

## 4.B Project Description

The comments and corresponding responses in this section cover topics in draft SEIR Chapter 2, Project Description. These include topics related to:

- Comment PD-1: Construction Schedule
- Comment PD-2: Project Description

### *Comment PD-1: Construction Schedule*

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

I-HEGGIE2-11

"9. In the Notes section at the bottom of Table 2-2 on p. 2-38, "Phases 1 and 2 could occur simultaneously for a duration of two years following Phase 0." But above, in the same table, Phase 1 and Phase 2 are each estimated to have a duration of 2.5 years. Please explain how the condensed schedule would take two years rather than 2.5 years for Phases 1 and 2."

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-11])

### **Response PD-1: Construction Schedule**

The comment requests clarification regarding the compressed construction schedule and why Phases 1 and 2 would be 2.5 years under the six-year scenario, but two years under the compressed schedule.

The construction durations for both scenarios described on SEIR pp. 2-38 to 2-39 are correct and were provided by the project sponsor team. Under the compressed schedule, the vertical construction phases (Phases 1 and 2) would follow Phase 0 and occur concurrently over a shorter period of two years, and assumes weekend work. As acknowledged on SEIR p. 2-39, "a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity."

The text on SEIR p. 2-39 is revised as follows to clarify the compressed schedule:

As stated in the footnote to Table 2-2, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as the end of 2023~~2024~~ under a compressed schedule or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter

**Commented [WW(1)]:** Please add an explanation if this changes the analysis assumptions or not in the SEIR.

**Commented [WW(2)]:** Global: please make sure all SEIR text edits show up in chapter 5. I don't see these edits in chapter 5 or the updated figure 2-12.

period of time of three years, thereby increasing the typical daily construction activity. Phase 0 would occur in 2021, followed by Phases 1 and 2 occurring simultaneously for approximately 24 months from 2022 to 2023. The construction analysis in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, is generally based on conservative assumptions where appropriate and described in the “Approach to Analysis” section of the resource topic area.

---

### ***Comment PD-2: Project Description***

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

I-BARISH3-19  
I-GOMEZ-1  
I-OSAWA-2

I-PEDERSON2-6  
I-PEDERSON2-7

I-PEDERSON2-8  
O-WPA3-14

---

“Figures in DSEIR Figures 2-1 through 2-8; Figures 2-9 through 2-12; Figure 2-16; Figures 2-18 through 2-21; Figure 3.B-4; Figures 5-1 through 5-4; Figure 6-1; and Figure 6-2 are inadequate and incorrect. They do not show the alterations to the Upper Lot, where the CCSF Multi Use Building is located, that are included in the Facilities Master Plan, approved by the CCSF Board of Trustees in March, 2018, and the subsequent Plan that was presented to the Board of Trustees for consideration of a San Francisco Bond Measure. Table 3.A-2 describes the New Facilities planned for this area. (P. 3,A-13). Accordingly, these Figures are all misleading and do not accurately represent buildings on the land adjoining the proposed project. The FSEIR must use accurate, updated Figures.”

*(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-19])*

---

“1) I noticed the impact report mentions the decrease in parking needs after the first week of a semester, and the proposal of a new parking lot that accommodates 750 vehicles. How many spaces would be reserved for students as opposed to residents who would live in the new development?”

*(Wilson Oswaldo Gomez, Email, August 28, 2019 [I-GOMEZ-1])*

---

“Most critically, according to the proposal the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue. **This would seem to be wholly inadequate.**”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-2])*

---

“The Draft is also silent about how the public parking garage will be financed. If the developer will fund the garage with proceeds from the residential development, that raises the question about why those proceeds couldn’t instead be used to fund more below-market rate housing. If the public parking garage will be paid for with public funds (either the City’s or City College’s), that should be disclosed as well. The Draft should address how any subsidy (whether public or private) for the garage would reduce the parking fees and thereby generate additional parking demand, VMT, and GHG emissions.

If the public parking garage will be financed entirely by parking fees paid by users of the garage, the Draft should address whether the garage will be financially viable. Those who currently commute to City College either park for free or pay nominal fees. It is unlikely that they would be willing to pay the kind of substantial fees that would be necessary to pay for construction of a 750-space garage.”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-6])*

“If the users of the parking garage are instead anticipated to be the residents of the Balboa Reservoir project, that would be an end run around the City’s and the developer’s agreement that the overall parking ratio for the residential component of the project would be 0.5 parking spaces per residence. Using the public parking garage as residential parking would also mean that the project would exceed the zoning code’s maximum 1:1 parking ratio for the site.”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-7])*

“Finally, the Draft is entirely silent about how the parking rates for the garage would be structured. For example, would the daily rate be lower than 8 hours of the hourly rate? Would weekly, monthly, semester, or annual rates be allowed? If rates for periods longer than one day would be allowed, the Draft should address whether such rates would reduce incentives for commuters to take transit, walk, or bike on days during those periods when the commuter doesn’t need to drive. Finally, would the rates and any leasing arrangements be structured so that any employer who pays for spaces within the garage on behalf of its employees would be subject to California’s parking cash-out statute? (See Cal. Health & Safety Code, section 43845.) The Draft should address how the fee structure and the applicability of the parking cash-out statute would affect VMT and GHG emissions.”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-8])*

“A representative of the developer has informed the Chair of the BRCAC that the developer will not develop the 1,550 unit Additional Housing Option. The Planning Department should verify the accuracy of this representation to the BRCAC. If correct, the 1,550 Unit Project option should be added to the list of alternatives considered but rejected by the Planning Department since its development will not be undertaken by the developer.”

(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-14])

## Response PD-2: Project Description Comments and Questions

This group of comments are regarding the project description, figures, or require clarification of the proposed project.

Regarding the project description figures, Figures 2-1 through 2-12, Figure 2-16, Figures 2-18 through 2-21, Figure 3.B-4, Figures 5-1 through 5-4, and Figures 6-1 through 6-2 in the SEIR depict the plan-view diagrams of the proposed project. As described in Response CEQA-2: Existing Setting and Baseline, on RTC p. **Error! Bookmark not defined.**, per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published was used to establish the baseline for the project-level analysis in the SEIR and initial study. The figures in the SEIR reflect the existing conditions and the proposed project. The commenter's statement that the facilities master plan projects should be shown is incorrect, as the City College projects are considered under cumulative future conditions and do not represent existing or near-term baseline conditions.

The 1,550 Additional Housing Option was developed by the City to fulfill the objectives of the general plan to maximize affordable housing and housing in transit-rich neighborhoods (draft SEIR p. 2-1). The draft SEIR analyzes the environmental impacts of the Developer's Proposed Option and Additional Housing Option as proposed.

One comment incorrectly states that the project would have one vehicular inlet point. The proposed circulation of the project site is described in SEIR Section 2.E.8, Transportation and Circulation Plan (SEIR pp. 2-26 to 2-30). As described in SEIR Section 2.E.8 and as shown in Figure 2-12, Proposed Street Type Plan (SEIR p. 2-27), there would be two access points to the project site. Lee Avenue would provide a vehicle travel lane in each direction from Ocean Avenue, and North Street would provide a vehicle travel lane in each direction from Frida Kahlo Way.

The assertion that the use of the public parking as residential parking would exceed the zoning code's 1:1 parking ratio is incorrect. Residential parking would be provided at a 0.5:1 parking ratio. Vehicle parking is described on draft SEIR p. 2-23, and all residential parking would be unbundled (that is, parking would be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units) with the exception of the townhomes, as required by San Francisco Planning Code section 167. As stated on draft SEIR p. 2-23, "up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks C, D, F, and G and in the townhomes." The proposed up to 750 public-space parking spaces could be provided in a garage that would be located under Blocks A and B, or in an above-ground garage in Block G under variant 2, or in dedicated public parking areas within several of the residential garages, all of which is-would be separate from the residential parking. The public parking garage spaces would not be sold or leased to project residents and would instead be available to the public (including students). The use of the proposed public parking garage, like the other components of

**Commented [PJ(3)]:** Changes to Variant 2 shouldn't be mentioned here but instead in the Variants chapter. This change to the project description needs to be a tracked change to the DSEIR and elsewhere as appropriate. Also need to address that there would be fewer residential parking spaces if more of them are public.



the proposed project, would be addressed through the special use district and/or conditions of project approval.

Two comments ask about financing of, and parking rates that would be charged at the public parking garage that could be developed as part of the proposed project. Project financing, including financing of any potential parking garage, is not directly related to any potential physical effects of the project and, therefore, financing of the project, including its components, is not a subject of CEQA analysis.

The following information is provided for informational purposes. It is not anticipated that the public parking garage would be publicly funded but would be financed based on anticipated parking fees; rather, public subsidies for project development are anticipated to be devoted to the affordable housing component and possibly to infrastructure improvements, such as utilities. Rates charged for use of the public parking garage could also be governed by the special use district and/or conditions of approval; it is noted, for example, that rates for new non-accessory parking garages in and near downtown San Francisco and in mixed-use districts throughout the City are subject to planning code sections 155(g) and 303(t), which requires that the rate charge for four hours of parking duration is no more than four times the rate charged for the first hour, and the rate charge for eight or more hours of parking duration is no less than 10 times the rate charge for the first hour. In addition, discounted parking is not permitted for weekly, monthly or similar time-specific periods. This downtown garage pricing structure is designed to discourage commuter parking, consistent with the City's Transit First Policy (San Francisco Charter, section 8A.115).

Concerning the recommendation that funds used for the proposed public parking garage be instead directed to more housing, this is not the proposed project that is under analysis in the SEIR. Concerning the recommendation that funds used for the proposed parking garage could instead be directed to develop more housing, the draft SEIR analyzes the project as proposed and this is theoretically true, although the draft SEIR analyzes a maximum of 1,500 dwelling units (under the Additional Housing Option). From a practical standpoint, and for informational purposes only, it has been stated on many occasions by project sponsors appearing before the Planning Commission and Board of Supervisors over the years, financial backers of market-rate residential development, such as banks and investment and pension funds, often require provision of a certain amount of parking as a condition of financial backing. It isHowever, the draft SEIR acknowledges that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that such projects that provide more off-street vehicular parking providing fewer parking spaces would likely decrease project vehicle miles traveled; in fact, reducing traffic and increasing walking, cycling, and transit use was part of the City's rationale for eliminating parking requirements citywide. This is acknowledged in the draft SEIR. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90 references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit.<sup>1</sup>

<sup>1</sup> Ordinance 211-18, approved December 21, 2018, effective January 21, 2019; available at: <http://sfbos.org/sites/default/files/0311-18.pdf>. Accessed February 28, 2020.

In the case of the proposed project, however, the public parking garage(s) included under the Developer's Proposed Option would provide fewer public parking spaces (750) than currently existing on the site (approximately 1,000), meaning that the garage itself would not increase VMT compared to existing conditions. Because of this, and because of existing travel patterns in the project area and the site's transit proximity, infill nature, and mix of uses, the draft SEIR identifies a less-than-significant impact with respect to VMT (Impact TR-5, p. 3.B-79). To the extent that less parking ~~were-would be~~ provided on-site, VMT effects ~~would likely be incrementally~~ reduced ~~per capita~~, and would remain less than significant.

---