: based on the policies of the Housing Element Alternatives, the anticipated physical changes described in the discussion of Development Assumptions by Alternative in the EIR page VII-6 provide the basis for determining the associated environmental impacts of each alternative. No further response is required and no change to the EIR is warranted.

---

***Response to R30-38 (Rose Hillson)***

The comment makes various references to very specific types of physical changes, and requests to know specifically where such changes may occur. This level of detailed analysis would provide a high degree of speculation, as the EIR analysis is generally calibrated to the general physical changes that may occur at a policy-level of detail. Under CEQA Guidelines section 15146 and 15146(b), “the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR,” and “an EIR on a project such as the adoption or amendment of a . . . local general plan should focus on the secondary effect that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.” No further response is required and no change to the EIR is warranted.

---

***Response to R30-39 (Rose Hillson)***

The comment summarizes portions of Alternative B described in the EIR, and references several projects that have been approved in the City. This comment does not relate to the adequacy, accuracy, or thoroughness of the Revised EIR, and no further response is required.

---

***Response to R30-40 (Rose Hillson)***

This comment general refers to approval actions taken by the City Planning Commission, and poses further questions that relates to the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R30-41 (Rose Hillson)***

The analysis of the EIR is not site-specific, and cannot be so given the policy-level changes that are proposed under the Housing Element alternatives. Refer to Response R30-38 above. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is required, and no change to the EIR is warranted.

---

***Response to R30-42 (Rose Hillson)***

This comment references Policy 1.6.2 of the 2004 Housing Element, and makes general reference to transportation-related impacts, though these are not clearly associated with the Housing Element

policy referenced in the comment. Policy (Implementation measure) 1.6.2 of the 2004 Housing Element is not included in the policies which make up Alternative B. Regardless, it is noted that the anticipated environmental impacts of this and other housing element policies are documented in the 2004 and 2009 Housing Element EIR, including the recirculated Revised EIR. See also Response to R1-3, R1-32 and R30-30 above. No further response is required, and no change to the EIR is warranted.

---

***Response to R30-43 (Rose Hillson)***

This comment makes reference to at 2004 Housing Element affordable housing policy, and provides comments related to housing production and middle class residents of the City. Please see Responses to R1-2 and R1-15 for additional information. No further response is required, and no change to the EIR is warranted.

---

***Response to R30-44 (Rose Hillson)***

The San Francisco General Plan includes a Land Use Element (known as the Land Use Index), which is updated periodically. The referenced Alternative B Implementation Measure 1.6.4 calls for a future update of the Land Use Element, the purpose of which would be to reinforce the associated Housing Element policy related to future development along transit corridors. The comment follows by expressing concerns regarding impacts related to transit, which are generally mirrored in the 2004 and 2009 Housing Element EIR (i.e., refer to analysis and conclusions of a significant unavoidable impact on transit). The comment further requests an inventory of land suitable for residential development; such maps are included in the EIR in Section IV of the EIR, at a scale that is suitable to the policy-level analysis provided in the EIR. Additional comments related to the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. These comments are noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R30-45 (Rose Hillson)***

The comment references Alternative B Policy 1.8.1 and alludes to secondary units and neighborhood character in the Jordan Park area. Land Use impacts associated with Alternative B are addressed beginning on page VII-49 of the Revised EIR. Please also see Response to R1-15 regarding the perceived impacts of Housing Element on future zoning in residential districts. No further response is provided, and no change to the Revised EIR is required.

---

***Response to R30-46 (Rose Hillson)***

The comment references Alternative B Policy 1.8.1 and alludes to secondary units and neighborhood character in the Jordan Park area. Land Use impacts associated with Alternative B are addressed beginning on page VII-49 of the Revised EIR. Please also see Response to R1-15 regarding the perceived impacts of Housing Element on zoning in residential districts. No further response is provided, and no change to the EIR is required.

---

**Response to R30-47 (Rose Hillson)**

Please see Responses to R30-26 and R30-36 above. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-48 (Rose Hillson)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. Please also see Response to R1-2.

---

**Response to R30-49 (Rose Hillson)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. Please also see Response to R1-2. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-50 (Rose Hillson)**

The comment states that the Revised EIR indicates there is a need to add 1 million people into the City. This is not a correct statement. Rather, the Housing Element alternatives are formulated based on project objectives that include “Ensure capacity for the development of new housing to meet the RHNA at all income levels.” The 2007 to 2014 RHNA addressed in the EIR calls for approximately 32,000 new housing units. *Part 1 Data and Needs Analysis* notes that ABAG projects that by 2030, the City’s population will be 934,800. Please also see Response to R1-2.

---

**Response to R30-51 (Rose Hillson)**

Please see Response to R1-15 regarding zoning in residential districts and Response to R1-3 regarding public transportation. This comment also references greenhouse gas (GHG) and transit impact, which are assessed in the Revised EIR. No further response is required and no change to the EIR is warranted.

---

**Response to R30-52 (Rose Hillson)**

Alternative B policies are based on the 2007 Court order on the 2004 Housing Element (i.e., the 2004 Housing Element adjudicated). Policies shown in strikeout reflect the Court’s decision to allow the City to rely on only certain policies of the 2004 Housing Element. Please also see Response to R1-2. No further response is required and no change to the EIR is warranted.

---

**Response to R30-53 (Rose Hillson)**

Please see Response to R1-15 regarding the perceived impacts of the Housing Element on zoning in residential districts. The information requested by the commenter is beyond the scope or

requirements of CEQA and this EIR. No further response is required and no change to the EIR is warranted.

---

***Response to R30-54 (Rose Hillson)***

Please see Response to R1-15, above, regarding the perceived impacts of the Housing Element on zoning in residential districts, and Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is required and no change to the EIR is warranted.

---

***Response to R30-55 (Rose Hillson)***

Please see Response to R1-15, above, regarding the perceived impacts of the Housing Element on zoning in residential districts, and Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. No further response is required and no change to the EIR is warranted.

---

***Response to R30-56 (Rose Hillson)***

This is a comment on the merits of the No Project Alternative and not on the adequacy or accuracy of the Revised EIR. Additional comments regarding impacts are sufficiently vague so that no further response is practical, and thus no change to the EIR is required. Please also see Response to R1-15.

---

***Response to R30-57 (Rose Hillson)***

This is a comment on the merits of the Alternative C and not on the adequacy or accuracy of the Revised EIR. Additional comments regarding impacts are sufficiently vague so that no further response is practical, and thus no change to the EIR is required. Please also see Response to R1-15.

---

***Response to R30-58 (Rose Hillson)***

This is a comment on the merits of the No Project Alternative and not on the adequacy or accuracy of the Revised EIR. Additional comments regarding impacts are sufficiently vague so that no further response is practical, and thus no change to the EIR is required. Please also see Response to R1-15.

---

***Response to R30-59 (Rose Hillson)***

This comment relates to the activities of the San Francisco Municipal Transportation Agency, and does not relate to the Revised EIR. The EIR adequately addressed impacts of the Housing Elements on greenhouse gas emissions as well as noise and vibration. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR.

---

**Response to R30-60 (Rose Hillson)**

The comment mainly addresses the merits of the Housing Element policies in Alternative B related to transportation. The associated environmental impacts of the Housing Element Alternatives are provided in the Revised EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-61 (Rose Hillson)**

The rationale supporting the analysis of Housing Element Alternatives is provided under the discussion of Development Assumptions by Alternative in the Revised EIR. The comment makes general reference to the adequacy of the environmental analysis, but does not provide sufficient specifics or evidence to allow for a substantive response. Please also see Response to R1-15 regarding the perceived impacts of Housing Element on zoning in residential districts. No further response is warranted and no change to the EIR is required.

---

**Response to R30-62 (Rose Hillson)**

The rationale supporting the analysis of Housing Element Alternatives is provided under the discussion of Development Assumptions by Alternative in the Revised EIR. The comment makes general reference to the adequacy of the environmental analysis, but does not provide sufficient specifics or evidence to allow for a substantive response. Moreover, the information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-63 (Rose Hillson)**

Please see Response to R1-15 regarding the perceived impacts of the Housing Element on zoning in residential districts, as well as Responses to R30-61 and R30-62 above. No further response is warranted and no change to the EIR is required.

---

**Response to R30-64 (Rose Hillson)**

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. This comment provides a figure related to the current residential vacancy rate that is not substantiated. The analysis of greenhouse gases (GHGs) associated with each housing element Alternative, as well as impacts related to seismic activity and water supply, is provided in the Revised EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-65 (Rose Hillson)**

Please see Response to R1-15 regarding the perceived impacts of the Housing Element on zoning in residential districts, as well as Response to R30-38, above, regarding the degree of specificity required

in the 2004 and 2009 Housing Element EIR. No further response is warranted and no change to the EIR is required.

---

***Response to R30-66 (Rose Hillson)***

This comment provides no specifics related to the Revised EIR, which was recirculated for public comment in December 2013. As explained in the Notice of Availability of the Revised EIR dated December 18, 2013, “Comments should be limited to the recirculated sections of the EIR in accordance with Section 15088.5(f)(2) of the CEQA Guidelines. Under CEQA Guidelines Section 15088(f)(2) a lead agency need only respond to comments on the parts of the EIR that are being recirculated,” namely, the Revised EIR’s Alternatives Analysis. No further response is warranted and no change to the EIR is required.

---

***Response to R30-67 (Rose Hillson)***

The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. Moreover, this comment does not relate to the adequacy, accuracy, or completeness of the Revised EIR, and no further response is warranted.

---

***Response to R30-68 (Rose Hillson)***

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. No further response is warranted and no change to the EIR is required.

---

***Response to R30-69 (Rose Hillson)***

The EIR analysis notes that no inconsistencies or conflicts between the Urban Forest Plan and Housing Element have been identified. The comment provides no evidence that indicates otherwise, and no further response is provided.

---

***Response to R30-70 (Rose Hillson)***

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. Regarding the perceived impacts of the Housing Element on zoning in residential districts, please see Response to R1-15. No further response is warranted and no change to the EIR is required.

---

***Response to R30-71 (Rose Hillson)***

Impacts related to aesthetics (including light and glare) and biological resources resulting from the Housing Element Alternatives are adequately analyzed in the Revised EIR. See also Response to R30-



38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. No further response is warranted and no change to the EIR is required.

---

***Response to R30-72 (Rose Hillson)***

Impacts related to aesthetics (including light and glare) and biological resources resulting from the Housing Element Alternatives are adequately analyzed in the Revised EIR. See also Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. No further response is warranted and no change to the EIR is required.

---

***Response to R30-73 (Rose Hillson)***

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on population and housing. No further response is warranted and no change to the EIR is required.

---

***Response to R30-74 (Rose Hillson)***

The commenter quotes text from the Revised EIR but does not provide any specific comments regarding the quoted text; therefore, no further response can be provided.

---

***Response to R30-75 (Rose Hillson)***

Impacts on historic resources resulting from the Housing Element Alternatives are analyzed in the Revised EIR. See also Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The information requested by the commenter is beyond the scope or requirements of CEQA and this EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on historical resources. No further response is warranted and no change to the EIR is required.

---

***Response to R30-76 (Rose Hillson)***

Impacts on historic resources resulting from the Housing Element Alternatives are analyzed in the Revised EIR. See also Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. No further response is warranted and no change to the EIR is required.

---

***Response to R30-77 (Rose Hillson)***

Impacts related to transportation, and information regarding parking, related to the Housing Element Alternatives is provided in the Revised EIR. Also, for additional response regarding parking issues, please see Response to R1-32. No further response is warranted and no change to the EIR is required.

---

**Response to R30-78 (Rose Hillson)**

Impacts related to transportation, and information regarding parking, related to the Housing Element Alternatives is provided in the Revised EIR. Also, for additional response regarding parking issues, please see Response to R1-32. The commenter requests information that is beyond the scope of the Revised EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-79 (Rose Hillson)**

Impacts related to transportation, and information regarding parking, related to the Housing Element Alternatives is provided in the Revised EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-80 (Rose Hillson)**

Please see Response to R1-48 regarding impacts on water supply. No further response is warranted and no change to the EIR is required.

---

**Response to R30-81 (Rose Hillson)**

Please see Response to R1-15, above. The comment does not present any evidence that the implementation of the Housing Elements would result in conflicts with the existing neighborhood character. The Revised EIR analyzes impacts related to transit. No further response is warranted and no change to the EIR is required.

---

**Response to R30-82 (Rose Hillson)**

Please see Response to R1-15, above, regarding the perceived impacts of the Housing Element on zoning, and Response to R1-3 regarding the capacity and effectiveness of the local transit system. The Revised EIR adequately analyzes impacts related to transit. No further response is warranted and no change to the EIR is required.

---

**Response to R30-83 (Rose Hillson)**

As stated in Response to R1-15, above, the housing element policies are formulated to meet the demand for housing, in accordance with the RHNA. Adoption of the Housing Element would not result in the production of housing, which is a primarily a function of economic factors (i.e., supply and demand), but would instead influence the location and type of residential development. Please see Response to R1-3 regarding public transportation. No further response is warranted and no change to the EIR is required.

---

**Response to R30-84 (Rose Hillson)**

This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the

adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R30-85 (Rose Hillson)**

See also Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on historical resources. No further response is warranted and no change to the EIR is required.

---

**Response to R30-86 (Rose Hillson)**

See also Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. Shadow and wind impacts are addressed in *Section V.J (Wind and Shadow)* of the Draft EIR. Shadow and wind impacts associated with project alternatives are discussed in the Revised EIR and were determined to be less than significant for all three alternatives. There is no evidence that any incremental increases in shadow on areas throughout the city would substantially affect existing or future parks or other protected locations. Moreover, there is also no evidence that implementation of the proposed project would have a discernable effect on wind speeds, since the Housing Element would not in and of itself result in development projects. Based on this, no further response is warranted and no change to the EIR is required.

---

**Response to R30-87 (Rose Hillson)**

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on public services and recreation. No further response is warranted and no change to the EIR is required.

---

**Response to R30-88 (Rose Hillson)**

Please refer to Response to R1-48, above, as well as Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on water supply. No further response is warranted and no change to the EIR is required.

---

**Response to R30-89 (Rose Hillson)**

Please refer to Response to R1-48, above, as well as Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The Revised EIR adequately addressed the impacts of Housing Element Alternatives on water supply. No further response is warranted and no change to the EIR is required.

---

**Response to R30-90 (Rose Hillson)**

Please see Response to R30-38, above, regarding the degree of specificity required in the 2004 and 2009 Housing Element EIR. The impacts of the Housing Element Alternatives referenced in the comment, including impacts on cultural and paleontological resources, GHG's, public services and transportation, are adequately analyzed in the Revised EIR. No further response is warranted and no change to the EIR is required.

---

**Response to R30-91 (Rose Hillson)**

This comment relates to transit issues in general, but does not specifically address the impacts of the Housing Element Alternatives. The impacts of the Housing Element Alternatives on transit are addressed in the Revised EIR. Regarding the capacity of the local transit system, please see Response to R1-3. This comment provides no specifics related to the 2004 and 2009 Housing Element EIR or the Revised EIR, which was recirculated for public comment in December 2013. As specified in the Notice of Availability of the partially revised EIR dated December 18, 2013, "Comments should be limited to the recirculated sections of the EIR in accordance with Section 15088.5(f)(2) of the CEQA Guidelines. Under CEQA Guidelines Section 15088(f)(2) a lead agency need only respond to comments on the parts of the EIR that are being recirculated," namely, the Revised EIR's Alternatives Analysis. No further response is warranted and no change to the EIR is required.

---

**Response to R31-1 (Rose Hillson)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3.

Regarding comments concerning Greenhouse Gas Emissions (GHGs), these are discussed in the Revised EIR. The greenhouse gas analysis presented in the Draft EIR in *Section V.I. (Greenhouse Gas Emissions)* assumes a worst-case trip generation associated with population growth under cumulative 2025 conditions, in that it assumes all future housing would be market rate, which yields a higher trip generation than other types of residential uses. The greenhouse gas analysis is also conservative in that it does not assume a different mode split (e.g., reduced vehicle trips and increased transit, bicycling and walking trips) based on the Housing Element policies. Any increase in the use of public transit (as suggested by the commenter), would be captured within the GHG emissions analysis presented in the Draft EIR. No further response is required and no change to the EIR is warranted.

---

**Response to R31-2 (Rose Hillson)**

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R32-1 (Malcolm Kaufman)**

The comment that transit services and/or traffic congestion in the City, and particularly along Union and O'Farrell Streets, are difficult is noted. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3.

In regard to the comments concerning traffic congestion, as stated in Response to Comment F-1 in the 2011 Responses to Comments document, the Housing Element is a policy document intended to provide a vision for how new housing in the City should occur as a result of projected population growth. The Housing Element would not change allowable land uses or result in any other changes to the Planning Code that would directly result in additional vehicle trips, beyond those that could occur under the current zoning. Residential growth within the City would occur regardless of the policies contained in the proposed Housing Elements, and consequently, the Housing Element policies themselves would not generate new trips.

As concluded under Impact TR-1, the proposed Housing Elements would not result in significant impacts related to traffic, pedestrians, bicycles, loading, emergency access, or construction areas. Moreover, individual residential developments within the City would continue to be subject to independent environmental review pursuant to CEQA on a project-by-project basis. Those analyses would analyze site-specific effects on the City's transportation network as well as roadway circulation.

The Draft EIR acknowledged that some Housing Element policies that direct future growth to certain areas in the City may result in increased congestion in those areas, particularly if such measures focus specifically on areas that are already congested. However, as determined in the EIR, the net result of implementing Housing Element policies would be a reduction in overall vehicle trips and vehicle miles traveled (VMT) within the City by locating residents near employment and encouraging utilization of the existing transit system. This would result in overall beneficial impacts to the City's roadway network, as compared to the projected 2025 Cumulative Conditions.

The commenter states inaccurately that, with Housing Element implementation, Union Street would be targeted for high-rise development. Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

#### **Response to R33-1 (Josephine Kennedy)**

The potential for the 2004 and 2009 Housing Elements policies to affect public service and utilities were adequately addressed in the EIR in *Sections V.M (Public Services) and V.L (Utilities and Service Systems)*. Impacts on Public Services and Utilities and Service Systems from the Alternatives are addressed in the Revised EIR and take into account the City's population growth projections. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

#### **Response to R33-2 (Josephine Kennedy)**

Housing Elements are policy-level documents that would guide future residential development in San Francisco through application of various policies in certain areas of the City. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to

development controls, such as increases in density. Further, future proposals that may result in changes to development controls would require environmental review.

Please see Responses to R1-15 and R24-2 for additional response. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R33-3 (Josephine Kennedy)***

Please see Response to R32-1. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R33-4 (Josephine Kennedy)***

These comments do not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R34-1 (Nancy P. Leavens)***

Please see Response to R32-1. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R34-2 (Nancy P. Leavens)***

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R35-1 (Nancy P. Leavens)***

Please see Response to R33-1.

---

***Response to R35-2 (Nancy P. Leavens)***

The commenter asks how the projected population growth was determined. State Housing Element Law requires local jurisdictions to show, through their housing element, that they have adequate capacity to accommodate the Regional Housing Needs Allocation. Determination of regional housing need starts with an assessment of existing need based on the state's estimates of current total households plus growth for the year; a vacancy rate is also applied and existing vacancies are subtracted. Projected need is based on estimated population growth and includes a) natural increase (births minus deaths); b) migration and c) household formation rates. The state Department of Finance and the Association of Bay Area Governments (ABAG) worked together to determine

appropriate headship rates to use with projected population growth forecasts to determine household growth and consequent demand for housing.

These population projections are not based on the changes to the Housing Elements, but are projected to occur even without the adoption of either Housing Element. The purpose of the Housing Element is to identify and analyze the City's existing and projected housing needs by income category, as identified by the RHNA, through available capacity and housing policies.

---

***Response to R35-3 (Nancy P. Leavens)***

The Revised EIR address impacts of the proposed alternatives on seismic activity on p. VII-38 for Alternative A, pp. VII-72 to VII-73 for Alternative B, and p.VII-99 for Alternative C. Under all alternatives, the Revised EIR concludes that compliance with federal, state, and local regulations, which are required by law, would reduce impacts from seismic hazards. Such regulations include the San Francisco Building Code (Building Code), Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. Thus, for reasons similar to those provided in the Draft EIR Section V (Environmental Setting and Impacts), impacts under all alternatives would be less than significant. No further additional response is required and no change to the EIR is warranted.

---

***Response to R36-1 (Francis J. Martin)***

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R37-1***

Please see Responses to R1-2 and R1-15. This comment does not address the adequacy or accuracy of the Draft EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R37-2***

Please see Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R37-3***

This comment does not address the adequacy or accuracy of the Draft EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R38-1 (Patty Murphy)**

A response to comments on the perceived effects of the proposed Housing Elements on zoning is provided in Response to R1-15. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R38-2 (Patty Murphy)**

A response to comments concerning the perceived effects of the Housing Element on zoning is provided in Responses to R1-2 and R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R39-1 (Lynn Norris and Neil Ransick)**

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R40-1 (Christine O’Gara)**

No rezoning is proposed by the 2004 or 2009 Housing Elements or the Alternatives, the subject of the Revised EIR; please see Response to R1-15 for additional information on this comment. The remainder of this comment is on the character of the commenter’s neighborhood and not on the adequacy or accuracy of the Draft EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R40-2 (Christine O’Gara)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on traffic congestion is provided in Response to R32-1. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. These comments are noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R40-3 (Christine O’Gara)**

To the extent that “quality of life” impacts noted by the commenter would result in physical effects on the environment, these have been considered in the DEIR for all applicable environmental topics. Regarding perceived impacts of the 2004 and 2009 Housing Elements on RH-1 zoning districts, please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---



**Response to R41-1 (Vincent O’Gara)**

The commenter’s objection to Alternative C is noted. Please also see Response to R1-15. The Housing Elements do not propose any changes to development controls and would not enable greater residential density than could otherwise result from ongoing development activities that are largely consistent with the Planning Code.

---

**Response to R41-2 (Vincent O’Gara)**

The commenter’s objection to Alternative C is noted. Please also see Response to R1-15. The Housing Elements do not propose any changes to development controls and would not enable greater residential density than could otherwise result from ongoing development activities that are largely consistent with the Planning Code. A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on traffic congestion is provided in Response to R32-1. These comments do not address the adequacy or accuracy of the Revised EIR; thus, no further response is required and no change to the EIR is warranted.

---

**Response to R42-1 (Frances Pasquini)**

Please see Response to R1-15. The commenter mischaracterizes the Housing Elements by indicating that they would lead to “infill” of private open space and elimination of RH-1 zoning; no such changes are proposed by the Housing Elements. To the extent that “quality of life” impacts noted by the commenter would result in physical effects on the environment, these have been considered in the DEIR for all applicable environmental topics. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R43-1 (Carolyn Squeri)**

Please see Response to R1-15. The Housing Elements do not propose any changes to development controls and would not enable greater residential density than could otherwise result from ongoing development activities that are largely consistent with the Planning Code.

Regarding the comment on the City’s capacity to adequately meet future water demands, please see Response to R1-48. The Draft EIR determined that the City has adequate capacity to meet the existing needs of the population and that policies set forth in the Housing Elements would not create the need for construction of new water delivery infrastructure. The promotion of multi-family residential housing units in downtown and underutilized commercial and industrial areas would decrease water demand as compared to single family residential units.

---

**Response to R43-2 (Carolyn Squeri)**

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. Development in areas outside of San Francisco, such as Mountain View, is outside

the scope of this environmental review. No further response is required and no change to the EIR is warranted.

---

***Response to R43-3 (Carolyn Squeri)***

The commenter's request to study an alternative that makes revisions to the current rent control program is noted. However, the commenter presents no evidence to suggest how such an alternative would reduce or eliminate any environmental impacts identified in the Revised EIR. The Revised EIR studied an appropriate number and range of alternatives pursuant to CEQA. Please see Response to R1-4 for additional information. It is noted that this comment does not address the adequacy or accuracy of the Draft EIR; therefore, no additional response is required and no change to the EIR is warranted.

---

***Response to R43-4 (Carolyn Squeri)***

The commenter mischaracterizes the Housing Elements by indicating that they would lead to elimination of RH-1 zoning. Please see Response to R1-2 and R1-15. Moreover, this comment does not address the adequacy or accuracy of the Draft EIR; therefore, no additional response is required and no change to the EIR is warranted.

---

***Response to R43-5 (Carolyn Squeri)***

The commenter mischaracterizes the Housing Elements by implying that they would cease to rely on the City's Residential Design Guidelines. In fact, both Housing Elements support the mandatory use of the City's Residential Design Guidelines, and promote the creation and use of neighborhood-specific Design Guidelines. The Design Guidelines, which require consideration of building massing and design to maintain compatibility with neighborhood scale, would continue to be applied to future development proposals and, together with other Planning Code requirements, would continue to influence building scale and neighborhood compatibility. Future development will also be subject to CEQA review.

The commenter quotes text from the Revised EIR that residential development under Alternative A would include inappropriate alterations or additions to existing housing that could diminish their historic significance. It is noted that Alternative A is the No Project Alternative, under which the 1990 Residence Element policies would remain in effect and the proposed 2004 Housing Element and 2009 Housing Element policies would not be implemented.

---

***Response to R43-6 (Carolyn Squeri)***

Please see Response to R1-15. Moreover, this comment does not address the adequacy or accuracy of the Draft EIR; therefore, no additional response is required and no change to the EIR is warranted.

***Response to R43-7 (Carolyn Squeri)***

The commenter does not specify which part of the alternatives analysis was confusing. The alternatives analysis focused on physical environmental effect on the environment of the potentially

feasible Alternatives to the 2004 and 2009 Housing Element updates, and was prepared in full compliance with CEQA. To the extent that “quality of life” impacts noted by the commenter would result in physical effects on the environment, these have been considered in the DEIR for all applicable environmental topics. Moreover, this comment does not address the adequacy or accuracy of the Draft EIR; therefore, no additional response is required and no change to the EIR is warranted.

---

***Response to R43-8 (Carolyn Squeri)***

Please see Response to R1-15. Moreover, this comment does not address the adequacy or accuracy of the Draft EIR; therefore, no additional response is required and no change to the EIR is warranted.

---

***Response to R44-1 (Pamela A. Stone)***

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R44-2 (Pamela A. Stone)***

The commenter mischaracterizes the Housing Elements by indicating that they would lead to “infill” of private open space and elimination of single-family residences. The Housing Elements do not propose any changes to current Planning Code regulations, including regulations to density, height, bulk, set-backs, open space or parking. Rather, they are policy-level documents that would guide future residential development in San Francisco through application of various policies in certain areas of the City. Adoption of the Housing Elements themselves, however, would not directly result in any amendments to development controls, such as those listed above. Further, future proposals that may result in changes to development controls would require environmental review.

These comments do not specifically address the adequacy of the Revised EIR or its compliance with CEQA. For additional responses regarding the perceived loss of RH-1 zoning, please see Response to R1-15. For additional response regarding parking issues, please see Response to R1-32. No further response is required and no change to the EIR is warranted.

---

***Response to R44-3 (Pamela A. Stone)***

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on traffic congestion is provided in Response to R32-1. This comment does not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R44-4 (Pamela A. Stone)***

The commenter mischaracterizes the Housing Elements by indicating that they would lead to “infill” of private undeveloped land. A response regarding the perceived impacts of the Housing Elements on future development is provided in Responses to R1-2 and R1-15.

Additional response to comments concerning perceived impacts of the Housing Elements on historic districts, please see Response to R18-2. The Housing Elements would not have any direct adverse impacts on the historic character of any neighborhoods, including St. Francis Wood and all future projects would be required to undergo environmental review. No further response is required and no change to the EIR is warranted.

---

***Response to R45-1 (Virginia Wells)***

Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R46-1 (Rosilyn Young)***

The commenter mischaracterizes the Housing Elements by indicating that they would lead to the elimination of RH-1 zoning districts. Please see Response to R1-15. This is a comment on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. This comment is noted; however, no additional response is required and no change to the EIR is warranted. A response to comments on traffic congestion is provided in Response to R32-1.

---

***Response to R47-1 (Gibert V. Young)***

The commenter mischaracterizes the Housing Elements by indicating that they would lead to rezoning of single-family zoning districts. Please see Response to R1-15. The commenter's request that Alternative A (No Project) be rejected is noted and will be forwarded to the decision-makers. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. These comments are noted; however, no additional response is required and no change to the EIR is warranted.

---

***Response to R48-1 (Cynthia Gissler)***

A response to comments on the capacity and effectiveness of the local transit system is provided in Response to R1-3. A response to comments on traffic congestion is provided in Response to R32-1. This comment does not address the adequacy or accuracy of the Draft EIR; thus, no further response is required and no change to the EIR is warranted.

---

***Response to R48-2 (Cynthia Gissler)***

The commenter mischaracterizes the 2004 and 2009 Housing Elements by indicating that they would lead to elimination of density limits or loss of garage spaces. Please see Response to R1-15. The Housing Element is a programmatic document and would not directly lead to such changes. All individual projects in the future would be required to undergo additional environmental review. These are comments on the merits of the proposed project and/or on the Draft EIR, and not on the adequacy or accuracy of the Revised EIR. These comments are noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R48-3 (Cynthia Gissler)**

The commenter mischaracterizes the 2004 and 2009 Housing Elements by indicating that they would encourage conversions of garages into living space and eliminate density limits. A response to comments concerning the perceived effects of the Housing Element on single-family zoning districts is provided in Response to R1-15. A response to comments concerning parking is provided in Response to R1-32. These comments are not on the adequacy or accuracy of the Draft EIR. They are noted; however, no additional response is required and no change to the EIR is warranted.

---

**Response to R49-1 (Geoff Wood)**

Please see Response to R33-1. Impacts related to crime, violence, homelessness as well as suitability and cost of housing are outside the scope of CEQA, and therefore, do not require to be analyzed. No further response is required and no change to the EIR is warranted.

---

**Response to R49-2 (Geoff Wood)**

Transportation impacts have been adequately considered in the Draft EIR. As discussed throughout the Draft EIR, the proposed Housing Elements are policy-level documents and would not result in an increase in person-trips. The length of the daily commute noted by the commenter is an existing condition and not a result of the proposed project. Moreover, future increases in telecommuting would be expected to reduce, not increase, person-trips. No further response is required and no change to the EIR is warranted.

---

**Response to R49-3 (Geoff Wood)**

The Revised EIR considered all impacts of the proposed Housing Elements, to the extent that they would result in physical impacts to the environment. Moreover, the Revised EIR considered an appropriate number and range of alternatives. No further response is required and no change to the EIR is warranted.

---



## SECTION IV

---

### Revised EIR Text Changes

Below are text changes to the Revised EIR. These changes on the EIR were initiated by Planning Department staff to correct errata. Deletions to the EIR text are shown with ~~striketrough~~ and additions are shown with single underline.

#### TEXT CHANGES IN RESPONSE TO COMMENTS

To clarify text on Page VII-46 of the Revised EIR, a footnote is appended to the second paragraph as follows:

The following policies and implementation actions were struck by the San Francisco Superior Court based on the Court of Appeal's decision regarding the 2004 Housing Element, and are therefore NOT included in Alternative B<sup>1</sup>:

1. This list is not all inclusive. Refer to Table VII-1 for further detail regarding the policies and implementation measures eliminated under Alternative B, and Appendix B-4 of the EIR for a comprehensive list of objectives, policies, and implementation measures struck by the San Francisco Superior Court.

To correct errata in Section VII Alternatives of the Revised EIR, the second sentence, in the last paragraph, on Page VIII-50 of the Revised EIR will be modified to reflect the following:

As a result, incrementally smaller residential buildings might be constructed under Alternative ~~AB~~, resulting in incrementally fewer potential impacts or scenic vistas than the 2004 or 2009 Housing Elements.

To correct errata in Table VII-2 in Section VII Alternatives of the Revised EIR, the following text change was made on Page VII-57, to be consistent with the description of Alternative B policies as correctly listed in Table VII-1:

Policy 4.4: Consider granting density bonuses ~~and parking requirement exemptions~~ for the construction of affordable housing or senior housing.

To correct errata in Section VII Alternatives of the Revised EIR, the text that conflates Policies 2.2 and 2.3 of the 1990 Residential Element with the similar Policies 1.1 and 4.5 from the 2004 Housing Element and Alternative B has been changed. Specifically, the text in the second sentence in the second paragraph on Page VII-62 of Section VII Alternatives is corrected as follows:

However, Alternative B includes Policies ~~2-21.1~~ and ~~2-34.5~~ from the 2004 Housing Element could increase residential density more generally throughout the City, as compared to the 2009 Housing Element policies that generally limit encouragement of increased densities to affordable housing projects and through community planning processes.

To correct errata in Section VII Alternatives of the Revised EIR, the third sentence, in the last paragraph, on Page VIII-82 of the Revised EIR will be modified to reflect the following:

Such impacts could ~~be~~ also increase incrementally under Alternative C, as a result of policies that could increase new development on vacant or undeveloped parcels or redevelopment of underutilized parcels, and which could affect existing natural features (and scenic resources) as compared to the 2004 and 2009 Housing Elements.