



RESPONSES TO COMMENTS

469 Stevenson Street Project

PLANNING DEPARTMENT
CASE NO. 2017-014833ENV

STATE CLEARINGHOUSE NO. **2019100093**



**SAN FRANCISCO
PLANNING
DEPARTMENT**

Draft	Draft EIR Publication Date:	March 11, 2020
	Draft EIR Public Hearing Date:	April 16, 2020
Final	Draft EIR Public Comment Period:	March 12, 2020 – May 11, 2020
	Final EIR Certification Hearing Date:	June 10, 2021



MEMORANDUM

Date: May 26, 2021
Case No: 2017-014833ENV
Project Title: 469 Stevenson Street
To: Members of the Planning Commission and Interested Parties
From: Lisa Gibson, Environmental Review Officer
Re: Attached Responses to Comments on Draft Environmental Impact Report for the 469 Stevenson Street Project

Attached for your review please find a copy of the responses to comments document for the draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the draft EIR, will be before the planning commission for Final EIR certification on June 10, 2021.** The planning commission will receive public testimony on the Final EIR certification at the June 10, 2021 hearing. Please note that the public review period for the draft EIR ended on May 11, 2020. Comments received after the close of the public review period, including any comments provided orally or in writing at the informational hearing on the project that was held on **November 12, 2020** or at the Final EIR certification hearing, will not be responded to in writing. The agenda for the June 10 planning commission hearing showing the start time and order of items at the hearing will become available at <https://sfplanning.org/hearings-cpc-grid>, by close of business Friday, June 4.

The planning commission does not conduct a hearing to receive comments on the responses to comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to commission members or to the president of the commission at commissions.secretary@sfgov.org (preferred) or 49 South Van Ness Avenue, Suite 1400 and express an opinion on the responses to comments document, or the commission's decision to certify the Final EIR for this project.

This document, along with the Draft EIR, constitute the Final EIR. The Draft EIR may be downloaded from: <https://sfplanning.org/environmental-review-documents>. If you have any questions concerning the responses to comments document or the environmental review process, please contact Jenny Delumo, EIR coordinator, at CPC.469Stevenson@sfgov.org or 628.652.7568.

Thank you for your interest in this project and your consideration of this matter.

NOTE: Because of the COVID-19 shelter-in-place order, planning department offices are closed, staff are working from home, and the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at www.sfplanning.org.

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- Attachment C: Photo Simulations
- Attachment D: SoMa Youth and Family Zone Special Use District Map
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- Attachment F: Revised Shadow Fan Analysis
- Attachment G: Socioeconomic Effects of 469 Stevenson Street Market-Rate Development

1.0 INTRODUCTION TO RESPONSES AND COMMENTS

1.1 PURPOSE OF THIS RESPONSE TO COMMENTS DOCUMENT

The purpose of this responses to comments (RTC) document is to present comments submitted on the draft environmental impact report (EIR) for the proposed 469 Stevenson Street Project and respond in writing to comments on environmental issues. Comments were made in written form during the public comment period from March 12, 2020 to May 11, 2020 and as oral testimony before the San Francisco Planning Commission as part of the public hearing on the draft EIR held on April 16, 2020. A complete transcript of proceedings from the public hearing on the draft EIR as well as all written comments are included herein in their entirety and are also included as Attachment A (Draft EIR Public Hearing Transcript) and Attachment B (Draft EIR Comment Letter and Emails). A complete list of commenters is provided in Section 2.0, Public Agencies and Commissions, Non-Governmental Organizations, and Individuals Commenting on the draft EIR.

Pursuant to the California Environmental Quality Act (CEQA) section 21091(d)(2)(A) and (B) and the CEQA Guidelines, the San Francisco Planning Department (planning department) has considered the comments received on the draft EIR, evaluated the issues raised, and provided written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the evaluation of all public comments received on the draft EIR and the identification of comments that raise significant environmental issues and therefore require a good-faith, reasoned analysis in a written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in the response may correspond to the level of detail provided in the comment.

In accordance with CEQA, responses to the comments focus on clarifying the project description and addressing significant environmental effects associated with the proposed project. "Significant effects on the environment" means substantial, or potentially substantial, adverse changes in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered significant effects on the environment. Therefore, this document focuses on responding to comments related to physical environmental issues, in compliance with CEQA. However, for informational purposes, this RTC document also provides limited responses to general comments on the draft EIR received during the public review period that were not related to physical environmental issues.

The comments do not identify any new significant environmental impacts, or substantial increases in the severity of previously identified environmental impacts, beyond those analyzed in the draft EIR, nor do the comments identify feasible project alternatives or mitigation measures that would be considerably different from those analyzed in the draft EIR and would reduce the significant environmental impacts of the proposed project that the project sponsor has not agreed to study or implement.

The planning department is the lead agency under CEQA and is responsible for administering the environmental review of projects within the City and County of San Francisco. The draft EIR and this RTC document constitute the final EIR for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The final EIR has been prepared in compliance with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. This EIR is an informational document for use by (1) governmental agencies (e.g., the planning department) and the public, aiding in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts, and (2) the San Francisco Planning Commission and other commissions/departments, prior to their decision to approve, disapprove, or modify the project. If the San Francisco Planning Commission or other City and County of San Francisco (City) entities approve the proposed project, they would be

required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP or mitigation program) to ensure that the mitigation measures identified in the final EIR are implemented.

1.2 ENVIRONMENTAL REVIEW PROCESS

Notice of Preparation of an EIR and Initial Study

In accordance with sections 15063 and 15082 of the CEQA Guidelines, the planning department published and distributed a notice of preparation (NOP) of an EIR and an initial study for the 469 Stevenson Street Project. The initial study was prepared to determine whether any aspect of the project, either individually or cumulatively, would cause a significant effect on the environment. The initial study narrowed the focus (or scope) of the environmental analysis by identifying which impacts would be less than significant (with or without mitigation) and therefore were adequately analyzed in the initial study, and which impacts require further study in the EIR. The initial study included the following findings:

- Impacts from the project related to aesthetics and parking are not applicable to the proposed project.
- Impacts from the project related to land use and planning, population and housing, cultural resources, tribal cultural resources, transportation and circulation, odors, greenhouse gas (GHG) emissions, recreation, utilities and services systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy resources, agriculture and forestry resources, and wildfire would either be less than significant or less than significant with mitigation, or would have no impact.
- Impacts from the project related to air quality (all topics except odors), wind, and shadow would be potentially significant and require further evaluation in the EIR.

The planning department mailed a notice of availability of the NOP and initial study to the State Clearinghouse and relevant state and regional agencies; occupants of adjacent properties; property owners within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. A legal notice concerning the NOP was also published on Wednesday, October 2, 2019 in a newspaper of general circulation in San Francisco. The NOP and initial study were circulated for a 30-day public review period starting on October 3, 2019 and ending on November 1, 2019. Five written communications were received during the public review period requesting additional information about the proposed project. One of these comments expressed concern about vehicular circulation to and from the project site. Information regarding project site circulation and the proposed project's transportation and circulation related impacts are provided in Section E.5, Transportation and Circulation, of the initial study.

Draft EIR

The planning department prepared the draft EIR for the 469 Stevenson Street Project in accordance with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. The draft EIR was published on March 11, 2020. An initial study was attached to the draft EIR. The draft EIR was originally planned to circulate for a 45-day public review and comment period, starting on March 12, 2020 and ending on April 27, 2020. However, the public comment and review period was extended to May 11, 2020 instead of ending on April 27, 2020, resulting in a 61-day public review period.

During this time, public comments were solicited on the adequacy and accuracy of the information presented in the draft EIR. A remote public hearing regarding the draft EIR was held on April 16, 2020, to solicit additional comments. The hearing was held remotely due to the shelter-in-place order for San

Francisco County as a result of the COVID-19 pandemic. The planning department sent hard copies of the draft EIR and appendices to those who requested hard copies throughout the duration of the public comment and review period. Hard copies of the draft EIR were also made available for public review at the planning department's office on the fourth floor of 1650 Mission Street until the shelter-in-place order went into effect. Electronic copies of the draft EIR were made available for review or download on the planning department's "Environmental Review Documents" web page:

(<https://sfplanning.org/environmental-review-documents>).

The planning department distributed paper copies of the notice of public hearing and availability of the draft EIR through the U.S. Postal Service to relevant state and regional agencies, adjacent properties, property owners within 300 feet of the project site, and other potentially interested parties, including neighborhood organizations that requested such notice. The planning department also distributed the notice electronically, using email, to recipients who had provided email addresses; published notification of its availability in a newspaper of general circulation in San Francisco; and posted the Notice of Public Hearing and Availability of the EIR at the County Clerk's office and multiple locations on the project site.

Comments on the draft EIR were submitted in written form during the public comment period or received as oral testimony at the public hearing on the draft EIR before the San Francisco Planning Commission on April 16, 2020. A court reporter attended the remote public hearing to transcribe the oral comments verbatim and provide a written transcript (Attachment A).

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft EIR. Under CEQA Guidelines section 15201, members of the public may comment on any aspect of the project. Furthermore, CEQA Guidelines section 15204(a) states that the focus of public review should be on "the sufficiency of the [draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "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." As discussed above, CEQA Guidelines section 15088 specifies that the lead agency is required to respond to comments that raise significant environmental issues during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft EIR with respect to disclosing the significance of the physical environmental impacts of the proposed project evaluated in the draft EIR.

The planning department will distribute this RTC document to the San Francisco Planning Commission as well as other public agencies and commissions; non-governmental organizations, including neighborhood associations; and individuals who commented on the draft EIR. The San Francisco Planning Commission will consider the adequacy of the final EIR, consisting of the draft EIR and the RTC document, with respect to complying with the requirements of CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. If the San Francisco Planning Commission finds that the final EIR is adequate, accurate, complete and in compliance with CEQA requirements, it will certify the final EIR and then consider the associated MMRP as well as the requested approvals for the proposed project.

Consistent with CEQA Guidelines section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the final EIR and adopted by decision makers to mitigate or avoid the proposed project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which an EIR has been certified.

1.3 DOCUMENT ORGANIZATION

This RTC document consists of the following sections and attachments, as described below:

- **Section 1.0, Introduction to Responses and Comments**, discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.
- **Section 2.0, Public Agencies and Commissions, Non-governmental Organizations, and Individuals Commenting on the Draft EIR**, presents the names of persons who provided comments on the draft EIR during the public comment period. This section includes two tables: Public Agencies and Commissions Commenting on the Draft EIR, and Individuals Commenting on the Draft EIR. Commenters within each category are listed in alphabetical order. These lists also show the comment code (described below), the format (i.e., public hearing transcript, letter, email), and date for each set of comments.
- **Section 3.0, Comments and Responses**, presents substantive comments, excerpted verbatim from a transcript of the remote San Francisco Planning Commission public hearing and written correspondence. The complete transcript as well as the letters and emails with the comments are provided in Attachments A and B of this RTC document. The comments and responses in this section are organized by topic and, where appropriate, by subtopic, including the same environmental topics addressed in Chapter 4 of the draft EIR and Section E of the initial study. Preceding each group of comments is an introduction that summarizes the issues raised about a specific topic. Following each comment or group of comments on a topic are the planning department's responses. The responses generally clarify the text in the draft EIR. In some instances, the responses may result in revisions or additions to the draft EIR. Text changes are shown as indented text, with deleted material shown as ~~strikethrough~~ text and new text double underlined.
- **Section 4.0, Draft EIR Revisions**, presents staff-initiated text changes to the draft EIR that were made by the planning department to update, correct, or clarify the text of the draft EIR. These changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft EIR, pursuant to CEQA Guidelines section 15088.5, is not required.
- **Attachments A and B** present, respectively, a complete transcript of the remote San Francisco Planning Commission hearing and written correspondence received by the planning department during the public comment period for the draft EIR, with individual comments bracketed and coded as described in Section 2. An additional code points the reader to the topic and subtopic in Section 3 where the bracketed comment appears as well as the response that addresses it.
- **Attachments C, D, E, F, and G** present, respectively, photo simulations of the proposed project, a map of the SoMa Youth and Family Zone Special Use District, a map of the SoMa Pilipinas Cultural Heritage District, the Revised Shadow Fan Analysis, and the Socioeconomic Effects of 469 Stevenson Street Market-Rate Development.

Upon certification of the EIR, the draft EIR and the RTC document will together comprise the project's final EIR.

2.0 PUBLIC AGENCIES AND COMMISSIONS, NON-GOVERNMENTAL ORGANIZATIONS, AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

Public agencies, commissions, non-governmental organizations, and individuals submitted written comments (letters and emails) on the draft EIR for the 469 Stevenson Street Project. The City received comments during the 61-day public comment period, starting on March 12, 2020 and ending on May 11, 2020. On April 16, 2020, the San Francisco Planning Commission held a remote public hearing about the draft EIR and received comments as oral testimony. RTC Table 2-1 lists the public agencies and commissioners who commented on the draft EIR; RTC Table 2-2 lists the individuals who commented on the draft EIR. Along with the names of the commenters, the tables include corresponding comment codes, which were used in Section 3, Comments and Responses, to denote each set of comments, the comment format, and the comment date. This RTC document assigns the comments to two categories:

- Comments from local, state, or federal agencies and commissions are designated “A-,” followed by an abbreviation for the name of the agency. For example, comments from the San Francisco Planning Commission are designated “A-SFPC-.”
- Comments from non-governmental organizations, including neighborhood associations, are designated by “O-” and the acronym of the organization’s or association’s name.
- Comments from individuals are designated “I-,” followed by the individual’s last name.

In cases where a commenter spoke at the public hearing and also submitted written comments, or submitted more than one letter or email, the individual’s last name or the abbreviation for the organization’s name is followed by a sequential number, assigned by date of submission. A final number at the end of the code keys each comment to the order of the bracketed comments within each written communication or set of transcript comments. Therefore, each discrete comment has a unique comment code. The coded comment excerpts in Section 3 tie in with the bracketed comments presented in Attachments A and B of this RTC document.

RTC Table 2-1: Public Agencies and Commissioners Commenting on the Draft EIR

Comment Code	Name of Person and Agency Submitting Comments	Comment Format	Comment Date
A-NAHC	Sarah Fonseca, Native American Heritage Commission	Letter	March 20, 2020
A-SFPC-Diamond	Sue Diamond, Commissioner	Draft EIR hearing transcript	April 16, 2020
A-SFPC-Fung	Frank Fung, Commissioner	Draft EIR hearing transcript	April 16, 2020
A-SFPD-Hillis	Rich Hillis, Planning Director	Draft EIR hearing transcript	April 16, 2020
A-SFPC-Imperial	Theresa Imperial, Commissioner	Draft EIR hearing transcript	April 16, 2020
A-SFPC-Johnson	Millicent Johnson, Commissioner	Draft EIR hearing transcript	April 16, 2020

Comment Code	Name of Person and Agency Submitting Comments	Comment Format	Comment Date
A-SFPC-Koppel	Joel Koppel, Commissioner	Draft EIR hearing transcript	April 16, 2020
A-SFPC-Moore	Kathrin Moore, Commissioner	Draft EIR hearing transcript	April 16, 2020

RTC Table 2-2: Non-Governmental Agencies Commenting on the Draft EIR

Comment Code	Name of Person Submitting Comments	Comment Format	Comment Date
O-FoMP-1	Jill Helffenstein, Friends of Mint Plaza	Draft EIR hearing transcript	April 16, 2020
O-FoMP-2	Jill Helffenstein, Friends of Mint Plaza	Letter	April 16, 2020
O-SFAYC	Ozzie Rohm, San Francisco Alliance Youth Coalition	Draft EIR hearing transcript	April 16, 2020
O-SFH	Mike Buhler, San Francisco Heritage	Letter	April 15, 2020
O-SFHAC	Corey Smith, San Francisco Housing Action Coalition	Draft EIR hearing transcript	April 16, 2020
O-SoMa-1	David Woo, SoMa Pilipinas Cultural Heritage District	Draft EIR hearing transcript	April 16, 2020
O-SoMa-2	David Woo, SoMa Pilipinas Cultural Heritage District	Email	April 20, 2020
O-SOMCAN-1	Angelica Cabande, South of Market Community Action	Draft EIR hearing transcript	April 16, 2020
O-SOMCAN-2	Angelica Cabande, South of Market Community Action	Email	May 12, 2020
O-YBNC	John Elberling, Yerba Buena Neighborhood Consortium	Email	April 15, 2020

RTC Table 2-3: Individuals Commenting on the Draft EIR

Comment Code	Name of Person Submitting Comments	Comment Format	Comment Date
I-Basoco	Leonard Basoco	Draft EIR hearing transcript	April 16, 2020
I-Hestor-1	Sue Hestor	Email	March 11, 2020
I-Hestor-2	Sue Hestor	Email	April 13, 2020
I-Hestor-3	Sue Hestor	Draft EIR hearing transcript	April 16, 2020
I-Hestor-4	Sue Hestor	Letter	May 7, 2020
I-Hestor-5	Sue Hestor	Letter	May 12, 2020
I-Ogilvie	Sarah Ogilvie	Draft EIR hearing transcript	April 16, 2020
I-Penonque	Andy Penonque	Draft EIR hearing transcript	April 16, 2020
I-Randolph	Theodore Randolph	Email	April 17, 2020

3.0 COMMENTS AND RESPONSES

3.1 INTRODUCTION

This section presents quoted excerpts from comments received on the draft EIR and responses to those comments. For the full text of each comment in the context of the public hearing transcript or comment letter or email in which it appears, refer to Attachments A and B, respectively.

Comments are organized by topic. Within each topic, similar comments are grouped together under subheadings, designated by a topic code and sequential number. For example, the comments in Section 3.2, Project Description, coded as “PD,” are organized under headings PD-1 through PD-8. Comments related to plans and policies, presented in Section 3.2, Plans and Policies, are coded as “PP” and organized under heading PP-1. The order of the comments, and the responses in this section, are shown below, along with the prefix assigned to each topic.

RTC Table 3-1: Comment Organization

Section	Topic Code	Topic Code Prefix
3.2	Project Description	PD
3.3	Plans and Policies	PP
3.4	Environmental Setting and Impacts	ESI
3.5	Transportation and Circulation	TR
3.6	Cultural Resources	CR
3.7	Wind	WD
3.8	Shadow	SD
3.9	Geology and Soils	GEO
3.10	Alternatives	AL
3.11	CEQA Process	CEQA
3.11	General Environmental Comments	GEC
3.12	Merits of the Project	ME
3.13	General Comments	GC

Each comment is presented verbatim and concludes with the commenter’s name and, if applicable, title and affiliation; the comment source (i.e., public hearing transcript, letter, email); the comment date; and the comment code, as described on pg. 5 of Section 2, Public Agencies and Commissions, Non-Governmental Organizations, and Individuals Commenting on the Draft EIR.

Following each comment or group of comments, a comprehensive response is provided to address physical environmental issues raised in the comments and clarify or augment information in the draft EIR, as appropriate. Each response begins with a brief summary of the substantive environmental issues raised by the comments and clarifies the text in the draft EIR.

3.2 PROJECT DESCRIPTION

The comments and corresponding responses in this section concern draft EIR Chapter 2, Project Description. The comments are further grouped according to the following project description–related issues that the comments raise:

- PD-1, Project Design and Location
- PD-2, Project Zoning
- PD-3, Illustrative figures, maps, and photographs
- PD-4, Soil Excavation and the Amount of Parking
- PD-5, Quality of Bedroom Units
- PD-6, Justification of Project Objectives
- PD-7, Community Benefits
- PD-8, LEED Certification

A corresponding response follows each grouping of comments.

COMMENT PD-1: PROJECT DESIGN AND LOCATION

“At this moment it is a very large building. It is extremely difficult to understand, partially because it is not where I believe it should have come forward with, which is the Central SoMa Plan.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-2]*)

“In addition to that, it's just basically a large, oversized project floating like an island on its own.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-3]*)

“We are being shown an excessively large building, where we are only asked to few -- in the future approve these exceptions without really understanding qualitatively what that means.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-13]*)

“It is, from their conceptual design, a simply extruded tower massing diagram which completely disrespects context and site setting.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-27]*)

“We have concerns about the proposed Density Bonus approach that completely disrespects homeless alleyways. In taking the Density Bonus, it provides no setbacks to provide relief either for people on the alleyways, in the open spaces around the development, or for residents.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-2]*)

RESPONSE PD-1: PROJECT DESIGN AND LOCATION

The comments generally pertain to the project design, including the overall scale, design, and height of the building. Two comments express concerns about the size and massing of the proposed building. One comment expresses concern that the increased density of the project does not provide adequate setbacks.

As discussed in draft EIR Section 2.5, Project Characteristics, the proposed project includes the development of a 27-story mixed-use residential building that is 274 feet tall (with an additional 10 feet for rooftop mechanical equipment). The project site is located at 469 Stevenson Street in the SoMa neighborhood of San Francisco. As shown in Figure 2 of the draft EIR (pg. 2-7), the project site is a through lot with frontages on both Stevenson and Jessie streets and is located mid-block between Fifth and Sixth streets (Assessor's Block 3704, Lot 45). The project site is located within the Downtown Area Plan, which is bounded by Second Street on the east, Sixth Street on the west, Townsend Street on the south, and an irregular border to the north that generally jogs along Folsom, Howard, and Stevenson streets. The Central SoMa Plan area is adjacent to the project site and encompasses the parcels west of the project site along Sixth Street.

The physical environmental effects of the proposed project design, including the project scale, height, and setbacks, were appropriately analyzed in the initial study and draft EIR in accordance with CEQA requirements. Specifically, the potential physical environmental effects of the proposed project scale, height, and setbacks were considered as it relates to the project's cultural resources, wind, and shadow impacts. As discussed in Section E.3, Cultural Resources, in the initial study, the proposed project would have a less-than-significant impact on the surrounding historic districts (refer to Response CR-1 for further discussion). The scale, height, and setbacks of the proposed project would also not create wind hazards that affect publicly accessible areas of substantial pedestrian use and this impact would be less than significant (refer to Response WD-1 for further discussion). As discussed in draft EIR Section 4.4, Shadow, the proposed project could result in a significant and unavoidable shadow impact on Mint Plaza due to the scale and height of the building (refer to Response SD-1 for further discussion).

On pg. 2-11 of the draft EIR, it states the proposed project would use the Individually Requested State Density Bonus Program¹ and proposes to provide 19 percent of the base project's residential units as very low affordable dwelling units onsite. However, since the publication of the draft EIR, the following staff-initiated text revisions have been made to clarify the project's program requirements:

The project proposes to use the Individually Requested State Density Bonus Program² and must provide at least ~~11~~ 13 percent of the base³ project's residential units as very low affordable dwelling units onsite in order to qualify for a ~~35~~ 42.5 percent increase in density. The project proposes to provide ~~19~~ 13 percent of the base project's residential units as very low affordable dwelling units onsite.

In exchange for providing affordable units onsite, the project sponsor can request waivers from height, bulk, setbacks, and other physical constraints of the planning code to accommodate the increased density. Therefore, the proposed height, bulk, and reduced setbacks would be allowed with application of the Individually Requested State Density Bonus Program.

¹ City of San Francisco Planning Department, Individually Requested State Density Bonus Program, Informational and Supplemental Application Packet. http://forms.sfplanning.org/IndividuallyRequestedState_SupplementalApplication.pdf. Accessed September 18, 2019.

² Ibid.

³ In order to determine how much of a density bonus state law will allow, the density allowed by current controls ("base density" or "base project") must first be calculated. The base density is the maximum gross residential density allowed pursuant to the site's zoning requirements.

The comment regarding locating the project in the Central SoMa Plan area is acknowledged. As discussed above, the project site is adjacent to, but not located within, the Central SoMa Plan area.

The decision makers may consider concerns raised about the project design, location, and reduced setbacks that may affect the homeless living in the alleyways near the project site when deciding whether to approve the project. However, these comments do not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines section 15088.

COMMENT PD-2: PROJECT ZONING

"I would like to see further elaboration on the exact criteria that this project is not in C-3 but in C-3-G District. The characteristics of that district are that there are lower-in-density buildings. This building seems to be emulating extremely high density, and that's why it appears it's somewhat missing context." (Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-6])

RESPONSE PD-2: PROJECT ZONING

The comment requests clarification that the project site is located within the C-3-G zoning district and not within the C-3 zoning district.

As stated in draft EIR Section 3.1.4, Planning Code, the project site is located within the C-3-G (Downtown-General, Commercial) zoning district. The project site is also within the 160-F Height and Bulk District, which allows for buildings up to 160 feet in height. These zoning designations are per the San Francisco Zoning Map and Height and Bulk Map.⁴

Pursuant to section 210.2 of the planning code, the C-3-G District "is composed of a variety of uses: retail, offices, hotels, entertainment, clubs and institutions, and high-density residential. Many of these uses have a citywide or regional function, although the intensity of development is lower here than in the downtown core area." The project site is also within the SoMa neighborhood, a rapidly changing neighborhood as its old industrial areas have been redeveloped into new residential uses, convention centers, and office parks.

As further discussed in draft EIR Section 3.1.4, Planning Code, the proposed project's commercial and residential uses are permitted in the C-3-G zoning district. Additionally, the proposed project would construct high-density residential uses on the project site, which is consistent with the description of the C-3-G district in section 210.2 of the planning code. Mixed-use development, including high-density residential development, is commonplace in the C-3-G zoning district.

This comment does not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts; therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

⁴ San Francisco Planning Department. 2020. San Francisco Zoning Map, Height/Bulk Districts.

Zoning Map: <https://export.amlegal.com/media/b5e32b97b4e4f81832b2bdbbf46962d08e804d21/DATAOBJECTS/0-0-0-1731.pdf> Height and Bulk Map: <https://export.amlegal.com/media/b5e32b97b4e4f81832b2bdbbf46962d08e804d21/DATAOBJECTS/0-0-0-1707.pdf>. Accessed on July 6, 2020.

COMMENT PD-3: ILLUSTRATIVE FIGURES, MAPS, AND PHOTOGRAPHS

“There was photographs, diagrams, and maps which I think are missing. There are lots of words. But there is indeed a little bit of an illustrative part that is somewhat absent here.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-8]*)

RESPONSE PD-3: ILLUSTRATIVE FIGURES, MAPS, AND PHOTOGRAPHS

The comment generally mentions that the draft EIR is missing photographs, diagrams, and maps.

The comment does not specify the type of photographs, diagrams, and maps that are missing from the draft EIR. Chapter 2.0, Project Description, of the draft EIR includes Figures 1 through 17, which depict the project location, proposed site plan, proposed floor plans, elevations, landscaping and open space, and parking levels. The figures included in the draft EIR meet the planning department’s *Environmental Review Guidelines*, which require the project description to include figures illustrating the proposed project (as applicable), such as a site plan, a ground-floor plan, floor plans of parking areas, a representative upper floor plan, and elevations of visible facades. Additionally, the initial study and draft EIR include applicable figures to support the impact analyses for cultural resources (pg. 89 of the initial study), transportation and circulation (pg. 105 of the initial study), noise (pg. 129 of the initial study), air quality (pg. 4-39 of the draft EIR), wind (pg. 4-65 of the draft EIR), shadow (pgs. 4-85, 4-95, and 4-97 of the draft EIR), cumulative projects (pg. 4-9 of the draft EIR), and alternatives (pgs. 6-11, 6-13, 6-19, 6-23, and 6-25 of the draft EIR). As discussed on pg. 75 of the initial study, the proposed project is subject to Public Resources Code section 21099(d)(1), which eliminates aesthetics as an impact that can be considered in determining the significance of physical environmental effects under CEQA for projects meeting certain criteria. Accordingly, visual simulations were not prepared for the proposed project and the CEQA analysis does not contain analysis of aesthetic impacts of the project. However, photo simulations of the proposed project are provided as part of this RTC (Attachment C) for informational purposes.

This comment does not present any evidence that the figures included in the draft EIR are inadequate, inaccurate, or incomplete to evaluate the physical environmental effects of the proposed project. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT PD-4: SOIL EXCAVATION AND THE AMOUNT OF PARKING

“Excessive soil. Why are we considering that amount of excavation for a large amount of 178 cars, when we are adjacent to all accessible transit lines that could ever be put together at literally five minutes away.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-18]*)

RESPONSE PD-4: SOIL EXCAVATION AND THE AMOUNT OF PARKING

The comment questions the amount of soil that will be excavated to accommodate the number of parking spaces provided by the proposed project.

As discussed in draft EIR Section 2.6, Construction Activities and Schedule, the proposed project would excavate the project site to a maximum depth of 55 feet below ground surface (bgs) and remove approximately 55,850 cubic yards of soil. This amount of excavation would be required to accommodate the three levels of proposed below-grade parking and the mat foundation. The three levels of below-grade

parking would total approximately 56,000 gross square feet (gsf) and include 178 parking spaces. The amount of soil to be excavated was stated in the project description (draft EIR pg. 2-1 and initial study pg. 54). The depth of excavation and amount of soil disturbance was factored throughout the draft EIR analysis, and no significant unavoidable impacts associated with this amount of excavation were found. Additionally, the project site is currently a surface parking lot with 176 spaces and the proposed project would provide a similar number of parking spaces.

Although the draft EIR found no significant and unavoidable impacts as a result of proposed excavation and number of parking spaces, the draft EIR did evaluate Alternative C, No Residential Parking, Tower Only Alternative, which would require less excavation than the proposed project. This alternative would construct one below grade garage for off-street loading, service vehicle parking, accessible parking, and bicycle parking. Alternative C, No Residential Parking Alternative would require excavation to a depth of 10 feet for a total amount of 10,740 cubic yards of soil excavated.

This comment does not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. The decision makers may consider this information as part of their deliberations on whether to approve, modify, or disapprove the proposed project or approve an alternative to the proposed project. No further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT PD-5: QUALITY OF BEDROOM UNITS

"I see an insufficient detail even on the conceptual building design no matter what alternative. I'm interested in quality of unit layouts that -- which many EIRs show at this level of the -- of project discussion. We want to avoid necessant (phonetic) bedrooms. We understand that it's basically a market-rate building, but we do also want to examine the quality of units being proposed." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-21]*)

"I am really wondering why the top floor would have a five-bedroom unit." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-26]*)

RESPONSE PD-5: QUALITY OF BEDROOM UNITS

The comments express interest in the quality of dwelling unit layouts and questions why the top floor would have a five-bedroom unit.

As discussed in draft EIR Section 2.5, Project Characteristics, the proposed project would provide a variety of bedroom units including 192 studios, 33 junior one-bedroom units, 116 one-bedroom units, 96 two-bedroom units, 50 three-bedroom units, and 8 five-bedroom units. However, the project sponsor has updated the dwelling unit type to clarify the term junior one-bedroom units to be one-bedroom units. The following staff-initiated text edits have been made to reflect this clarification:

The proposed 495 dwelling units consisting of approximately 192 studios, ~~33 junior one-bedroom units, 116~~ 149 one-bedroom units, 96 two-bedroom units, 50 three-bedroom units, and 8 five-bedroom units would be available to rent.

These staff-initiated text edits have been made throughout the draft EIR and are reflected in Section S.2, Project Synopsis, on pg. S-1; Section 1.1, Project Summary, on pg. 1-1; Section 2.1, Project Overview, on pg.

2-1; Table 2.5-1, Project Characteristics, on pg. 2-1; and Table 2.7-1, Changes to the Proposed Project Since Publication of the NOP and Initial Study, on pg. 2-50.

Additionally, the project sponsor has updated the proposed floor plans to reflect the changes to the dwelling unit types and the ground-floor setback as described in Response TR-1, and has also updated the project plan set to include the proposed floor plan for levels 3 through 5. Accordingly, Figures 3 through 7 on pgs. 2-13 to 2-21 of the draft EIR have been revised to reflect the updated floor plans and the ground floor setback. The figure showing levels 3 through 5 has been added as Figure 4b. The revised floor plan figures are included in this RTC as Figures 1 through 6.

The following staff-initiated text edits have also been made on pg. 2-11 of the draft EIR to reflect the changes made to the proposed floor plans:

Levels 2 through 5 would contain 21 units consisting of 6 studios, ~~3 junior one bedroom units, 6~~ 9 one-bedroom units, 2 two-bedroom units, 2 three-bedroom units, and 2 five-bedroom units. ~~Level 6 would contain 19 units consisting of 6 studios, 3 junior one bedroom units, 6 one bedroom units, 2 two bedroom units, and 2 three bedroom units.~~ Levels ~~7~~ 6 through 26 would contain 19 units consisting of 8 studios, ~~1 junior one bedroom units, 4~~ 5 one-bedroom units, 4 two-bedroom units, and 2 three-bedroom units. The 27th level would include ~~2 junior one bedroom units, 6~~ 8 one-bedroom units, and 4 two-bedroom units.

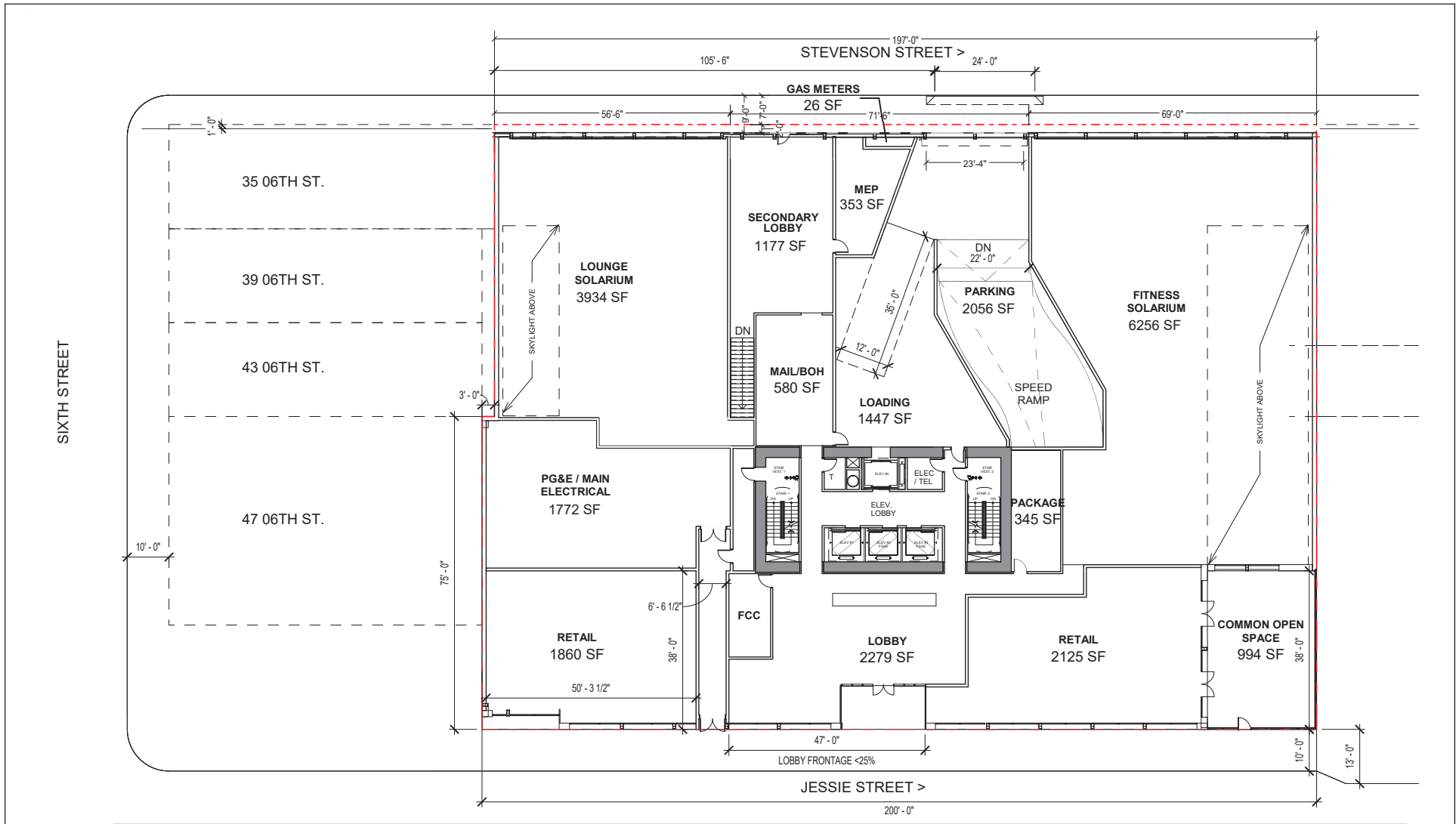
As shown on RTC Figure 6 and Figure 7, p 2-21 of the draft EIR, the 27th floor does not include a five-bedroom unit. As discussed above, the 27th floor plan has been updated to include 8 one-bedroom units and 4 two-bedroom units. The proposed project would include 2 five-bedroom units on each of the second, third, fourth, and fifth floors.

The revisions do not change the analysis or conclusions presented in the draft EIR pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5, and recirculation of the draft EIR is not required. Furthermore, the quality of unit layouts does not pertain to the adequacy, accuracy, or completeness of the draft EIR’s analysis of the project’s physical environmental impacts. The draft EIR analysis considers the overall square footage of the proposed building (535,000 gsf), which includes 475,000 gsf for the residential component. The overall square footage of the building is consistently used throughout the CEQA documentation as the basis for analysis and to determine potentially significant impacts on the environment. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

COMMENT PD-6: JUSTIFICATION OF PROJECT OBJECTIVES

“I have to say that I do not see any justification or any kind of discussion on project objectives. In many cases we do have a description of that.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-22]*)

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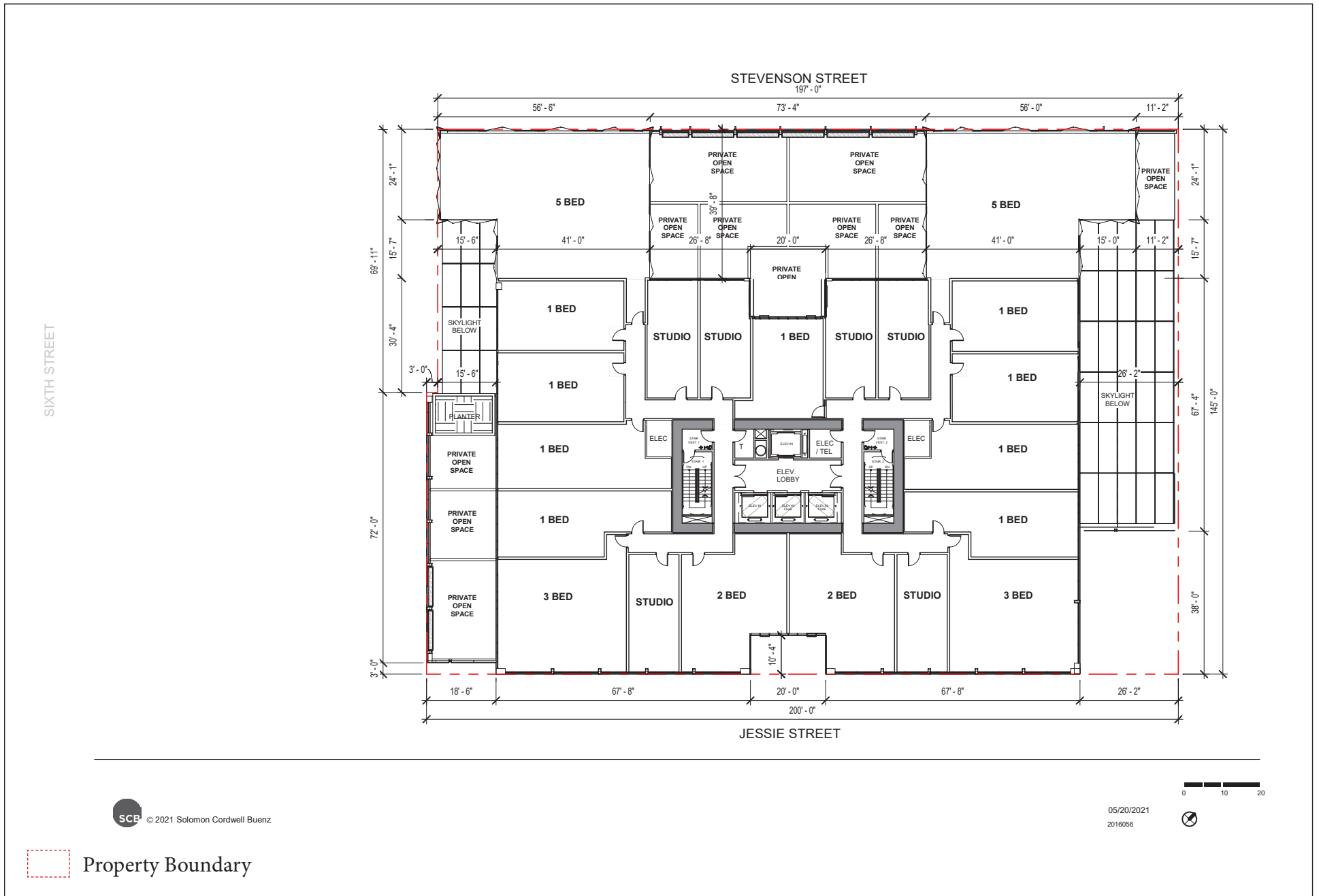
Property Boundary

469 Stevenson Street Project

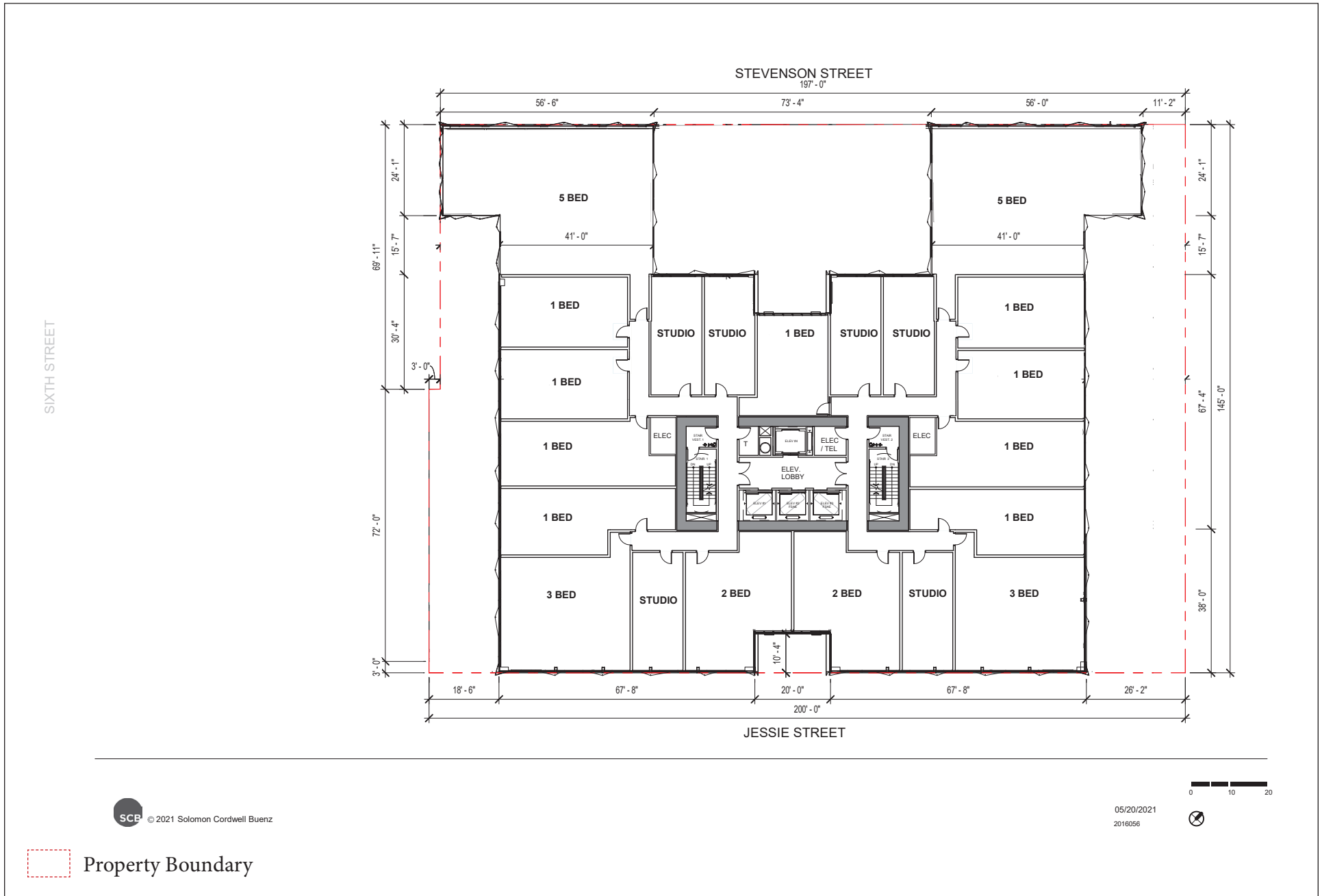
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RTC Figure 1: Ground Floor Plan

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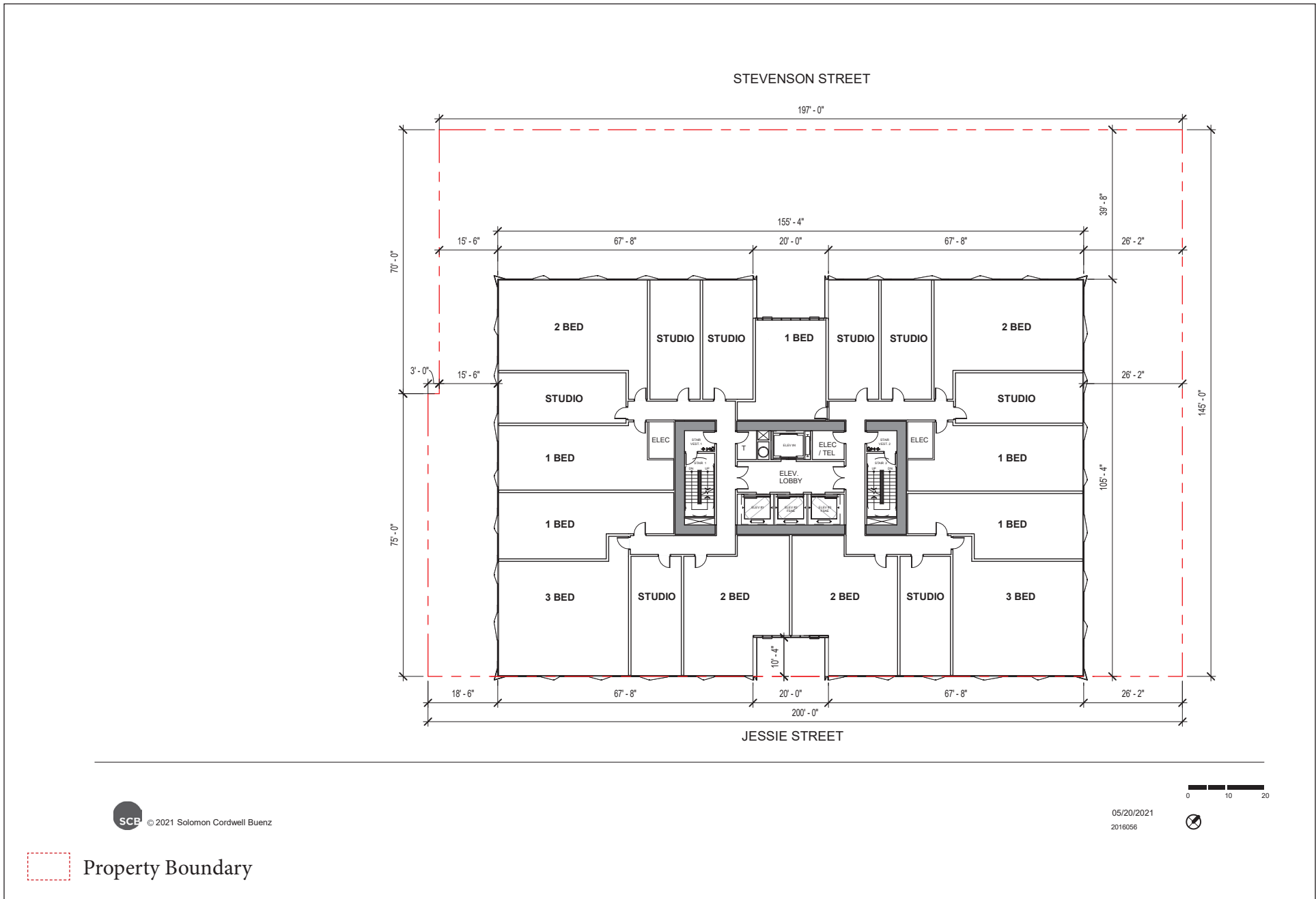


469 Stevenson Street Project

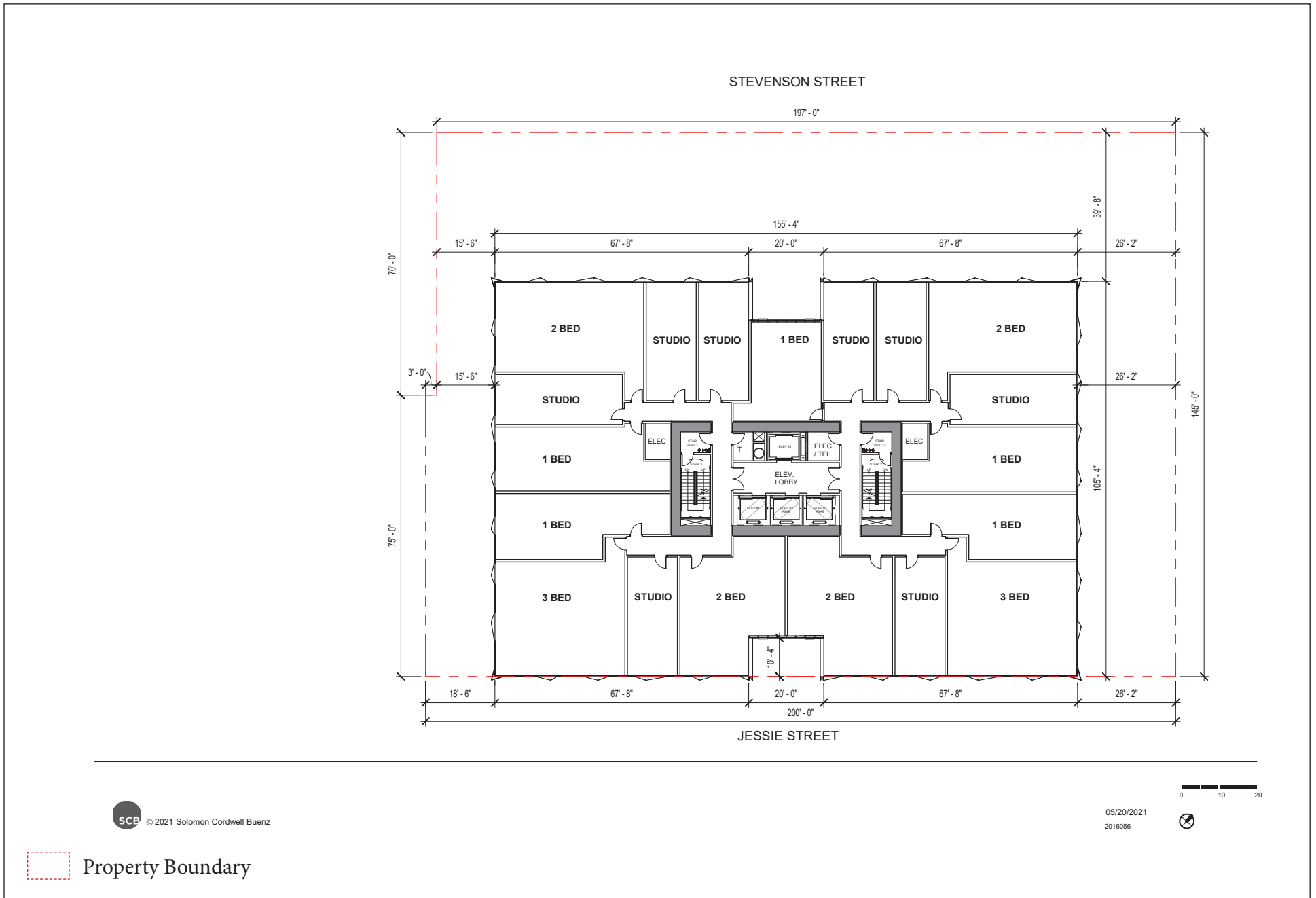
Case No. 2017.014833ENV.

RTC Figure 3: Levels 3 through 5 Plan

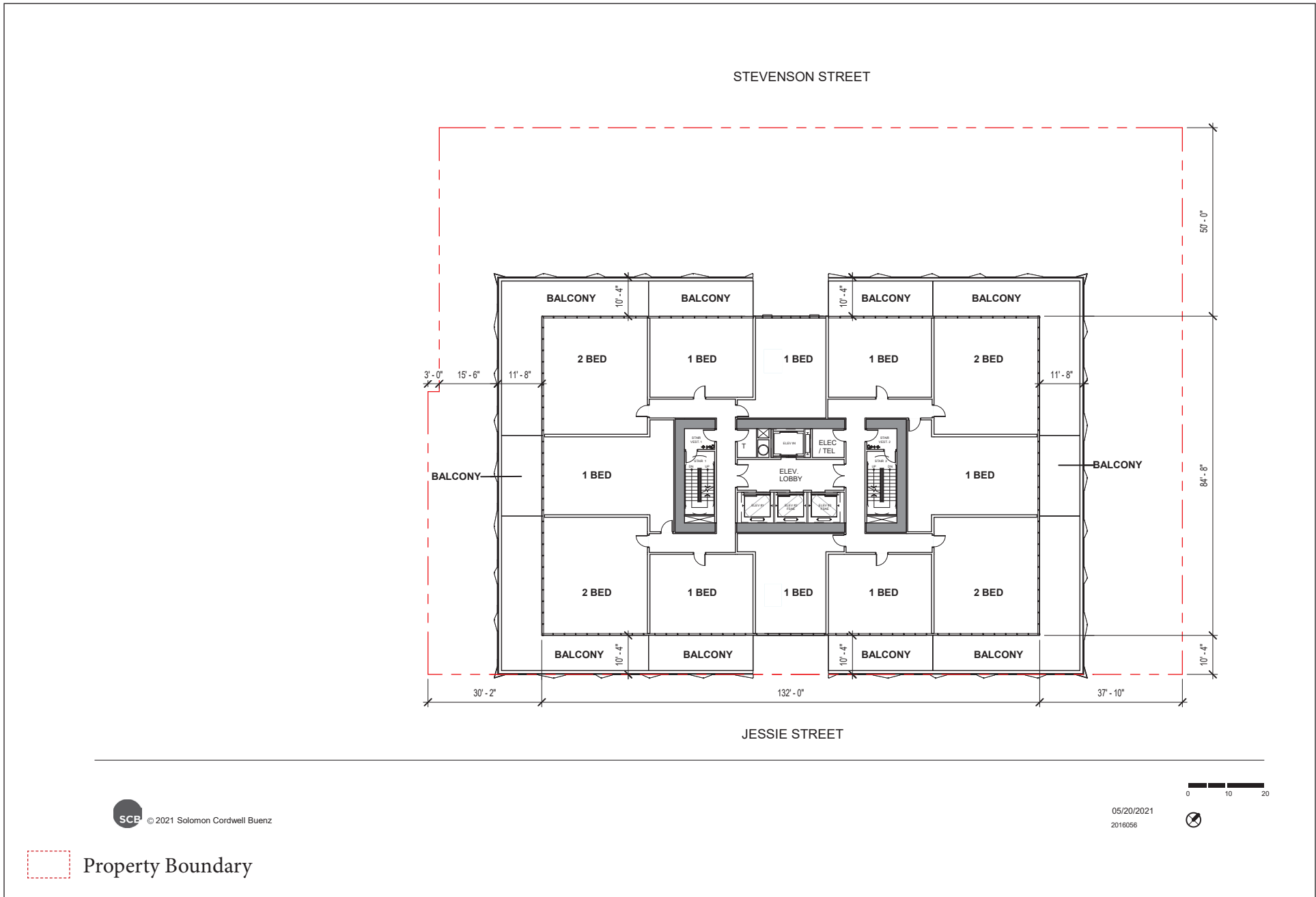
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RESPONSE PD-6: JUSTIFICATION OF PROJECT OBJECTIVES

The comment mentions that the draft EIR does not include discussion or justification of project objectives.

The following project objectives were identified by the project sponsor and are listed in Section 2.2, Project Sponsor's Objectives, on pg. 2-2 of the draft EIR:

1. Redevelop an underutilized site in a transit-oriented, urban infill location with a range of dwelling units, ground-floor commercial retail uses, and open space amenities.
2. Build a substantial number of residential units onsite to help alleviate the current housing shortage in San Francisco and the greater Bay Area, and to contribute to the General Plan's Housing Element goals and the Association of Bay Area Government's (ABAG's) Regional Housing Needs Allocation for the City and County of San Francisco.
3. Promote the construction of affordable housing units in San Francisco by providing onsite inclusionary housing units.
4. Produce a high-quality architectural and landscape design that encourages variety, is compatible with its surrounding context and promotes sustainability through environmentally sensitive design features that meet or exceed the requirements of the San Francisco Public Utilities Commission's Non-Potable Water Ordinance as well as the City and County of San Francisco's Stormwater Management Requirements, Green Building Ordinance, and Better Streets Design Guidelines.
5. Develop the project site to encompass ample open space amenities for building residents and encourage use of common residential open space.
6. Provide off-street vehicle parking that is adequate for the occupancy proposed pursuant section 151.1 of the San Francisco Planning Code (planning code) and to meet investment capital parking requirements.
7. Design a project that incorporates building massing features, including massing articulation, that would improve the building's performance with respect to wind safety and comfort impacts.
8. Construct a high-quality project that includes a sufficient number of dwelling units and commercial space to make redevelopment of the site economically feasible by producing a reasonable return on investment for the project sponsor and its investors, attracting investment capital and construction financing, and generating sufficient revenue to provide onsite inclusionary housing units.

As required by section 15126.6 of the CEQA Guidelines, Section 6.0, Alternatives, of the draft EIR also considers three alternatives to the proposed project and discusses the ability of these alternatives to meet the sponsor's objectives.

The comments do not present new information that would require changes or updates to the draft EIR, or change the conclusions of the draft EIR. The comment also does not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

COMMENT PD-7: COMMUNITY BENEFITS

“I see a relative nonexistent description of community benefits, and I hope that that can be brought into the discussion of the EIR as well.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-24]*)

“The Stevenson Project seems to not understand the small-scale restoration and stewardship that people have taken to really bring this part of the older portion of downtown back to a life of its own. It's a lovely, wonderful part that I think we should take a larger protective attitude towards. And I want to restate my - - my objection that the -- the Title 5M Project and its benefits to the community have not at all been taken into consideration. I would like to ask for something which we have never done before.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-30]*)

RESPONSE PD-7: COMMUNITY BENEFITS

The comments suggest consideration of the project's community benefits. One comment also generally states the 5M Project and that its benefits to the community have not been taken into consideration.

The comment pertaining to the community benefits of the 5M Project does not apply to the adequacy or accuracy of the 469 Stevenson Street Project draft EIR's analysis of physical environmental impacts; therefore, a response is not required under CEQA Guidelines section 15088.

The proposed project involves the construction of a mixed-use infill development. The proposed project would include residential and commercial uses, and as discussed under Response PD-1, 13 percent of the base project's residential units would be provided as very low affordable dwelling units. The proposed project would provide new jobs onsite for residential building staff and for employees of the ground floor commercial uses. The proposed project is also a transit-oriented development and would provide new housing and jobs within one-half mile of several rail and bus transit routes, including the BART and Muni Powell Street Station. In addition, the proposed project would provide on-going maintenance of the sidewalk and building perimeter and new landscaping and streetscaping; reactivation of the project site from the active retail uses on the ground floor; and five-bedroom family unit options. The project sponsor would also be subject to Article 4 of the planning code and pay the required development impact fees for the proposed project. The planning commission will consider these community benefits when it decides whether to approve, modify, or disapprove the proposed project.

The comment related to the community benefits of the proposed project does not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT PD-8: LEED CERTIFICATION

“The DEIR states in Section 2.5.3 that the proposed project complies with the SF Green Building Ordinance by meeting LEED Silver certification requirements. We would hope that Planning would hold developers to doing better than the bare minimum to comply with the Ordinance, and would encourage developers to design to a higher level of LEED certification than Silver. We have to remember that each project does not

make an impact on its own, but the many projects that are built have an aggregate or cumulative impact.”
(*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-1]*)

RESPONSE PD-8: LEED CERTIFICATION

The comment discusses the project’s compliance with the San Francisco Green Building Ordinance by meeting Leadership in Energy and Environmental Design (LEED) Silver certification requirements. The comment also suggests that the planning department should encourage developers to design to a higher level of LEED certification than Silver.

As discussed in draft EIR Section 2.5.3, Building Features, the proposed project would meet the LEED Silver certification requirements as required by the San Francisco Green Building Ordinance for new high-rise residential development. Additionally, as described in Section E.8, Greenhouse Gas Emissions, of the initial study, the proposed project would incorporate building materials, fixtures, and landscaping that promote energy efficiency and water conservation. The proposed project would also designate at least 8 percent of the total parking spaces for low-emitting, fuel efficient, and carpool/van pool vehicles. Thus, the physical environmental effects of the project’s proposed LEED Silver certification were analyzed in the initial study and draft EIR.

This comment does not pertain to the adequacy, accuracy, or completeness of the draft EIR’s analysis of the project’s physical environmental impacts. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

3.3 PLANS AND POLICIES

The comments in this section are related to the topic of plans and policies, as evaluated in draft EIR Chapter 3, Plans and Policies, and initial study Section C, Compatibility with Existing Zoning and Plans.

- PP-1, Plans and Policies

A corresponding response follows each grouping of comments.

COMMENT PP-1: PLAN AND POLICIES

“The other issue that I believe is missing is to show the boundaries of the SoMa Youth and Family Zone which will be most and most negatively impacted by its proximity.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-4]*)

“I would also like to see further exploration and comment and details of what the Urban Design, the San Francisco Urban Design Plan, envisioned for this part.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-7]*)

“The DEIR references the Downtown Area Plan and even acknowledges that the height of the proposed building is inconsistent with Policy 3.5, and the proposed project is also inconsistent with Policy 3.4 “which encourages building forms to respect and improve the integrity of open spaces and other public areas.” The DEIR is deficient, however, as an informational document as it does not reveal the proposed project’s conflicts with policies intended to protect alleys which are a vital resource for SoMa, yet are in peril by developments such as this one proposed for 469 Stevenson.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-2]*)

“The proposed project appears to conflict with Policy 14.1 which says “Promote building forms that will maximize the sun access to open spaces and other public areas” and in the description of this policy, it includes alleys.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-3]*)

“Any net new shadow affecting the limited open spaces that exist in this part of San Francisco is unacceptable. As described in the DEIR, this project is inconsistent with the Urban Design Element of the San Francisco General Plan. As stated in the DEIR, “The proposed project would be potentially inconsistent with policy 3.4, which encourages building forms to respect and improve the integrity of open spaces and other public areas” (pg. 3-2). As this project casts new shadow on two open spaces, the project does not “respect” or “improve the integrity” of either open space, and is therefore inconsistent with policy 3.4 of the General Plan. With respect to shadow impacts, the project is also inconsistent with the goals of the Downtown Area Plan.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-6]*)

RESPONSE PP-1: PLANS AND POLICIES

One comment requests additional detail of what the urban design element of the general plan envisions for the project area. Three other comments express concern regarding the project's potential inconsistency with policies 3.4, 3.5, and 14.1 in the urban design element. One comment states that the draft EIR does not show the SoMa Youth and Family Zone Special Use District (SUD) in proximity to the project site.

As discussed in draft EIR section 3.1.1, San Francisco General Plan, the urban design element focuses on the physical character and order of the City and is concerned both with development and preservation. Its goal is to protect public views of open space and water bodies, and to protect and enhance the aesthetic character of San Francisco. The urban design element includes a map titled "Street Areas Important to Urban Design and Views," which identifies particular street segments throughout the city possessing street views of important buildings, streets that define the city form, or streets that extend the effect of public open space. The map identifies Market Street as having "Street View of Important Building" and as one of the "Streets that Define the City Form." The project site and Market Street are visually disconnected by existing buildings. As such, the proposed project would not be inconsistent with policies addressing street views from Market Street.

Draft EIR section 3.1.1 also includes discussion of urban design element policy 3.4⁵ and policy 3.5,⁶ which encourage new development to consider its scale in relation to the existing height and bulk of structures in the area. The draft EIR notes that the proposed project would potentially be inconsistent with these policies as it would exceed the existing 160-foot height limit as set forth in the planning code and height maps, and would be taller than surrounding structures. However, the proposed height and bulk would be allowed with application of the Individually Requested State Density Bonus Program. Section 3.1.2, Downtown Area Plan, of the draft EIR also states that the proposed project is potentially inconsistent with policy 14.1, which promotes building forms that will maximize the sun access to open spaces and other public areas. The draft EIR evaluated shadow impacts on public open spaces and determined it could result in a significant and unavoidable shadow impact on Mint Plaza (refer to Response SD-1 for further discussion).

The project site is not located within the SoMa Youth and Family Zone SUD. As shown in Attachment D, this SUD is located 1,116 feet (0.2 mile) south of the project site. This SUD is within the Central SoMa Plan area and generally bounded by Howard, Fourth, and Harrison Streets, and extends to the west outside of the Central SoMa Plan Area to just beyond Seventh Street.⁷ According to the Central SoMa Plan, this SUD was adopted as part of the planning for the Eastern Neighborhoods Area Plans and Rezoning project in 2008.⁸ It is intended to expand the provision of affordable housing, and to that end allows for dedication of land to the City and County of San Francisco (the City) by a developer, for use as a site for affordable housing, in lieu of the developer paying a fee or providing affordable housing.⁹ The SoMa Youth and Family SUD also requires Conditional Use authorization for several uses, including bars and liquor stores, restaurants, religious facilities, various entertainment uses, and parking.¹⁰ This SUD does not have any bearing on the physical environmental impacts of the proposed project because the project site is not located within this boundary of the district.

The physical environmental effects of the proposed project due to any policy inconsistencies were considered in the initial study and draft EIR analysis as it relates to the project's cultural resources, wind,

⁵ Policy 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.

⁶ Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.

⁷ San Francisco Planning Department. 2016. Central SoMa Plan Draft Environmental Impact Report. Accessed June 15, 2020.

https://sfmea.sfplanning.org/CentralSoMaPlanDEIR_07-iv-a-land-use.pdf

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

and shadow impacts. As discussed in Section E.3, Cultural Resources, in the initial study the proposed project would have a less-than-significant impact on the surrounding historic districts (refer to Response CR-1 for further discussion). The proposed project would also not create wind hazards that affect publicly accessible areas of substantial pedestrian use and this impact would be less than significant (refer to Response WD-1 for further discussion). As discussed in draft EIR Section 4.4, Shadow, the proposed project could result in a significant and unavoidable shadow impact on Mint Plaza due to the scale and height of the building (refer to Response SD-1 for further discussion). Draft EIR Section 4.4, Shadow, also discloses the proposed project's shadow impact on nearby streets and sidewalks, concluding shadow impacts caused by the proposed project on streets and sidewalks would be less than significant.

As discussed on pg. 3-2 of the draft EIR, the compatibility of the proposed project with general plan goals, policies, and objectives that do not relate to physical environmental issues will be considered by decision-makers when deciding whether to approve or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

The comments do not present new information that would require changes or updates to the draft EIR, or change the conclusions of the draft EIR. The comments also do not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

3.4 ENVIRONMENTAL SETTING AND IMPACTS

The comments and corresponding responses in this section relate to the project location and existing setting. These topics are discussed in Section 2.3, Project Location, and Section 2.4, Existing Setting, of the draft EIR.

- ESI-1, Existing and Surrounding Uses

A corresponding response follows each grouping of comments.

COMMENT ESI-1: EXISTING AND SURROUNDING USES

“This project is located in a complicated area of SF with varied neighborhoods. And street circulation patterns which have changed IN THE PAST WEEKS. (Since transportation studies down for THIS DEIR. Very low income neighborhood to the north (Tenderloin) with many disabled people, unsheltered persons, low income seniors and families raising children. Very low and low income persons south of Market Street, including Filipino immigrants and families raising children. Retail and hotel districts to east both north and south of Market.” (*Sue Hestor, Letter, May 12, 2020 [I-Hestor-5-2]*)

“There has been significant attention paid to nearby area around Chronicle - 5M Project. But project site is a parking lot in the middle of 5th, Market, 6th, and Mission Streets. It does not have a similar level of pedestrian traffic as do those streets, or the other alleys surrounding The Mint, which is also on this block. Some residential hotels have been converted to tourist hotels, or have otherwise ceased serving lower income people. Rents have been pushed massively higher over the past 5-10 years.” (*Sue Hestor, Letter, May 12, 2020 [I-Hestor-5-3]*)

“Also the surrounding areas. This area is surrounded by S.R.O.s, whether they are affordable S.R.O.s, whether they are private S.R.O.s. Some of the S.R.O.s may have been used as a tourist hotel. There are also small businesses in this area.” (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-3]*)

RESPONSE ESI-1: EXISTING AND SURROUNDING USES

The comments request additional detail regarding the existing and surrounding uses and the roadway network near the project site.

As stated on pg. 4-1 of the draft EIR, the environmental setting for the draft EIR analysis is defined as the physical conditions on the project site and in the surroundings at the time of issuance of the notice of preparation, which occurred on October 2, 2019. Under section 15125 of the CEQA Guidelines, the environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives.

Each environmental topic discussed in the initial study and the draft EIR contains a description of the existing physical conditions of the project site and surroundings as it relates to the topic being analyzed.

As stated in Section 2.4 of the draft EIR, there are a variety of land uses in the surrounding area consisting of a mix of retail, commercial office, industrial, hotel, and residential uses. The east boundary of the project site is also adjacent to Clearway Energy's thermal power station, Station T, which produces space heating, domestic hot water, air conditioning, and industrial process uses. There are also four buildings adjacent to the west boundary of the project site, consisting of two 3-story hotels, a 3-story mixed-use building with commercial and hotel uses, and a 7-story mixed-use building with commercial and residential uses. Three buildings are located directly across from the project site on Stevenson Street. These buildings front Market Street and include two 7-story mixed-use buildings with commercial and office uses, and a 2-story commercial building. Four buildings are located directly across from the project site on Jessie Street consisting of automotive and office uses ranging from one to five-stories. These land uses represent the physical conditions of the surrounding area, and are sufficient to establish the existing baseline conditions of the project site.

Furthermore, the comments do not identify specific information about the existing setting that is missing and is pertinent to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. No further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

3.5 TRANSPORTATION AND CIRCULATION

The comments and corresponding responses in this section relate to the topic of transportation and circulation, as evaluated in draft EIR Section 4.2, Transportation and Circulation. The comments are further grouped according to the following transportation-related issues that the comments raise:

- TR-1, Project Travel Demand
- TR-2, Cumulative Transportation Analysis

A corresponding response follows each grouping of comments.

COMMENT TR-1: PROJECT TRAVEL DEMAND

“Hello, this is David Woo with SoMa Pilipino Cultural District. The Draft EIR does not study the impacts of ride-sharing, E-Scooters, E-Bikes and delivery services which represent safety impacts and, as well as, increases V.M.T. The City has greatly struggled with the inability to control the safety and transit impacts of these modes of transportation.” (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-2]*)

“The geographical context of this project is not adequately studied or understood in the Draft EIR. The mains large –The main large streets in SoMa are treated as extensions of the freeways and are subject to high amounts of traffic, for these same reasons. As a result, especially in the era of ride-sharing and delivery services, the alleys have become shortcuts for drivers to weave through the SoMa and have had serious safety and traffic impacts.” (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-3]*)

“This current project is completely out of scale. It’s not stepped back. It interjects parking and loading access on Stevenson, which is a busy and narrow pedestrian way.” (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-4]*)

“The DEIR does not sufficiently study the project impacts to people walking, biking, and driving, stating that “the project would not create potentially hazardous conditions for people walking, bicycling, driving, or riding public transit” (Initial Study pg.114). This assertion contradicts the physical design of the building which places the parking and loading access on Stevenson Street.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-10]*)

“The DEIR is inconsistent in acknowledging that the proposed project is on an alley, not on a major street. In the “Landscaping” section on pg. 2-29, the DEIR states “Due to the narrow sidewalks along Stevenson Street, street trees cannot be planted,” providing an accurate portrayal of how constrained the public right of way actually is. The introduction of a large underground parking garage’s access for 178 cars and 200 bicycles (the number of bicycle parking spaces that would be sheltered inside the parking garage), and adjacent loading area on this alley that has significant pedestrian traffic which would increase significantly with this proposed project is not studied adequately in the DEIR.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-11]*)

“The Initial Study states that the Sixth Street corridor is an existing high injury corridor (Initial Study pg.104). The potential addition of more than 1,100 new residents to the area in the age of ride-sharing (Uber, Lyft), e-scooters, e-bikes, delivery services, and potentially future unknown modes of transportation that pose serious threats to the safety of people walking, biking, and driving speak to the gaps in the analysis and conclusions provided in the DEIR. This is all while the population and density of San Francisco continues to climb without the proper regulations in place (i.e. ride-sharing) and infrastructure (i.e. an overburdened public transit system) to handle such population increases without significant impacts to the safety of pedestrians, bicyclists, and drivers as well as significant impacts to traffic and total vehicle miles travelled (VMT).” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-12]*)

“The DEIR does not study the impacts of ride-sharing, e-scooters, e-bikes, and delivery services which represent a core feature of increased safety impacts in San Francisco to pedestrians, bicyclists, and drivers, as well as a core feature of increased traffic and VMT in San Francisco. The City has greatly struggled with the inability to control the safety and transit impacts of these new modes of transportation, and as future modes of transportation emerge, challenges will only increase.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-13]*)

“The geographical context of this project and the above-mentioned impacts are also not adequately studied or understood in the DEIR. The main streets and thoroughfares in the South of Market are treated as extensions of the freeways that they are connected to and are used as a means of getting from point A to B as quickly as possible. They are also subject to high amounts of traffic for these same reasons. As a result, especially in the era of ridesharing and delivery services, the alleys in the South of Market have become short-cuts for drivers to weave through the South of Market. This has resulted in the alleyways (where a large number residents reside) becoming more congested, seeing increased traffic and speeding. The alleys in the South of Market are very small, with extremely insufficient sidewalk space for pedestrians, putting pedestrians at high risk, especially when considering the increase in vehicular traffic. Adding to this is the increased use of e-scooters and e-bikes (electronically powered scooters and bikes) that notoriously ride on sidewalks and are left in the middle of sidewalks (all of which creates safety impacts to pedestrians) – this includes in the alleys as well as main streets. None of this is properly studied or understood in the DEIR.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-15]*)

“The other thing that’s happened in the past couple of years is all the circulation has been thrown into chaos because this project is going to depend on 5th Street and 6th Street to get into, get out of or into, the project. And those streets go to Market Street, which is closed to traffic.” (*Sue Hestor, Draft EIR hearing transcript, April 16, 2020 [I-Hestor-3-3]*)

“In terms of the transportation, that, I mean, or in the – the street, alleyway, the Stevenson Street, it’s always being used as an alternative to Market Street, to go to the free – free highway.” (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-6]*)

RESPONSE TR-1: PROJECT TRAVEL DEMAND

The comments express concern that the Sixth Street corridor is an existing high injury corridor and that the addition of more than 1,100 new residents will result in impacts to the safety of pedestrians, bicyclists, and drivers. Several comments also express concerns regarding the project's travel demand methodology, VMT impacts, pedestrian safety, transit facilities, and narrow sidewalks surrounding the project site. The comments also express concerns regarding the use of alleyways as a short cut to the freeways and state that as a result the alleyways are often congested and subject to high amounts of traffic.

The transportation and circulation analysis is presented in Section E.5 of the initial study and draft EIR Section 4.5.4. As stated in Section E.5 of the initial study on pg. 75, vehicular congestion is not, by itself, to be used to determine whether a project would have a significant effect on the environment. The initial study and draft EIR analyze the potential secondary effects of project-induced congestion, in terms of safety, accessibility, delays to public transit, and other environmental topic areas. As such, the transportation analysis in Section E.5 of the initial study evaluated potential VMT, safety, accessibility, and public transit delay impacts due to the proposed project and its design features. This analysis included a consideration of the existing environmental conditions such as the street and sidewalk widths, amount of existing pedestrian, bicycle and vehicle traffic, and transit conditions.

The remainder of this response addresses the comments raised and are organized into the following categories: the geographical context of the existing and near-term baseline roadway network, travel demand methodology, VMT, and safety/pedestrian and bicycle safety.

Geographical Context of Existing and Near-Term Baseline Roadway Network

Section E.5, Transportation and Circulation, in the initial study describes the existing roadway network surrounding the project site. As discussed on pgs. 103 and 104 of the initial study, the project site is bound by Stevenson Street to the north and Jessie Street to the south. Stevenson Street and Jessie Street are both one-way eastbound alleyways. Stevenson Street connects Sixth Street to Fifth Street, while Jessie Street ends at Mint Plaza, where the roadway turns southbound at Mint Street and ends at Mission Street. Access to the project site for people walking, bicycling, and driving is provided from Fifth Street and Sixth Street, which are both four-lane, north-south roadways that are designated as major arterials in the San Francisco General Plan. Sixth Street is designated as a neighborhood commercial street between Market Street and Folsom Street. To the north and south of the project site, Market and Mission streets are four-lane, east-west streets designated as transit- and pedestrian-priority streets, with frequent transit service, high ridership, and wider sidewalks encouraging pedestrian-oriented uses. Market Street also has a combination of class 2 and class 3 bicycle facilities near the project site.

The existing setting in the transportation section also describes the parking, local public transit, and regional transit services in the vicinity of the project site. The transportation study area generally includes both the areas immediately adjacent to the proposed project and in the nearby vicinity to capture all possible effects on the transportation system. Given that some projects in the vicinity of the site are under construction and will be complete by the time the proposed project is operational, the transportation analysis included those projects in the near-term baseline. The transportation setting for the near-term baseline includes the 5M Project, Sixth Street Pedestrian Improvement Project, signalization of the intersection at Mission Street and Mint Street (to accommodate a signalized pedestrian crossing and other pedestrian safety improvements) as part of Vision Zero, and Central Subway. As part of the transportation analysis, traffic counts were conducted near the project site to establish the baseline existing traffic volumes. The traffic counts were conducted in 2019 and are representative of the existing conditions at the time of the NOP.

The comments generally suggesting that alleyways are used as a short cut to the freeways and are often congested are acknowledged and may be taken into consideration by the decision makers.

Travel Demand Methodology

As described in Section E.5, Transportation and Circulation, of the initial study, the transportation analysis is consistent with the methodology outlined in the *San Francisco Impact Analysis Guidelines* for assessing the travel and loading demand of development projects. The travel demand for the proposed project was determined using the travel demand tool developed as part of the planning department's 2019 *Traffic Impact Analysis (TIA) Guidelines update*. A consultant, under the direction of the planning department, collected and analyzed vehicle counts, intercept surveys (i.e., intercept people to ask questions such as how they traveled to/from a site), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data. This collection and analysis led to the 2019 TIA Guidelines travel demand updates including estimates of the number of people taking transportation network company (TNCs) vehicles.

As discussed on pg. 108 of the initial study in Table 4: Project Trip Generation, the project's vehicle trips accounts for TNCs. "Other" modes "includes biking, skateboards, etc." These other modes also account for electric scooter and electric bicycles. Therefore, person travel by TNCs and electric scooters and bicycles are reasonably accounted for in the transportation analysis.

Vehicle Miles Traveled (VMT)

VMT is defined as a measurement of miles traveled by vehicles within a specified region for a specified time period. The transportation analysis evaluated VMT for the proposed project in accordance with the CEQA Guidelines, guidance from the Office of Planning and Research (OPR), and the planning department's TIA Guidelines referenced above.

Updated transportation analysis guidelines promulgated by OPR in response to CEQA section 21099(b)(2) became effective December 28, 2018. These guidelines require that by July 1, 2020 all CEQA documents statewide analyze a project's VMT impact. Prior to this update by OPR, on March 3, 2016, the San Francisco Planning Commission, by Resolution No. 19579, adopted VMT as the principal criterion for determining transportation impacts, consistent with the direction of CEQA section 21099(b)(2) and the updated CEQA Guidelines.

The planning department uses the following quantitative thresholds of significance to determine whether the project would generate substantial additional VMT:

- For residential projects, if it exceeds the regional household VMT per capita minus 15 percent.
- For retail projects, if it exceeds the regional VMT per retail employee minus 15 percent.
- For mixed-use projects, evaluate each land use independently, per the thresholds of significance described above.

As discussed on pg. 118 of the initial study, the project site is located in transportation analysis zone (TAZ) 667. In this TAZ, the existing average daily residential VMT per capita is 1.9, which is 89 percent below the existing regional average daily residential VMT per capita of 17.2. The existing average daily VMT per retail employee is 7.3 for TAZ 667, which is 51 percent below the regional average VMT per retail employee of 14.8. Given that the project site is located in an area where existing residential and retail VMT per capita is greater than 15 percent below the existing regional average, the proposed project would not cause substantial additional VMT. As such, the CEQA analysis determined that the project's VMT would be less than significant.

Safety/Pedestrian & Bicycle Safety

As discussed on pg. 104 in Section E.5, Transportation and Circulation, of the initial study, Sixth Street is a high injury corridor; as such, the Sixth Street Pedestrian Safety Improvement Project is currently underway in the City to address pedestrian safety issues along Sixth Street. As further discussed on pg. 104 of the initial study, the Sixth Street Pedestrian Safety Improvement Project was assumed as part of near-term baseline operational conditions in the transportation analysis since it would be complete prior to operation of the proposed project. As further stated on pg. 104 of the initial study, the Sixth Street Pedestrian Safety Improvement Project would add new signals along Sixth Street at Stevenson Street and Jessie Street and provide pedestrian amenities such as widened sidewalks, curb ramps, crosswalks, and pedestrian crossing signal heads at the nearest intersections (Sixth Street/Stevenson Street and Sixth Street/Jessie Street) to the project site. Additionally, in the future, the Sixth Street Pedestrian Safety Improvement Project would prohibit left turns at these two intersections during the peak hours, reducing the potential for conflicts between turning southbound vehicles and northbound vehicles or people walking or bicycling there.

As discussed on pg. 35 of the initial study and pg. 2-29 of the draft EIR, the proposed project would provide sidewalk improvements along Stevenson Street and Jessie Street in accordance with the city's Better Streets Plan. These sidewalk improvements would include enhanced sidewalk paving, tree planting areas along Jessie Street, landscaped strips along Stevenson Street, bicycle racks, and relocation of one existing streetlight along Jessie Street to Stevenson Street near the driveway entrance. It should be noted pg. 35 of the initial study and pg. 2-29 of the draft EIR state the proposed project would not alter the existing sidewalk width on Stevenson Street. The proposed project would widen the existing sidewalk along the project frontage on Stevenson Street from 7 to 9 feet by stepping the ground floor of the building back from the property line. The following staff-initiated text edits have been made to accurately reflect this consideration:

The proposed project would not alter the existing 10-foot-wide sidewalk ~~widths~~ on ~~Stevenson Street or Jessie Street~~, but would widen the existing sidewalk along the project frontage on Stevenson Street from 7 to 9 feet by stepping the ground floor of the building back from the property line.

As discussed on pg. 113 of the initial study, the existing pedestrian volumes are low and there is sufficient capacity on adjacent sidewalks to handle both existing foot traffic and the anticipated project-generated walking activity. Sidewalks adjacent to the project meet or exceed the Better Streets Plan standards. The project site does not include any physical obstructions or slopes that would obstruct sightlines between a substantial amount of people walking and people driving or bicycling adjacent to the proposed project. Furthermore, as stated on pg. 112 of the initial study, the lobby entrance and access point for bicycle parking would be on Jessie Street, which would be the primary access point for people walking or bicycling. Stevenson Street would be the primary access point for people who need to park in the garage or make freight deliveries, separating and reducing potential conflicts between people driving or loading and those walking or bicycling to and from the project site. Therefore, the initial study and draft EIR determined that the proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving, or riding public transit.

Conclusion

Overall, the comments pertaining to the geographic context of the roadway network, and narrow sidewalks surrounding the project site are acknowledged. These existing conditions were taken into consideration to determine whether the proposed project's VMT impacts and impacts on pedestrian safety and transit operations would result in significant transportation impacts using the planning department's TIA guidelines. Decision makers will consider the proposed project's transportation impacts during their

deliberations on whether to approve, modify or disapprove the proposed project. However, these comments do not present any evidence that the transportation analysis in the initial study and draft EIR is inadequate, inaccurate, or incomplete. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

COMMENT TR-2: CUMULATIVE TRANSPORTATION ANALYSIS

“The Planning Department has not had measurement of what the impacts of the closure of Market Street to traffic are; and those of us who are familiar with this area know that, um, pardon me, Uber and Lyft and other transportation-alternative companies disregard the law, the stoppage of traffic. And we have no – Because right now traffic is closed for the city, there's -- reduced for the city, they have no measurement at all. They should do a need -- a basic remodel -- re -- retake -- pardon me. They should re-look-at the traffic and enforcement; and the -- the enforcement is non-existent.” (*Sue Hestor, Draft EIR hearing transcript, April 16, 2020 [I-Hestor-3-4]*)

“That indeed also raises a question of site access, as mentioned by other Commissioners, about from alleys with Market Street closed. Since the closure of Market Street has not been evaluated, nor has the closure of Market Street with effect of alleys been evaluated, together with the narrow, the narrowness of alleys, impacting proper movement and flow of cars in the first place.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-19]*)

“The DEIR does not sufficiently study the project and cumulative impacts on alleys. The project locates a main lobby entrance on Jessie Street (an alley) and a secondary lobby entrance as well as passenger and commercial loading on Stevenson Street (an alley). This design treatment for development of a high-rise residential building (27 stories, accommodating more than 1,100 new residents) that is being proposed in SoMa alleyways will completely overwhelm the existing alleyways, and sets a dangerous precedent for future developments in other SoMa alleys.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-16]*)

“The impacts described above for the project related to traffic and pedestrian safety also apply to the cumulative impacts, and further show how cumulative impacts are not properly studied (ride-sharing, e-scooters, e-bikes, delivery services, geographic context of how main streets and alleys are used).” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-17]*)

RESPONSE TR-2: CUMULATIVE TRANSPORTATION ANALYSIS

The comments pertain to cumulative transportation impacts. Two commenters suggest that the cumulative impacts on alleyways have not been evaluated with the closure of Market Street. Two comments also express concern that the proposed project design will overwhelm the alleyways and result in cumulative traffic and pedestrian safety issues as the project locates a main lobby entrance on Jessie Street and secondary lobby entrance, as well as passenger and commercial loading zones on Stevenson Street.

Cumulative traffic impacts are discussed on pgs. 119 through 125 of the initial study. Cumulative transportation impacts were considered for the long-term cumulative (year 2040) with project scenario. The cumulative scenario includes relevant nearby plans and projects in addition to those included in the near-term baseline scenario. Specific projects and plans included in the cumulative scenario include: the Central

SoMa Plan, the Eastern Neighborhoods Rezoning and Area Plans, the Hub and Civic Center Public Realm Plan, Muni Forward, and the Better Market Street Project. Both the near-term baseline and cumulative transportation analysis included the Better Market Street Project, which involves the closure of Market Street. Therefore, the closure of Market Street and any changes in traffic patterns were specifically evaluated in the initial study.

As discussed on pg. 122 of the initial study, the Better Market Street Project would not generate any net new vehicle trips to the transportation network, but some trips would be shifted to new routes, resulting in approximately 300 additional vehicles on southbound Fifth Street during the peak hour. Under the cumulative with the proposed project scenario, it was determined that the proposed project would add 28 additional vehicle trips to Fifth Street during the p.m. peak hour (representing less than 10 percent of p.m. peak hour vehicle volumes added to Fifth Street by changes stemming from the Better Market Street Project) and would add fewer than one additional vehicle per minute to Fifth Street during the p.m. peak hour. Additionally, the cumulative plus proposed project scenario would add 23 additional vehicle trips to Mission Street during the p.m. peak hour – approximately 1 percent of all p.m. peak hour vehicle traffic on Mission Street in the cumulative scenario.

Furthermore, as described in Appendix E of the draft EIR, the largest increase to a single intersection movement during the p.m. peak hour under the cumulative scenario with the proposed project scenario would be the addition of 23 p.m. peak vehicle trips traveling northbound through the intersection of Sixth Street/Jessie Street, of which 21 vehicles trips are estimated to turn right at the Sixth Street/Stevenson Street intersection to head east on Stevenson Street. As such, under the cumulative plus proposed project scenario, which includes the Better Market Street Project and the closure of Market Street, the additional level of traffic due to the proposed project would not be expected to contribute substantially to the surrounding street network, including Stevenson Street and Jessie Street.

As discussed in Impact C-TR-2, on pg. 121 of the initial study, the project, in combination with reasonably foreseeable future projects, would not create potentially hazardous conditions for people walking, bicycling, or driving, or for public transit operations. Under the cumulative conditions, citywide growth would contribute to increased traffic volumes on streets surrounding the project site. Citywide changes to traffic volumes would not create new hazards by themselves. Plans such as the Central SoMa Plan and Better Market Street Project would implement roadway changes near the proposed project that would reduce potentially hazardous conditions to people walking, bicycling, or driving, or public transit vehicles and no such impact were identified in those projects' EIRs. Additionally, cumulative transportation projects such as the streetscape improvement projects proposed under the Central SoMa Plan, Better Market Street Project, Fifth Street Improvement Project, and Vision Zero would improve accessibility for people walking and bicycling within a block of the project site. These projects would increase sidewalk widths, install new curb bulb-outs, and expand bicycle facilities.

The comments pertaining to the project's cumulative transportation impacts do not present new information that would require changes or updates to the draft EIR or change the conclusions of the draft EIR. The comments also do not present any evidence that the cumulative transportation impacts in the initial study and draft EIR is inadequate, inaccurate, or incomplete. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

3.6 CULTURAL RESOURCES

The comments and corresponding responses in this section relate to the topic of cultural resources evaluated in Section E.3, Cultural Resources, in the initial study and Section 4.5.3, Cultural and Tribal Cultural Resources, in the draft EIR:

- CR-1, Impacts on Surrounding Historic Districts and Cultural Districts
- CR-2, Cultural Resources Assessment and Consultation

A corresponding response follows each grouping of comments.

COMMENT CR-1: IMPACTS ON SURROUNDING HISTORIC DISTRICTS AND CULTURAL DISTRICTS

“On behalf of San Francisco Heritage (Heritage), the following letter sets forth our comments on the Draft Environmental Impact Report (DEIR) for the proposed project at 469 Stevenson Street (Case No. 2017.014833ENV). Heritage is concerned with the project’s indirect impacts on historic and cultural resources, primarily with regard to the project’s scale and its overall combined effect on historic resources in the area. The proposed project is also located within a highly sensitive historic and cultural heritage context; it is surrounded by dozens of small-scale, individual historic buildings, three identified historic districts, Western SoMa Light Industrial and Residential Historic District, Sixth Street Lodginghouse District, and the new Mint-Mission Conservation District. The proposed project is also located adjacent to the Stevenson Street boundary of the “SoMa Pilipinas” Social Heritage Special Use District (SUD).” (Mike Buhler, Letter, April 15, 2020 [O-SFH-1])

“As stated in the 2018 designating ordinance, the Mint-Mission Conservation District is characterized by—and is intended to preserve—“small- to medium-scale industrial, residential, and commercial buildings ranging in height from one to ten stories, with the predominate height between two and five stories.” To this end, the designating ordinance includes detailed design guidelines to ensure that compatibility of new construction in terms of size, scale, materials, and fenestration.” (Mike Buhler, Letter, April 15, 2020 [O-SFH-2])

“COMMISSIONER FUNG: But I guess this time it worked. I will be issuing a couple of comments on the DEIR with respect to the cultural artifacts analysis. Given the history of this area and its use during the Gold Rush days and other things, I think there’s gonna be a number of questions that I would like to raise.” (Commissioner Fung, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Fung-1])

“The proposed residential tower would be situated half a block west of, and seasonally cast shadows over, the Old U.S. Mint located at 88 Fifth Street, a National Historic Landmark completed in 1874 that is among the few SoMa buildings to survive the 1906 Earthquake and Fire. The former Haas Candy Factory at 54 Mint Street listed on the National Register of Historic Places. Other noteworthy historic buildings in close proximity to the Project Site include: the Remedial Loan Association (66 Mint Street), California Casket Co. (959-965 Mission Street), Pickwick Hotel (85-99 Fifth Street), and 194-198 5th Street.

The EIR for the proposed project should analyze the tower's impacts on, and compatibility with, the surrounding historic and cultural context, including project alternatives that would reduce or avoid such impacts, and prescribe appropriate mitigation." (*Mike Buhler, Letter, April 15, 2020 [O-SFH-3]*)

"I'd like to speak to some of the documents and where I see information that could be amplified or further explained. I'd like to talk about the context in which this building occurs, the adjoining historic district as the Mission Conservation District, Western SoMa Light Industrial District, Six Street Lodging House District, and the Filipino Cultural District. I believe the district boundaries and the importance of those districts, with a certain elaboration of why they are where they are, would help really putting this project into better context." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-1]*)

"There are also individual historic buildings of important – importance, not to mention the Mint and the New Mint Mission Conservation District." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-5]*)

RESPONSE CR-1: IMPACTS ON SURROUNDING HISTORIC DISTRICTS AND CULTURAL DISTRICTS

The comments pertain to the proposed project's compatibility with the surrounding National Register landmarks and other historic buildings and historic districts in the project's vicinity, such as the Western SoMa Light Industrial and Residential Historic District, Sixth Street Lodginghouse District, and the Mint-Mission Conservation District. The comments also pertain to the proposed project's compatibility with surrounding cultural heritage districts, such as the Filipino Cultural Heritage District, known as SoMa Pilipinas Cultural Heritage District. One comment mentions that they will be issuing a couple comments on the draft EIR with respect to the cultural artifact analysis; however, no additional comments were provided to the planning department.

As discussed on pg. 85 of the initial study, there are no existing onsite structures on the project site, and the site is not located within a historic district. However, as shown on Figure 19, pg. 89 of the initial study, the project site is directly adjacent to the National Register-eligible Market Street Theatre and Loft Historic District, National and California-Register eligible Sixth Street Lodging House Historic District, the Mint-Mission article 11 Conservation District, and a property within the Pacific Gas and Electric (PG&E) City Beautiful Substations Discontinuous Thematic Historic District. The project site is not located within the boundary of the Western SoMa Light Industrial and Residential Historic District. This district is located 0.25 mile west of the project site. The boundaries of the historic districts in relation to the project site and the locations of historic resources within those historic districts are shown on Figure 19, pg. 89, of the initial study, and Attachment E.

As shown in Attachment E, the proposed project is within the SoMa Pilipinas Cultural Heritage District. The planning department defines cultural heritage as: "tangible properties or intangible assets that express the ways of living developed by a community and passed on from generation to generation, including customs, practices, places, objects, artistic expressions and values." The SoMa Pilipinas Cultural Heritage District contains tangible and intangible heritage assets. However, the SoMa Pilipinas Cultural Heritage District it is not a historic district and, as such, is not a historic resource as defined by CEQA. Unlike historic districts that are locally designated, listed, or determined eligible for listing in national or state registers, the SoMa Pilipinas Cultural Heritage District was not established through a formal survey by a consultant

or planning department staff member meeting the Secretary of the Interior's Professional Standards. Furthermore, the board of supervisor's resolution establishing the SoMa Pilipinas Cultural Heritage District does not include a statement of significance addressing eligibility for listing in either the California or National registers, nor was the SoMa Pilipinas Cultural Heritage District adopted as a historic district by the San Francisco Historic Preservation Commission. Thus, while properties within the SoMa Pilipinas Cultural Heritage District may qualify as historic resources, either individually or as part of historic districts, the SoMa Pilipinas Cultural Heritage District is not an identified historic district for the purposes of CEQA review.

The planning department considers if a property is significant for association with cultural events or trends as part of the historic resource analysis. In order to determine if a property is eligible for the California Register, the planning department reviews if the property is within a cultural district, and if it is that cultural district informs the planning department's analysis. Cultural districts are one of many sources the planning department relies upon when making a determination of historic significance and potential CEQA impacts. Thus, cultural districts inform the planning department's historic resource evaluation even if they are not in themselves historic resources for the purposes of CEQA, as is the case with the SoMa Pilipinas Cultural Heritage District.

Section E.3, Cultural Resources, of the initial study evaluated the proposed project's impacts on surrounding historic and cultural districts. Therefore, the initial study considered the SoMa Pilipinas Cultural Heritage District when finding that the proposed project would result in a less than significant impact to historic resources, as defined under CEQA. The comments raised about the project's compatibility with the SoMa Pilipinas Cultural Heritage District do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts under CEQA as presented in the draft EIR.

The comments pertaining to whether the proposed project is compatible with the surrounding historic districts is acknowledged; however, a project that is determined to be incompatible with a surrounding historic district does not necessarily rise to a significant impact under CEQA. The CEQA Guidelines require lead agencies consider whether a proposed project would result in the material impairment of the significance of a historic resource. Per section 15064.5(b) of the CEQA Guidelines, the significance of a historic resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance." As discussed on pg. 83 of the initial study, the project site is a surface parking lot located within a highly urbanized area and would not result in the demolition of a historic resource. As discussed on pgs. 84 and 85 of the initial study, the proposed project includes the construction of a building that would be a different scale than existing adjacent historic resources, particularly 35-37, 39-41, and 43-45 Sixth Street, which are low-scale three-story contributing buildings in the National and California-Register eligible Sixth Street Lodging House Historic District. However, the proposed project's setbacks on the north and west elevations would distance the project's tallest massing from these historic resources to ensure their setting is not compromised. As further discussed in the initial study, the project site directly abuts the thermal power plant at 460 Jessie Street, which is identified as a contributor to the California Register-eligible PG&E City Beautiful Substations Discontinuous Thematic Historic District. However, the industrial nature of the historic resource within this dense urban area of the City is such that its setting would not be impacted by the proposed project. Other identified historic resources, such as the article 11 Mint-Mission Conservation District, and the National Register-listed Market Street Theater and Loft Historic District, have primary elevations that front onto streets away from the proposed project (Market Street and Mission Street) or are sufficiently distanced from the project site that their setting would not be adversely impacted. Therefore, the planning department determined that the project's proposed design would not materially alter in an

adverse manner the physical characteristics of the adjacent historic resources, including designated historic districts, such that their historic significance would be affected. The commenter did not provide any evidence that the conclusions in the initial study analysis related to the project's physical environmental effects on historic resource is inaccurate, inadequate, or incomplete. Furthermore, the comments do not present new information that would require updates or changes to the conclusions of the draft EIR. No further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

Comments pertaining to shadow on the Mint Building located at 88 Fifth Street, the former Haas Candy Factory at 54 Mint Street, the Remedial Loan Association (66 Mint Street), California Casket Co. (959-965 Mission Street), Pickwick Hotel (85-99 Fifth Street), and 194-198 5th Street are acknowledged. The amount of light received by any of these historic resources in itself is not a character defining feature of these resources and the planning department does not consider the shading of historic buildings in itself an impact to historic resources. However, the Mint Building's publicly accessible, open interior courtyard is a rare and prominent feature of the building. Therefore, a supplemental shadow analysis was prepared to show the estimated shading on the Mint Building open interior courtyard resulting from the project. A shadow fan and hourly shadow diagrams during four representative days of the year (the solstices and equinoxes)^{11,12} show that the courtyard is substantially shaded by existing buildings, including the Mint Building itself (Attachment F). The shadow analysis also shows that the project would result in no net new shade on the Mint Building's open interior courtyard and no further analysis is warranted.

As discussed in Response SD-1, the draft EIR analysis evaluated shadow impacts on Mint Plaza and UN Plaza. The draft EIR determined the proposed project would result in a significant and unavoidable shadow impact on Mint Plaza (refer to Response SD-1 for further discussion).

The comments pertaining to the project's compatibility with surrounding historic districts and the project's shadow impact were provided by San Francisco Heritage, a non-profit organization, which qualify as experts in their field on this topic. However, the commenter did not provide any evidence that compatibility with the surrounding districts or shadow on the identified historic resources would materially impair their significance such that the conclusions in the draft EIR analysis related to the project's impact on historic resources are inaccurate, inadequate, or incomplete. Additionally, the comments do not present new information that would require updates or changes to the conclusions of the draft EIR. To the extent that the commenter may disagree with the planning department's analysis, as stated in CEQA Guidelines Section 15151, assuming that the comments express the view of a qualified expert, "[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The main points of this disagreement are described in the initial study, the comments received by the planning department, and this response to comments, and relate to whether the proposed project is compatible with the surrounding districts and shadow impacts of the project on nearby historic buildings. No further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

¹¹ Prevision Design. 2020. Updated Shadow Fan Diagrams for 469 Stevenson Street Project.

¹² The representative days are June 21 (the summer solstice); September 20 (the fall equinox); and December 20 (winter solstice). While three days are listed, the analysis captures all four representative days (two solstices and two equinoxes). Fall and spring experience nearly similar durations of day and night; therefore, are included as a single diagram in Attachment F.

COMMENT CR-2: CULTURAL RESOURCES ASSESSMENT AND CONSULTATION

“The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR)/Mitigated Negative Declaration (MND) or Negative Declaration prepared for the project referenced above. The review may have included the Cultural Resources Section, Archaeological Report, Appendices for Cultural Resources Compliance, as well as other informational materials. We have the following concerns:

- There is no information in the documents of any contact or consultation with all traditionally, culturally affiliated California Native American Tribes from the NAHC’s contact list.
- There does not appear evidence that a cultural assessment was completed.”(Sarah Fonseca, Email, March 20, 2020 [A-NAHC-1])

“The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE). CEQA was amended in 2014 by Assembly Bill 52 (AB 52).⁴ AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. AB 52 created a separate category for “tribal cultural resources”, that now includes “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. Your project may also be subject to Senate Bill 18 (SB 18) (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. Both SB 18 and AB 52 have tribal consultation requirements. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 19668 may also apply.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Contact Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wpcontent/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled “Tribal Consultation Under AB 52: Requirements and Best Practices.” The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. A brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments is also attached.” (Sarah Fonseca, Email, March 20, 2020 [A-NAHC-2])

Footnotes:

¹ *Pub. Resources Code § 21000 et seq.*

² *Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)*

³ *Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)*

⁴ *Pub. Resources Code § 21080.3.1, subds. (d) and I*

RESPONSE CR-2: CULTURAL RESOURCES ASSESSMENT AND CONSULTATION

The comments pertain to potential cultural resources impacts from the proposed project. The first comment expresses concern that there is no information in the documents of any contact or consultation with all traditionally, culturally affiliated California Native American Tribes from the NAHC's contact list. The comment also mentions that there does not appear to be a cultural assessment completed for the proposed project. The second comment generally describes the CEQA process for determining if a project may cause a substantial adverse change in the significance of a historic resource. It also describes tribal consultation requirements under Assembly Bill 52.

As discussed on pg. 91 of the initial study, the planning department conducted a preliminary archeological review of the project site.¹³ There are no known prehistoric or historic resources at the project site. However, the preliminary archaeological review determined that the project site is highly sensitive for prehistoric archeological resources based on proximity of the project site to the resource-rich historic bayshore and Sullivan Marsh. There are also three known prehistoric sites within 0.25 mile of the project site.¹⁴ As discussed on pg. 91 of the initial study, there is potential for project construction activities to disturb significant archeological resources and the effect of the proposed project on archeological resources would be significant. Mitigation Measure M-CR-3, Archeological Testing, as described in the initial study, pg. 92, would be required to reduce the potential impacts on archeological resources to a less-than-significant level.

As stated in the initial study, pg. 99, the planning department contacted the NAHC-listed Native American individuals and organizations who are traditionally culturally affiliated with the San Francisco area on March 12, 2019 in accordance with the requirements of CEQA section 21080.3.1(d). The planning department provided a description of the project and requested comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. During the 30-day comment period, no Native American tribal representatives contacted the planning department to request consultation. On this basis, it was determined that there are no known tribal cultural resources on the project site. However, as disclosed in the initial study (pg. 100), based on the results of prior consultation, the San Francisco Planning Department considers all archaeological resources of Native American origin, including all prehistoric archeological sites, to be potential tribal cultural resources. If any such resources are discovered during construction this would be considered a significant impact to tribal cultural resources. Implementation of Mitigation Measure M-TCR-1, Tribal Cultural Resources Interpretive Program, as described in the initial study, pg. 100, would be required, to mitigate impacts to a less-than-significant level. This requires additional tribal consultation, preservation in place of the resource if feasible and, if not feasible, archaeological data recovery and public interpretation of the resource in collaboration with tribal representatives.

¹³ San Francisco Planning Department. Environmental Review Preliminary Archeological Review for 469 Stevenson Street, February 19, 2019.

¹⁴ Far Western Anthropological Research Group, Inc., and Environmental Science Associates, Archaeological Research Design and Treatment Plan for the Central SoMa Plan Area, April 2014.

This comment does not present any evidence that the archeological review or tribal consultation completed for the proposed project is inadequate, inaccurate, or incomplete. This comment also does not present any evidence the initial study's analysis of the project's physical environmental impacts on cultural and tribal cultural resources is inadequate. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

3.7 WIND

The comments and corresponding responses in this section relate to wind impacts evaluated in Section 4.3, Wind, of the draft EIR.

- WD-1, Wind Impacts on SoMa Youth and Family Zone Special Use District

A corresponding response follows the comment.

COMMENT WD-1: WIND IMPACTS ON SOMA YOUTH AND FAMILY ZONE SPECIAL USE DISTRICT

“and I'd like to get a better understanding how the Youth and Family Zone would not be seriously impacted by wind acceleration. That particular part of town has lots of children who do walk to school, and I believe they and myself, walking in that area, are often and frequently impacted by high winds. And I am not the smallest or more frail person; but I do feel the impact of wind in that area, and I'd like that to be considered, providing for children walking on the street as well.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-17]*)

RESPONSE WD-1: WIND IMPACTS ON YOUTH AND FAMILY ZONE SPECIAL USE DISTRICT

The comment generally requests clarification on how wind impacts of the proposed project will impact the SoMa Youth and Family Zone SUD, noting that the area near the project site has lots of children who walk to school and experiences existing high winds. See Response PP-1 for a description of the SoMa Youth and Family Zone SUD. The remainder of this response summarizes the wind analysis presented in the draft EIR.

Potential wind impacts from the project are discussed in Section 4.3, Wind, pg. 4-59 through 4-82, in the draft EIR. As discussed therein, a wind tunnel test was conducted to characterize the existing wind environment and to determine future wind conditions on sidewalks and open spaces that would result with implementation of the project. The wind tunnel test relied on a model of the proposed project and considered the surrounding buildings within a 1,200-foot radius of the project site. Such distance from the project site is considered appropriate to reproduce the local wind effects of the surrounding buildings (existing and planned) on site and is commonly used in the wind analysis industry. Natoma Street and Howard Street define the northern boundary of the SoMa Youth and Family Zone SUD and is approximately 1,116 feet south of the project site. As such, the SoMa Youth and Family Zone SUD was included within the 1,200-foot modeling boundary for the wind analysis.

Wind speeds were measured at 63 ground-level test locations within 1,200 feet of the project site (refer to figure 20 on pg. 4-65 of the draft EIR). Under existing conditions, the wind tunnel test determined that none of the 63 locations tested exceed the wind hazard criterion of 36 miles per hour (mph) (refer to Table 4.3-1 on pg. 4-68 and pg. 4-69 in the draft EIR). Pursuant section 148 of the planning code, the proposed project may not cause wind speeds that meet or exceed 36 mph. Therefore, the proposed project has incorporated the following design features to ensure that wind speeds would not exceed the 36 mph wind hazard criteria:

- The position of the tower is about 26 feet away from the northeast side of the podium;
- The height of the volumetric elements toward Stevenson Street is reduced from 45 feet to 35 feet;

- A 20-foot-tall solid screen along the podium edge on Stevenson Street; and
- A 12-foot-tall solid screen on the volumetric elements.

These design features would be maintained over the life of the proposed project. As such, under the existing-plus-project scenario, while the average wind speed would increase from approximately 22 mph to 24 mph, none of the 63 locations tested would exceed the wind hazard criterion of 36 mph (refer to Table 4.3-1 on pgs. 4-68 and 4-69 in the draft EIR). Therefore, the proposed project would not create wind hazards that affect publicly accessible areas of substantial pedestrian use, including the SoMa Youth and Family Zone SUD.

Section 4.3, Wind, of the draft EIR also includes the wind comfort analysis for the project. However, the wind comfort analysis is provided for informational purposes only as the 11-mph pedestrian comfort criterion and the 7-mph seating comfort criterion are not the planning department's CEQA significance criteria for wind impacts. Under existing conditions, wind speeds average 11.6 mph for all measurement locations. Wind speeds at 61 of the 63 locations currently exceed the 11-mph pedestrian comfort criterion established by planning code section 148 (refer to Table 4.3-3 on pgs. 4-77 through 4-79 in the draft EIR). With the proposed project, the seating and pedestrian comfort criteria would be exceeded at all 63 locations. However, addition of the proposed project would only increase the wind conditions in the project area by about 1 mph and exceed the comfort criteria at two new locations (locations #5 and #10) under the existing plus project condition and the cumulative plus project condition. As shown in Figure 20 on page 4-65 of the draft EIR, locations #5 and #10 are not within the SoMa Youth and Family Zone SUD. Locations #24 and #25 analyzed in the wind study are the closest locations to the SoMa Youth and Family Zone SUD. These wind testing points, located on either side of Sixth Street at Minna Street are approximately 290 feet north of the northern boundary of the SoMa Youth and Family Zone SUD. The existing wind hazard speeds for these two locations are 20 mph and would decrease to 17 mph with the proposed project (refer to Table 4.3-2, pg. 4-72, in the draft EIR). The wind comfort speeds would also decrease at these two locations with the proposed project from 11 mph to 10 mph at location #24, and from 10 mph to 9 mph at location #25 (refer to Table 4.3.3, pg. 4-77, in the draft EIR). Therefore, the draft EIR adequately evaluated wind impacts associated with the proposed project to determine if it would create wind hazards in publicly accessible areas of substantial pedestrian use, including areas proximate to the SoMa Youth and Family Zone SUD. No additional analysis is required and no further response to this comment is required pursuant to CEQA Guidelines section 15088.

3.8 SHADOW

The comments and corresponding responses in this section relate to shadow impacts evaluated in Section 4.4, Shadow, of the draft EIR. The comments are further grouped according to the following shadow-related issues that the comments raise:

- SD-1, Shadow Impacts on Public Open Spaces
- SD-2, Shadow Impacts on Sidewalks
- SD-3, Cumulative Shadow Analysis

A corresponding response follows each grouping of comments.

COMMENT SD-1: SHADOW IMPACTS ON PUBLIC OPEN SPACES

“We generally support new housing in this location; however, as evidenced in the shadow study in the EIR, the net new shadow from the project would take away significant sunlight from Mint Plaza in the late afternoon for several months of the year.” (*Jill Helffenstein, Draft EIR hearing transcript, April 16, 2020 [O-FoMP-1-2]*)

“As a public green space, Mint Plaza should be treated as a park space, and San Francisco does not allow shadowing of parks, as referenced in the Sunlight Ordinance.” (*Jill Helffenstein, Draft EIR hearing transcript, April 16, 2020 [O-FoMP-1-3]*)

“On behalf of Friends of The Plaza, we urge the San Francisco Planning Department to consider the adverse impacts the shadow will have on the use and vibrancy of Mint Plaza and take steps to reduce the overall height and massing of this proposed tower.” (*Jill Helffenstein, Draft EIR hearing transcript, April 16, 2020 [O-FoMP-1-4]*)

We generally support new housing in this location, however as evidenced in the shadow analysis in the EIR (please see attached shadow pages for your reference), the net new shadow from the project would take away significant sunlight from Mint Plaza in the late afternoon for several months of the year. As a public green space, Mint Plaza should be treated as a park space, and San Francisco does not allow the shadowing of parks:

In 1984, San Francisco voters passed Prop K, the sunlight Ordinance. In part, the ordinance reads:

‘[The city] shall disapprove any building permit governed by the provisions of this section if it finds that the proposed project will have any adverse impact on the use of the property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission because of [...] shadowing.’

On behalf of Friends of Mint Plaza, we urge the San Francisco Planning Department to consider the adverse impact the shadow will have on the use and vibrancy of Mint Plaza, and take steps to reduce the overall height and massing of this proposed tower. “(*Jill Helffenstein, Letter, April 16, 2020 [O-FoMP-2-1]*)

"I believe that the overshadowing of Mint Plaza and the surrounding context of buildings is indeed being threatened by the massive overtowering of this building over the entire setting." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-29]*)

"The project creates net new shadow impacts on two publicly accessible open spaces, Mint Plaza and UN Plaza. Both Mint Plaza and UN Plaza serve as public spaces for neighborhoods that are severely deficient in public open space. Mint Plaza, located in the South of Market, provides public open space that provides access to sunlight and allows for rest, leisure, and relaxation for neighborhood residents, workers, and visitors. UN Plaza provides public open space for residents, workers, and visitors, also providing access to sunlight and allows for rest, leisure, and relaxation. UN Plaza serves as space for a farmers market, retail booths, and contains interactive activities for the public to engage with as well. Currently, the City is undertaking plans to update and retrofit parts of UN Plaza which is at the heart of the Civic Center Public Realm Plan. The DEIR is deficient in that it does not make reference to or analyze the proposed project in context of the Civic Center Public Realm Plan in either the "Applicable Plans" or Appendix D." (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-5]*)

"The Shadow impact analysis ignores and does not detail the project's potential shadowing of the new Mary Plaza POPOS in the 5M Project a block away. That POPOS is a key feature of the project for community benefit and use, and the likely time of day of the project's shadowing in the late morning/noon time is of particular concern. This impact must be fully evaluated and detailed." (*John Elberling, Email, April 15, 2020 [O-YBNC-4]*)

"The DEIR is 1129 pages. Because of projects height and location 27-story tower casts shadows on nearby parks/open spaces that are important to nearby residents lacking open space where they live. Notice of the DEIR states that implementation of proposed project would result in significant and unavoidable impacts related to shadow." (*Sue Hestor, Email, April 13, 2020 [I-Hestor-2-2]*)

RESPONSE SD-1: SHADOW IMPACTS ON PUBLIC OPEN SPACES

The comments express concern regarding the shadow impacts of the proposed project on Mint Plaza and UN Plaza. One comment generally suggests that Mint Plaza should be treated as a public park in accordance with Section 295 of the planning code. Another comment also suggests that the draft EIR is deficient in that it does not make reference to or analyze the proposed project in context of the Civic Center Public Realm Plan. A comment also mentions that the proposed project does not discuss potential shadow impacts on Mary Plaza, a privately-owned public open space associated with the 5M Project.

As discussed in Section B.1, Existing Setting, of the initial study on pg. 59, five projects within a 0.25-mile radius of the project site are currently under construction and therefore are considered part of the existing environmental conditions. One of these projects is the 5M project, which includes construction of Mary Plaza, a publicly accessible privately owned open space. After publication of the draft EIR, it was determined that the existing plus project shadow fan analysis did not include the 5M Project and so the existing plus project shadow fan analysis was remodeled to include the 5M Project. The updated shadow fan analysis diagrams are included as Attachment F in this RTC. The following provides a response regarding the shadow impact of the proposed project on each of the open spaces discussed above and provides staff-initiated text edits to the draft EIR related to potential shadow impacts on Mint Plaza. With

the 5M Project included in the existing plus project conditions, there was no effect on the net new shadow cast on Mint Plaza by the project or the project alternatives. Therefore, these staff-initiated revisions do not result in any changes to the conclusions prepared in the draft EIR pursuant to CEQA, and do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines Section 15088.5. Therefore, recirculation of the draft EIR is not required.

UN Plaza

The shadow impact analysis is provided in Section 4.4.4 of the draft EIR and Appendix D. As discussed on pg. 4-93 of the draft EIR, the proposed project would result in net new shadow falling on UN Plaza, adding approximately 9,693 net new annual square foot-hours (sfh) of shadow and increasing sfh of shadow by 0.003 percent above current levels from 37.048 percent to 37.051 percent. As shown on Figure 22 in the draft EIR, the areas affected by net new shadow include areas that were not observed to be the most used by visitors, such as small portions of the plaza hardscape area, the McAllister point of public entry, and portions of the water feature. Furthermore, the date which has the maximum amount of net new shadow throughout the day would occur at a time early in the day when shadows are shortening and all net new shadow would leave the plaza prior to 7:30 a.m., and prior to the start of the types of events that were observed to increase user activity in UN Plaza, such as the farmer’s market and arts and crafts fair. Therefore, the draft EIR concluded that project shadow would not be expected to substantially and adversely affect the use and enjoyment of UN Plaza and shadow impacts on UN Plaza would be less than significant. Comments regarding the project’s shadow impact on UN Plaza do not raise any specific concerns regarding the adequacy, accuracy or completeness of the analysis presented in the draft EIR. Therefore, no further response to these comments is required pursuant to CEQA Guidelines section 15088.

Mint Plaza

As discussed on pg. 4-89 of the draft EIR, section 295 of the planning code prohibits the issuance of building permits for structures over 40 feet in height that would cast net new shadow on properties under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission between one hour after sunrise to one hour before sunset at any time of year, unless the planning commission determines that the net new shadow (1) would not have an adverse impact on the use of the property or (2) the impact would not be significant. Mint Plaza is not Recreation and Park department public open space and therefore not subject to section 295. Nevertheless, Mint Plaza is a public open space and therefore shadow impacts of the proposed project on Mint Plaza were evaluated pursuant to the planning department’s environmental analysis under CEQA. The following staff-initiated text changes have been made to the draft EIR on pg. 4-94 to include the 5M Project:

Mint Plaza experiences ~~38,441,767~~ 39,688,461 annual sfh of shadow under current conditions. Based on a TAAS of 57,665,807 sfh, Mint Plaza’s annual shadow load is ~~66.66~~ 68.82 percent. Mint Plaza is surrounded on most sides by multi-story development which generates substantial shading on the plaza during the morning and mid- to late afternoon hours, and throughout the day over the winter months. Midday and early afternoon hours are the least shaded under current conditions, with the greatest sunlight availability occurring over the summer months.

The proposed project would result in net new shadow falling on Mint Plaza, adding approximately 325,407 net new annual sfh of shadow and increasing sfh of shadow by 0.56 percent above current levels from ~~66.66~~ 68.82 percent to ~~67.22~~ 69.38 percent. Net new shadow on Mint Plaza that would be cast by the proposed project would occur between approximately September 21st through March 21st and would be present for up to 90 minutes in the mid- to late afternoon (no net new shadow would be present just before 2 p.m. or later than 4:30 p.m. on any date). The largest area of net new shadow cast would be 5,811 square feet and occur on November 1st and February 8th at 2:30 p.m.

The proposed project would still increase net new shadow on Mint Plaza by 0.56 percent. The addition of the 5M Project under existing conditions would have no effect on the net new shadow cast on Mint Plaza by the project or the project alternatives. As discussed on pg. 4-99 of the draft EIR, due to the size, duration and location of shadow cast on Mint Plaza from the proposed project, the time of day the net new shadow would occur, and the number of users observed in the open space areas identified as most sensitive areas, the draft EIR concluded that new shadow cast by the proposed project could substantially affect the use and enjoyment of Mint Plaza and result in a significant shadow impact. Furthermore, pg. 4-99 of the draft EIR states that other than a reduction in building height or a change in building mass, no further modification of the proposed project would eliminate the net new shadow on Mint Plaza. For these reasons, the draft EIR concludes that the shadow impact from the project on Mint Plaza would be significant and unavoidable.

The draft EIR includes two alternatives that would avoid or reduce the shadow impact on Mint Plaza to less than significant levels. Alternative A, the No Project alternative, which is required per CEQA Guidelines section 15126.6(e), would retain the existing parking lot on the project site and therefore would not result in any net new shadow on Mint Plaza. In addition, the draft EIR includes Alternative B, Reduced Density Alternative. This alternative was specifically included in the draft EIR to analyze a project alternative that would result in a less-than-significant impact on Mint Plaza. The Reduced Density Alternative would have fewer shadow impacts as it would be 114 feet shorter than the proposed project and would not cast net new shadow on UN Plaza. The Reduced Density Alternative would also cast shadow on Mint Plaza; however, this alternative would cast shadow for a shorter duration compared to the proposed project, or areas would be unaffected due to the presence of existing shadow or observed to be areas of predominantly transitory uses. Therefore, the draft EIR determined the shadow impact on Mint Plaza with the Reduced Density Alternative would be less than significant and would have fewer shadow impacts than the proposed project.

Comments regarding the project's shadow impact on Mint Plaza do not raise any specific concerns regarding the adequacy, accuracy, or completeness of the draft EIR's shadow analysis. As discussed above, the draft EIR identifies a significant and unavoidable shadow impact on Mint Plaza and includes mitigation measures that would avoid or substantially lessen that impact. Decision makers will consider this information as part of their deliberations on whether to approve, modify, or disapprove the proposed project. No further response to these comments is required pursuant to CEQA Guidelines section 15088.

Mary Plaza and the Civic Center Public Realm Plan

Mary Plaza is a privately owned public open space proposed as part of the 5M Project that has not yet been constructed. Like Mint Plaza, Mary Plaza is also proposed to be a public open space, but is not owned or to be acquired by the San Francisco Recreation and Parks Department and therefore is not subject to planning code section 295. Nevertheless, a shadow fan analysis was prepared to show the estimated shading on Mary Plaza resulting from the project during four representative days when shadows are likely to be longest and largest: June 21, September 20 (spring similar), December 20.^{15,16} The shadow fan analysis indicates that the proposed project would not cast shadow on Mary Plaza during these representative days, indicating that annual net new shadow on Mary Plaza resulting from the proposed project would be limited (see figures included in Attachment F). This is because intervening buildings would likely block much, if

¹⁵ Prevision Design. 2020. Updated Shadow Fan Diagrams for 469 Stevenson Street Project.

¹⁶ The updated shadow fan diagrams show shading for summer solstice, June 21; approximate fall equinox (spring similar), September 20; and winter solstice, December 20. While three days are listed, the analysis captures all four representative days (two solstices and two equinoxes). Fall and spring experience nearly similar durations of day and night; therefore, are included as a single diagram in Attachment F.

not all, of the project's shadow from reaching Mary Plaza. Furthermore, any net new project shadow on Mary Plaza would occur for a relatively short duration toward the end of the day.

Similar to Mary Plaza, the Civic Center Public Realm Plan has not been implemented. This plan is currently in the conceptual design phase and has not been finalized or approved by the planning department at this time. However, the boundaries of the Civic Center Public Realm Plan extend from Market Street north to Turk Street, west to Fell and Gough Street, and east to Taylor Street. UN Plaza is located within the southern portion of this plan and shadow impacts on this public open space were evaluated in the draft EIR. As discussed above, the draft EIR determined the proposed project's shadow impact on UN Plaza would be less than significant. Shadow from the proposed project further north and east within the Civic Center Public Realm Plan area would be less than those presented for UN Plaza as any public open spaces proposed as part of the Civic Center Public Realm Plan would be farther away.

Because future public open spaces such as Mary Plaza and open spaces that may be constructed under the Civic Center Public Realm Plan have not yet been constructed, there is no information available regarding the current use and enjoyment of these potential open spaces or how the proposed project could adversely affect the use of these open spaces. Therefore, any potential shadow impact from the project on these open spaces would be speculative at this point. However, as discussed above, shadow from the proposed project on these potential public open spaces would be limited. No additional analysis or further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT SD-2: SHADOW IMPACTS ON SIDEWALKS

"The project also has shadow impacts on sidewalks in the South of Market and Streets north of Market street as well. As described in the DEIR, 'The proposed project could create new shadow on nearby streets and sidewalks at times of day and throughout the year when these areas would not already be shaded by existing buildings in the area. At certain times of day and year, the proposed project would cast net new shadow on nearby sidewalks, including those along Stevenson Street, Jessie Street, Fifth Street, and Sixth Street.' (pg.4-99). The lack of public open space in the South of Market speaks to the necessity of access to sunlight in all publicly accessible spaces including sidewalks. The reality of the use of public space, especially in a neighborhood deficient in open space, must be considered when identifying the impacts of new development such as shadow." (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-7]*)

RESPONSE SD-2: SHADOW IMPACTS ON SIDEWALKS

The comment expresses concern for the lack of public open space in South of Market and the necessity of access to sunlight in all publicly accessible spaces, including sidewalks.

As discussed on pgs. 4-99 and 4-100 of the draft EIR, the proposed project would create new shadow on nearby streets and sidewalks at times of day and throughout the year when these areas would not already be shaded by existing buildings in the area. At certain times of day and year, the proposed project would cast net new shadow on nearby sidewalks, including those along Stevenson Street, Jessie Street, Fifth Street, and Sixth Street. Most of the sidewalks in this area are already shaded by existing buildings and the proposed project would add only incremental additional shadow to portions of those sidewalks not already shaded. Acknowledging that sidewalks in the project vicinity may be used by some populations for longer periods of time, sidewalks are designed for and typically used by pedestrians traveling between destinations. Even though sidewalks in the project vicinity may be used by some populations for longer

periods of time, they are not a recreational resource. Therefore, the additional project-related shadow would not substantially affect the use of the sidewalks.

Shadow from the proposed project on nearby sidewalks would be transitory in nature. Overall, the proposed project would not increase the amount of shadow on the sidewalks above levels that are common and generally expected in developed urban environments. Therefore, the draft EIR concluded that the proposed project would have a less than significant shadow impact on the use of streets and sidewalks.

COMMENT SD-3: CUMULATIVE SHADOW ANALYSIS

“The argument that the net new shadow impact from this project is insignificant ignores the cumulative shadow impacts from recently constructed towers in the area which is described on pg. 27 of Appendix D. The cumulative shadow impacts from the aggregate of these developments contribute significantly to the degradation of these rare and vitally important open spaces. Likewise, the argument that additional shadow impacts coincide with higher percentage of “pass-thru” use does not make sense (pg. 35 of Appendix D). Public open spaces with more shadows are less inviting for passive enjoyment, so rather than being an excuse for adding more shadow, this should be an incentive for preserving the sunlight that we do have on these spaces, rather than making these spaces more hostile to people who use them.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-8]*)

RESPONSE SD-3: CUMULATIVE SHADOW ANALYSIS

The comment expresses that the draft EIR does not include discussion of cumulative shadow impacts from recently constructed towers in the area, which is described on pg. 27-9 of Appendix D.¹⁷ The comment requests clarification on a “pass-thru” use. The comment also suggests that public open spaces with more shadows are less inviting for passive enjoyment and that this should be an incentive for preserving sunlight on public open spaces, rather than making them hostile to people who use them. The commenter also appears to state that the draft EIR concluded the project’s shadow impacts were determined to be less than significant.

The comment regarding cumulative shadow analysis appears to relate to the cumulative shadow analysis on UN Plaza as this is the open space that is discussed on pgs. 27-29 of Appendix D (shadow study). Cumulative shadow impacts on UN Plaza resulting from the proposed project in addition to shadow from reasonably foreseeable development projects are specifically addressed in the draft EIR, under Impact C-SD-1, beginning on pg. 4-100. This analysis is based on information provided in the shadow study, which is included as Appendix D. Development projects considered as part of the cumulative shadow impacts are listed in Table 4.4-1 in the draft EIR and include the project located at 1125 Market Street as shown on pg. 27 of Appendix D. The analysis provided in the draft EIR is consistent with the discussion provided in Appendix D, which determined the cumulative net new shadow from the proposed project and the cumulative development projects would result in an increase of 838,530 sfh of net new shadow on UN Plaza, compared to an increase of 9,693 sfh in net new shadow from the proposed project alone. This increase in sfh would result in a cumulative condition shadow load increase of 0.220 percent.

¹⁷ After publication of the draft EIR, it was determined that the existing plus project shadow fan analysis did not include the 5M Project and so the existing plus project shadow fan analysis was remodeled to include the 5M Project. The updated shadow fan analysis diagrams are included as Attachment F in this RTC. These revisions do not result in any changes to the conclusions in the draft EIR pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5. Therefore, recirculation of the draft EIR is not required.

The analysis provided on pg. 4-101 of the draft EIR further states that due to the location of net new cumulative shadow on seating walls that were observed to be well used by visitors, the size of maximum net new shadow at 14.75 percent of the plaza, and up to 2.5-hour duration of cumulative shadow on UN Plaza, the proposed project in combination with cumulative projects could result in a significant cumulative shadow impact. However, as the proposed project would only increase sfh of shadow by 0.003 percent above current levels in the early morning, and because the areas of net new shadow from the project were not observed to be areas well used or particularly sensitive to shadow, the project's incremental shadow contribution on UN Plaza was determined to not be cumulatively considerable and cumulative shadow impacts of the proposed project would be less than significant. The commenter provides no evidence that the cumulative shadow analysis provided in the draft EIR omits any specific development project or is otherwise inadequate, inaccurate, or incomplete.

Draft EIR, Impact C-SD-1, also includes a cumulative shadow analysis on Mint Plaza. The draft EIR concludes that the proposed project in combination with reasonably foreseeable cumulative projects could substantially affect the use and enjoyment of Mint Plaza and result in a significant cumulative shadow impact. The draft EIR also concludes that the proposed project would result in a considerable contribution to this cumulative impact. As discussed on pg. 35 of Appendix D, the observed intensity of use varied at Mint Plaza but could be characterized as moderate to high, and was largely observed to be used as a pass-through, or a destination to buy café goods then leave. However, as discussed on pg. 4-99 of the draft EIR, while the observed uses of Mint Plaza were largely transitory in nature, the draft EIR acknowledges that portions of Mint Plaza that would likely be more sensitive to the addition of net new shadow would be features that are fixed in location, conducive to more stationary activities (where users remain rather than pass through) or are observed to be currently well used by the public. The seating wall areas in Mint Plaza would likely qualify as the most sensitive areas as would the areas where movable seating is typically placed. The sensitivity of these areas would likely be increased if net new shadow were to occur at times of the day when the plaza is typically more unshaded and when such features would typically receive higher levels of use, such as around the midday hours. As such, the draft EIR concluded that the proposed project could substantially affect the use and enjoyment of Mint Plaza and result in a significant shadow impact under existing plus project and cumulative conditions.

The comment suggesting that public open spaces with more shadows are less inviting for passive enjoyment and that this should be an incentive for preserving sunlight on public open spaces, rather than making them hostile to people who use them is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the draft EIR.

The comments do not present new information that would require changes or updates to the draft EIR or change the conclusions of the draft EIR. No further response is required pursuant to CEQA Guidelines section 15088.

3.9 GEOLOGY AND SOILS

The comments and corresponding responses in this section relate to the topic of geology and soils evaluated in Section E.15, Geology and Soils, of the initial study.

- GEO-1, Geotechnical Analysis

A corresponding response follows the comment.

COMMENT GEO-1: GEOTECHNICAL ANALYSIS

“The Initial Study conclusion there are no significant seismic/geotechnical issues is wrong on its face. The discussion in the IS clearly confirms existing project site conditions are in fact seismically dangerous. The proposed design mitigation of deep excavation does not obviate the existing situation and the DEIR should lay this out in full. Moreover, the extensive dewatering required for such a deep excavation itself is a major potential impact issue for all adjacent properties, especially the UMB buildings adjacent to the project site on Sixth Street, and that issue is not detailed and evaluated in the IS at all. It could result in differential settlement of those buildings, including residential hotels. Such a missing analysis in the EIR might then demonstrate that deep excavation plus dewatering is hazardous and therefore a pile-supported project without below grade parking is the necessary mitigation.” (John Elberling, Email, April 15, 2020 [O-YBNC-3])

RESPONSE GEO-1: GEOTECHNICAL ANALYSIS

The comment expresses concern regarding the existing seismic conditions and geotechnical issues of the project site. The comment mentions that project excavation and dewatering activities could impact adjacent properties, including the buildings adjacent to the project site on Sixth Street. The comment also mentions that excavation and dewatering activities could result in differential settlement of those buildings, including residential hotels.

As discussed in draft EIR Section 2.6, Construction Activities and Schedule, the proposed project would excavate 55,850 cubic yards of soil at the project site and excavate to a maximum depth of 55 feet. The proposed project is anticipated to be constructed on a mat foundation and no pile driving or piers are proposed or required.

Potential geology and soils impacts associated with the proposed project are analyzed in Section E.15 of the initial study. The analysis presented in that section is based on the information and findings provided in the *preliminary geotechnical investigation* completed by Langan Engineering and Environmental Services, Inc on August 18, 2017.¹⁸

As discussed in initial study Section E.15, the proposed project would be required to comply with the Seismic Hazards Mapping Act and the mandatory provisions of the California Building Code and San Francisco Building Code. Compliance with these mandatory provisions requires a geotechnical report to evaluate and address the potential for liquefaction and failure-prone soils at the project site, and to address impacts from seismic ground shaking. The geotechnical report includes recommendations pertaining to the shoring and dewatering systems for the proposed project to prevent impacts on adjacent properties, including the buildings adjacent to the project site on Sixth Street.

¹⁸ Langan Engineering and Environmental Services, Inc. 2017. Preliminary Geotechnical Study- 469 Stevenson Street. August 18, 2017.

In addition, pg. 184 of the initial study states that the proposed project is required to comply with the building department's *Interim Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review for New Tall Buildings* (Information Sheet S-18).¹⁹ The interim guidelines supplement and clarify the information in the city's *Guidelines and Procedures for Structural Design Review* (Administrative Bulletin-082),²⁰ as well as the city's *Requirements and Guidelines for the Seismic Design of New Tall Buildings using Non-Prescriptive Seismic-Design Procedures* (Administrative Bulletin-083).²¹ Compliance with these guidelines would require a peer review of the design-level geotechnical study by an engineering design review team to determine the adequacy of the building's foundation and structural design to support the proposed building.²² The proposed project would also be required to implement a monitoring program to evaluate settlement at the project site during a 10-year period once the certificate of final completion and occupancy is issued.²³ As such, a thorough evaluation of the existing seismic conditions and geotechnical issues of the project is provided in the initial study and such impacts were determined less than significant with adherence the mandatory building code provisions referenced herein. This comment does not present any evidence that the geotechnical evaluation completed for the proposed project is inadequate, inaccurate, or incomplete. This comment also does not present any evidence or new information that the initial study's analysis of the project's physical environmental impacts on geology and soils is inadequate. Therefore, no updates to the draft EIR or change to the conclusions of the EIR are warranted. No additional analysis or further response to this comment is required pursuant to CEQA Guidelines section 15088.

¹⁹ City and County of San Francisco. 2017. *Interim Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review for New Tall Buildings* (Information Sheet [IS] S-18). Available <https://sfdbi.org/sites/default/files/IS%20S-18.pdf>. Accessed February 10, 2019.

²⁰ San Francisco Building Code. 2008. *Guidelines and Procedures for Structural Design Review* (Administrative Bulletin-082). Available http://www.gsweventcenter.com/GSW_RTC_References/2008_0325_AB_082.pdf. Accessed February 10, 2019.

²¹ City and County of San Francisco. 2007. *Requirements and Guidelines for the Seismic Design of New Tall Buildings using Non-Prescriptive Seismic-Design Procedures* (Administrative Bulletin-083). Available https://sfdbi.org/ftp/uploadedfiles/dbi/meeting_information/structural/supporting/2008/AB_083_Draft8.pdf. Accessed February 10, 2019.

²² City and County of San Francisco. 2017. *Interim Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review for New Tall Buildings* (Information Sheet [IS] S-18). Available <https://sfdbi.org/sites/default/files/IS%20S-18.pdf>. Accessed February 10, 2019.

²³ Ibid.

3.10 ALTERNATIVES

The comments and corresponding responses in this section relate to the Alternatives presented in Section 5.0, Alternatives, in the DEIR.

- Comment AL-1, Alternative B, Reduced Density Alternative
- Comment AL-2, Alternative B, Reduced Density Alternative, Shadow Impacts

A corresponding response follows each grouping of comments.

COMMENT AL-1: ALTERNATIVE B, REDUCED DENSITY ALTERNATIVE

“There is a study of Project Alternatives as required by CEQA, but the presentation of these alternatives is deficient and misleading. The DEIR is deficient because as an “informational document,” calling Alternative B the “reduced density” alternative is misleading to the public. Alternative B would be more accurately described as the project alternative that complies with the existing density and height limits for the site. Often, DEIR’s call these Project Alternatives “Code Compliant” in order for the public to understand that the alternative being described is an alternative project that would comply with the current codes. The Proposed Project seeks to take advantage of the State Density Bonus, so it proposes a higher intensity of use and a different design approach than would be allowed under the current zoning for this site. There are, however, significant and unmitigatable environmental impacts that the Proposed Project would inflict. If the project did not seek the State Density Bonus, and rather sought to develop a project that complied with the existing density and height limits for this site, those negative environmental consequences would not exist. Therefore, the way this Alternative B is titled as somehow providing a reduction in what it provides in terms of housing or any other on-site amenities is misleading and therefore renders the DEIR deficient as an informational document.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-21]*)

“The Reduced Density Alternative should be instead configured as the No State Density Bonus Alternative otherwise permitted by the current City zoning.” (*John Elberling, Email, April 15, 2020 [O-YBNC-2]*)

“The proposed project is only possible by taking the State Density Bonus, yet it misleadingly calls Alternative B the “Reduced Density Alternative,” as though by taking this alternative we’re somehow getting less of something, when that framing is incorrect. Alternative B is just one way of approaching this site with a building that would conform to the existing height-and-density requirements. This tactic is misleading and makes the Draft EIR deceptive and deficient as an informational document.” (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-5]*)

“I’d like to go and explore the question and ask why a Code Compliant project is not the baseline, a Code Compliant project that would be designed to an FAR of six point one -- 6-to-1 rather than 19-to-1.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-9]*)

“I’d like to see a project that diagrams what a building that follows height, bulk and tower-separation rules looks like.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-12]*)

“I’d expect to see a diagram or a baseline building that is indeed Code Compliant.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-14]*)

“The building’ I’d like to see a building that respects alley regulations.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-16]*)

RESPONSE AL-1: ALTERNATIVE B, REDUCED DENSITY ALTERNATIVE

The comments express concern that the naming of the Alternative B, Reduced Density Alternative, is misleading to the public and that it is more accurate to refer to it as the Code Compliant Alternative so that the public understands that this alternative is consistent with the existing height and density requirements for the site. One comment also suggests that Alternative B, Reduced Density Alternative, should be referred as the No State Density Bonus Alternative. Additionally, this comment states that if the project did not seek the State Density Bonus, and rather sought to develop a project that complied with the existing density and height limits for this site, negative environmental consequences would not exist.

Several comments also request details and diagrams regarding a code compliant building that follows the height, bulk, and alley regulations, and is designed to a floor area ratio (FAR) of 6:1 rather than 19:1.

The naming of the Alternative B, Reduced Density Alternative, does not pertain to the analysis of physical environmental impacts associated with the proposed project. The naming of the Reduced Density Alternative is not deficient or misleading as it is stated on pg. 6-9 of the draft EIR that the Alternative B, Reduced Density Alternative, would be consistent with the density and building height requirements of the planning code, and was selected to consider a project alternative that would lessen the significant shadow impacts on Mint Plaza that would occur from construction of the proposed project.

In addition, state density bonus projects are required to submit a code compliant “base” version of the project. This base project is required to adhere to the existing height, bulk, and tower-separation rules for the project site’s zoning district and height and bulk district. The plans for the base project, along with other materials referenced in the initial study and draft EIR, are available for review on the San Francisco Property Information Map, which can be accessed at <https://sfplanninggis.org/pim/>. Individual files can be viewed by clicking on the Planning Applications link, clicking the “More Details” link under the project’s environmental record number 2017-014833ENV and then clicking on the “Related Documents” link.

As discussed on pg. 6-9 of the draft EIR, the Reduced Density Alternative would have a maximum FAR of 9:1 and a building height of approximately 160 feet (with an additional 10 feet for rooftop mechanical equipment). In the C-3-G District, a base 6:1 FAR is allowed under planning code section 124, with a FAR of up to 9:1 with the purchase of transferable development rights (TDR).²⁴ The Reduced Density Alternative would also comply with any alley regulations in the planning code. As such, the draft EIR adequately analyzed an alternative that would be compliant with the planning code. A visual rendering of this alternative is shown on Figure 24, pg. 6-11 of the draft EIR. Additionally, a building elevation of this alternative is shown on Figure 25, pg. 6-13 of the draft EIR.

With the code-compliant massing, the Reduced Density Alternative would provide 346 residential units as compared with the proposed project’s 495 residential units. The Reduced Density Alternative would

²⁴ Transferable Development Rights: Units of gross floor area that may be transferred, pursuant to the provisions of section 128 and article 11 of the planning code, from a transfer lot to increase the allowable gross floor area of development on a development lot.

provide two levels of below grade parking, resulting in 37,000 cubic yards of excavation as opposed to the 55,870 cubic yards of excavation required for the proposed project. The Reduced Density Alternative would require implementation of the same mitigation measures as the proposed project to reduce impacts related to archeological resources, human remains, tribal cultural resources, noise, and air quality. However, the severity and potential for significant impacts related to these topic areas would be reduced compared with those of the proposed project because of the reduced amount of excavation and earth movement, shorter construction duration, and fewer residential units constructed. The Reduced Density Alternative would be 114 feet shorter than the proposed project and would not cast net new shadow on UN Plaza and would avoid the significant and unavoidable project-level and cumulative shadow impact on Mint Plaza. The Reduced Density Alternative could also feasibly attain most of the project sponsor objectives.

However, to address concerns that the naming of this alternative is misleading and to make it abundantly clear to the reader that this alternative is compliant with the planning code requirements for the site, the following staff-initiated text edits have been made to the draft EIR on pg. S-19, 6-4, and 6-9:

The purpose of the Reduced Density Alternative is to consider a project alternative that would lessen the significant shadow impacts on Mint Plaza that would occur from construction of the proposed project. The Reduced Density Alternative would redevelop the project site with a new mixed-use residential project, similar to the proposed project, but would meet the planning code requirements for the site and therefore construct a shorter and less dense building than under the proposed project.

In addition, global changes have been made throughout the document to reference “Alternative B: Reduced Density” as “Alternative B: Reduced Density Alternative (Planning Code Compliant).”

These revisions do not change the analysis or conclusions presented in the draft EIR pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines Section 15088.5. Therefore, recirculation of the draft EIR is not required.

COMMENT AL-2: ALTERNATIVE B, REDUCED DENSITY ALTERNATIVE, SHADOW IMPACTS

“I would like to see a building without shadow impacts on important public open spaces like Mint Plaza, U.N. Plaza, and most notably Mary Alley that is the community room of an approved high-intensity project called "The 5M Project" which is a main community organizer particularly also for the... Youth and Family Zone.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-10]*)

“The Reduced Density Alternative (Alternative B) eliminates the shadow impacts on UN Plaza by approaching the building’s design in two significantly different ways from the Proposed Project. It both complies with the existing height restriction of 160 feet, and it incorporates significant setbacks, reducing the bulk of the building. Both of these design features significantly reduce the massing of the building and, therefore, its shadow impacts. It would be interesting to see if further refinements in the building’s massing would reduce Alternative B’s shadow impacts on Mint Plaza to having zero net new shadow on this public open space as well. A building compliant with the underlying zoning is the environmentally superior alternative, and could possibly be made even better with further design refinement.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-9]*)

“The Alternative B shows that if the building stuck to the 160-foot height limit, it might even be possible to end up with no new shadows.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-5]*)

RESPONSE AL-2: ALTERNATIVE B, REDUCED DENSITY ALTERNATIVE, SHADOW IMPACTS

The comments pertain to the shadow impacts expected from implementation of Alternative B, Reduced Density Alternative. One comment requests evaluation of a building that would not create shadow impacts on important public open spaces, such as Mint Plaza, UN Plaza, and Mary Alley (referred as Mary Street Alleyway). Two comments suggest that further refinements to the Reduced Density Alternative could eliminate net new shadow on Mint Plaza.

As discussed in draft EIR Chapter 6.0, Alternatives, the CEQA Guidelines require the analysis of a reasonable range of alternatives to the proposed project or to the location of the project that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines section 15126.6). The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6[f]). CEQA generally defines “feasible” to mean the ability to be accomplished in a successful manner within a reasonable timeframe, taking into account economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (CEQA Guidelines section 15126.6[f][1]). An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative. Furthermore, an EIR need not consider every conceivable alternative but must consider a reasonable range of alternatives that will foster informed decision-making and public participation.

In draft EIR Chapter 6.0, Alternatives, the analysis presents Alternative A, No Project Alternative, and Alternative B, Reduced Density Alternative. As discussed in draft EIR Chapter 6.0, Alternatives, the No Project Alternative would result in no net new shadow on any open spaces, and the Reduced Density Alternative would result in less than significant shadow on UN Plaza and Mint Plaza. Pursuant to CEQA Guidelines section 15126.6, an alternative is not required to eliminate an impact entirely rather it is required to substantially reduce any of the significant effects of the project. The draft EIR evaluates two alternatives to the proposed project that eliminate the significant shadow impacts of the proposed project. As shown on the revised shadow fan analysis (Attachment F), the proposed project would not cast shadow on Mary Plaza or the north portion of Mary Street Alleyway, which the 5M Project has proposed for pedestrians only and as public open space. Therefore, it is also reasonably assumed that Alternative B would result in no shadow on Mary Plaza or Mary Street Alleyway. The alternatives analyzed in the draft EIR adequately meet the requirements of CEQA Guidelines section 15126.6 and no changes to the analysis are required.

3.11 CEQA PROCESS

The comments and corresponding responses in this section relate to the CEQA process.

- CEQA-1, Public Review and Comment Period
- CEQA-2, CEQA Framework

A corresponding response follows each grouping of comments.

COMMENT CEQA-1: PUBLIC REVIEW AND COMMENT PERIOD

"We ask for the continuance of this hearing and an extension of the Comment Period including, again, if the Shelter-in-Place is again extended due to the current Coronavirus health crisis and the lack of equitable accessible to and format of online public hearings. The health crisis has put both community members and community organizations into a tailspin, struggling to adapt and meet the urgent needs of residents and workers on the ground that are struggling day to day to survive. This has greatly limited the ability to engage in the public planning process. As the Planning Department undertakes a racial, social, equity plan and framework for planning, this should be applied to the current health crisis, which is having disparate and huge impacts based on race and socioeconomic status." (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-6]*)

"We ask that this hearing be continued and the Comment Period extended, including if Shelter-in-Place is again extended, to address the inability of working-class residents to mutually engage in this planning process during this health--and -- health crisis and, further, to increase the economical impacts to the city." (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-11]*)

"I want to join in the question of Miss Cabande and the person that spoke in the first place about continuing the hearing and extending the time for Public Comment." (*Sue Hestor, Draft EIR hearing transcript, April 16, 2020 [I-Hestor-3-1]*)

"I support the extension. The two-week extension for comments is not enough. People in this area are low-income people' they've been moved and had a lot of problems because of closures, and that is really important to the city and to the health of people in the area." (*Sue Hestor, Draft EIR hearing transcript, April 16, 2020 [I-Hestor-3-5]*)

"I understand that it is complicated. And I do, you know, I do support other public's comments in continuing and extending the comments until there is -- until the Shelter-in-Place is lifted. It's mainly because that people right now doesn't have the mental capacity; even the organizations are working on this, or the stakeholders, don't have the capacity, as they are trying to, you know, help their own communities. So, we need to be sensitive on this. And I would urge other Commissioners to also think the same." (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-7]*)

"DIRECTOR HILLIS: And just to know, we've extended the Comment Period from the 27th to May 11th already." (*Rich Hillis, Draft EIR hearing transcript, April 16, 2020 [A-SFPD-Hillis-2]*)

“COMMISSIONER THERESA IMPERIAL: My request was to -- for the comments. I understand the Comment right now is extended, in submitting Comments, is extended to May 11th. My request is to extend the request until the Shelter-in-Place is lifted, where the people can come to City Hall and can also give Comments, and where there's a more extensive time in giving Comments. I think that this is a time where there is a pandemic, and people's worries are everywhere. So, my request is to extend the Comment until Shelter-in-Place is lifted.” (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-1]*)

“We respectfully submit this letter in as timely a way as we have been able to. With COVID-19, and so many projects being proposed in SoMa, it has been unrealistic for the community and organizations to be able to engage with all of these projects. We hope planning understands our need to prioritize meeting the critical daily needs of vulnerable community members during this time of crisis.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-22]*)

“Page 1-4 boilerplate statement on encourage public participation and comment in planning and environmental review processes on proposed project. Please comment on the unprecedented situation of public lockdown during virtually the entire DEIR process has affected ability of Commissioners and the public to submit informed comments.” (*Sue Hestor, Letter, May 12, 2020 [I-Hestor-5-1]*)

“The ORDER to stay at home affects ability of public to check out 469 Stevenson site and surroundings as they read DEIR. And prepare to submit oral and written comments. People and community organizations have been effectively ORDERED to refrain from checking and verifying information in the DEIR. There have been repeated requests - including by Planning Commissioners - that DEIR comment period be extended until AFTER the ORDER instructing San Franciscans to stay at home is lifted. And that a second opportunity for ORAL testimony on DEIR be provided. An information presentation AFTER closure of comment period is not the same. Issues that may arise from that hearing will not have to be addressed in the Responses and in FEIR. A 2-week extension of period to submit written comments is not the same.” (*Sue Hestor, Letter, May 12, 2020 [I-Hestor-5-4]*)

“469 Stevenson - DEIR comment period should be extended until AFTER the information hearing at LIVE Commission meeting. This is major market rate housing project - 500 units - just off Market between 5th & 6th Streets. In middle of low income housing. ERO has power to - AND SHOULD - extend DEIR comment period given current situation.” (*Sue Hestor, Letter, May 7, 2020 [I-Hestor-4-1]*)

“469 Stevenson DEIR set for hearing as #13 Thursday was released 3/12/20 just as SF began cancelling hearings, and started lockdown mode. The notice date and 4/6 agenda has Monday 4/27 as deadline for written comments. This must be changed. Proposed project, by Build Inc is a 27-story (w/3 underground parking levels) 495 DU project using State Density Bonus. It is mostly a market rate housing project, unaffordable to most residents nearby in the Tenderloin and South of Market. Residents who will face gentrifying pressure from this project. 469 Stevenson is located between 5th & 6th Streets on the first street immediately south of Market Street. The location and this mostly market rate housing project will have substantial effects on both the Tenderloin and this area of SoMa which still has significant number of

Filipino families. Residents and organizations in those areas deserve enough time to submit written comments. Even if they are able to do verbal comments online Thursday. This area is in middle of dealing with unhoused residents facing outbreak of Covid-19 because of their lack of affordable housing. This must take precedence people and organizations in immediate future." (Sue Hestor, Email, April 13, 2020 [I-Hestor-2-1])

"Even more important, informed written comment is impossible for many Tenderloin and South of Market residents who do not have a computer and printer at their home. Many residents depend on access to computers at public libraries or at community organizations. Access to public libraries and facilities, and to non-profit organizations, has been impossible for the past 3 weeks. Even those with access to a computer may face difficulty loading such large file as the EIR. The notice itself refers to using the PIM to access complicated documents relied on by 369 Stevenson DEIR. Over the past 2 weeks I have received repeated calls for help from citizens about the difficulty of making comments and receiving information - they really attempt to give informed comment on matters at Planning but are really having problems because city facilities and information is no longer available to people lacking internet connections and computers of their own. Cell phones cannot read a lengthy EIR. The comment period on Build Inc's proposal to build mostly market rate housing tower 495 DU at 469 Stevenson should be extended to a date at least 3 weeks after City offices and the city as a whole is gain open for business. Extending the comment period is also the right thing to do." (Sue Hestor, Email, April 13, 2020 [I-Hestor-2-3])

"Planning Department/Commission ignores effect of current lockdown on District 6 residents. District which has large concentrations of Residential Hotels and homeless. Low income workers who have lost jobs. South of Market, Filipino communities being overrun with large projects at Commission NOW. Projects at boundary of areas designed to protect Filipino families/low-income residents.

- 469 Stevenson - 500 unit mostly MARKET RATE housing. ENTIRE DEIR comment period during lockdown.

SoMa residents deserve time to meet, including with Supervisor Haney. SLOW DOWN." (Sue Hestor, Letter, May 7, 2020 [I-Hestor-4-1])

"I have a question for Director Hillis, and that is whether or not we could schedule an opportunity for an informational hearing on this project, where we could do a much deeper dive into many of the aspects of the project that aren't necessarily environmental impacts per se that are addressed in the DEIR, and if we could do that significantly in advance of any approval hearings for this project." (Commissioner Diamond, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Diamond-1])

"Sure, Commissioner Diamond, through the Chair, absolutely. I think we anticipate this project coming back to you for approval late this year. But we can certainly schedule a hearing in advance of that to address some of the issues that you may have or other others may have. I get that this is complicated, especially given that it's a Density Bonus project. So, yes." (Planning Director Hillis, Draft EIR hearing transcript, April 16, 2020 [A-SFPD-Hillis-2])

"I think Miss Cabande and other speakers, together with Commissioner Imperial, summarized very well that the community most affected by this project is indeed one which is people with lesser means; small or diminished access to technology. And I am asking as to whether or not we could potentially have a second live hearing, hopefully back at City Hall, where people from the community could come and comment in person on what they are not able to do today. I believe that would be us practicing social and environmental equity, and I strongly urge that the Commission as a body considers holding a Special Hearing for additional live comments on the subject matter." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-31]*)

"DIRECTOR HILLIS: I just want to clarify, our understanding is to have an additional Public Hearing, not necessarily on the Draft EIR but on the project itself prior to -- and somewhat well before the approval hearing that's anticipated at the end of the year." (*Planning Director Hillis, Draft EIR hearing transcript, April 16, 2020 [A-SFPD-Hillis-1]*)

"COMMISSIONER JOHNSON: I would be supportive of that hearing." (*Commissioner Johnson, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Johnson-1]*)

"I think I do feel that we are willing to hold an informational hearing long before approval, to get a lot of the real issues addressed, and that the Comment Period was extended. And so, again, this is just at the "Draft" Environmental Impact Report section. And so, seeing as though we're just at the very beginning, I'm in support of approving today." (*Commissioner Koppel, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Koppel-1]*)

"COMMISSIONER JOHNSON: Thanks. So, I'd like to just get some clarification from my fellow Commissioners. I really appreciate you reflecting on the project itself, on things that you'd like to see, um, brought out in the project. And am just wanting, uh, want to, one, focus on the EIR; and then, two, ask if the com -- the recommendation is something different from...the line of questioning or conversation between Commissioner Diamond and Director Hillis, related to the fact that this project would, uh -- was thinking it would come back at the end of the year; that there would be a public hearing before that, hopefully in the fall. That is a time in which we all hope we are in person. Just wanting to make sure that we're being as clear as possible about the recommendation. So, I would love to hear feedback from those who spoke." (*Commissioner Johnson, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Johnson-1]*)

469 Stevenson DEIR - 500 unit mostly MARKET RATE project shadowing parks in Tenderloin and South of Market - has DEIR comment period ENDING (although slightly extended) before ANY opportunity for affected residents to meet. "Info presentation" on project AFTER DEIR COMMENTS COMPLETE - means that comments/issues not factored into EIR. (*Sue Hestor, Letter, May 12, 2020 [I-Hestor-5-2]*)

"Language below is not what appears as legal Notice for 469 Stevenson DEIR in today's SF Ex. Legal Notice is case number, a description of the project and includes info on how to find info via PIM. Is there someone else who would have sent copy to Examiner for publication that I should talk to?" [Comment letter email includes a copy of the notice for publication of the draft EIR on March 12, 2020, as referred to as "language

below” in the commenter’s email] A follow-up email was received later the same day on March 11, 2020 acknowledging that the commenter had found the information related to the legal notice for the proposed project (*Sue Hestor, Email, March 11, 2020 [I-Hestor-1-1]*)

RESPONSE CEQA-1: PUBLIC REVIEW AND COMMENT PERIOD

The comments refer to the extension of the draft EIR public comment period due to the shelter-in-place order for San Francisco County. There are several comments that mention extending the draft EIR comment period until after the shelter-in-place order has been lifted. In addition, several comments suggest that there should be a second opportunity for in-person oral testimony on the draft EIR and an informational hearing for the project. One comment suggests that a second hearing be held at City Hall, so that members of the public could come and comment on the project in person.

In addition, several comments mention that due to the shelter-in-place order stakeholders, organizations, and residents in the community are unable to access the draft EIR online and provide comments because they do not have access to a personal computer, and cannot access public libraries and facilities. One comment also states that the comment period is ending before residents in the Tenderloin and SoMa neighborhoods can meet and that their comments will not be factored into the EIR.

The draft EIR was noticed and circulated in accordance with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. CEQA Guidelines section 15105(a) addresses the review period length, stating that the comment period should not be less than 30 days nor more than 60 days except in unusual circumstances. “Unusual circumstances” are not defined in CEQA. The language in chapter 31 of the San Francisco Administrative Code is similar to the CEQA Guidelines in defining the required length of the comment period (section 31.14(b)(1)), stating that a comment period shall not be less than 30 days nor more than 60 days except under unusual circumstances. As discussed in RTC Section 1.0, Introduction to Responses and Comments, the 45-day public review and comment period for the project, starting on March 12, 2020, was extended to 61 days due to the shelter-in-place order for San Francisco County. The public review and comment period for the project was extended to 61 days because the 60th day was on a Sunday; therefore, the public review and comment period ended on Monday, May 11, 2020, because it is the first business day following the 60-day public review and comment period.

The draft EIR was made available for public review and comment on the planning department’s website at <https://sfplanning.org/environmental-review-documents>. As stated on pg. 1-4 of the draft EIR, members of the public could also request a hard copy of the draft EIR to be mailed to them by emailing the EIR Coordinator at CPC.469Stevenson@sfgov.org or calling 415-575-9146. Referenced materials in the draft EIR were (and continue to be) available for review on the San Francisco Property Information Map at <https://sfplanninggis.org/pim/>. The draft EIR includes detailed instructions for how to access individual documents on the San Francisco Property Information Map.

Members of the public were able to submit written comments or questions on the draft EIR by emailing CPC.469Stevenson@sfgov.org, by mailing them to 1650 Mission Street, Suite 400, San Francisco, California 94103, or calling 415.575.9146. Comments could also be made in person during the public hearing before the planning commission that was held remotely due to the shelter-in-place order on April 16, 2020. To protect public health, the April 16, 2020 planning commission hearing was held in accordance with the Governor’s Executive Order N2920, which exempts the requirement to provide a physical location for members of the public to participate in public meetings, and has also suspended certain teleconference requirements of the Brown Act. In addition, CEQA Guidelines section 15202 and chapter 31 of the San Francisco Administrative Code does not require a public hearing on a draft EIR to be held in person.

During the public hearing held on April 16, 2020, the planning commission did not make a motion to extend the public comment period beyond May 11, 2020, and did not make a motion to conduct another in-person or remote public hearing on the draft EIR once the shelter-in-place order is lifted. A remote informational hearing on the project was held before the planning commission on November 12, 2020. A remote hearing to certify the Final EIR will be held on the date noted on the cover of this RTC. During the EIR certification hearing, the public may provide additional testimony pertaining to the project. These comments may be taken into account by the decision makers when determining whether or not to certify the Final EIR. However, the public comment period ended on May 11, 2020 and any comments received after the close of the public review period, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.²⁵

As such, the public review and comment period for the project was adequate and completed in accordance with section 15105(a) of the CEQA Guidelines and chapter 31 of the San Francisco Administrative Code. These comments do not raise specific issues related the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the draft EIR. Therefore, no further response to these comments is required pursuant to CEQA Guidelines section 15088.

COMMENT CEQA-2: CEQA FRAMEWORK

“COMMISSIONER FUNG: Overall the Draft EIR is... is comprehensive enough to be able to initiate this process. Both the environmental and entitlement issues that have been brought up hopefully will be resolved and this very unimaginatively designed building will go through its process.” (*Commissioner Fung, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Fung-4]*)

“COMMISSIONER PRESIDENT KOPPEL: So, before we call on anybody else, I'm in favor of initiating what we're looking at today....And so, again, this is just at the "Draft" Environmental Impact Report section. And so, seeing as though we're just at the very beginning, I'm in support of approving today.” (*Commissioner President Koppel, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Koppel-1]*)

“The existing CEQA framework doesn't adequately consider any project in the context of a global environment, because it doesn't consider positive environmental impacts.” (*Theodore Randolph, Email, April 17, 2020 [I-Randolph-1]*)

RESPONSE CEQA-2: CEQA FRAMEWORK

The comments acknowledge the sufficiency and adequacy of the draft EIR. One comment generally states that the existing CEQA framework doesn't adequately consider any project in the context of a global environment, because it doesn't consider positive environmental impacts.

The comments pertaining to the sufficiency and adequacy of the draft EIR are acknowledged. CEQA and the CEQA Guidelines require an EIR to analyze a project's potential physical environmental effects, and identify possible ways of reducing or avoiding the potentially significant impacts. In accordance with CEQA requirements, the analysis provided in the draft EIR focuses on the physical environmental effects

²⁵ On May 12, 2020, the planning department received two additional comment letters via email from Angelica Cabande, with South of Market Community Action and Sue Hestor. Although the public comment period ended on May 11, 2020 for the proposed project, responses to these two additional comment letters have been provided in this Response to Comments document and included in Attachment B.

as required by the CEQA Guidelines to determine significant effects on the environment, and therefore the framework of the draft EIR is adequate. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the draft EIR. No further response to this comment is required pursuant to CEQA Guidelines section 15088.

3.12 GENERAL ENVIRONMENTAL COMMENTS

The following comments and corresponding responses in this section relate to general environmental comments on the draft EIR:

- GEC-1, Cumulative Impact Analysis

A corresponding response follows the grouping of comments.

COMMENT GEC-1: CUMULATIVE IMPACT ANALYSIS

“I’d like to see a discussion of the cumulative effect of all required exemptions, rear-yard requirements, quality of onsite open space. When you do not provide the rear yard, what is the quality of open space cumulative for the project as it is proposed?” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-20]*)

“The Cumulative analysis is based on an arbitrary 0.25-mile radius area surrounding the project site. It should be based on applicable planning districts with previous environmental review for data consistency and a much larger district for reality. This would include Central and West SoMa, Central Market, the Hub, and Tenderloin districts.” (*John Elberling, Email, April 15, 2020 [O-YBNC-1]*)

RESPONSE GEC-1: CUMULATIVE IMPACT ANALYSIS

The first comment requests discussion of the cumulative effects of all required exemptions, rear-yard requirements, and the quality of onsite open space proposed by the project. The second comment mentions that the cumulative analysis should not be based on a 0.25-mile radius area surrounding the project site. Instead, the cumulative analysis should be based on applicable planning districts with previous environmental review, including projects within the Central and West SoMa, Central Market, the Hub, and Tenderloin districts.

Rear-yard and Open Space Requirements

The proposed project would use the Individually Requested State Density Bonus Program to provide affordable housing units onsite. In exchange for providing affordable housing units, the proposed project can request any waivers necessary to physically accommodate the increase in density.²⁶ As such, the proposed project can request a waiver from the rear yard requirements in planning code section 134(g) as allowed by the Individually Requested State Density Bonus Program.

On pg. 3-5 of the draft EIR, it states that the proposed project would provide 14,000 square feet of private open space and 11,000 square feet of common usable open space. The proposed project would not meet the open space requirements of the planning code and is requesting an open space waiver. Therefore, the following staff-initiated text revisions have been made to clarify the project’s request for a waiver:

The proposed project would provide 14,000 square feet of private open space and 11,000 square feet of common usable open space. Private open space would consist of private balcony spaces for 22 dwelling units. The private balconies would be provided on the 2nd, 6th, and 27th floors. The common usable open space would consist of the ground floor courtyard and solariums. The

²⁶ City of San Francisco Planning Department, Individually Requested State Density Bonus Program, Informational and Supplemental Application Packet. http://forms.sfplanning.org/IndividuallyRequestedState_SupplementalApplication.pdf. Accessed September 18, 2019.

proposed project is requesting a waiver from the open space requirements in planning code section 135 under the Individually Requested State Density Bonus Program.

Rear yard and open space provided by the project may be relevant to the recreational analysis under CEQA. Section E.11, Recreation, of the initial study evaluated the project's impacts and cumulative impacts on parks and recreation. As discussed on pg. 164 of the initial study, there are six parks within 0.5-mile of the project site. While the proposed project would introduce a new permanent population living at the site, it is unlikely the proposed project would substantially increase the demand for or use of either neighborhood parks and recreational facilities, or city-wide facilities to the extent that physical deterioration would occur or require the construction or expansion of recreational facilities that could result in significant physical environmental impacts. Furthermore, the proposed project would provide onsite private and common open space areas to partially offset potential impacts on parks and recreation facilities. Therefore, the initial study determined the proposed project would have a less-than-significant impact on parks and recreational facilities, and a less-than-significant cumulative impact. This comment does not present any evidence that the cumulative impact analysis on parks and recreational facilities in the draft EIR is inadequate, inaccurate, or incomplete. Decision makers will consider the proposed project, including all requested waivers and incentives allowed through the individually requested state density bonus program during their deliberations on whether to approve, modify or disapprove the proposed project. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

Geographic Scope of Cumulative Impact Analysis

As discussed in the draft EIR Section 4.1.6, Cumulative Impacts, there are two approaches to a cumulative impact analysis as provided in CEQA Guidelines section 15130(b)(1):

- The analysis can be based on a list of reasonably foreseeable future projects that could produce closely related impacts and combine with those of a proposed project, or
- A summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The following factors were used to determine an appropriate level for cumulative analysis in this EIR:
 - **Similar Environmental Impacts.** A relevant project contributes to effects on resources that are also affected by the proposed project. A relevant future project is defined as one that is "reasonably foreseeable," such as a project with an application on file at the approving agency or approved funding.
 - **Geographic Scope and Location.** A relevant project is within the geographic area where effects could combine. The geographic scope varies on a resource-by-resource basis. For example, the geographic scope for evaluating cumulative effects on regional air quality consists of the affected air basin, whereas the cumulative effects of construction noise are limited to combined noise from the project and nearby projects.
 - **Timing and Duration of Implementation.** Effects associated with activities for a relevant project (e.g., short-term construction or demolition, long-term operations) would most likely coincide with the timing of related effects from the proposed project.

The cumulative impacts analyses in the draft EIR and initial study relied on the geographic scope and location most appropriate for the environmental topic analyzed. The projects within 0.25-mile of the project site that are listed in Table 4.1-1 and shown in Figure 18 of the draft EIR are illustrative of the types of projects nearby that may have the potential to combine with the proposed project to result in cumulative effects and thus may be considered in the cumulative analysis. In addition, some environmental topics included projects outside of the 0.25-mile radius or planning areas, as appropriate. For instance, the

cumulative analysis of shadow impacts considers individual projects that are anticipated to shade the same open spaces as the proposed project, even if they are outside of a 0.25-mile radius of the project site. The cumulative analysis of transportation impacts also considered the Central SoMa Plan, the Eastern Neighborhoods Rezoning and Area Plans, the Hub and Civic Center Public Realm Plan, Muni Forward, and the Better Market Street Project. As such, the cumulative analysis provided in the draft EIR is adequate and meets the requirements of CEQA Guidelines section 15130(b)(1).

The comment pertaining to the geographic scope of the cumulative impact analysis does not present any evidence that the cumulative analysis to the draft EIR is inadequate. Therefore, no further analysis or changes to the draft EIR are required pursuant to CEQA Guidelines section 15088.

3.13 MERITS OF THE PROJECT

The following comments and corresponding responses in this section relate to the merits of the proposed project:

- ME-1, Opposition of Project's Shadow Impacts
- ME-2, Support for Project
- ME-3, General Merits

A corresponding response follows each grouping of comments.

COMMENT ME-1: OPPOSITION OF PROJECT'S SHADOW IMPACTS

"MS. HELFFENSTEIN: Good afternoon, Commissioners. This is Jill Helffenstein. I am the Board President of Friends of Mint Plaza, the organization specially created to manage Mint Plaza for the public's benefit. I am speaking to express the Board's strong opposition to the shadow cast by the 469 Stevenson project over Mint Plaza." (*Jill Helffenstein, Draft EIR hearing transcript, April 16, 2020 [O-FoMP-1-1]*)

"Friends of Mint Plaza (FoMP) is a non-profit 501(c)(3) organization specially created to manage Mint Plaza for the public's benefit. We seek to activate the Plaza through thoughtful and creative programming, and maintain the Plaza in a clean and orderly fashion that makes it a safe and inviting place for people of all ages and incomes to enjoy at all hours of the day.

As the Board President of FoMP, I am writing to express the Board's opposition to the shadow cast by the 469 Stevenson project over Mint Plaza. We generally support new housing in this location, however as evidenced in the shadow analysis in the EIR (please see attached shadow pages for your reference), the net new shadow from the project would take away significant sunlight from Mint Plaza in the late afternoon for several months of the year. As a public green space, Mint Plaza should be treated as a park space, and San Francisco does not allow the shadowing of parks:

In 1984, San Francisco voters passed Prop K, the Sunlight Ordinance. In part, the ordinance reads:

'[The city] shall disapprove any building permit governed by the provisions of this section if it finds that the proposed project will have any adverse impact on the use of the property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission because of [...] shadowing.'

On behalf of Friends of Mint Plaza, we urge the San Francisco Planning Department to consider the adverse impact the shadow will have on the use and vibrancy of Mint Plaza, and take steps to reduce the overall height and massing of this proposed tower." (*Jill Helffenstein, Draft EIR hearing transcript, April 16, 2020 [O-FoMP-2-1]*)

RESPONSE ME-1: OPPOSITION OF PROJECT'S SHADOW IMPACTS

The comments express opposition to the project based on its merits (related primarily to the shadow cast over Mint Plaza).

These comments do not raise specific environmental issues about the adequacy or accuracy of the draft EIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. CEQA directs public agencies to treat EIRs as "full disclosure" documents to ensure that the public is aware that public agencies have considered potential adverse environmental

effects in their decision-making processes. In addition to the physical environmental effects disclosed in the draft EIR, all comments provided to the planning department on the proposed project through the CEQA process, whether on the EIR analysis or the merits of the proposed project, are included in Attachment B of this RTC document. Although general comments in opposition to the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA, such comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process. Therefore, no further analysis or response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT ME-2: SUPPORT FOR PROJECT

“Good afternoon, Commissioners. Corey Smith on behalf of the San Francisco Housing Action Coalition, here, in support. You know, we -- We obviously understand the environmental imperative of taking underutilized sites like parking lots and adding lots and lots of housing. We all know that putting housing in close proximity to jobs and public transit is environmentally sound. And as we've watched the air quality... during this COVID-19 crisis... increase, that the air is cleaner, we know it's because people are not driving as much. And so, if we want to continue with the idea that, hey, climate change is real, we know that exhaust from cars is one of the key contributors, the best and most effective way today that we can work to mitigate that negative impact is by creating density in our urban corridors, adding lots and lots of housing in places that are already well connected, close to the Central SoMa Area Plan where we just added jobs or employees. And so, I just want to encourage everybody, when thinking about the environmental impacts of this, look at it from a holistic perspective to understand what great things could come out of building homes at this site on Stevenson. Thank you.” (*Corey Smith, Draft EIR hearing transcript, April 16, 2020 [O-SFHAC-1]*)

“Good afternoon, President Koppel, fellow Commissioners. Thank you for giving me this opportunity to speak. My name's Leonard Basoco, I'm a Field Rep with the Carpenters' Union, Local 22 here in San Francisco. I represent 40,000 Carpenters in Northern California, and about 4,000 live here in San Francisco. We are in support of the 469 Stevenson Street project, building, a long-time partner of the Carpenters' Union who's committed to using Union General Contractors. With 27 stories and 497 units, this project will give local Carpenters the opportunity to work close to home and give Apprentices opportunities to learn a trade that offers a living wage and benefits including health and retirement. You know, we are in a job-and-housing crisis right now; and this may not be the answer, but this is part of the solution. So, the Carpenters' Union fully supports this project and asks that you approve the project when the time comes. Thank you.” (*Leonard Basoco, Draft EIR hearing transcript, April 16, 2020 [I-Basoco-1]*)

“Hi, I'm Andy Penonque (phonetic spelling). I'm calling in support of this project. I think what we're really not considering, a lot of the comments I've heard, is the people who would live here, especially would live here, if the larger proposal would be allowed to go ahead. You know, we're talking all about shadows and transit. I think we need to sort of look at the classic balance scale. On one side we have more shadows, maybe a little more traffic. Although a lot of those people are not going to be driving. On the other hand we have housing for dozens, even hundreds of people. Right? So, it's important to consider the needs of the people who are currently living there. It's also important to consider the needs of the people who are without housing because we don't have enough of it in the city. And I also just want to say, like, there's a

lot that we can't do in terms of planning and being contingent in the current Coronavirus; but there's a lot that we can do that actually is more easy to do now online than it would be before, people take time out of their day, leaving work. I wouldn't be having this comment right here if I had to take, you know, half a day off of work. That's not something a lot of working people can say. So, listen, hats off for that. So, we really need to -- to make sure everyone actually has an opportunity to speak, and so, I really like this format. But, yeah, we need to build this and consider the needs of the people who aren't on the line but the people who would live here. We need you to look at that. Thank you." (*Andy Penonque, Draft EIR hearing transcript, April 16, 2020 [I- Penonque -1]*)

"In particular, the VMT impacts of maximum density should be considered a positive impact because it replaces the VMT of people driving from long distances to park in the lot, some commuters coming from up to hundreds of miles away. The existing condition imposes high VMT for residents of other counties to reach attractions and jobs in San Francisco. The residential parking in the project obviously also facilitates harmful VMT, and ideally the project would have no parking at all, but the VMT impact should be reduced, perhaps below 0, when taking into consideration the increased ability for residents to walk or take transit. In this regard, the proposed project is even better than the reduced density option, even though it has more parking spaces, because the parking ratio is lower." (*Theodore Randolph, Email, April 17, 2020 [I-Randolph-2]*)

"On the matter of gentrification risk, this project should also be considered positively. As a commercial parking lot, there are no residents to displace. On the contrary, providing the most housing, even additional market-rate housing, has been shown in most study methodologies and through the most solidly accepted economic principles to decrease gentrification risk the most. In addition, as an affordable housing bonus project near transit without excessive parking, this project has both on-site affordable rent and car-free lifestyle affordability. This lifestyle affordability applies also to market-rate units when the residents decline to pay for the unbundled parking. Especially compared to the current condition, when many low-income workers pay for vehicles and fuel to commute to this neighborhood from homes up to hundreds of miles away." (*Theodore Randolph, Email, April 17, 2020 [I-Randolph-3]*)

"We get the most environmental benefit from allowing the project to be as big and bulky, with the most housing units, as possible. Whoever is editing the EIR should make that clear." (*Theodore Randolph, Email, April 17, 2020 [I-Randolph-4]*)

RESPONSE ME-2: SUPPORT FOR PROJECT

These comments generally pertain to the merits of the project providing additional housing for people near jobs and public transit, reduction in VMT, and the alternative that would provide the most housing units. One comment also expresses support for having the option to attend the public hearing remotely rather than attending in person.

These comments do not raise specific environmental issues about the adequacy or accuracy of the draft EIR's coverage of physical environmental impacts that require a response under CEQA Guidelines section 15088. These comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT ME-3: GENERAL MERITS

“I think, in closing, I think it is a market-rate-driven, speculative project.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-25]*)

“My own belief is that the State Density Bonus does not really add the numbers of required B.M.R. units but that, rather, a negotiated project like Former Supervisor Kim used to do, would create far more benefits and less impact from a building that takes a lot and does not seem to give a lot.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-15]*)

RESPONSE ME-3: GENERAL MERITS

These comments pertain to the general merits of the proposed project. One comment generally states that the proposed project is a market-rate-driven, speculative project. The other comment believes that the State Density Bonus project does not provide the number of required below market rate units, and that negotiated projects provide more benefits.

These comments do not raise specific environmental issues about the adequacy or accuracy of the draft EIR’s coverage of physical environmental impacts that require a response under CEQA Guidelines section 15088.

3.14 GENERAL COMMENTS

The comments and corresponding responses in this section relate to general comments on the draft EIR. The general comments are grouped according to the following issues they raise:

- GC-1, Socioeconomic Impacts
- GC-2, Density Bonus
- GC-3, General Shadow and Transit Impacts
- GC-4, ALH Urban and Regional Economics Study
- GC-5, COVID-19 impacts
- GC-6, Mark Cavagnero and Associates Site Study

A corresponding response follows each grouping of comments.

COMMENT GC-1: SOCIOECONOMIC IMPACTS

“I see the possibility of great impact of gentrification, especially social and equity impacts on the SoMa and Youth and Family Zone.” (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-23]*)

“The DEIR does not sufficiently study the impacts of gentrification and displacement on the environment that will result from this project. As stated in the Initial Study, “It is also noted that the planning department, with assistance from ALH Urban & Regional Economics, has completed extensive analysis of gentrification and displacement in the city to determine whether individual projects, including market-rate housing projects, contribute to gentrification and displacement and whether either of these phenomena directly or indirectly result in physical environmental effects. The planning department has not found empirical evidence supporting the position that market-rate housing development leads to residential or commercial displacement that results in secondary physical effects on the environment. No impact would occur” (Initial Study pg. 83).

The addition of more than 1,100 new residents in a high income bracket as reflected in the type of luxury market-rate housing that is being proposed for this site creates a specific impact whereby disposable income creates a demand for services that increase environmental impacts in the area. This includes but is not limited to the increased usage of ride-sharing and delivery services. The increase in demand for services also creates the need for additional service-sector workers to serve the new higher income residents, the environmental impacts of which are not adequately studied.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-18]*)

“The impacts also reverberate further due to the increased land value that a new high-rise luxury residential development infers on nearby parcels as the opportunity for similar developments that are very profitable are now possible to move forward. As there are now higher income residents in the neighborhood, there is also the ability for neighboring residential units to be rented at higher prices to this new higher income clientele, causing increased pressure for evictions leading to displacement. This displacement has environmental impacts as those who are displaced out of the city have to travel further back to get to current employment that is within San Francisco, and the new higher income residents have new environmental impacts that have been outlined above. This is not studied in the DEIR.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-19]*)

“Hello, this is David Woo with SoMa Pilipino Cultural District. There are many gentrification, misplacement, environmental impact concerns about the project.” (*David Woo, Draft EIR hearing transcript, April 16, 2020 [O-SoMa-1-1]*)

“MS. CABANDE: Good afternoon, Commissioners. My name is Angelica Cabande, and I'm with the SOMCAN. The proposed luxury housing project at 469 Stevenson Street continues to provide an overabundance of market-rate housing that negative -- negatively impacts our community.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-1]*)

“Lastly, there is an environmental impact when new projects cause displacement and gentrification. This project will increase rents in the area and will also escalate the profitability over the over – the underlying zoning.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-8]*)

“Displacement of lower-income workers from being able to live near work and providing new housing for people who tend to drive and use ride-share service has a clear environmental impact.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-9]*)

“There is an enormous conflict between this project and the surrounding low-income communities. And that should be basically accounted for in the project.” (*Sue Hestor, Draft EIR hearing transcript, April 16, 2020 [I-Hestor-3-2]*)

“Good afternoon, Commissioners. Thank you so much for this opportunity to give Public Comment. My name is Sarah Ogilvie. I am a member of B&B Action. And I am also speaking on my own behalf as a resident of San Francisco. I believe in projects that create an abundance of housing in opportunity-rich areas. I would like to -- I completely understand the fears and the concerns of the people who have spoken, who represent low-income and hard-working working-class people, people who may be displaced. I completely understand what they're saying. I, myself, have experienced homelessness. And it was only through housing, through obtaining housing little by little, that I was able to get my family out of a crisis of homelessness and out of a crisis of economic challenges. The 495 units that would be created here would take tremendous pressure off of districts like the Mission where I live. And it would allow people who can afford these homes, who are putting pressure on the low -- on the old housing stock in the Mission District. And it would get them to an area where transit is plentiful. Problems regarding the street and the plaza, they can be resolved. I've -- I have been homeless, standing in the middle of Stevenson Plaza. My concern at that point wasn't shadows. It was the fact that I was homeless. So, I just want to -- I want to -- I wanted to speak on behalf of a lot of different people here when I say that adding housing stock to San Francisco helps the Carpenter who just spoke, creates hundreds of jobs and millions in revenue for the City, which, the City is looking at serious fiscal danger. And we need to think proactively. We need to be forward thinking. We need to give everybody an opportunity to boost the economy here. And creating abundant housing is going to give infinite possibility to thousands of people who can't live in San Francisco right now, to deliver it from a catastrophe. So, please, please look at this project with open eyes and as widely -- as widely scaled for housing as possible. Thank you so much.” (*Sarah Ogilvie, Draft EIR transcript hearing, April 16, 2020 [I-Ogilvie-1]*)

“The socio-economic makeup of new residents is also not taken into account, as these residents have more disposable income to expend on services such as ride-sharing and delivery services. The vast majority of new residential units will be luxury market-rate, and the impacts of the types of services that such residents use is not studied in the DEIR.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-14]*)

RESPONSE GC-1: SOCIOECONOMIC IMPACTS

The comments express concerns that the project could cause social and economic impacts, including gentrification and displacement, specifically for low-income workers and on the SoMa Youth and Family Zone SUD. One commenter suggests that there is an environmental impact when new projects cause displacement and gentrification.

Several comments also express concern that the proposed project will provide luxury market-rate housing that will increase rent for neighboring residential units, causing increased pressure for evictions leading to displacement. Additionally, one commenter suggests that luxury market-rate housing will increase environmental impacts in the area. The commenter suggests that this impact includes but is not limited to the increased use of ride-sharing and delivery services. The commenter also argues that the increase in demand for services also creates the need for additional service-sector workers to serve the new higher income residents and that these environmental impacts are not adequately studied.

One commenter generally expresses support for the proposed project by providing affordable housing units and creating jobs and revenue for the City.

This response discusses whether the project would result in socioeconomic changes, such as gentrification and displacement, and whether such changes could result in a physical environmental impact for the purposes of CEQA. Whether or not the project would result in environmental impacts under CEQA, the planning department acknowledges that gentrification and displacement are real and that communities experience its effects. Even if a project would not result in physical environmental changes due to socioeconomic effects, the planning department and other City agencies have implemented and will continue to implement initiatives to address racial inequity, social inequity, and housing affordability and their socioeconomic effects.

Socioeconomic Effects and CEQA

Socioeconomic effects are not, in themselves, considered physical environmental impacts under CEQA. Rather, pursuant to CEQA Guidelines section 15064, an EIR reviews the effects of a project that are related to a physical change to the environment. A significant effect on the environment, in turn, is one that results in a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.²⁷ However, an economic or social change by itself shall not be considered a significant effect on the environment. Therefore, evidence of social or economic effects that do not contribute to, or are not caused by, physical impacts on the environment is not substantial evidence of a significant effect on the environment.²⁸

²⁷ Section 15382 of the CEQA Guidelines.

²⁸ Section 15064(f)(6) of the CEQA Guidelines.

The commenters' concerns about displacement and gentrification resulting in environmental impacts primarily in the form of increased VMT due to ridesharing and delivery services, and people moving farther away and commuting back to the City, are acknowledged. As discussed in Response TR-1, the person trip generation for the proposed project accounts for use of transportation network companies. The person trip generation for the proposed project also accounts for "Other" modes, which includes biking, skateboards, etc. These other modes also account for electric scooter and electric bicycles. Furthermore, as discussed in Response TR-1, the project site is located in an area where existing daily VMT is substantially lower than the regional average and the proposed project would not cause substantial additional VMT.

The commenters' overall concerns about the project resulting in gentrification and displacement are also acknowledged. As discussed on pg. 83 of the initial study, the project site is currently developed as a parking lot and would not directly displace any residents or housing units. Therefore, the proposed project would have no direct impact related to the displacement of housing units or people and would not necessitate the construction of replacement housing. As further stated on pg. 83 of the initial study and by the commenter, the planning department's analyses of market rate projects in similar settings do not identify any indirect or secondary physical environmental effects of market rate development and the comments do not provide any evidence or information to the contrary. The planning department's analysis of other projects in the City, primarily the Mission neighborhood, concluded that similar projects would not result in gentrification and displacement and did not identify any potential secondary physical environmental impacts, even if gentrification and displacement were to occur as a result of these projects.

Nevertheless, based on the comments received above during the public review of the draft EIR, a project-specific study was prepared by ALH Urban & Regional Economics in September 2020²⁹ to assess the potential socioeconomic effects, including residential gentrification and displacement, due to the proposed project. The findings of the study are summarized herein, and the full study is included as Attachment G. The study reviewed residential development patterns in San Francisco and in the area surrounding the project site to assess the amount of development occurring in the area historically and presently in conjunction with the proposed project. The study also reviewed historic and current rents in San Francisco to further provide perspective on the existing market in which the planned rental units at the project site and surrounding areas will be developed.

The study acknowledges that the proposed project is being developed in the portion of the City of San Francisco historically characterized by the greatest amount of residential development. In addition to the proposed project, there are a number of other new multi-family residential projects currently planned within a 1-mile radius of the project site. Apartment rents in San Francisco have increased strongly over time. However, a high percentage of existing San Francisco apartment residents living in older units are insulated from rental increases due to San Francisco's rent control provisions.³⁰

ALH Urban & Regional Economics' review of academic and related literature as well as case studies in San Francisco concluded that market-rate housing production, such as the proposed project, is not likely to cause an increase in existing rents in nearby housing units. The literature review and case study examination generally coalesce around the following conclusions:

- Housing production does not result in increased costs of the existing housing stock, but rather helps suppress increases in rents and home prices in existing buildings;
- Failure to increase housing stock to accommodate demand resulting from job growth and a generally increasing population will result in greater competition for existing housing, with higher

²⁹ ALH Economics. Socioeconomic Effects of 469 Stevenson Street Market-Rate Development, September 2020.

³⁰ Ibid.

income households outbidding lower income households and otherwise exerting upward price pressure on existing housing stock; and,

- Both market-rate and affordable housing development help to suppress price appreciation and reduce displacement.

As discussed in the ALH Urban & Regional Economics study for this project (Attachment G), analysis of the relationship between development, affordability, and displacement at the highly localized level is required to understand the rate at which it occurs in very small, localized areas. Two studies published in 2019 studied and analyzed this localized impact and found that rents of existing apartment projects in the immediate vicinity of new market-rate apartment buildings declined upon completion of the market-rate units in the immediate surrounding area for a duration of up to three years after completion of the new units.³¹

The ALH Urban & Regional Economics study for this project also reviewed literature on the topic of gentrification and the causal relationship between market-rate residential development and gentrification and displacement. Based on their review of these studies, ALH Urban & Regional Economics concluded that experts in the field generally agree that there is weak causation between gentrification and displacement. Displacement can occur without gentrification, and displacement is not inevitable, with public policy tools available to stabilize communities. In some instances, studies suggest that existing low-income households in a gentrifying neighborhood may benefit from gentrification because of neighborhood improvements perceived to be of value and increased housing satisfaction. Finally, some experts also conclude that the ability for residents to relocate or move (e.g., mobility rates) are not distinguishable between neighborhoods experiencing gentrification and neighborhoods not experiencing gentrification.³²

The overall conclusion from the literature review is that there is no evidence to support the argument that new market-rate development causes gentrification or displacement. The findings overwhelmingly suggest that while some displacement may occur, it is not the inevitable result of gentrification, and that many factors influence whether or not displacement occurs.³³ As such, the planning department finds that the proposed project is not likely to result in residential displacement and gentrification. Thus, the proposed project would not result in physical environmental impacts due to gentrification or displacement beyond those disclosed in the draft EIR.

For the reasons described above, comments pertaining to socioeconomic effects are outside of the scope of CEQA and do not raise specific issues concerning the adequacy or accuracy of the draft EIR's analysis of the project's physical environmental impact under CEQA. However, such comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. For this reason, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

City Actions to Address Racial and Social Inequity, Community Stabilization, and Housing Affordability

While the proposed project would not result in gentrification and displacement, the department acknowledges that gentrification, displacement, and racial and social inequity are real and that it affects communities in the City. The planning department and other City agencies have implemented and will continue to implement initiatives that address these socioeconomic effects. Recent city and departmental actions related to these initiatives are summarized below.

³¹ Ibid.

³² Ibid.

³³ Ibid.

Racial and Social Equity

In 2019, the San Francisco Planning Commission adopted and the Historic Preservation Commission endorsed Phase I of the planning department's Racial and Social Equity Action Plan (Action Plan), which focused on the planning department's internal functions.^{34,35}

Phase II of the plan is currently underway and will focus on strategies and actions to advance racial and social equity outcomes for the planning department's community-facing programs, policies, and processes. The forthcoming second phase of the Action Plan will include guidance on racial and social equity impact analysis for development review.

On June 11, 2020, the planning commission adopted Resolution No. 20738, Centering Planning on Racial and Social Equity. The equity resolution acknowledges the racial and social inequities that have occurred in the past and are still occurring. As stated in the resolution, "San Francisco has a long history of creating and/or enforcing laws, policies, and institutions that have promoted white supremacy and perpetuated racial inequities in the City...Although the City has taken steps to undo the damage caused by past policies and practices, the racial disparities caused continue to the present day." Resolution No. 20738 directs the planning department to center its work program and resource allocation on racial and social equity and condemns and apologizes for the City's history of racist, discriminatory, and inequitable planning policies that have resulted in racial disparities. The resolution directs the planning department to implement its Action Plan; develop proactive strategies to address structural and institutional racism, in collaboration with Black and Indigenous communities and communities of color; directs the planning department to amend its hiring and promotion practices to ensure that the department's staff reflects the diversity and demographics of the community at all staff levels; recommends that the board of supervisors condemn discriminatory government actions and reallocate resources towards expanding access to open space, housing, transportation, and services for American Indian community, Black community, and communities of color; and, directs the planning department to build accountability through metrics and reporting.³⁶

On July 15, 2020, the San Francisco Historic Preservation Commission adopted a similar resolution as the planning commission, centered on the planning department's preservation work program and resource allocation on racial and social equity.³⁷

In response to the equity resolution the planning department has created and staffed a new community equity division within the planning department to prioritize and coordinate equity tasks across the planning department. The new division will support the transition of the planning department towards a strong equity framework. The division will finalize the development and help ensure implementation of the planning department's Action Plan, develop metrics for monitoring and measuring outcomes, and issue annual reports on progress. The division will also work on strategies and advise on policy on a wide range of topics with equity implications, including but not limited to housing, community development, and COVID-19 recovery strategies. A few of the key priority projects will include implementation of a budget equity tool to the planning department's budget, guidance on a racial and social equity impact analysis for the planning department's regulatory review processes and practices, and identify equity changes to the

³⁴ San Francisco Planning Commission Resolution No. 20569. Racial & Social Equity Action Plan, Phase I, adopted November 21, 2019.

³⁵ San Francisco Historic Preservation Commission Resolution No. 1114. Racial & Social Equity Action Plan, Phase I, endorsed December 18, 2019.

³⁶ San Francisco Planning Commission Resolution No. 20738. Racial & Social Equity Initiative - Centering the Planning Department's Work Program and Resource Allocation on Racial and Social Equity, adopted June 11, 2020.

³⁷ San Francisco Historic Preservation Commission Resolution No. 1127. Racial & Social Equity Initiative - Centering Preservation Planning on Racial and Social Equity, adopted July 15, 2020.

planning code. While the community equity division is guiding the planning department's initial efforts to implement the equity resolution and Action Plan, staff in all divisions will participate in the department's work to advance racial and social equity.

Community Stabilization & Housing Affordability Efforts

The City's Community Stabilization Report³⁸ was completed and released in 2019. This multiagency effort seeks to alleviate the impacts of ongoing displacement, prevent future displacement, and help vulnerable populations thrive and contribute to the City's economy and culture. The initiative consists of a comprehensive and interactive policy and program inventory that organizes the City's existing portfolio of tools and priorities in one location on the planning department website.³⁹ The inventory includes an assessment of the City's policies and programs relating to tenant protection and housing stabilization, housing production and preservation, cultural stabilization, and economic development. Policy and program assessment summaries include ideas for future consideration that have the potential to increase community stability.

In March 2020, the planning department published the Housing Affordability Strategies Report.⁴⁰ The report provides strategies for building 5,000 new housing units per year through 2050, ensuring at least one third are affordable, and preserving 1,100 existing units as permanently affordable housing every year for the next 30 years.

In addition to the City's community stabilization and housing affordability efforts, the department is also working on the following related efforts:

- Environmental justice updates to the San Francisco General Plan – The environmental justice update to the City's general plan will integrate environmental justice policies throughout the general plan to address environmental racism and community health. It will be closely coordinated with the planning department's Racial & Social Equity Action Plan.
- Recovery Strategies: Housing, Small businesses and Retail, Work trends, Community Services – Building on the work of the Economic Recovery Task Force,⁴¹ the planning department is analyzing recommendations that the department would implement, in partnership with other City agencies, to scope its equitable recovery strategies work program and identify priority projects.

The planning department is also engaged in leading or supporting various community-based efforts aimed at stabilizing communities and minimizing displacement such as the Cultural Districts Program. In the SoMa neighborhood this includes supporting the SoMa Pilipinas Cultural Heritage District⁴² and the SoMa Leather & LGBTQ Cultural District⁴³ in their development of a Cultural Heritage, Housing and Economic Sustainability Strategy report.

³⁸ San Francisco Planning Department, Community Stabilization, <https://sfplanning.org/community-stabilization-strategy#schedule-and-next-steps>, accessed September 24, 2020.

³⁹ <https://sfplanning.org/community-stabilization-strategy>

⁴⁰ San Francisco Planning Department. San Francisco Housing Affordability Strategies. March 2020. <https://sfplanning.org/housing-affordability-strategy#about>. Accessed November 9, 2020.

⁴¹ San Francisco Economic Recovery Task Force. <https://www.onesanfrancisco.org/covid-19-recovery>. Accessed November 9, 2020.

⁴² SoMa Pilipinas. <https://www.somapilipinas.org/>

⁴³ Leather & LGBTQ Cultural District. <https://sfleatherdistrict.org/>

COMMENT GC-2: DENSITY BONUS

“The proposed waivers from Planning Code sections 132.1 and 134 for setbacks and rear yard requirements (pg. 3-5) are unacceptable because of the impacts the building’s mass will make on the alleys.” (*Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-4]*)

RESPONSE GC-2: DENSITY BONUS

The comment expresses concern regarding the project’s request for waivers from planning code sections 132.1 and 134, and the building’s mass on the alleys.

As discussed in draft EIR Section 3.1.4, Planning Code, the proposed project is requesting a waiver from the rear yard requirements in planning code section 134(g) as allowed by the Individually Requested State Density Bonus Program. The following staff-initiated text edit has been made to the list of project approvals included in Section 2.8.1, pg. 2-51, of the draft EIR to clarify the project’s requested waivers, including a waiver from the rear yard requirements:

- Approval of an Individually Requested State Density Bonus project with up to two incentives/concessions and unlimited waivers from the following requirements: height, bulk, floor area ratio, rear yard requirements, open space, section 148 wind comfort exceedances, and dwelling unit exposure.

These revisions do not change the analysis or conclusions presented in the draft EIR pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5. Therefore, recirculation of the draft EIR is not required.

The potential physical environmental effects of the proposed building’s massing were considered in the draft EIR analysis as it relates to the project’s wind and shadow impacts. The draft EIR determined the proposed project would not create wind hazards that affect publicly accessible areas of substantial pedestrian use and this impact would be less than significant (refer to Response WD-1 for further discussion). As discussed in draft EIR Section 4.4, Shadow, the proposed project could result in a significant and unavoidable shadow impact on Mint Plaza (refer to Response SD-1 for further discussion).

Decision makers will consider this information, including all requested waivers allowed through the individually requested state density bonus program, during their deliberations on whether to approve, modify or disapprove the proposed project. However, the comments do not pertain to the adequacy, accuracy, or completeness of the draft EIR’s analysis of the project’s physical environmental impacts. No further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT GC-3: GENERAL SHADOW AND TRANSIT IMPACTS

“Any net new shadow is completely unacceptable. We’re tired of EIRs dismissing this issue as long as the shadow is minimum.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-6]*)

“Whatever you’re building, adding new minimal amounts of shadow, the communit -- communitive -- cumulative effect is that we’re destroying the few open space we have in that part of the city.” (*Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-7]*)

"This particular project, while not realized, is approved; and by not bringing it into the context of a shadow analysis, I believe it is somewhat diminishing the full impact and understanding of the project proposed." (Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-11])

"We have testified so many times before the Commission about shadow impacts. SoMa and the Tenderloin have precious few publicly accessible open space, and they need to be protected from huge shadows." (Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-4])

"This project, it is big and it is -- you know, there's a lot of issues in it in terms of shadows, the transit mode." (Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-2])

RESPONSE GC-3: GENERAL SHADOW AND TRANSIT IMPACTS

These comments generally note the shadow impacts of the proposed project on public open spaces and transit in the SoMa neighborhood.

These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the draft EIR. Refer to Responses TR-1 and TR-2 regarding the project's travel demand and cumulative transportation impacts. Additionally, refer to Response SD-1 regarding the project's shadow impacts on public open space areas. Decision makers will consider the proposed project's transit and shadow impacts during their deliberations on whether to approve, modify or disapprove the proposed project. No further response is required pursuant to CEQA Guidelines section 15088.

COMMENT GC-4: ALH URBAN AND REGIONAL ECONOMICS STUDY

"The fact that slightly dismissing this basis on a report by "H" -- L.H. Urban and Regional Economics, that is impossible to find and is not provided as an attachment to the draft, to the DEIR, means that the -- this DEIR is -- is further deficient." (Angelica Cabande, Draft EIR hearing transcript, April 16, 2020 [O-SOMCAN-1-10])

"The DEIR also fails as to provide sufficient information to the public. In dismissing the environmental impacts of gentrification and displacement, the planning department refers to research by ALH Urban & Regional Economics that is not only missing from this DEIR document, but is also not searchable online. With the supporting information not accessible by any reasonable means, the assertion by planning that gentrification and displacement cannot be evaluated as to their environmental impacts exposes a significant failure of this DEIR as an informational document." (Angelica Cabande, Email, May 12, 2020 [O-SOMCAN-2-20])

"Hello, I wanted to please request a copy of the analysis and/or report by the Planning Department and ALH Urban and Regional Economics that is referenced in the 469 Stevenson DEIR and Initial Study (Initial Study page 83 - see full quote below). "It is also noted that the planning department, with assistance from

ALH Urban & Regional Economics, has completed extensive analysis of gentrification and displacement in the city to determine whether individual projects, including market-rate housing projects, contribute to gentrification and displacement and whether either of these phenomena directly or indirectly result in physical environmental effects" (DEIR, Initial Study pg. 83). (*David Woo, Email, April 20, 2020 [O-SoMa-2-1]*)

RESPONSE GC-4: ALH URBAN AND REGIONAL ECONOMICS STUDY

The comments assert that the draft EIR is deficient because it does not include the ALH Urban and Regional Economics Study, referenced on pg. 83 of the initial study, and suggest that the draft EIR dismisses the environmental impacts of gentrification and displacement on the basis of that study. One commenter also requested a copy of the ALH Urban and Regional Economics Study. The planning department emailed an electronic copy of the ALH Urban and Regional Economics Study to the commenter on April 21, 2020.

The ALH Urban and Regional Economics Study was referenced in Section E.2, Population and Housing, of the initial study. While there is no requirement in CEQA that the entire administrative record for this project be available online, the administrative record is and has always been available upon request. As stated in the draft EIR, members of the public could call the EIR Coordinator at 415-575-9146 or email CPC.469Stevenson@sfgov.org for questions related to review of materials and are encouraged to request copies of the documents to review. As discussed above, some members of the public did contact the EIR coordinator to obtain an electronic copy of this document and it was made available upon request.

The comments do not present any evidence that the analysis presented in the draft EIR is deficient. The comments also do not pertain to the adequacy, accuracy, or completeness of the draft EIR's analysis of the project's physical environmental impacts. Therefore, no further response to this comment is required pursuant to CEQA Guidelines section 15088.

COMMENT GC-5: COVID-19 IMPACTS

"I appreciate one of the public's comments regarding the housing crisis and the economic crisis we're in. And I just want to also inform other Commissioners and to the public as to, you know, my other end of the job as who works in a nonprofit for, um, in access for affordable housing. We are really seeing people that are getting layoffs. And they are asking for rental assistance. They don't want to have debt for your rents, that, even though there is an eviction moratorium, great. But people are worried about the economic impact in their lives." (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-1]*)

"We all know that small businesses are also highly impacted during these times. The rents, definitely the rent is something that is a big issue. Right now people are scrambling to pay for your rent. And we're waiting for money for that rent as well." (*Commissioner Imperial, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Imperial-4]*)

"Good afternoon. Ozzie Rohm with, excuse me, San Francisco Alliance Youth Coalition. I just couldn't help about jump in after hearing, um, the -- the talks about thousands of people that need housing in this city and the gentleman from the Carpenters' Union that was talking about more jobs for his fellow colleagues. I am a hundred percent supportive of the Union. But I do want to remind you that one of the unions that is hurting right now is the hospitality, the Local 2, the people who work in the hotels. We have thousands,

if not tens of thousands, of people who have lost this job -- their jobs because of the crisis, COVID-19 crisis, that we're facing. And we're not out of it yet. We do have people in all sectors that have lost their jobs, including the tech sector. I do want to bring up the fact that -- that Yelp, as an outfit, has laid off a thousand people and furloughed another 1100 people. So, isn't it insensitive to talk about more homes? For who? For the people who lost their jobs? Is it time to talk about housing crisis, where we have economic crisis ahead of us? I just want to, you know, chime in on that because it is important for you, the Commissioners, to think in terms of what the average San Franciscan is going through and who is gonna be coming to San Francisco to reside in these places, in these units. Right now the people who are living in San Francisco are concerned about their rent, they're mortgage payment, because they do not have the economic security to think from this week to the next. And it is premature to think about or talk about the jobs that 400-some-odd units and the buildings of these 400-some-odd units is gonna bring to San Francisco. We are in the middle of an economic uncertainty that we have not seen in recent years, something that economists even predict to be far worse than the 2008 financial collapse. So, please, do not downplay that. And please do not downplay the pain that people are going through, including the folks in the union, the people who work in the hotels, and the hospitality profession. It is a crisis. We have to be sensitive to everybody, not to mention the tech workers. The tech workers are also faced with layoffs. This is not the time to talk about jobs, jobs, jobs. We've lost our jobs. Thank you." (*Ozzie Rohm, Draft EIR hearing transcript, April 16, 2020 [O-SFAYC-1]*)

RESPONSE GC-5: COVID-19 IMPACTS

The comments generally discuss the effects of the COVID-19 pandemic and the economic impact it has had on small business, the job market, and the ability to pay rent on-time.

These comments are acknowledged and do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts of the proposed project presented in the draft EIR. Therefore, no further analysis or response to these comments is required pursuant to CEQA Guidelines section 15088.

COMMENT GC-6: MARK CAVAGNERO AND ASSOCIATES SITE STUDY

"Mark Cavagnero and Associates did a site study for this particular project site. While I do not have any numerical data in terms of how many units it generated, it is a far more interesting design; and again I feel that numbers, numerical numbers of units, are driving the design, which seems to be significantly impacting, to say the least. I want to add that I believe that the project adds the... um, that the... this project impacts the attempt to revitalize and bring the Mint itself back to life." (*Commissioner Moore, Draft EIR hearing transcript, April 16, 2020 [A-SFPC-Moore-28]*)

RESPONSE GC-6: MARK CAVAGNERO AND ASSOCIATES SITE STUDY

The comment generally references conceptual designs prepared by Mark Cavagnero and Associates in November 2017 for the project site. The comment notes that the number of units is driving the design of the project. These comments are acknowledged and do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts of the proposed project presented in the draft EIR. Therefore, no further response to these comments is required pursuant to CEQA Guidelines section 15088.

4.0 Draft EIR Revisions

4.1 INTRODUCTION

This section presents text changes for the 469 Stevenson Street Project draft EIR initiated by planning department staff or text change made in response to comments received on the draft EIR. The text revisions clarify, expand, or update the information presented in the draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR and initial study or a substantial increase in the severity of an impact identified in the EIR and initial study that cannot be mitigated to less than significant with implementation of mitigation measures agreed to by the project sponsor. Thus, none of the text revisions would require recirculation pursuant to CEQA Guidelines section 15088.5. The draft EIR and this Response to Comments document together constitute the final EIR for the proposed project. In the revisions shown below, deleted text is shown in ~~strike through~~ and new text is double-underlined.

4.2 TABLE OF CONTENTS

As discussed in Response PD-5, the project sponsor has updated the project plan set to include the proposed floor plan for levels 3 through 5. Figure 4b has been added to depict the proposed floor plan for levels 3 through 5. As such, the staff-initiated text edits have been made to the list of figures in the Table of Contents, on pg. iii of the draft EIR, to update the figure numbering of Figure 4.

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4.3 REVISIONS TO CHAPTER 2, PROJECT DESCRIPTION

PROJECT CHARACTERISTICS

As discussed in Response PD-1, on pg. 2-11 of the draft EIR, it states that the proposed project is proposing to provide 19 percent of the base project's residential units as very low affordable dwelling units in order to qualify for the Individually Requested State Density Bonus Program. The following staff-initiated text edits have been made to accurately reflect the percentage of very low affordable dwelling units that the proposed project would provide:

The project proposes to use the Individually Requested State Density Bonus Program and must provide at least ~~11~~ 13 percent of the base project's residential units as very low affordable dwelling units onsite in order to qualify for a ~~35~~ 42.5 percent increase in density. The project proposes to provide ~~19~~ 13 percent of the base project's residential units as very low affordable dwelling units onsite.

The proposed project has also updated the dwelling unit types. As discussed in Response PD-5, the project sponsor has updated the dwelling unit type to clarify the term junior one-bedroom units to be one-bedroom units. Therefore, the following staff-initiated text edits have been made to reflect this clarification:

The proposed 495 dwelling units consisting of approximately 192 studios, ~~33 junior one-bedroom units,~~ 149 one-bedroom units, 96 two-bedroom units, 50 three-bedroom units, and 8 five-bedroom units would be available to rent.

These staff-initiated text edits have been made throughout the draft EIR and are reflected in Section S.2, Project Synopsis, on pg. S-1; Section 1.1, Project Summary, on pg. 1-1; Section 2.1, Project Overview, on pg. 2-1; Table 2.5-1, Project Characteristics, on pg. 2-1; and Table 2.7-1, Changes to the Proposed Project Since Publication of the NOP and Initial Study, on pg. 2-50.

The project sponsor has also updated the proposed floor plans to reflect the changes to the dwelling unit types and the ground-floor setback and has also updated the project plan set to include the proposed floor plan for levels 3 through 5. Figures 3 through 7 on pgs. 2-13 to 2-21 of the draft EIR have been revised to reflect the updated floor plans. Figure 4b has been added to depict the proposed floor plan for levels 3 through 5. The revised floor plan figures are included in this RTC as Figures 1 through 6.

The following staff-initiated text edits have also been made on pg. 2-11 of the draft EIR to reflect the changes made to the proposed floor plans:

Levels 2 through 5 would contain 21 units consisting of 6 studios, ~~3 junior one-bedroom units,~~ 9 one-bedroom units, 2 two-bedroom units, 2 three-bedroom units, and 2 five-bedroom units. ~~Level 6 would contain 19 units consisting of 6 studios, 3 junior one-bedroom units, 6 one-bedroom units, 2 two-bedroom units, and 2 three-bedroom units.~~ Levels ~~7~~ 6 through 26 would contain 19 units consisting of 8 studios, ~~1 junior bedroom unit,~~ 4 5 one-bedroom units, 4 two-bedroom units, and 2 three-bedroom units. The 27th level would include ~~2 junior bedroom units,~~ 6 8 one-bedroom units, and 4 two-bedroom units.

Streetscape and Sidewalk Improvements

As discussed in Response TR-1, pg. 35 of the initial study and pg. 2-29 of the draft EIR states the proposed project would not alter the existing sidewalk widths on Stevenson Street. However, the proposed project now proposes to widen the existing sidewalk along the project frontage on Stevenson Street from 7 to 9 feet by stepping the ground floor of the building back from the property line. The following staff-initiated text edits have been made to accurately reflect this consideration:

The proposed project would not alter the existing 10-foot-wide sidewalk widths on Stevenson Street or Jessie Street, but would widen the existing sidewalk along the project frontage on Stevenson Street from 7 to 9 feet by stepping the ground floor of the building back from the property line.

Vehicle Parking

On pg. 2-39 of the draft EIR, the following staff-initiated text changes have been made to accurately reflect the proposed project's parking requirements per the planning code and the Transportation Demand Management (TDM) Plan:

Per sections 155(i), ~~and~~ 166, and 169 of the planning code, the proposed project would provide at least 9 7 accessible parking spaces and 3 12 car-share spaces.

Transportation Demand Management Plan

Since the publication of the draft EIR, the project sponsor has updated the TDM measures for the proposed project. The TDM measures are listed on pg. 2-47 of the draft EIR and included in the project's revised March 2021 TDM application.⁴⁴ The following staff-initiated text edits have been made to reflect the updated TDM measures:

1. ACTIVE-1: Improve Walking Conditions (Option ~~D~~ A): The project would provide streetscape improvement elements consistent with the Better Streets Plan.
2. ACTIVE-2: Bicycle Parking (Option A): The project would provide class 1 bicycle parking spaces as required by the planning code.
3. ACTIVE-4: Bike Share Membership (Location B). The project would offer one complimentary bike share membership to each dwelling unit and/or employee, at least once annually, for the life of the project.
4. ACTIVE-5A: Bicycle Repair Station: The project would provide an indoor bicycle repair station in the below grade parking level that is equipped with tools and supplies necessary to perform basic bicycle maintenance.
5. ACTIVE-5B: Bicycle Maintenance Services. The property owner shall offer bicycle maintenance services to each dwelling unit and/or employee, at least once annually, for 40 years.
- ~~6. ACTIVE 6: Fleet of Bicycles: The project would provide five shared bicycles for building residents, visitors, or employees to use.~~
6. CSHARE-1: Carshare (Option ~~E~~ D): The project would provide one car-share membership for each dwelling unit and reserve three parking spaces for car-share services.
7. DELIVERY-1: Delivery Supportive Amenities: The project would facilitate delivery support amenities by providing an area for receipt of deliveries that offers one of the following: (1) clothes lockers for delivery services; (2) temporary storage for package deliveries, laundry deliveries, and other deliveries; or (3) providing temporary refrigeration for grocery deliveries.
8. FAMILY-1: Family TDM – Amenities (Option A + B): The project would provide family amenities that include onsite storage for family gear, utility carts, and cargo bicycles.
9. FAMILY-3: Family TDM Package. The project would include CSHARE-1 Option D and FAMILY-1, Options A and B.
- ~~10. HOV 1: Contributions or Incentives for Sustainable Transportation (Option A). The project would offer contributions or incentives to each dwelling unit and employee, at least once annually, for the~~

⁴⁴ San Francisco Planning Department, Transportation Demand Management Program Application, submitted August 29, 2018, revised March 22, 2021.

~~life of the project. The project would provide at least 25 percent (Muni M pass = \$81/month. As such, $\$81 \times 25\% = \$20.25/\text{month}/\text{DU}$) contribution or incentive.~~

10. INFO-1: Multimodal Wayfinding Signage. The project would provide multimodal wayfinding signage that can withstand weather elements in key locations. That is, the signs shall be located externally and/or internally so that the residents, tenants, employees, and visitors are directed to transportation services and infrastructure, including: transit, bike share, car-share, bicycle parking and amenities, showers and lockers, taxi stands, and carpool/shuttle/vanpool pick-up/drop-off locations.
11. INFO-2: Real Time Transportation Information Displays. The project would provide real time transportation information on displays in prominent locations on the project site to highlight sustainable transportation options and support informed trip-making.
- ~~12. INFO-3: Tailored Transportation Marketing Services (Option C). The project would provide individualized, tailored marketing and communication campaigns, including incentives to encourage the use of sustainable transportation modes.~~
12. LU-2: Onsite Affordable Housing (Option B). The project would use the Individually Requested State Density Bonus Program and provide at least ~~41~~ 13 percent of the base⁴⁵ project's residential units as very low affordable dwelling units onsite in order to qualify for a ~~35~~ 42.5 percent increase in density. The project would provide ~~49~~ 13 percent of the base project's residential units as very low affordable dwelling units onsite.
13. PKG-1: Unbundle Parking (Location E). The project would lease or sell all parking spaces separately from the rental for the life of the project, so that tenants have the option of renting or buying a parking space at an additional cost, and would, thus, experience a cost savings if they opt not to rent or purchase parking.
14. PKG-4: Parking Supply (Option ~~A~~ D). The project would provide off-street private vehicular parking (Accessory Parking) in an amount no greater than the off-street parking rate for the neighborhood (neighborhood parking rate), based on the transportation analysis zone for the project site.

PROJECT APPROVALS

As discussed in Response GC-2, the following staff-initiated text edit has been made to the list of project approvals included in Section 2.8.1 pg. 2-51, of the draft EIR to clarify the project's request for a waiver from the rear yard requirements:

- Approval of an Individually Requested State Density Bonus project with up to two incentives/concessions and unlimited waivers from the following requirements: height, bulk, floor area ratio, rear yard requirements, open space, section 148 wind comfort exceedances, and dwelling unit exposure.

⁴⁵ In order to determine how much of a density bonus state law will allow, the density allowed by current controls ("base density" or "base project") must first be calculated. The base density is the maximum gross residential density allowed pursuant to the site's zoning requirements.

- Adoption of findings and a statement of overriding considerations under the California Environmental Quality Act (CEQA)
- Approval of a Downtown Project Authorization (planning code section 309)
- Approval of Conditional Use Authorization (planning code section 124[f])
- Approval of a TDM Plan (planning code section 169)

The text edits to Chapter 2, Project Description, of the draft EIR do not change the analysis or conclusions presented in the draft EIR, and do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5.

4.4 REVISIONS TO SECTION 3.1.4, PLANNING CODE

On pg. 3-5 of the draft EIR, it states that the proposed project would provide 14,000 square feet of private open space and 11,000 square feet of common usable open space. The proposed project would not meet the open space requirements of the planning code and is requesting an open space waiver. Therefore, the following staff-initiated text revisions have been made to clarify the project’s request for a waiver:

The proposed project would provide 14,000 square feet of private open space and 11,000 square feet of common usable open space. Private open space would consist of private balcony spaces for 22 dwelling units. The private balconies would be provided on the 2nd, 6th, and 27th floors. The common usable open space would consist of the ground floor courtyard and solariums. The proposed project is requesting a waiver from the open space requirements in planning code section 135 under the Individually Requested State Density Bonus Program.

4.5 REVISIONS TO SECTION 4.2, AIR QUALITY

On pg. 4-34 of the draft EIR, Table 4.2-5: Criteria Air Pollutant Thresholds, incorrectly states that the average daily emissions threshold for PM_{2.5} is 84 lbs/day. Therefore, the following staff-initiated text revision has been made to reflect that the average daily emissions threshold for PM_{2.5} is 54 lbs/day.

Table 4.2-5: Criteria Air Pollutant Thresholds

Pollutant	Average Daily Emissions (pounds per day)	Maximum Annual Emissions (tons per year)
ROG	54	10
NO _x	54	10
PM ₁₀	82	15
PM _{2.5}	84 54	10
Fugitive Dust	Construction dust ordinance or other best management practices to control fugitive dust emissions	

Source: Air District, CEQA Air Quality Guidelines, May 2017.

These revisions do not change the analysis or conclusions presented in the draft EIR. The air quality analysis prepared for the proposed project used 54 lbs/day as the average daily emissions threshold for PM_{2.5}. Therefore, this revision does not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5.

4.6 REVISIONS TO SECTION 4.4, SHADOW

As discussed in Response SD-1, the following staff-initiated text edits have been made to the Mint Plaza shadow analysis on pg. 4-94 of the draft EIR to include the 5M Project under the existing plus project conditions:

Mint Plaza experiences ~~38,441,767~~ 39,688,461 annual sfh of shadow under current conditions. Based on a TAAS of 57,665,807 sfh, Mint Plaza's annual shadow load is ~~66.66~~ 68.82 percent. Mint Plaza is surrounded on most sides by multi-story development which generates substantial shading on the plaza during the morning and mid- to late afternoon hours, and throughout the day over the winter months. Midday and early afternoon hours are the least shaded under current conditions, with the greatest sunlight availability occurring over the summer months.

The proposed project would result in net new shadow falling on Mint Plaza, adding approximately 325,407 net new annual sfh of shadow and increasing sfh of shadow by 0.56 percent above current levels from ~~66.66~~ 68.82 percent to ~~67.22~~ 69.38 percent. Net new shadow on Mint Plaza that would be cast by the proposed project would occur between approximately September 21st through March 21st and would be present for up to 90 minutes in the mid- to late afternoon (no net new shadow would be present just before 2 p.m. or later than 4:30 p.m. on any date). The largest area of net new shadow cast would be 5,811 square feet and occur on November 1st and February 8th at 2:30 p.m.

4.7 REVISIONS TO CHAPTER 6, ALTERNATIVES

To address concerns that the naming of this alternative is misleading and to make it abundantly clear to the reader that this alternative is compliant with the planning code requirements for the site, the following staff-initiated text edits have been made to the draft EIR on pg. 6-4, and 6-9:

The purpose of the Reduced Density Alternative is to consider a project alternative that would lessen the significant shadow impacts on Mint Plaza that would occur from construction of the proposed project. The Reduced Density Alternative would redevelop the project site with a new mixed-use residential project, similar to the proposed project, but would meet the planning code requirements for the site and therefore construct a shorter and less dense building than under the proposed project.

Staff-initiated text revisions have also been made to Tables S-3, S-14, 6.1.1, and 6.2-1 to reference this alternative as: Alternative B: Reduced Density Alternative (Planning Code Compliant).

Additionally, on pg. 6-5 of the draft EIR, Table 6.1-1: Characteristics of the Proposed Project and Project Alternatives, incorrectly states that the residential square footage for Alternative B is 259,110 sf and that the residential square footage for Alternative C is 343,813 sf. The following staff-initiated text changes have been made to accurately reflect the residential square footage for Alternative B is ~~259,110 sf~~ 272,967 sf and the residential square footage for Alternative C is ~~343,813 sf~~ 469,181 sf. These revisions have also been made in Table S-3: Characteristics of the Proposed Project and Project Alternatives, on pg. S-21 of the draft EIR for consistency. The commercial retail square footages shown in Table 6.1-1: Characteristics of the Proposed Project and Project Alternatives, for Alternative B and Alternative C remains accurate and does not require additional changes. The revisions to the residential square footages for Alternative B and Alternative C do not change the analysis or conclusions presented in the draft EIR as the total gross square footages shown in Table 6.1-1: Characteristics of the Proposed Project and Project Alternatives, are accurate and were used throughout the draft EIR analysis. Therefore, these revisions do not change the analysis or conclusions

presented in the draft EIR, and do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15088.5.

ATTACHMENTS

ATTACHMENT A

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S A N F R A N C I S C O

P L A N N I N G C O M M I S S I O N

R E M O T E H E A R I N G

THURSDAY, APRIL 16, 2020

1:00 P.M.

PUBLIC HEARING AND COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT REPORT

Regarding Agenda Item 13
Project 2017-014833ENV
Project Location 469 Stevenson Street

Court Reporter's Stenographic Transcription
From Live Broadcast Streamed Online www.sfgovtv.org

Reported By CHARLOTTE C. ROCHE, R.D.R., C.R.R.
Certified Shorthand Reporter License No. 4486
BAY AREA COURT REPORTERS
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Hayward, California 94541
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SAN FRANCISCO PLANNING COMMISSION MEETING

BE IT REMEMBERED that pursuant to Notice of Hearing and Agenda, and on Thursday, April 16, 2020, commencing at the hour of 1:00 p.m., with Agenda Item 13 beginning at 2:25 p.m., with participant call-in capabilities via A.T.&T. Telephone Conference Bridge, audience viewing via Television Broadcast at Cable Channel 78, and Livestreaming Online via www.sfgovtv2.org, with participation by the Commissioners through Microsoft Teams from their remote locations, the following Public Comments were reported and transcribed.

REMOTE APPEARANCES OF COMMISSIONERS

- JOEL KOPPEL, President
- KATHRIN MOORE, Vice President
- SUE DIAMOND, Commissioner
- FRANK FUNG, Commissioner
- THERESA IMPERIAL, Commissioner
- MILICENT JOHNSON, Commissioner
- JONAS P. IONIN, Commission Secretary (Moderator)
- CHAN SON, Executive Secretary

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AGENDA ITEM 13 - 469 STEVENSON STREET PROJECT

COMMISSION SECRETARY IONIN: With respect to Agenda Items, your opportunity to address the Commission will be afforded when the item is reached in the meeting.

Each member of the public may address the commission for up to 3 minutes. When the number of speakers exceed the 15-minute General Public Comment, it will be moved to the end of the agenda; there will be a hard stop today, before the General Public Comment will be moved to the end of the agenda.

Members of the Public, this would be your time to call 888-273-3658; again, the Access Code is 3107452, press pound and pound again, and then enter 1 and 0 to enter the queue.

Chan, if we could go to the question-and-answer mode for the A.T.&T. Conference Bridge.

(Other matters heard and discussed.)

COMMISSION SECRETARY IONIN: Placing us on Item 13 for Case Number 2017-014833ENV at 469 Stevenson Street.

This is the Public Hearing on the Draft Environmental Impact Report.

Are you ready?

MS. DELUMO: I am. I'm gonna share my screen.

COMMISSION SECRETARY IONIN: Great.

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JENNY DELUMO

MS. DELUMO: So, good afternoon, President Koppel and Members of the Commission.

I'm Jenny Delumo, Planning Department Staff and Environmental Coordinator for the 469 Stevenson Street project or the "proposed project."

Joining me remotely today is Lisa Gibson, Environmental Review Officer, and Jessica Range, Principal Planner, both with the Planning Department.

Members of the project sponsor team and the City's consultants for this project are also joining remotely.

The item before you today is Review and Comment on the Draft Environmental Impact Report or Draft EIR prepared for the proposed project.

The purpose of today's hearing is to take Public Comment on the adequacy, accuracy and completeness of the Draft EIR pursuant to the California Environmental Quality Act or "CEQA" and San Francisco's local procedures for implementing CEQA.

No approval action on this document is requested at this time.

The Draft EIR for the proposed project was published on March 11th, 2020; the Public Review Period began on March 12th, 2020 and will continue until 5:00

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1 p.m. on May 11th, 2020.

2 The project site is an approximately 28,790
3 square-foot through lot in the SOMA neighborhood.

4 The site fronts Stevenson Street and Jessie
5 Street and is on the block between 5th and 6th Street.

6 The project site is currently developed with
7 a 176-space surface public parking lot.

8 The proposed project would demolish that
9 parking lot and construct an approximately 535,000
10 square-foot 274-foot-tall building with an additional 10
11 feet for rooftop mechanical equipment.

12 The proposed project would provide
13 approximately 495 dwelling units, 4,000 square feet of
14 commercial retail use on the ground floor, and 25,000
15 square feet of private and common open space.

16 The proposed project would include a three-level
17 below-grade parking garage with 178 vehicle parking
18 spaces, 200 Class 1 bicycle parking spaces, 2 service
19 delivery/loading spaces, and 1 freight loading space, and
20 would install 27 Class 2 bicycle spaces on adjacent
21 sidewalks.

22 The project sponsor proposes to use the
23 individually requested State Density Bonus and provide 19
24 percent of the base project's residential units as
25 affordable dwelling units onsite.

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1 That number of those affordable units will be
2 determined prior to project approval.

3 The Draft EIR concluded that shadow cast by the
4 proposed project could substantially and adversely affect
5 the use and enjoyment of Mint Plaza.

6 This was determined to be a project-level and
7 cumulative, significant and unavoidable impact with no
8 feasible mitigation.

9 The Draft EIR also concluded that impacts to air
10 quality would be significant but could be mitigated to a
11 less than significant level, and that impacts on
12 pedestrian-level wind would be less than significant.

13 As described in the initial study, all other
14 impacts from the proposed project were found to be less
15 than significant, less than significant with mitigation,
16 or would result in no impact.

17 The Draft EIR analyzed three project
18 alternatives, including the No Project Alternative, which
19 is required by CEQA, and would mean no changes to the
20 project site and thus no impacts.

21 Under the Reduced Density Alternative, the
22 project site would be developed with an approximately
23 160-foot-tall building and 346 dwelling units, 6,357
24 square feet of retail, 150 vehicle parking spaces, and 2
25 freight and 2 service-vehicle loading spaces.

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1 This alternative would cast less shadow on
2 Mint Plaza than the proposed project and would not lose
3 all insignificant and unavoidable shadow impact.

4 This alternative would require the same
5 mitigation measures as the proposed project to reduce
6 impacts to cultural resources, noise-and-air quality
7 to less-than-significant levels.

8 The No Residential Parking, Tower Only
9 Alternative would be slightly taller than the proposed
10 project at 284 feet with 467 dwelling units.

11 This alternative would include 3,651 square feet
12 of retail and no residential parking spaces.

13 Due to the reduced parking, this alternative
14 would construct one basement level for off-street
15 freight-and-service vehicle loading, accessible parking
16 and bicycle parking, compared to the proposed project's
17 three basement levels.

18 The No Residential Parking, Tower Only
19 Alternative would be taller than the proposed project
20 and still result in significant an unavoidable shadow
21 impact.

22 This alternative would require the same
23 mitigation measures of the proposed project to reduce
24 impacts to cultural resources, noise-and-air quality
25 to less than significant levels.

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1 Today the Planning Department is seeking
2 comments on the adequacy and accuracy of the information
3 contained in the Draft EIR.

4 For members of the public who wish to provide
5 verbal comments, please state your name for the record,
6 please speak slowly and clearly so that the Court
7 Reporter can make an accurate transcript of today's
8 proceedings.

9 Staff is not here to respond to comments today.
10 Comments will be transcribed and responded to in writing
11 in a responses-to-comment document which will respond to
12 all relevant verbal and written comments received during
13 the comment period in the provisions to the Draft EIR as
14 appropriate.

15 On April 13, 2020, the department received a
16 request to extend the Public Review Period to three weeks
17 after the close of the Shelter-in-Place Order.

18 In response, and to allow more time for
19 interested parties to submit their comments, the
20 Environmental Review Officer is extending the Public
21 Review Period from April 27th, 2020, which is a 47-day
22 review, to May 11, 2020, which is a 61-day review.

23 Those who are interested in commenting on the
24 Draft EIR in writing may submit their comments to me,
25 Jenny Delumo, EIR Coordinator, at

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1 CPC.469stevenson@sfgov.org or mail them to 1650 Mission
2 Street, Suite 400, San Francisco, California 94103
3 by 5:00 p.m. on May 11, 2020.

4 If you do wish to receive a hard copy of the
5 Draft EIR or a copy of the written responses to your
6 comments, please provide your contact information either
7 in email or mailing address to the same email address,
8 CPC.469stevenson@sfgov.org or call 415-575-9146 and leave
9 a message.

10 Thank you.

11 COMMISSION SECRETARY IONIN: Thank you, Jenny.

12 Chan, why don't we open up the Q-and-A. And
13 Members of the Public, if you wish to --

14 THE OPERATOR: Your conference is now in
15 question-and-answer mode. To summon each question,
16 press 1 then 0 pro.

17 COMMISSION SECRETARY IONIN: Members of the
18 Public, this is your opportunity to submit your public
19 testimony on this item.

20 You can do so by calling the 800 Number at
21 the bottom of your screen on SFGovTV, entering the
22 Access Code, pressing the pound, pound again, and then
23 entering 1, 0, to enter the queue.

24 Chan, do we have any Members of the Public in
25 queue for this matter?

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1 MS. SON: Yes.

2 COMMISSION SECRETARY IONIN: Why don't we go
3 ahead and --

4 THE OPERATOR: You have two questions remaining.

5 DAVID WOO

6 MR. WOO: Hello, this is David Woo with SOMA
7 Pilipino Cultural District.

8 There are many gentrification, misplacement,
9 environmental impact concerns about the project.

10 The Draft EIR does not study the impacts of
11 ride-sharing, E-Scooters, E-Bikes and delivery services
12 which represent safety impacts and, as well as, increases
13 V.M.T.

14 The City has greatly struggled with the
15 inability to control the safety and transit impacts of
16 these modes of transportation.

17 The geographical context of this project is not
18 adequately studied or understood in the Draft EIR.

19 The mains large --

20 The main large streets in SOMA are treated as
21 extensions of the freeways and are subject to high
22 amounts of traffic, for these same reasons.

23 As a result, especially in the era of
24 ride-sharing and delivery services, the alleys have
25 become shortcuts for drivers to weave through the SOMA

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(GC-1)

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(TR-1)

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(TR-1)

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3 cont

(ESI-1 cont.)

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and have had serious safety and traffic impacts.

2

This current project is completely out of scale.

4

(TR-1)

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It's not stepped back. It interjects parking and

4

loading access on Stevenson, which is a busy and narrow

5

pedestrian way.

6

The proposed project is only possible by taking

7

the State Density Bonus, yet it misleadingly calls

8

Alternative B the "Reduced Density Alternative," as

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though by taking this alternative we're somehow getting

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less of something, when that framing is incorrect.

11

Alternative B is just one way of approaching

12

this site with a building that would conform to the

13

existing height-and-density requirements.

14

This tactic is misleading and makes the

15

Draft EIR deceptive and deficient as an informational

16

document.

17

We ask for the continuance of this hearing and

18

an extension of the Comment Period including, again, if

19

the Shelter-in-Place is again extended due to the current

20

Coronavirus health crisis and the lack of equitable

21

accessible to and format of online public hearings.

22

The health crisis has put both community members

23

and community organizations into a tailspin, struggling

24

to adapt and meet the urgent needs of residents and

25

workers on the ground that are struggling day to day to

BAY AREA COURT REPORTERS

1 survive.

2 This has greatly limited the ability to engage
3 in the public planning process.

4 As the Planning Department undertakes a racial,
5 social, equity plan and framework for planning, this
6 should be applied to the current health crisis, which is
7 having disparate and huge impacts based on race and
8 socioeconomic status.

9 Thank you.

10 THE OPERATOR: You have four questions
11 remaining.

12 JILL HELFFENSTEIN

13 MS. HELFFENSTEIN: Good afternoon,
14 Commissioners. This is Jill Helffenstein.

15 I am the Board President of Friends of Mint
16 Plaza, the organization specially created to manage
17 Mint Plaza for the public's benefit.

18 I am speaking to express the Board's strong
19 opposition to the shadow cast by the 469 Stevenson
20 project over Mint Plaza.

21 We generally support new housing in this
22 location; however, as evidenced in the shadow study in
23 the EIR, the net new shadow from the project would take
24 away significant sunlight from Mint Plaza in the late
25 afternoon for several months of the year.

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6 cont.
(CEQA-1
cont.)

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(ME-1)

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(SD-1)

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(SD-1)

1 As a public green space, Mint Plaza should be
2 treated as a park space, and San Francisco does not allow
3 shadowing of parks, as referenced in the Sunlight
4 Ordinance.

4
(SD-1)

5 On behalf of Friends of The Plaza, we urge the
6 San Francisco Planning Department to consider the adverse
7 impacts the shadow will have on the use and vibrancy of
8 Mint Plaza and take steps to reduce the overall height
9 and massing of this proposed tower.

10 Thank you.

11 THE OPERATOR: You have four questions
12 remaining.

13 ANGELICA CABANDE

14 MS. CABANDE: Good afternoon, Commissioners. My
15 name is Angelica Cabande, and I'm with the SOMCAN.

1
(GC-1)

16 The proposed luxury housing project at 469
17 Stevenson Street continues to provide an overabundance of
18 market-rate housing that negative -- negatively impacts
19 our community.

2
(PD-1)

20 We have concerns about the proposed Density
21 Bonus approach that completely disrespects homeless
22 alleyways.

23 In taking the Density Bonus, it provides no
24 setbacks to provide relief either for people on the
25 alleyways, in the open spaces around the development, or

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2 cont.
(PD-1 cont.)



1

for residents.

2

We have testified so many times before the Commission about shadow impacts.

3

4
(GC-3)

4

SOMA and the Tenderloin have precious few publicly accessible open space, and they need to be protected from huge shadows.

5

6

7

5
(AL-2)

8

The Alternative B shows that if the building stuck to the 160-foot height limit, it might even be possible to end up with no new shadows.

9

10

6
(GC-3)

11

Any net new shadow is completely unacceptable. We're tired of EIRs dismissing this issue as long as the shadow is minimum.

12

13

7
(GC-3)

14

Whatever you're building, adding new minimal amounts of shadow, the cumulative effect is that we're destroying the few open space we have in that part of the city.

15

16

17

8
(GC-1)

18

Lastly, there is an environmental impact when new projects cause displacement and gentrification.

19

20

This project will increase rents in the area and will also escalate the profitability over the over -- the underlying zoning.

21

22

9
(GC-1)

23

Displacement of lower-income workers from being able to live near work and providing new housing for people who tend to drive and use ride-share service has a clear environmental impact.

24

25

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10
(GC-4)

1 The fact that slightly dismissing this basis
2 on a report by "H" -- L.H. Urban and Regional Economics,
3 that is impossible to find and is not provided as an
4 attachment to the draft, to the DEIR, means that
5 the -- this DEIR is -- is further deficient.

11
(CEQA-1)

6 We ask that this hearing be continued and the
7 Comment Period extended, including if Shelter-in-Place is
8 again entended, to address the inability of working-class
9 residents to mutually engage in this planning process
10 during this health and -- health crisis and, further, to
11 increase the economical impacts to the city.

12 Thank you.

13 THE OPERATOR: You have five questions
14 remaining.

SUE HESTOR

16 MS. HESTOR: Sue Hestor.

1
(CEQA-1)

17 I want to join in the question of Miss Cabande
18 and the person that spoke in the first place about
19 continuing the hearing and extending the time for
20 Public Comment.

2
(GC-1)

21 There is an enormous con -- cons -- conflict
22 between this project and the surrounding low-income
23 communities.

24 And that should be basically accounted for in
25 the project.

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1 The other thing that's happened in the past
 2 couple of years is all the circulation has been
 3 thrown into chaos because this project is going to depend
 4 on 5th Street and 6th Street to get into, get out of or
 5 into, the project.

3
 (TR-1)

6 And those streets go to Market Street, which is
 7 closed to traffic.

8 The Planning Department has not had measurement
 9 of what the impacts of the closure of Market Street to
 10 traffic are; and those of us who are familiar with this
 11 area know that, um, pardon me, Uber and Lyft and other
 12 transportation-alternative companies disregard the law,
 13 the stoppage of traffic. And we have no --

4
 (TR-2)

14 Because right now traffic is closed for the
 15 city, there's -- reduced for the city, they have no
 16 measurement at all. They should do a need -- a basic
 17 remodel -- re -- retake -- pardon me.

18 They should re-look-at the traffic and
 19 enforcement; and the -- the enforcement is nonexistent.

20 I support the extension. The two-week extension
 21 for comments is not enough.

22 People in this area are low-income people,
 23 they've been moved and had a lot of problems because of
 24 closures, and that is really important to the city and
 25 to the health of people in the area.

5
 (CEQA-1)

BAY AREA COURT REPORTERS

1 Thank you.

2 THE OPERATOR: You have four questions
3 remaining.

4 COREY SMITH

5 MR. SMITH: Good afternoon, Commissioners.

6 Corey Smith on behalf of the San Francisco Housing Action
7 Coalition, here, in support. You know, we --

8 We obviously understand the environmental
9 imperative of taking underutilized sites like parking
10 lots and adding lots and lots of housing.

11 We all know that putting housing in close
12 proximity to jobs and public transit is environmentally
13 sound.

14 And as we've watched the air quality... during
15 this COVID-19 crisis... increase, that the air is
16 cleaner, we know it's because people are not driving as
17 much.

18 And so, if we want to continue with the idea
19 that, hey, climate change is real, we know that exhaust
20 from cars is one of the key contributors, the best and
21 most effective way today that we can work to mitigate
22 that negative impact is by creating density in our urban
23 corridors, adding lots and lots and lots of housing in
24 places that are already well connected, close to the
25 Central SOMA Area Plan where we just added jobs or

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1
(ME-2)



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employees.

And so, I just want to encourage everybody, when thinking about the environmental impacts of this, look at it from a holistic perspective to understand what great things could come out of building homes at this site on Stevenson.

Thank you.

THE OPERATOR: You have three questions remaining.

SPEAKER NUMBER 6

SPEAKER NUMBER 6: Hi, I'm Andy Penonque (phonetic spelling). I'm calling in support of this project.

I think what we're really not considering, a lot of the comments I've heard, is the people who would live here, especially would live here, if the larger proposal would be allowed to go ahead.

You know, we're talking all about shadows and transit. I think we need to sort of look at the classic balance scale.

On one side we have more shadows, maybe a little more traffic. Although a lot of those people are not going to be driving.

On the other hand we have housing for dozens, even hundreds of people. Right?

1 cont.
(ME-2 cont)

1
(ME-2)

BAY AREA COURT REPORTERS

1 So, it's important to consider the needs of the
2 people who are currently living there.

3 It's also important to consider the needs of the
4 people who are without housing because we don't have
5 enough of it in the city.

6 And I also just want to say, like, there's a
7 lot that we can't do in terms of planning and being
8 contingent in the current Coronavirus; but there's a lot
9 that we can do that actually is more easy to do now
10 online than it would be before, people take time out of
11 their day, leaving work.

12 I wouldn't be having this comment right here if
13 I had to take, you know, half a day off of work.

14 That's not something a lot of working people can
15 say. So, listen, hats off for that.

16 So, we really need to -- to make sure everyone
17 actually has an opportunity to speak, and so, I really
18 like this format.

19 But, yeah, we need to build this and consider
20 the needs of the people who aren't on the line but the
21 people who would live here.

22 We need you to look at that.

23 Thank you.

24 THE OPERATOR: You have three questions
25 remaining.

BAY AREA COURT REPORTERS

1 cont.
(ME-2 cont.)

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LEONARD BASOCO

MR. BASOCO: Good afternoon, President Koppel, fellow Commissioners. Thank you for giving me this opportunity to speak.

My name's Leonard Basoco, I'm a Field Rep with the Carpenters' Union, Local 22 here in San Francisco. I represent 40,000 Carpenters in Northern California, and about 4,000 live here in San Francisco.

We are in support of the 469 Stevenson Street project, building, a long-time partner of the Carpenters' Union who's committed to using Union General Contractors.

With 27 stories and 497 units, this project will give local Carpenters the opportunity to work close to home and give Apprentices opportunities to learn a trade that offers a living wage and benefits including health and retirement.

You know, we are in a job-and-housing crisis right now; and this may not be the answer, but this is part of the solution.

So, the Carpenters' Union fully supports this project and asks that you approve the project when the time comes.

Thank you.

THE OPERATOR: You have two questions remaining.

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(ME-2)

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SARAH OGILVIE

MS. OGILVIE: Good afternoon, Commissioners.
Thank you so much for this opportunity to give Public
Comment.

My name is Sarah Ogilvie. I am a member of B&B
Action. And I am also speaking on my own behalf as a
resident of San Francisco.

I believe in projects that create an abundance
of housing in opportunity-rich areas. I would like to --

I completely understand the fears and the
concerns of the people who have spoken, who represent
low-income and hard-working working-class people, people
who may be displaced.

I completely understand what they're saying. I,
myself, have experienced homelessness. And it was only
through housing, through obtaining housing little by
little, that I was able to get my family out of a crisis
of homelessness and out of a crisis of economic
challenges.

The 495 units that would be created here would
take tremendous pressure off of districts like the
Mission where I live.

And it would allow people who can afford these
homes, who are putting pressure on the low -- on the old
housing stock in the Mission District. And it would get

BAY AREA COURT REPORTERS

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(GC-1)



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them to an area where transit is plentiful.

Problems regarding the street and the plaza, they can be resolved. I've --

I have been homeless, standing in the middle of Stevenson Plaza. My concern at that point wasn't shadows. It was the fact that I was homeless. So, I just want to -- I want to --

I wanted to speak on behalf of a lot of different people here when I say that adding housing stock to San Francisco helps the Carpenter who just spoke, creates hundreds of jobs and millions in revenue for the City, which, the City is looking at serious fiscal danger.

And we need to think proactively. We need to be forward thinking. We need to give everybody an opportunity to boost the economy here.

And creating abundant housing is going to give infinite possibility to thousands of people who can't live in San Francisco right now, to deliver it from a catastrophe.

So, please, please look at this project with open eyes and as widely -- as widely scaled for housing as possible.

Thank you so much.

THE OPERATOR: You have one question remaining.

BAY AREA COURT REPORTERS

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(GC-1 cont.)

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(GC-5)

OZZIE ROHM

MS. REALM: Good afternoon. Ozzie Rohm with, excuse me, San Francisco Alliance Youth Coalition.

I just couldn't help about jump in after hearing, um, the -- the talks about thousands of people that need housing in this city and the gentleman from the Carpenters' Union that was talking about more jobs for his fellow colleagues.

I am a hundred percent supportive of the Union. But I do want to remind you that one of the unions that is hurting right now is the hospitality, the Local 2, the people who work in the hotels.

We have thousands, if not tens of thousands, of people who have lost this job -- their jobs because of the crisis, COVID-19 crisis, that we're facing. And we're not out of it yet.

We do have people in all sectors that have lost their jobs, including the tech sector.

I do want to bring up the fact that -- that Yelp, as an outfit, has laid off a thousand people and furloughed another 1100 people.

So, isn't it insensitive to talk about more homes? For who? For the people who lost their jobs?

Is it time to talk about housing crisis, where we have economic crisis ahead of us?

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1 I just want to, you know, chime in on that
2 because it is important for you, the Commissioners, to
3 think in terms of what the average San Franciscan is
4 going through and who is gonna be coming to San Francisco
5 to reside in these places, in these units.

6 Right now the people who are living in
7 San Francisco are concerned about their rent, they're
8 mortgage payment, because they do not have the economic
9 security to think from this week to the next.

10 And it is premature to think about or talk about
11 the jobs that 400-some-odd units and the buildings of
12 these 400-some-odd units is gonna bring to San Francisco.

13 We are in the middle of an economic uncertainty
14 that we have not seen in recent years, something that
15 economists even predict to be far worse than the 2008
16 financial collapse.

17 So, please, do not downplay that.

18 And please do not downplay the pain that people
19 are going through, including the folks in the union, the
20 people who work in the hotels, and the hospitality
21 profession.

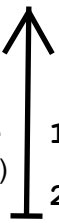
22 It is a crisis.

23 We have to be sensitive to everybody, not to
24 mention the tech workers. The tech workers are also
25 faced with layoffs.

BAY AREA COURT REPORTERS

1 cont.
(GC-5 cont.)

1 cont.
(GC-5 cont.)



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This is not the time to talk about jobs, jobs, jobs. We've lost our jobs.

Thank you.

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THE OPERATOR: You have zero questions remaining.

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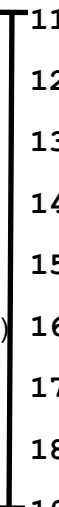
COMMISSION SECRETARY IONIN: Commissioners, I believe this would be your opportunity to review and comment.

9

Commissioner Diamond.

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COMMISSIONER SUE DIAMOND



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COMMISSIONER DIAMOND: I have a question for Director Hillis, and that is whether or not we could schedule an opportunity for an informational hearing on this project, where we could do a much deeper dive into many of the aspects of the project that aren't necessarily environmental impacts per se that are addressed in the DEIR, and if we could do that significantly in advance of any approval hearings for this project.

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(CEQA-1)

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(CEQA-1)

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DIRECTOR RICH HILLIS: Sure, Commissioner Diamond, through the Chair, absolutely.

I think we anticipate this project coming back to you for approval late this year.

25

But we can certainly schedule a hearing in advance of that to address some of the issues that you

BAY AREA COURT REPORTERS

1 cont.

(CEQA-2 cont)

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may have or other others may have.

I get that this is complicated, especially given that it's a Density Bonus project. So, yes.

COMMISSIONER DIAMOND: Thank you.

COMMISSION SECRETARY IONIN: Commissioner Imperial.

COMMISSIONER THERESA IMPERIAL

COMMISSIONER IMPERIAL: Thank you.

I just again would like to --

I appreciate one of the public's comments regarding the housing crisis and the economic crisis we're in.

And I just want to also inform other Commissioners and to the public as to, you know, my other end of the job as who works in a nonprofit for, um, in access for affordable housing.

We are really seeing people that are getting layoffs. And they are asking for rental assistance.

They don't want to have debt for your rents, that, even though there is an eviction moratorium, great. But people are worried about the economic impact in their lives.

This project, it is big and it is -- you know, there's a lot of issues in it in terms of shadows, the transit mode.

1
(GC-5)

2
(GC-3)

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1 Also the surrounding areas. This area is
 2 surrounded by S.R.O.s, whether they are affordable
 3 S.R.O.s, whether they are private S.R.O.s.

4 Some of the S.R.O.s may have been used as a
 5 tourist hotel.

6 There are also small businesses in this area.
 7 And we are also --

8 We all know that small businesses are also
 9 highly impacted during these times.

10 The rents, definitely the rent is something that
 11 is a big issue. Right now people are scrambling to pay
 12 for your rent. And we're waiting for money for that rent
 13 as well.

14 In terms of the transportation, that, I mean,
 15 or in the -- the street, alleyway, the Stevenson Street,
 16 it's always being used as an alternative to Market
 17 Street, to go to the free -- free highway.

18 I understand that it is complicated. And I do,
 19 you know, I do support other public's, um, comments in
 20 continuing and extending the comments until there is --
 21 until the Shelter-in-Place is lifted.

22 It's mainly because that people right now
 23 doesn't have the mental capacity; even the organizations
 24 are working on this, or the stakeholders, don't have the
 25 capacity, as they are trying to, you know, help their own

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(ESI-1)
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(GC-5)
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(GC-7)
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(TR-1)
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(CEQA-1)
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communities.

So, we need to be sensitive on this. And I would urge other Commissioners to also think the same.

COMMISSION SECRETARY IONIN: Commissioner Moore.

COMMISSIONER KATHRIN MOORE

COMMISSIONER MOORE: I'd like to --

I'd like to speak to some of the documents and where I see information that could be amplified or further explained.

I'd like to talk about the context in which this building occurs, the adjoining historic district as the Mission Conservation District, Western SOMA Light Industrial District, Six Street Lodging House District, and the Filipino Cultural District.

I believe the district boundaries and the importance of those districts, with a certain elaboration of why they are where they are, would help really putting this project into better context.

At this moment it is a very large building. It is extremely difficult to understand, partially because it is not where I believe it should have come forward with, which is the Central SOMA Plan.

In addition to that, it's just basically a large, oversized project floating like an island on its own.

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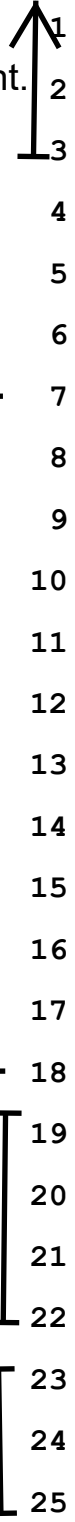
7 cont.

(CEQA-1 cont)

1 (CR-1)

2 (PD-1)

3 (PD-1)



4
(PP-1)

1 The other issue that I believe is missing is to
2 show the boundaries of the SOMA Use and Family Zone which
3 will be most and most negatively impacted by its
4 proximity.

5
(CR-1)

5 There are also individual historic buildings of
6 important -- importance, not to mention the Mint and the
7 New Mint Mission Conservation District.

6
(PD-2)

8 I would like to see further elaboration on the
9 exact criteria that this project is not in C-3 but in
10 C-3-G District. The characteristics of that district are
11 that there are lower-in-density buildings.

12 This building seems to be emulating extremely
13 high density, and that's why it appears it's somewhat
14 missing context.

7
(PP-1)

15 I would also like to see further exploration
16 and comment and details of what the Urban Design, the
17 San Francisco Urban Design Plan, envisioned for this
18 part.

8
(PD-3)

19 There was photographs, diagrams and maps which I
20 think are missing.

21 There are lots of words. But there is indeed a
22 little bit of an illustrative part that is somewhat
23 absent here.

9
(AL-1)

24 I'd like to go and explore the question and
25 ask why a Code Compliant project is not the baseline, a

BAY AREA COURT REPORTERS

Code Compliant project that would be designed to an FAR of six point one -- 6-to-1 rather than 19-to-1.

I would like to see a building without shadow impacts on important public open spaces like Mint Plaza, U.N. Plaza, and most notably Mary Alley that is the community room of an approved high-intensity project called "The 5M Project" which is a main community organizer particularly also for the, um... Youth and Family Zone.

This particular project, while not realized, is approved; and by not bringing it into the context of a shadow analysis, I believe it is somewhat diminishing the full impact and understanding of the project proposed.

I'd like to see a project that diagrams what a building that follows height, bulk and tower-separation rules looks like. We are given --

We are being shown an excessively large building, where we are only asked to few -- in the future approve these exceptions without -- without really understanding qualitatively what that means.

So, I'd expect to see a diagram or a baseline building that is indeed Code Compliant.

My own belief is that the State Density Bonus does not really add the numbers of required P.M.R. units but that, rather, a negotiated project like Former

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9 cont.
(AL-1 cont.)
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(AL-2)
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(GC-3)
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(AL-1)
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(PD-1)
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(AL-1)
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(GC-2)

1 Supervisor Kim used to do, would create far more benefits
 2 and less impact from a building that takes a lot and does
 3 not seem to give a lot.

4 The building, I'd like to see a building that
 5 respects alley regulations, and I'd like to get a better
 6 understanding how the Youth and Family Zone would not be
 7 seriously impacted by wind acceleration.

8 That particular part of town has lots of
 9 children who do walk to school, and I believe they and
 10 myself, walking in that area, are often and frequently
 11 impacted by high winds.

12 And I am not the smallest or more frail person;
 13 but I do feel the impact of wind in that area, and I'd
 14 like that to be considered, providing for children
 15 walking on the street as well.

16 I have other con -- other concerns about
 17 impacts.

18 Excessive soil.

19 Why are we considering that amount of excavation
 20 for a large amount of 178 cars, when we are adjacent to
 21 all accessible transit lines that could ever be put
 22 together at literally five minutes away.

23 That indeed also raises a question of site
 24 access, as mentioned by other Commissioners, about from
 25 alleys with Market Street closed.

15 cont. ↑
 (GC-2 cont.)
 16 (AL-1)
 17 (WD-1)
 18 (PD-4)
 19 (TR-2) ↓

BAY AREA COURT REPORTERS

19 cont.
(TR-3 cont.)

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Since the closure of Market Street has not been evaluated, nor has the closure of Market Street with effect of alleys been evaluated, together with the narrow, the narrowness of alleys, impacting proper movement and flow of cars in the first place.

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(GEC-1)

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I'd like to see, um, the cume --
I'd like to see a discussion of the cumulative effect of all required exemptions, rear-yard requirements, quality of onsite open space.

When you do not provide the rear yard, what is the quality of open space cumulative for the project as it is proposed?

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(PD-5)

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I see an insufficient detail even on the conceptual building design no matter what alternative.

I'm interested in quality of unit layouts that -- which many EIRs show at this level of the -- of project discussion. We want to avoid necessant (phonetic) bedrooms.

We understand that it's basically a market-rate building, but we do also want to examine the quality of units being proposed.

22
(PD-6)

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I have to say that I do not see any justification or any kind of discussion on project objectives.

In many cases we do have a description of that.

BAY AREA COURT REPORTERS

23
(GC-1)

1 I see the possibility of great impact of
2 gentrification, especially social and equity impacts on
3 the SOMA and Youth and Family Zone.

24
(PD-7)

4 I see relative --
5 I see a relative nonexistent description of
6 community benefits, and I hope that that can be brought
7 into the discussion of the EIR as well.

25
(ME-3)

8 I think, in closing, I think it is a
9 market-rate-driven, speculative project.

26
(PD-5)

10 I am really wondering why the top floor would
11 have a five-bedroom unit.

27
(PD-1)

12 It is, from their conceptual design, a simply
13 extruded tower massing diagram which completely
14 disrespects context and site setting.

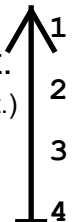
28
(GC-6)

15 By coincidence, in my research about what has
16 happened here in this area, I ran across a site study
17 that was conducted by another highly qualified architect
18 in the city -- you may want to Google it -- Mark of an
19 Arrow did a site study for this particular project site.

20 While I do not have any numerical data in
21 terms of how many units it generated, it is a far more
22 interesting design; and again I feel that numbers,
23 numerical numbers of units, are driving the design,
24 which seems to be significantly impacting, to say the
25 least.

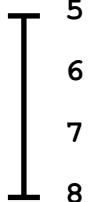
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28 cont.
(GC-6 cont.)



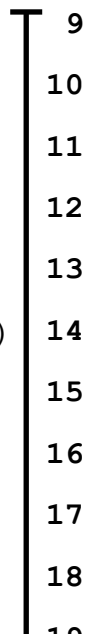
1 I want to add that I believe that the project
2 adds the... um, that the... this project impacts the
3 attempt to revitalize and bring the Mint itself back
4 to life.

29
(SD-1)



5 I believe that the overshadowing of Mint Plaza
6 and the surrounding context of buildings is indeed being
7 threatened by the massive overtowering of this building
8 over the entire setting.

30
(PD-7)



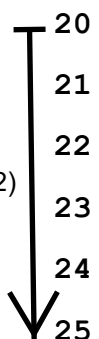
9 The Stevenson Project seems to not understand
10 the small-scale restoration and stewardship that people
11 have taken to really bring this part of the older
12 portion of downtown back to a life of its own.

13 It's a lovely, wonderful part that I think we
14 should take a larger protective attitude towards.

15 And I want to restate my -- my objection that
16 the -- the Title 5M project and its benefits to the
17 community have not at all been taken into consideration.

18 I would like to ask for something which we
19 have never done before.

31
(CEQA-2)



20 I think Miss Cabande and other speakers,
21 together with Commissioner Imperial, summarized very well
22 that the community most affected by this project is
23 indeed one which is people with lesser means; small or
24 diminished access to technology.

25 And I am asking as to whether or not we could

BAY AREA COURT REPORTERS

31 cont.
(CEQA-2
cont)



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potentially have a second live hearing, hopefully back at City Hall, where people from the community could come and comment in person on what they are not able to do today.

I believe that would be us practicing social and environmental equity, and I strongly urge that the Commission as a body considers holding a Special Hearing for additional live comments on the subject matter.

COMMISSION SECRETARY IONIN: Okay, Commissioners, I don't see any other requests to speak from Commissioners.

Oh, wait there is one.

COMMISSIONER MILICENT JOHNSON

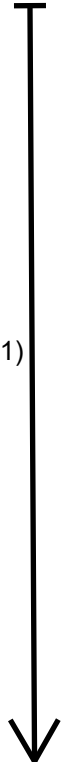
COMMISSIONER JOHNSON: Thanks.

So, I'd like to just get some clarification from my fellow Commissioners.

I really appreciate you reflecting on the project itself, on things that you'd like to see, um, brought out in the project.

And am just wanting, uh, want to, one, focus on the EIR; and then, two, ask if the com -- the recommendation is something different from... the line of questioning or conversation between Commissioner Diamond and Director Hillis, related to the fact that this project would, uh -- was thinking it would come back at the end of the year; that there would be a public hearing

1
(CEQA-1)



BAY AREA COURT REPORTERS

1 before that, hopefully in the fall. That is a time in
2 which we all hope we are in person.

3 Just wanting to make sure that we're being as
4 clear as possible about the recommendation.

5 So, I would love to hear feedback from those who
6 spoke.

7 DIRECTOR HILLIS: I just want to clarify, our
8 understanding is to have an additional Public Hearing,
9 not necessarily on the Draft EIR but on the project
10 itself prior to -- to -- and somewhat well before the
11 approval hearing that's anticipated at the end of the
12 year.

13 And just to know, we've extended the Comment
14 Period from the 27th to May 11th already.

15 COMMISSIONER JOHNSON: I would be supportive of
16 that hearing.

17 Thank you.

18 COMMISSION PRESIDENT KOPPEL: Commissioner Fung.

19 COMMISSIONER FRANK FUNG

20 COMMISSIONER FUNG: Sorry about that.

21 I tried a couple of times to try to type my
22 name, but it wasn't sending through. But I guess this
23 time it worked.

24 I will be issuing a couple of comments on the
25 DEIR with respect to the cultural artifacts analysis.

BAY AREA COURT REPORTERS

1 cont.

(CEQA-2)
cont.

(CEQA-1)

(CEQA-1) 2

(CEQA-1) 1

(CR-1)

1 Given the history of this area and its use
 2 during the Gold Rush days and other things, I think
 3 there's gonna be a number of questions that I would
 4 like to raise.

5 Over all the Draft EIR is... is comprehensive
 6 enough to be able to initiate this process.

7 Both the environmental and entitlement issues
 8 that have been brought up hopefully will be resolved and
 9 this very unimaginatively designed building will go
 10 through its process.

11 COMMISSION PRESIDENT KOPPEL: Commissioner
 12 Imperial?

13 COMMISSIONER THERESA IMPERIAL

14 COMMISSIONER IMPERIAL: My request was to -- for
 15 the comments.

16 I understand the Comment right now is extended,
 17 in submitting Comments, is extended to May 11th.

18 My request is to extend the request until the
 19 Shelter-in-Place is lifted, where the people can come to
 20 City Hall and can also give Comments, and where there's a
 21 more extensive time in giving Comments.

22 I think that this is a time where there is a
 23 pandemic, and people's worries are everywhere.

24 So, my request is to extend the Comment until
 25 Shelter-in-Place is lifted.

1 cont.
 (CR-1 cont.)

2
 (CEQA-2)

1
 (CEQA-1)

BAY AREA COURT REPORTERS

1
1
(CEQA-2)

1 COMMISSION PRESIDENT KOPPEL: So, before we call
2 on anybody else, I'm in favor of initiating what we're
3 looking at today.

1
(CEQA-1)

4 I think I do feel that we are willing to hold an
5 informational hearing long before approval, to get a lot
6 of the real issues addressed, and that the Comment Period
7 was extended.

8 And so, again, this is just at the "Draft"
9 Environmental Impact Report section.

10 And so, seeing as though we're just at the very
11 beginning, I'm in support of approving today.

12 COMMISSION SECRETARY IONIN: Commissioners, I
13 will remind you there's no action today.

14 We're just simply receiving Public Comment.

15 Seeing nothing further, Chan, I just want to
16 make absolutely certain there's no one in the queue on
17 the phone-in line.

18 MS. SON: Q-and-A was deactivated after Public
19 Comments was closed.

20 COMMISSION SECRETARY IONIN: Very good.

21 Commissioners, if there's nothing further on
22 this item, we can move on to Item 14.

23 (End of transcribed section at 3:11 p.m.)

24 ---oOo---

25

BAY AREA COURT REPORTERS

1 STATE OF CALIFORNIA)
) ss.
 2 COUNTY OF ALAMEDA)

3 I, the undersigned, a Certified Shorthand
 4 Reporter of the State of California, hereby certify that
 5 I reported these live proceedings as they occurred
 6 through a simultaneous online streaming broadcast and
 7 that I did not personally appear on location; that these
 8 proceedings were held remotely from each participant's
 9 location on the date of April 16, 2020, as stated; that
 10 while I cannot personally attest to the identities of the
 11 speakers in these proceedings, their appearances are
 12 identified on the San Francisco Planning Commission
 13 website, and Public Comment Speakers stated their names.

14 I certify that the statements made were
 15 stenographically reported and transcribed by me to the
 16 best of my ability and discernment, and that limitations
 17 from speaker enunciation and pronunciation and the use of
 18 remote technology may result in some inaccuracies.

19 I further certify that I am not in any way
 20 interested in the outcome of any cause named or discussed
 21 herein.

22 IN WITNESS WHEREOF, I have hereunto set my hand
 23 and this 30th day of April 2020.

24 _____
 25 Charlotte C. Roche, C.S.R. #4486
 State of California

BAY AREA COURT REPORTERS

ATTACHMENT B

NATIVE AMERICAN HERITAGE COMMISSION

March 20, 2020

Jenny Delumo
City and County of San Francisco

Via Email to: cpc.496stevenson@sfgov.org

Re: SCH#201900093, 469 Stevenson Street Project, San Francisco County, California

Dear Ms. Delumo:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR)/Mitigated Negative Declaration (MND) or Negative Declaration prepared for the project referenced above. The review may have included the Cultural Resources Section, Archaeological Report, Appendices for Cultural Resources Compliance, as well as other informational materials. We have the following concerns:

- There is no information in the documents of any contact or consultation with all traditionally, culturally affiliated California Native American Tribes from the NAHC's contact list.
- There does not appear evidence that a cultural assessment was completed.

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52 (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay (CR-2)
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain Apache

COMMISSIONER
Joseph Myers
Pomo

COMMISSIONER
Julie Tumamait-Stenslie (CR-2)
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

1

2

¹ Pub. Resources Code § 21000 et seq.
² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

2
cont. Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Contact Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

(CEQA
-3
cont.) The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

If you have any questions or need additional information, please contact me at my email address:
Sarah.Fonseca@nahc.ca.gov.

Sincerely,



Sarah Fonseca
Cultural Resources Analyst

Attachment

cc: State Clearinghouse

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice. A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.⁴ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).⁵

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.⁶

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.⁷

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.⁸

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.⁹

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁰

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹¹

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹²

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

⁴ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

⁵ Pub. Resources Code § 21080.3.1 (b)

⁶ Pub. Resources Code § 21080.3.2 (a)

⁷ Pub. Resources Code § 21080.3.2 (a)

⁸ Pub. Resources Code § 21082.3 (c)(1)

⁹ Pub. Resources Code § 21082.3 (b)

¹⁰ Pub. Resources Code § 21080.3.2 (b)

¹¹ Pub. Resources Code § 21082.3 (a)

¹² Pub. Resources Code § 21082.3 (e)

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹³

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of “preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county’s jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁴
- There is no Statutory Time Limit on Tribal Consultation under the law.
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,¹⁵ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city’s or county’s jurisdiction.¹⁶
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.¹⁷

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project’s APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.

¹³ Pub. Resources Code § 21082.3 (d)

¹⁴ (Gov. Code § 65352.3 (a)(2)).

¹⁵ pursuant to Gov. Code section 65040.2,

¹⁶ (Gov. Code § 65352.3 (b)).

¹⁷ (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.¹⁸
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.¹⁹

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁰ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

¹⁸ (Civ. Code § 815.3 (c)).

¹⁹ (Pub. Resources Code § 5097.991).

²⁰ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

April 16, 2020

San Francisco Planning Department
1660 Mission Street, First Floor
San Francisco, CA 94103-2479

RE: 469 Stevenson Project | Opposition to Shadow Cast on Mint Plaza

Dear Commissioners:

Friends of Mint Plaza (FoMP) is a non-profit 501(c)(3) organization specially created to manage Mint Plaza for the public's benefit. We seek to activate the Plaza through thoughtful and creative programming, and maintain the Plaza in a clean and orderly fashion that makes it a safe and inviting place for people of all ages and incomes to enjoy at all hours of the day.

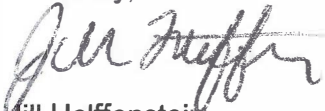
As the Board President of FoMP, I am writing to express the Board's opposition to the shadow cast by the 469 Stevenson project over Mint Plaza. We generally support new housing in this location, however as evidenced in the shadow analysis in the EIR (please see attached shadow pages for your reference), the net new shadow from the project would take away significant sunlight from Mint Plaza in the late afternoon for several months of the year. As a public green space, Mint Plaza should be treated as a park space, and San Francisco does not allow the shadowing of parks:

In 1984, San Francisco voters passed Prop K, the Sunlight Ordinance. In part, the ordinance reads:

"[The city] shall disapprove any building permit governed by the provisions of this section if it finds that the proposed project will have any adverse impact on the use of the property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission because of [...] shadowing."

On behalf of Friends of Mint Plaza, we urge the San Francisco Planning Department to consider the adverse impact the shadow will have on the use and vibrancy of Mint Plaza, and take steps to reduce the overall height and massing of this proposed tower.

Sincerely,

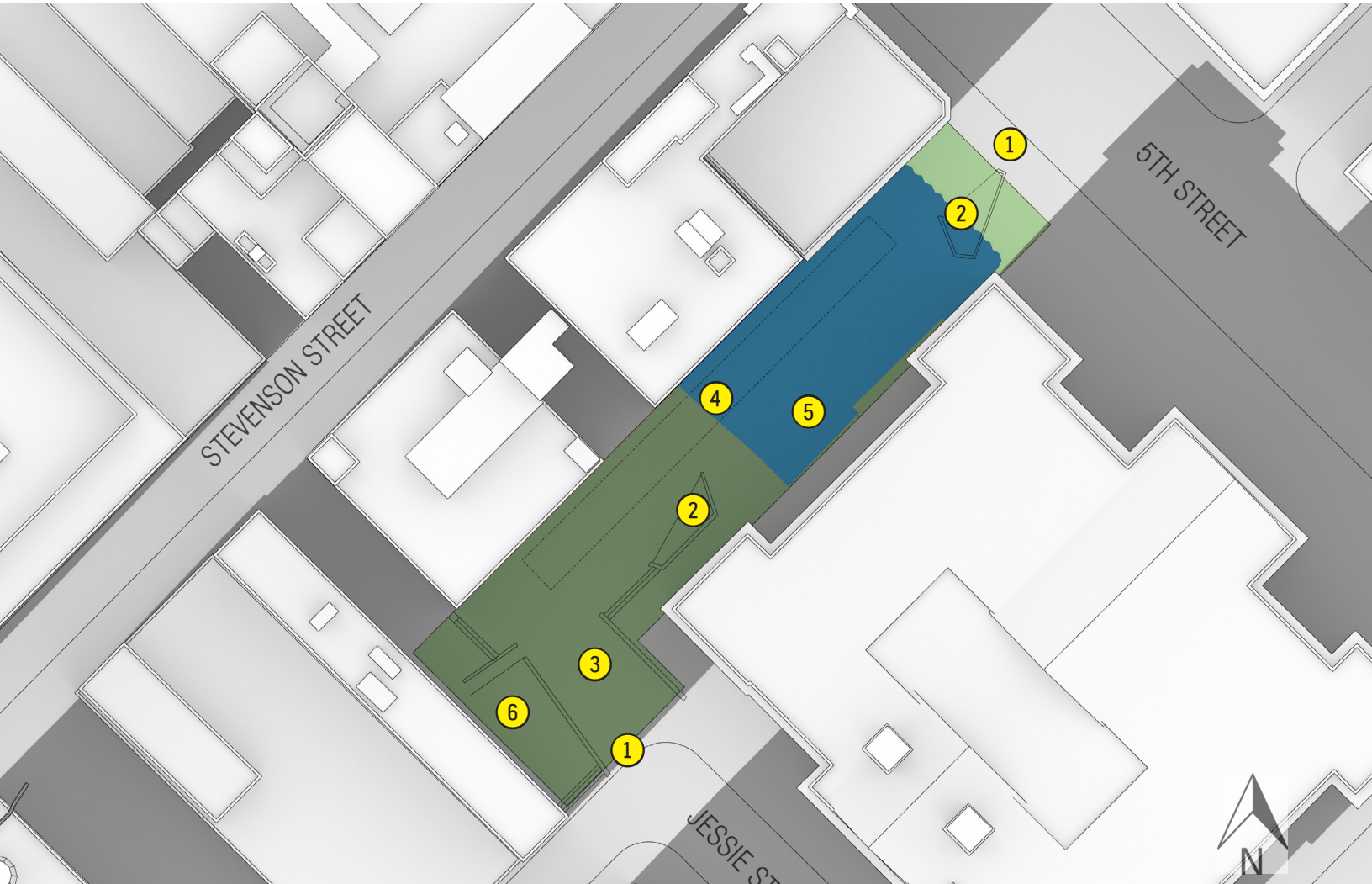


Jill Helffenstein
President, Friends of Mint Plaza

G1.10

469 STEVENSON STREET







Shading diagrams on the date(s) of maximum shading



**DATE WITH MOST NET NEW SHADOW
OCTOBER 25 & FEBRUARY 15**

2:30 PM

-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Public Entries
-  Landscape Planters/Seating Wall
-  Tree Wells (6 trees)
-  Vine Trellis Structure
-  Hardscape / Non-fixed Seating Areas
-  Cafe Seating

G1.11




469 STEVENSON STREET







Shading diagrams on the date(s) of maximum shading



**DATE WITH MOST NET NEW SHADOW
OCTOBER 25 & FEBRUARY 15**

2:45 PM

-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Public Entries
-  Landscape Planters/Seating Wall
-  Tree Wells (6 trees)
-  Vine Trellis Structure
-  Hardscape / Non-fixed Seating Areas
-  Cafe Seating

April 15, 2020

VIA EMAIL to CPC.469Stevenson@sfgov.org

Ms. Jenny Delumo
Environmental Impact Report Coordinator
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103

Re: **469 Stevenson Street Project**
2017-014833ENV

Dear Ms. Delumo,

On behalf of San Francisco Heritage (Heritage), the following letter sets forth our comments on the Draft Environmental Impact Report (DEIR) for the proposed project at 469 Stevenson Street (Case No. 2017.014833ENV). Heritage is concerned with the project’s indirect impacts on historic and cultural resources, primarily with regard to the project’s scale and its overall combined effect on historic resources in the area.

1
(CR-1)

The proposed project would construct a new 27-story, 535,000-square-foot mixed-use building approximately 274 feet tall, including approximately 495 dwelling units. The project would use the Individually Requested State Density Bonus Program and provide affordable housing units onsite.

The proposed project is also located within a highly sensitive historic and cultural heritage context; it is surrounded by dozens of small-scale, individual historic buildings, three identified historic districts, Western SoMa Light Industrial and Residential Historic District, Sixth Street Lodginghouse District, and the new Mint-Mission Conservation District. The proposed project is also located adjacent to the Stevenson Street boundary of the “SoMa Pilipinas” Social Heritage Special Use District (SUD).

2
(CR-1)

As stated in the 2018 designating ordinance, the Mint-Mission Conservation District is characterized by—and is intended to preserve—“small- to medium-scale industrial, residential, and commercial buildings ranging in height from one to ten stories, with the predominate height between two and five stories.” To this end, the designating ordinance includes detailed design guidelines to ensure that compatibility of new construction in terms of size, scale, materials, and fenestration.

3
(CR-1)

The proposed residential tower would be situated half a block west of, and seasonally cast shadows over, the Old U.S. Mint located at 88 Fifth Street, a National Historic Landmark completed in 1874 that is among the few SoMa buildings to survive the 1906 Earthquake and Fire. The former Haas Candy Factory at 54 Mint Street listed on the National Register of Historic Places. Other noteworthy historic buildings in close proximity to the Project Site include: the Remedial Loan Association (66 Mint Street), California Casket Co. (959-965 Mission Street), Pickwick Hotel (85-99 Fifth Street), and 194-198 5th Street.

The EIR for the proposed project should analyze the tower's impacts on, and compatibility with, the surrounding historic and cultural context, including project alternatives that would reduce or avoid such impacts, and prescribe appropriate mitigation.

Sincerely,



Mike Buhler
President & CEO
San Francisco Heritage

cc: Matt Haney, District 6 Supervisor
Rich Hillis, Director of Planning
San Francisco Planning Commission

From: David Woo <david@somapilipinas.org>
Sent: Monday, April 20, 2020 11:41 AM
To: Delumo, Jenny (CPC) <jenny.delumo@sfgov.org>
Cc: Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>
Subject: Request Copy of Planning Dept/ALH Urban and Regional Economics Analysis Referenced in 469 Stevenson DEIR

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

1
(GC
-4) Hello, I wanted to please request a copy of the analysis and/or report by the Planning Department and ALH Urban and Regional Economics that is referenced in the 469 Stevenson DEIR and Initial Study (Initial Study page 83 - see full quote below).

"It is also noted that the planning department, with assistance from ALH Urban & Regional Economics, has completed extensive analysis of gentrification and displacement in the city to determine whether individual projects, including market-rate housing projects, contribute to gentrification and displacement and whether either of these phenomena directly or indirectly result in physical environmental effects" (DEIR, Initial Study p.83).

Thank you,
David
--
David Woo
CHHESS Land Use Analyst
SOMA Pilipinas Cultural Heritage District

From: Delumo, Jenny (CPC) <jenny.delumo@sfgov.org>

Sent: Tuesday, April 21, 2020 3:49 AM

To: david@somapilipinas.org <david@somapilipinas.org>

Cc: Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Range, Jessica (CPC) <jessica.range@sfgov.org>; CPC.469Stevenson <CPC.469Stevenson@sfgov.org>

Subject: Re: Request Copy of Planning Dept/ALH Urban and Regional Economics Analysis Referenced in 469 Stevenson DEIR

Hello,

Thank you for your email. I have attached the ALH Urban & Regional Economics study referenced in the initial study prepared for the 469 Stevenson Street project.

Kind regards,
Jenny

Jenny Delumo

Senior Planner, Environmental Planning Division

Transportation Review Team Lead

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415.575.9146 **Fax:** 415-558-6409

Email: Jenny.Delumo@sfgov.org

Web: www.sfplanning.org



The Planning Department is open for business during the Shelter in Place Order. Most of our staff are working from home and we're [available by e-mail](#). Our [Public Portal](#), where you can file new applications, and our [Property Information Map](#) are available 24/7. The Planning Commission is convening remotely and [the public is encouraged to participate](#). The Board of Appeals and Board of Supervisors are [accepting appeals](#) via e-mail despite office closures. All of our in-person services at 1650 and 1660 Mission Street are suspended until further notice. [Click here for more information.](#)

12 May 2020

San Francisco Planning Department
Attention: Jenny Delumo, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

Also sent via e-mail to CPC.469Stevenson@sfgov.org

Re: 469 Stevenson Street
Case No. 2017-014833ENV
Comments to the Draft Environmental Impact Report

Dear Ms Delumo:

We submit these written comments on the adequacy and accuracy of the Draft EIR for 469 Stevenson Street. Our letter also addresses the sufficiency of the Draft EIR document with respect to identifying and analyzing possible significant environmental impacts and determining how they may be avoided or mitigated.

Comments that address the environmental analysis

Building Features

The DEIR states in Section 2.5.3 that the proposed project complies with the SF Green Building Ordinance by meeting LEED Silver certification requirements. We would hope that Planning would hold developers to doing better than the bare minimum to comply with the Ordinance, and would encourage developers to design to a higher level of LEED certification than Silver. We have to remember that each project does not make an impact on its own, but the many projects that are built have an aggregate or cumulative impact.

The DEIR references the [Downtown Area Plan](#) and even acknowledges that the height of the proposed building is inconsistent with Policy 3.5, and the proposed project is also inconsistent with Policy 3.4 “which encourages building forms to respect and improve the integrity of open spaces and other public areas.” The DEIR is deficient, however, as an informational document as it does not reveal the proposed project’s conflicts with policies intended to protect alleys which are a vital resource for SoMa, yet are in peril by developments such as this one proposed for 469 Stevenson.

The proposed project appears to conflict with Policy 14.1 which says “Promote building forms that will maximize the sun access to open spaces and other public areas” and in the description of this policy, it includes alleys.

1
(PD-8)

2
(PP-1)

3
(PP-1)

(GC-2) 4 The proposed waivers from Planning Code sections 132.1 and 134 for setbacks and rear yard requirements (p. 3-5) are unacceptable because of the impacts the building's mass will make on the alleys.

(SD-1) 5 **Shadow on Mint Plaza and UN Plaza**
The project creates net new shadow impacts on two publicly accessible open spaces, Mint Plaza and UN Plaza. Both Mint Plaza and UN Plaza serve as public spaces for neighborhoods that are severely deficient in public open space. Mint Plaza, located in the South of Market, provides public open space that provides access to sunlight and allows for rest, leisure, and relaxation for neighborhood residents, workers, and visitors. UN Plaza provides public open space for residents, workers, and visitors, also providing access to sunlight and allows for rest, leisure, and relaxation. UN Plaza serves as space for a farmers market, retail booths, and contains interactive activities for the public to engage with as well. Currently, the City is undertaking plans to update and retrofit parts of UN Plaza which is at the heart of the [Civic Center Public Realm Plan](#). The DEIR is deficient in that it does not make reference to or analyze the proposed project in context of the Civic Center Public Realm Plan in either the "Applicable Plans" or Appendix D.

(PP-1) 6 Any net new shadow affecting the limited open spaces that exist in this part of San Francisco is unacceptable. As described in the DEIR, this project is inconsistent with the Urban Design Element of the San Francisco General Plan. As stated in the DEIR, "The proposed project would be potentially inconsistent with policy 3.4, which encourages building forms to respect and improve the integrity of open spaces and other public areas" (p.3-2). As this project casts new shadow on two open spaces, the project does not "respect" or "improve the integrity" of either open space, and is therefore inconsistent with policy 3.4 of the General Plan. With respect to shadow impacts, the project is also inconsistent with the goals of the Downtown Area Plan.

(SD-2) 7 The project also has shadow impacts on sidewalks in the South of Market and Streets north of Market street as well. As described in the DEIR, "The proposed project could create new shadow on nearby streets and sidewalks at times of day and throughout the year when these areas would not already be shaded by existing buildings in the area. At certain times of day and year, the proposed project would cast net new shadow on nearby sidewalks, including those along Stevenson Street, Jessie Street, Fifth Street, and Sixth Street." (p.4-99). The lack of public open space in the South of Market speaks to the necessity of access to sunlight in all publicly accessible spaces including sidewalks. The reality of the use of public space, especially in a neighborhood deficient in open space, must be considered when identifying the impacts of new development such as shadow.

(SD-3) 8 The argument that the net new shadow impact from this project is insignificant ignores the cumulative shadow impacts from recently constructed towers in the area which is described on p. 27-9 of Appendix D. The cumulative shadow impacts from the aggregate of these developments contribute significantly to the degradation of these rare and vitally important open

8 cont.
(SD-3 cont) ↑ spaces. Likewise the argument that additional shadow impacts coincide with higher percentage of “pass-thru” use does not make sense (p. 35 of Appendix D). Public open spaces with more shadows are less inviting for passive enjoyment, so rather than being an excuse for adding more shadow, this should be an incentive for preserving the sunlight that we do have on these spaces, rather than making these spaces more hostile to people who use them.

9
(AL-2) ↓ The Reduced Density Alternative (Alternative B) eliminates the shadow impacts on UN Plaza by approaching the building’s design in two significantly different ways from the Proposed Project. It both complies with the existing height restriction of 160 feet, and it incorporates significant setbacks, reducing the bulk of the building. Both of these design features significantly reduce the massing of the building and, therefore, its shadow impacts. It would be interesting to see if further refinements in the building’s massing would reduce Alternative B’s shadow impacts on Mint Plaza to having zero net new shadow on this public open space as well. A building compliant with the underlying zoning is the environmentally superior alternative, and could possibly be made even better with further design refinement.

10
(TR-1) ↓ **Traffic and ped safety on the alleys**
11
(TR-1) ↓ The DEIR does not sufficiently study the project impacts to people walking, biking, and driving, stating that “the project would not create potentially hazardous conditions for people walking, bicycling, driving, or riding public transit” (Initial Study p.114). This assertion contradicts the physical design of the building which places the parking and loading access on Stevenson Street. The DEIR is inconsistent in acknowledging that the proposed project is on an alley, not on a major street. In the “Landscaping” section on p. 2-29, the DEIR states “Due to the narrow sidewalks along Stevenson Street, street trees cannot be planted,” providing an accurate portrayal of how constrained the public right of way actually is. The introduction of a large underground parking garage’s access for 178 cars and 200 bicycles (the number of bicycle parking spaces that would be sheltered inside the parking garage), and adjacent loading area on this alley that has significant pedestrian traffic which would increase significantly with this proposed project is not studied adequately in the DEIR.

12
(TR-1) ↓ The Initial Study states that the Sixth Street corridor is an existing high injury corridor (Initial Study p.104). The potential addition of more than 1,100 new residents to the area in the age of ride-sharing (Uber, Lyft), e-scooters, e-bikes, delivery services, and potentially future unknown modes of transportation that pose serious threats to the safety of people walking, biking, and driving speak to the gaps in the analysis and conclusions provided in the DEIR. This is all while the population and density of San Francisco continues to climb without the proper regulations in place (i.e. ride-sharing) and infrastructure (i.e. an overburdened public transit system) to handle such population increases without significant impacts to the safety of pedestrians, bicyclists, and drivers as well as significant impacts to traffic and total vehicle miles travelled (VMT).

13
(TR-1) ↓ The DEIR does not study the impacts of ride-sharing, e-scooters, e-bikes, and delivery services which represent a core feature of increased safety impacts in San Francisco to pedestrians,

13 cont.
(TR-1 cont.)

bicyclists, and drivers, as well as a core feature of increased traffic and VMT in San Francisco. The City has greatly struggled with the inability to control the safety and transit impacts of these new modes of transportation, and as future modes of transportation emerge, challenges will only increase. The socioeconomic makeup of new residents is also not taken into account, as these residents have more disposable income to expend on services such as ride-sharing and delivery services. The vast majority of new residential units will be luxury market-rate, and the impacts of the types of services that such residents use is not studied in the DEIR.

14
(GC-1)

15
(TR-1)

The geographical context of this project and the above mentioned impacts are also not adequately studied or understood in the DEIR. The main streets and thoroughfares in the South of Market are treated as extensions of the freeways that they are connected to and are used as a means of getting from point A to B as quickly as possible. They are also subject to high amounts of traffic for these same reasons. As a result, especially in the era of ride-sharing and delivery services, the alleys in the South of Market have become short-cuts for drivers to weave through the South of Market. This has resulted in the alleyways (where a large number of residents reside) becoming more congested, seeing increased traffic and speeding. The alleys in the South of Market are very small, with extremely insufficient sidewalk space for pedestrians, putting pedestrians at high risk, especially when considering the increase in vehicular traffic. Adding to this is the increased use of e-scooters and e-bikes (electronically powered scooters and bikes) that notoriously ride on sidewalks and are left in the middle of sidewalks (all of which creates safety impacts to pedestrians) - this includes in the alleys as well as main streets. None of this is properly studied or understood in the DEIR.

Cumulative Impacts especially on alleys

16
(TR-2)

The DEIR does not sufficiently study the project and cumulative impacts on alleys. The project locates a main lobby entrance on Jessie Street (an alley) and a secondary lobby entrance as well as passenger and commercial loading on Stevenson Street (an alley). This design treatment for development of a high-rise residential building (27 stories, accommodating more than 1,100 new residents) that is being proposed in SOMA alleyways will completely overwhelm the existing alleyways, and sets a dangerous precedent for future developments in other SOMA alleys.

17
(TR-2)

The impacts described above for the project related to traffic and pedestrian safety also apply to the cumulative impacts, and further show how cumulative impacts are not properly studied (ride-sharing, e-scooters, e-bikes, delivery services, geographic context of how main streets and alleys are used).

Impacts of Gentrification and Displacement

18
(GC-1)

The DEIR does not sufficiently study the impacts of gentrification and displacement on the environment that will result from this project. As stated in the Initial Study, "It is also noted that the planning department, with assistance from ALH Urban & Regional Economics, has completed extensive analysis of gentrification and displacement in the city to determine whether individual projects, including market-rate housing projects, contribute to gentrification and

displacement and whether either of these phenomena directly or indirectly result in physical environmental effects. The planning department has not found empirical evidence supporting the position that market-rate housing development leads to residential or commercial displacement that results in secondary physical effects on the environment. No impact would occur” (Initial Study p.83).

18 cont.

(GC-1 cont.)

The addition of more than 1,100 new residents in a high income bracket as reflected in the type of luxury market-rate housing that is being proposed for this site creates a specific impact whereby disposable income creates a demand for services that increase environmental impacts in the area. This includes but is not limited to the increased usage of ride-sharing and delivery services. The increase in demand for services also creates the need for additional service-sector workers to serve the new higher income residents, the environmental impacts of which are not adequately studied.

19

(GC-1)

The impacts also reverberate further due to the increased land value that a new highrise luxury residential development infers on nearby parcels as the opportunity for similar developments that are very profitable are now possible to move forward. As there are now higher income residents in the neighborhood, there is also the ability for neighboring residential units to be rented at higher prices to this new higher income clientele, causing increased pressure for evictions leading to displacement. This displacement has environmental impacts as those who are displaced out of the city have to travel further back to get to current employment that is within San Francisco, and the new higher income residents have new environmental impacts that have been outlined above. This is not studied in the DEIR.

20

(GC-4)

The DEIR also fails as to provide sufficient information to the public. In dismissing the environmental impacts of gentrification and displacement, the planning department refers to research by ALH Urban & Regional Economics that is not only missing from this DEIR document, but is also not searchable online. With the supporting information not accessible by any reasonable means, the assertion by planning that gentrification and displacement cannot be evaluated as to their environmental impacts exposes a significant failure of this DEIR as an informational document.

Suggestions of specific project alternatives

21

(AL-1)

There is a study of Project Alternatives as required by CEQA, but the presentation of these alternatives is deficient and misleading. The DEIR is deficient because as an “informational document”, calling Alternative B the “reduced density” alternative is misleading to the public. Alternative B would be more accurately described as the project alternative that complies with the existing density and height limits for the site. Often, DEIR’s call these Project Alternatives “Code Compliant” in order for the public to understand that the alternative being described is an alternative project that would comply with the current codes. The Proposed Project seeks to take advantage of the State Density Bonus, so it proposes a higher intensity of use and a different design approach than would be allowed under the current zoning for this site. There are, however, significant and unmitigatable environmental impacts that the Proposed Project

21 cont.
(AL-1 cont.)

would inflict. If the project did not seek the State Density Bonus, and rather sought to develop a project that complied with the existing density and height limits for this site, those negative environmental consequences would not exist. Therefore, the way this Alternative B is titled as somehow providing a reduction in what it provides in terms of housing or any other on-site amenities is misleading and therefore renders the DEIR deficient as an informational document.

22
(CEQA-1)

We respectfully submit this letter in as timely a way as we have been able to. With COVID-19, and so many projects being proposed in SOMA, it has been unrealistic for the community and organizations to be able to engage with all of these projects. We hope planning understands our need to prioritize meeting the critical daily needs of vulnerable community members during this time of crisis.

Thank you for your consideration and for accepting this letter under these extraordinary circumstances.

Sincerely,

**Angelica Cabande, Executive Director
Joseph Smooke, Board
South of Market Community Action**

cc: District 6 Supervisor Matt Haney

YERBA BUENA NEIGHBORHOOD CONSORTIUM

230 Fourth Street
San Francisco CA 94103

San Francisco Planning Department
Environmental Review Office
1660 Mission Street
San Francisco 94103

April 15, 2020

RE: 469 Stevenson Street DEIR

CASE NO. **2017-014833ENV**^[1]_[SEP] STATE CLEARINGHOUSE NO. **2019100093**

The Project DEIR is inadequate to meet the legal standards of CEQA.

- 1
(GEC-1) I 1. The Cumulative analysis is based on an arbitrary 0.25 mile radius area surrounding the project site. It should be based on applicable planning districts with previous environmental review for data consistency and a much larger district for reality. This would include Central and West SOMA, Central Market, the Hub, and Tenderloin districts.
- 2
(AL-1) I 2. The Reduced Density Alternative should be instead configured as the No State Density Bonus Alternative otherwise permitted by the current City zoning.
- 3
(GEO-1) I 3. The Initial Study conclusion there are no significant seismic/geotechnical issues is wrong on its face. The discussion in the IS clearly confirms existing project site conditions are in fact seismically dangerous. The proposed design mitigation of deep excavation does not obviate the existing situation and the DEIR should lay this out in full. Moreover, the extensive de-watering required for such a deep excavation itself is a major potential impact issue for all adjacent properties, especially the UMB buildings adjacent to the project site on Sixth Street, and that issue is not detailed and evaluated in the IS at all. It could result in differential settlement of those buildings, including residential hotels. Such a missing analysis in the EIR might then demonstrate that deep excavation plus dewatering is hazardous and therefor a pile-supported project without below grade parking is the necessary mitigation.
- 4
(SD-1) I 4. The Shadow impact analysis ignores and does not detail the project's potential shadowing of the new Mary Plaza POPOS in the 5M project a block away. That POPOS is a key feature of the project for community benefit and use, and the likely time of day of the project's shadowing in the late morning/noontime is of particular concern. This impact must be fully evaluated and detailed.

John Elberling
Manager

Cc: Susan Brandt Hawley
South of Market Working Group

From: [Radonich, Anna](#)
To: [Johnson, Kaela](#)
Subject: FW: Other one is correct legal notice - 469 Stevenson Street Project Draft Environmental Impact Report
Date: Tuesday, March 17, 2020 2:02:48 PM

Anna Radonich

Environmental Planner
Stantec
1340 Treat Boulevard, Suite 300
Walnut Creek, CA 94597-7966
Cell Phone: (925) 285-6541

From: CPC.469Stevenson <CPC.469Stevenson@sfgov.org>
Sent: Tuesday, March 17, 2020 1:56 PM
To: Radonich, Anna <Anna.Radonich@stantec.com>
Cc: tyler@bldsf.com; Alexis Pelosi <alexis@pelosilawgroup.com>
Subject: Fw: Other one is correct legal notice - 469 Stevenson Street Project Draft Environmental Impact Report

From: Sue Hestor <hestor@earthlink.net>
Sent: Wednesday, March 11, 2020 8:27 PM
To: CPC.469Stevenson <CPC.469Stevenson@sfgov.org>
Subject: Other one is correct legal notice - 469 Stevenson Street Project Draft Environmental Impact Report

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Just found your other email - THAT is one I wanted.

Thank you

Hestor

On 3/11/2020 1:26 PM, Sue Hestor wrote:

1
(CEQA-1) | Language below is ***not*** what appears as legal Notice for 469 Stevenson

DEIR in today's SF Ex.

1 cont.
(CEQA-1
cont.)

Legal Notice is case number, a description of the project and includes info on how to find info via PIM.

Is there someone else who would have sent copy to Examiner for publication that I should talk to?

Sue Hestor

On 3/11/2020 1:14 PM, CPC.469Stevenson wrote:

To all interested parties:

The San Francisco Planning Department published a draft environmental impact report (EIR) for the 469 Stevenson Street project today. The notice of availability and draft EIR are available at <https://sfplanning.org/environmental-review-documents>.

The public comment period for the draft EIR is March 12, 2020 to 5:00 p.m. on April 27, 2020. During this period you can submit comments on the adequacy of the draft EIR:

- orally or in writing at the planning commission public hearing on the draft EIR for the proposed project on Thursday, April 16, 2020, beginning at 1 p.m.;
- via email to CPC.469Stevenson@sfgov.org; or
- mailed or delivered to Jenny Delumo, Senior Planner, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

During the public comment period, planning department staff will not respond to comments on the content of the draft EIR but we will answer questions concerning the overall environmental review process.

Following the public comment period, planning department staff will review the comments and prepare written responses to the comments received in a separate document called Response to Comments. The draft EIR and the Responses to Comments document will be the final EIR.

At a later date, the planning commission will hold a hearing to certify the adequacy of the final EIR. The planning department will notify the public, including commenters on the draft EIR, when the department publishes the Responses to Comments document and has scheduled the final EIR certification hearing.

Please refer to the draft EIR (via the link above) for more details.

[San Francisco Property Information Map](#)

REDUCED CAPACITY DURING THE SHELTER IN PLACE ORDER -- The Planning Department is open for business. Most of our staff are working from home and we're [available by e-mail](#). Our [Public Portal](#), where you can file new applications, and our award-winning [Property Information Map](#) are available 24/7. Similarly, the [Board of Appeals](#) and [Board of Supervisors](#) are accepting appeals via e-mail despite office closures. To protect everyone's health, all of our in-person services at 1650 and 1660 Mission Street are suspended, and the Planning and Historic Preservation Commissions are cancelled until April 9, at the earliest. [Click here for more information](#).

From: Sue Hestor <hestor@earthlink.net>
Sent: Monday, April 13, 2020 10:37 AM
Cc: Sue Hestor <hestor@earthlink.net>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Koppel, Joel (CPC) <joel.koppel@sfgov.org>; Kathrin Moore <Mooreurban@aol.com>; Delumo, Jenny (CPC) <jenny.delumo@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Mcdonald, Courtney (BOS) <courtney.mcdonald@sfgov.org>; RivamonteMesa, Abigail (BOS) <abigail.rivamontemesa@sfgov.org>; Haney, Matt (BOS) <matt.haney@sfgov.org>
Subject: 469 Stevenson DEIR comment deadline must be changed

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

1 469 Stevenson DEIR set for hearing as #13 Thursday was released 3/12/20 just as SF began cancelling hearings, and started lockdown mode. The notice date and 4/6 agenda has Monday 4/27 as deadline for written comments. This must be changed.

(CEQA -1) **Proposed project, by Build Inc is a 27-story (w/3 underground parking levels) 495 DU project using State Density Bonus.** It is mostly a market rate housing project, unaffordable to most residents nearby in the Tenderloin and South of Market. Residents who will face gentrifying pressure from this project.

469 Stevenson is located between 5th & 6th Streets on the first street immediately south of Market Street. The location and this mostly market rate housing project will have substantial effects on both the Tenderloin and this area of SoMa which still has significant number of Filipino families. Residents and organizations in those areas deserve enough time to submit written comments. Even if they are able to do verbal comments on line Thursday.

This area is in middle of dealing with unhoused residents facing outbreak of Covid-19 because of their lack of affordable housing. This must take precedence people and organizations in immediate future.

2 (SD-1) The DEIR is 1129 pages. Because of projects height and location 27-story tower casts shadows on nearby parks/open spaces that are important to nearby residents lacking open space where they live. Notice of the DEIR states that implementation of proposed project would result in significant and unavoidable impacts related to shadow.

3 (CEQA -1) **Even more important, informed written comment is impossible for many Tenderloin and South of Market residents who do not have a computer and printer at their home.** Many residents depend on access to computers at public libraries or at community organizations. Access to public libraries and facilities, and to non-profit organizations, has been impossible for the past 3 weeks. Even those with access to a

3
cont.

(CEQA
-1
cont.)

computer may face difficulty loading such large file as the EIR. The notice itself refers to using the PIM to access complicated documents relied on by 369 Stevenson DEIR.

Over the past 2 weeks I have received repeated calls for help from citizens about the difficulty of making comments and receiving information - they really attempt to give informed comment on matters at Planning but are really having problems because city facilities and information is no longer available to people lacking internet connections and computers of their own. Cell phones cannot read a lengthy EIR.

The comment period on Build Inc's proposal to build mostly market rate housing tower 495 DU at 469 Stevenson should be extended to a date at least 3 weeks after City offices and the city as a whole is gain open for business.

Extending the comment period is also the right thing to do.

Sue Hestor

870 Market St #1128 94102

1

Planning Department/Commission ignores effect of current lockdown on District 6 residents. District which has large concentrations of **Residential Hotels** and **homeless. Low income workers** who have lost jobs.

(CEQA-1)

South of Market, Filipino communities being overrun with large projects at Commission **NOW**. Projects at boundary of areas designed to protect Filipino families/low-income residents.

469 Stevenson - 500 unit mostly MARKET RATE housing. **ENTIRE DEIR** comment period during lockdown.

701 Harrison new OFFICE building approved 4/30.

NEXT Thursday - MAJOR Area Plan ADOPTION. **The HUB**. Rezones part Districts 5 & 6. Abuts Districts 9 & 8.

South of Market subjected to FOUR Area Plans in past 18 years: Eastern Neighborhoods, Western SoMa, Central SoMa. Transit Center.

Now The Hub. Plus scheduled approval of 3 towers: 10 VanNess. 30 South VanNess. 98 Franklin.

6/18 - convert **54 4th RESIDENTIAL HOTEL** to Tourist Hotel.

1 cont.

SoMa residents deserve time to meet, including with Supervisor Haney. **SLOW DOWN**.

(CEQA-1 cont.)

Sue Hestor

Submission for 5/7/20 Plan Comm Minutes

Subject: RE: Sue Hestor's email: Typo correction - 5/7/20 Plan Comm minutes - effect on D6 residents being ignored by Planning

From: Delumo, Jenny (CPC)
Sent: Tuesday, May 12, 2020 8:37 AM
To: Sue Hestor <hestor@earthlink.net>
Subject: FW: Sue Hestor's email: Typo correction - 5/7/20 Plan Comm minutes - effect on D6 residents being ignored by Planning

Hello Ms. Hestor,

We received the email below and the attached, which include comments on the 469 Stevenson Street project. We will include these as comments on the draft EIR for the project and will respond to them in the responses to comments document.

As you know the Planning Department extended the original public comment period for the draft EIR from April 24 to May 11. The department has decided to keep the current deadline of May 11.

Kind regards,

Jenny Delumo
Senior Planner, Environmental Planning Division
Transportation Review Team Lead

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415.575.9146 **Fax:** 415-558-6409
Email: Jenny.Delumo@sfgov.org
Web: www.sfplanning.org



The Planning Department is open for business during the Stay Safe at Home Order. Most of our staff are working from home and we're [available by e-mail](#). Our [Public Portal](#), where you can file new applications, and our [Property Information Map](#) are available 24/7. The Planning and Historic Preservation Commissions are convening remotely and [the public is encouraged to participate](#). The Board of Appeals, Board of Supervisors, and Planning Commission are [accepting appeals](#) via e-mail despite office closures. All of our in-person services at 1650 and 1660 Mission Street are suspended until further notice. [Click here for more information](#).

From: Sue Hestor <hestor@earthlink.net>
Sent: Thursday, May 7, 2020 3:59 PM
To: Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Haney, Matt (BOS) <matt.haney@sfgov.org>; Mcdonald, Courtney (BOS) <courtney.mcdonald@sfgov.org>; RivamonteMesa, Abigail (BOS) <abigail.rivamontemesa@sfgov.org>; Sue Hestor <hestor@earthlink.net>
Cc: Jain, Devyani (CPC) <devyani.jain@sfgov.org>
Subject: Typo correction - 5/7/20 Plan Comm minutes - effect on D6 residents being ignored by Planning

TYPO correction.

THIS letter only - 6/4 for THE HUB - should be 10 South Van Ness

Attached minutes CORRECT

Sue Hestor

On 5/7/2020 3:07 PM, Sue Hestor wrote:

Attached is 150 word statement by Sue Hestor to be included in Planning Commission 5/7/20 minutes

The thrust of the statement - and of my verbal comments by PHONE:

- Planning is pushing through major South of Market projects & approvals during lockdown. No live hearings.
- D6/SoMa have very high concentration of low income and homeless residents PARTICULARLY AFFECTED by pandemic.
- Supervisor Haney, community organizations and individuals DESERVE TIME to become informed on proposed development projects BEFORE end of comments and decision.
- **469 Stevenson DEIR** - 500 unit mostly MARKET RATE project shadowing parks in Tenderloin and South of Market - has DEIR comment period ENDING (although slightly extended) before ANY opportunity for affected residents to meet. "Info presentation" on project AFTER DEIR COMMENTS COMPLETE - means that comments/issues not factored into EIR.
- 701 Harrison - new office building ignores other side of Harrison.
- Planning analysis of proposed projects routinely ignores nearby Youth and Family Zone SUD and Filipino Heritage District. AND PRESENCE OF LARGE NUMBER OF LOW INCOME RESIDENTS and RESIDENTIAL HOTELS.
- The Hub Area Plan sets up approval of major AREA PLAN & 3 BUILDING APPROVALS - in REMOTE HEARING - maximum difficulty for presentations and testimony.
- Besides 4 Area Plans in South of Market, in minutes attachment, also **Rincon Hill Area Plan** and **Market/Octavia Area Plan** crossing Market Street. SIX area plans in addition to at least 3 former Redevelopment Areas with various expiration dates.
- Community organizations and residents need/deserve opportunity to talk with FOUR affected Supervisors.

Keeping to **THE HUB** schedule -

- 5/14 - Hub EIR certified and various actions adopted
- 5/21 - Joint Hearing with Rec Park to approve shadows on 4 parks. Approve 30 Van Ness
- 6/4 - Approve 30 South Van Ness + Approve 98 Franklin

means Plan Comm hearings - over the phone. Not live Commission. THIS IS MAJOR AREA PLAN THAT WILL HAVE LONG TERM IMPLICATIONS.

The Hub needs to be delayed.

469 Stevenson - DEIR comment period should be extended until AFTER the information hearing at LIVE Commission meeting. This is major market rate housing project - 500 units - just off Market between 5th & 6th Streets. In middle of low income housing. ERO has power to - AND SHOULD - extend DEIR comment period given current situation.

Thought needed on 6/18 scheduled **LOSS OF RESIDENTIAL HOTEL HOUSING at 54 4th Street.**

- Tourist hotels have massively closed.
- Convention schedules have massively changed.
- Role of Residential Hotels needs to seriously thought thru.
 - By Planning.
 - By Board of Supervisors.
 - By affordable housing providers.
 - By tenant organizations.
 - By the general public.

In summary,

THE BOARD OF SUPERVISORS - particularly Sup Haney - have had their hands full the past 2 months dealing with low income residents, the homeless, and the massive outbreak of Covid-19.

Community organizations and residents have similar demands on their time.

Dealing with consideration AND APPROVAL of new market rate housing, office buildings, AREA PLANS - in the midst of current lockdown - is disrespectful, verging on being abusive.

Sue Hestor

870 Market St #1128 SF 94102

hestor@earthlink.net

469 Stevenson Street DEIR Comments

1
(CEQA-1) Page 1-4 boilerplate statement on **encourage public participation and comment in planning and environmental review processes on proposed project**. Please comment on the unprecedented situation of public lockdown during virtually the entire DEIR process has affected ability of Commissioners and the public to submit informed comments..

2
(ESI-1) This project is located in a complicated area of SF with varied neighborhoods. And street circulation patterns which have changed IN THE PAST WEEKS. (Since transportation studies down for THIS DEIR. Very low income neighborhood to the north (Tenderloin) with many disabled people, unsheltered persons, low income seniors and families raising children. Very low and low income persons south of Market Street, including Filipino immigrants and families raising children. Retail and hotel districts to east both north and south of Market.

3
(ESI-1) There has been significant attention paid to nearby area around Chronicle - 5M project. But project site is a parking lot in the middle of 5th, Market, 6th, and Mission Streets. It does not have a similar level of pedestrian traffic as do those streets, or the other alleys surrounding The Mint, which is also on this block.
Some residential hotels have been converted to tourist hotels, or have otherwise ceased serving lower income people. Rents have been pushed massively higher over the past 5-10 years.

4
(CEQA-1) The ORDER to stay at home affects ability of public to check out 469 Stevenson site and surroundings as they read DEIR. And prepare to submit oral and written comments.
People and community organizations have been effectively ORDERED to refrain from checking and verifying information in the DEIR.
There have been repeated requests - including by Planning Commissioners - that DEIR comment period be extended until AFTER the ORDER instructing San Franciscans to stay at home is lifted. And that a second opportunity for ORAL testimony on DEIR be provided. An information presentation AFTER closure of comment period is not the same. Issues that may arise from that hearing will not have to be addressed in the Responses and in FEIR.
A 2 week extension of period to submit written comments is not the same.

Sue Hestor

870 Market St #1128, SF 94102

(between 4th and 5th Streets)

Subject: RE: 469 Stevenson Street Project

From: Theodore <public@theodr.net>
Sent: Friday, April 17, 2020 1:18 AM
To: CPC.469Stevenson
Subject: 469 Stevenson Street Project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

1
(CEQA
-2) I The existing CEQA framework doesn't adequately consider any project in the context of a global environment, because it doesn't consider positive environmental impacts.

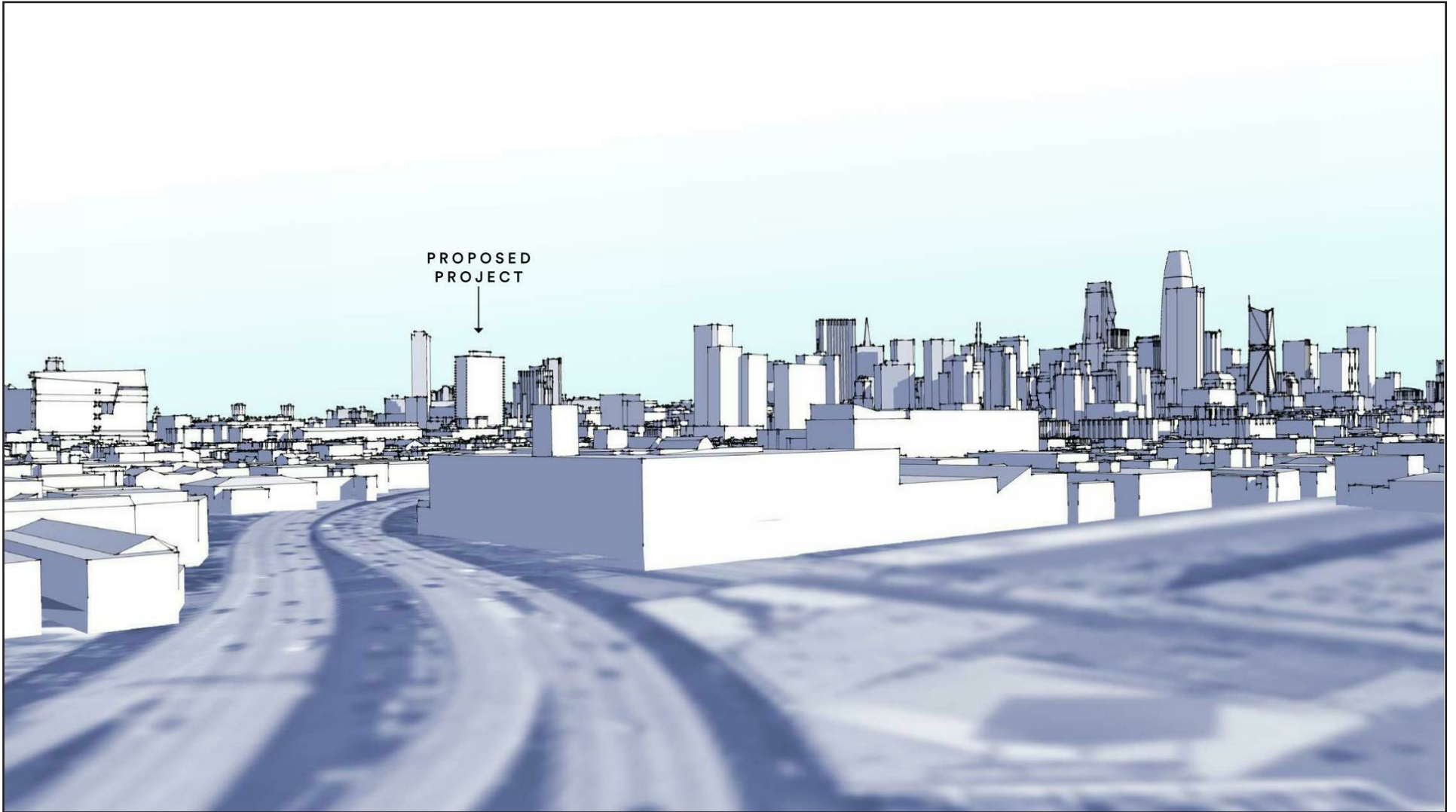
2
(ME-2) I In particular, the VMT impacts of maximum density should be considered a positive impact because it replaces the VMT of people driving from long distances to park in the lot, some commuters coming from up to hundreds of miles away. The existing condition imposes high VMT for residents of other counties to reach attractions and jobs in San Francisco. The residential parking in the project obviously also facilitates harmful VMT, and ideally the project would have no parking at all, but the VMT impact should be reduced, perhaps below 0, when taking into consideration the increased ability for residents to walk or take transit. In this regard, the proposed project is even better than the reduced density option, even though it has more parking spaces, because the parking ratio is lower.

3
(ME-2) I On the matter of gentrification risk, this project should also be considered positively. As a commercial parking lot, there are no residents to displace. On the contrary, providing the most housing, even additional market-rate housing, has been shown in most study methodologies and through the most solidly accepted economic principles to decrease gentrification risk the most. In addition, as an affordable housing bonus project near transit without excessive parking, this project has both on-site affordable rent and car-free lifestyle affordability. This lifestyle affordability applies also to market-rate units when the residents decline to pay for the unbundled parking. Especially compared to the current condition, when many low-income workers pay for vehicles and fuel to commute to this neighborhood from homes up to hundreds of miles away.

4
(ME-2) I In summary, we get the most environmental benefit from allowing the project to be as big and bulky, with the most housing units, as possible. Whoever is editing the EIR should make that clear.

Theodore Randolph

ATTACHMENT C



Source: Solomon Cordwell Buenz 2018



Source: Solomon Cordwell Buenz 2018



Source: Solomon Cordwell Buenz 2018



Source: Solomon Cordwell Buenz 2018

ATTACHMENT D



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

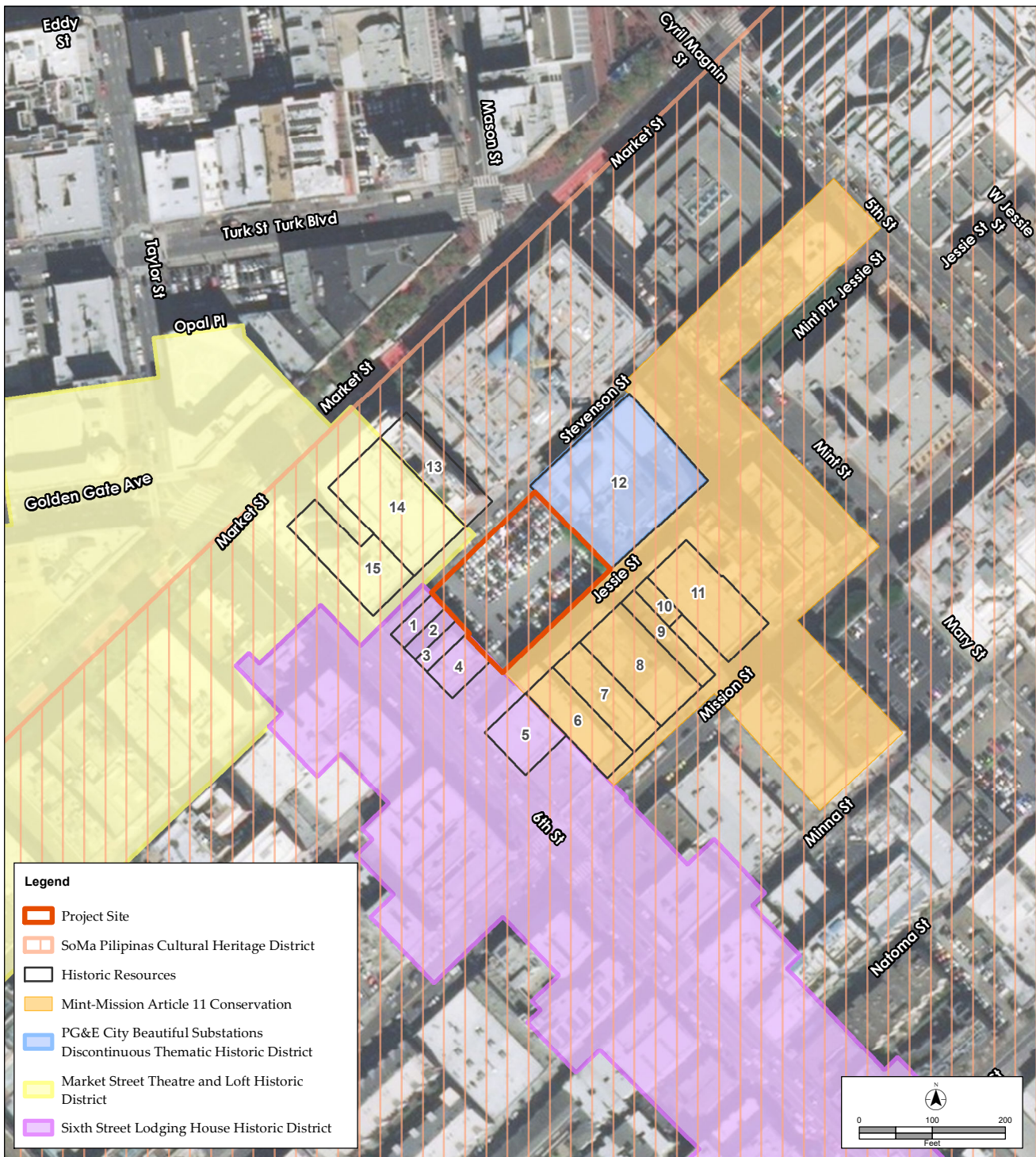
469 Stevenson Street Project

Case No. 2017.014833ENV.

Figure D.1: SoMa Youth and Family Zone Special Use District

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

ATTACHMENT E



- | | | |
|-----------------------|---|--|
| 1. 35-37 Sixth Street | 6. 986 Mission Street/481 Jessie Street | 11. 956-960 Mission Street (non-contributor) |
| 2. 39-41 Sixth Street | 7. 980-984 Mission Street | 12. 460 Jessie Street |
| 3. 43-45 Sixth Street | 8. 972- 976 Mission Street | 13. 973 Market Street |
| 4. 47-55 Sixth Street | 9. 968 Mission Street | 14. 979-989 Market Street |
| 5. 65-83 Sixth Street | 10. 471 Jessie Street | 15. 995 Market/ 1 Sixth Street (non-contributor) |

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

469 Stevenson Street Project

Case No. 2017.014833ENV.

Figure E.1: SoMa Pilipinas Cultural Heritage District and Surrounding Historic Districts

ATTACHMENT F

B1.1


469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

6:46 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
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B1.2

469 STEVENSON STREET

Shading diagrams on the Summer Solstice



**SUMMER SOLSTICE
JUNE 21**

7:00 AM

- Proposed Project
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B1.3

469 STEVENSON STREET

Shading diagrams on the Summer Solstice



**SUMMER SOLSTICE
JUNE 21**

8:00 AM

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B1.4

469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

9:00 AM

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-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
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B1.5





469 STEVENSON STREET

Shading diagrams on the Summer Solstice









**SUMMER SOLSTICE
JUNE 21**

10:00 AM

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B1.6




469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

11:00 AM

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B1.7


469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

12:00 PM

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B1.8

469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

1:00 PM

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-  New Shading from Cumulative Projects

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B1.9


469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

2:00 PM

-  Proposed Project
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B1.10 469 STEVENSON STREET

Shading diagrams on the Summer Solstice



**SUMMER SOLSTICE
JUNE 21**

3:00 PM

- Proposed Project
- Existing (current) Shadows
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B1.11 469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

4:00 PM

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B1.12 469 STEVENSON STREET

Shading diagrams on the Summer Solstice



**SUMMER SOLSTICE
JUNE 21**

5:00 PM

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B1.13 469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

6:00 PM

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B1.14 469 STEVENSON STREET

Shading diagrams on the Summer Solstice












**SUMMER SOLSTICE
JUNE 21**

7:00 PM

-  Proposed Project
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B1.15 469 STEVENSON STREET

Shading diagrams on the Summer Solstice



**SUMMER SOLSTICE
JUNE 21**

7:36 PM

- Proposed Project
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C1.1





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

7:57 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
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C1.2





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

8:00 AM

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C1.3





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

9:00 AM

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C1.4





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

10:00 AM

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C1.5

469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

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C1.6

469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

12:00 PM

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C1.7





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes










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C1.8





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

2:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

C1.9





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

3:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
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 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
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 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

C1.10





469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

4:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street





C1.11 469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

5:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
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 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street





C1.12 469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

6:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
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 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
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 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street



C1.13 469 STEVENSON STREET

Shading diagrams near the Fall/Spring Equinoxes












**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

6:09 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.1





469 STEVENSON STREET

Shading diagrams on the Winter Solstice












**WINTER SOLSTICE
DECEMBER 20**

8:19 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.2

469 STEVENSON STREET

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

9:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project
- New Shading from Cumulative Projects

- Parks and Open Spaces (Jurisdiction)
 - 1 United Nations Plaza (DPW)
 - 2 Boedekker Park (RPD)
 - 3 Hallidie Plaza (DPW)
 - 4 Mint Plaza (POPOS)
 - 5 Westfield Roof Terrace (POPOS)
 - 6 Intercontinental Roof Terrace (POPOS)
 - 7 SF Chronicle Rooftop (Future POPOS)
 - 8 Mary Plaza (Future POPOS)

- Cumulative Projects
 - 1 1125 Market Street
 - 2 1055 Market Street
 - 3 1028 Market Street
 - 4 57 Taylor Street
 - 5 25 Mason Street
 - 6 996 Mission Street
 - 7 457-475 Minna Street
 - 8 921 Howard Street

D1.3





469 STEVENSON STREET

Shading diagrams on the Winter Solstice












WINTER SOLSTICE
DECEMBER 20

10:00 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
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 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.4




469 STEVENSON STREET

Shading diagrams on the Winter Solstice












WINTER SOLSTICE
DECEMBER 20

11:00 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
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 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
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 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.5

469 STEVENSON STREET

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

12:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project
- New Shading from Cumulative Projects

- Parks and Open Spaces (Jurisdiction)
 - 1 United Nations Plaza (DPW)
 - 2 Boedekker Park (RPD)
 - 3 Hallidie Plaza (DPW)
 - 4 Mint Plaza (POPOS)
 - 5 Westfield Roof Terrace (POPOS)
 - 6 Intercontinental Roof Terrace (POPOS)
 - 7 SF Chronicle Rooftop (Future POPOS)
 - 8 Mary Plaza (Future POPOS)

- Cumulative Projects
 - 1 1125 Market Street
 - 2 1055 Market Street
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 - 4 57 Taylor Street
 - 5 25 Mason Street
 - 6 996 Mission Street
 - 7 457-475 Minna Street
 - 8 921 Howard Street

D1.6

469 STEVENSON STREET

Shading diagrams on the Winter Solstice



**WINTER SOLSTICE
DECEMBER 20**

1:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project
- New Shading from Cumulative Projects

- Parks and Open Spaces (Jurisdiction)
 - 1 United Nations Plaza (DPW)
 - 2 Boedekker Park (RPD)
 - 3 Hallidie Plaza (DPW)
 - 4 Mint Plaza (POPOS)
 - 5 Westfield Roof Terrace (POPOS)
 - 6 Intercontinental Roof Terrace (POPOS)
 - 7 SF Chronicle Rooftop (Future POPOS)
 - 8 Mary Plaza (Future POPOS)

- Cumulative Projects
 - 1 1125 Market Street
 - 2 1055 Market Street
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 - 5 25 Mason Street
 - 6 996 Mission Street
 - 7 457-475 Minna Street
 - 8 921 Howard Street

D1.7





469 STEVENSON STREET

Shading diagrams on the Winter Solstice












**WINTER SOLSTICE
DECEMBER 20**

2:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
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 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
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 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.8





469 STEVENSON STREET

Shading diagrams on the Winter Solstice












WINTER SOLSTICE
DECEMBER 20

3:00 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
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 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
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 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

D1.9





469 STEVENSON STREET

Shading diagrams on the Winter Solstice












**WINTER SOLSTICE
DECEMBER 20**

3:54 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project
-  New Shading from Cumulative Projects

-  Parks and Open Spaces (Jurisdiction)
 -  1 United Nations Plaza (DPW)
 -  2 Boedekker Park (RPD)
 -  3 Hallidie Plaza (DPW)
 -  4 Mint Plaza (POPOS)
 -  5 Westfield Roof Terrace (POPOS)
 -  6 Intercontinental Roof Terrace (POPOS)
 -  7 SF Chronicle Rooftop (Future POPOS)
 -  8 Mary Plaza (Future POPOS)

-  Cumulative Projects
 -  1 1125 Market Street
 -  2 1055 Market Street
 -  3 1028 Market Street
 -  4 57 Taylor Street
 -  5 25 Mason Street
 -  6 996 Mission Street
 -  7 457-475 Minna Street
 -  8 921 Howard Street

1.1

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

6:46 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

1.2

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

7:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.3

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

8:00 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project

-  Parks and Open Spaces (Jurisdiction)
 -  Mint Plaza (POPOS)
 -  Mint Building Courtyard (POPOS)
 -  SF Chronicle Rooftop (Future POPOS)
 -  Mary Plaza (Future POPOS)

1.4

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

9:00 AM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project

-  Parks and Open Spaces (Jurisdiction)
 -  1 Mint Plaza (POPOS)
 -  2 Mint Building Courtyard (POPOS)
 -  3 SF Chronicle Rooftop (Future POPOS)
 -  4 Mary Plaza (Future POPOS)

1.5

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

10:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.6

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

11:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

1.7

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

12:00 PM

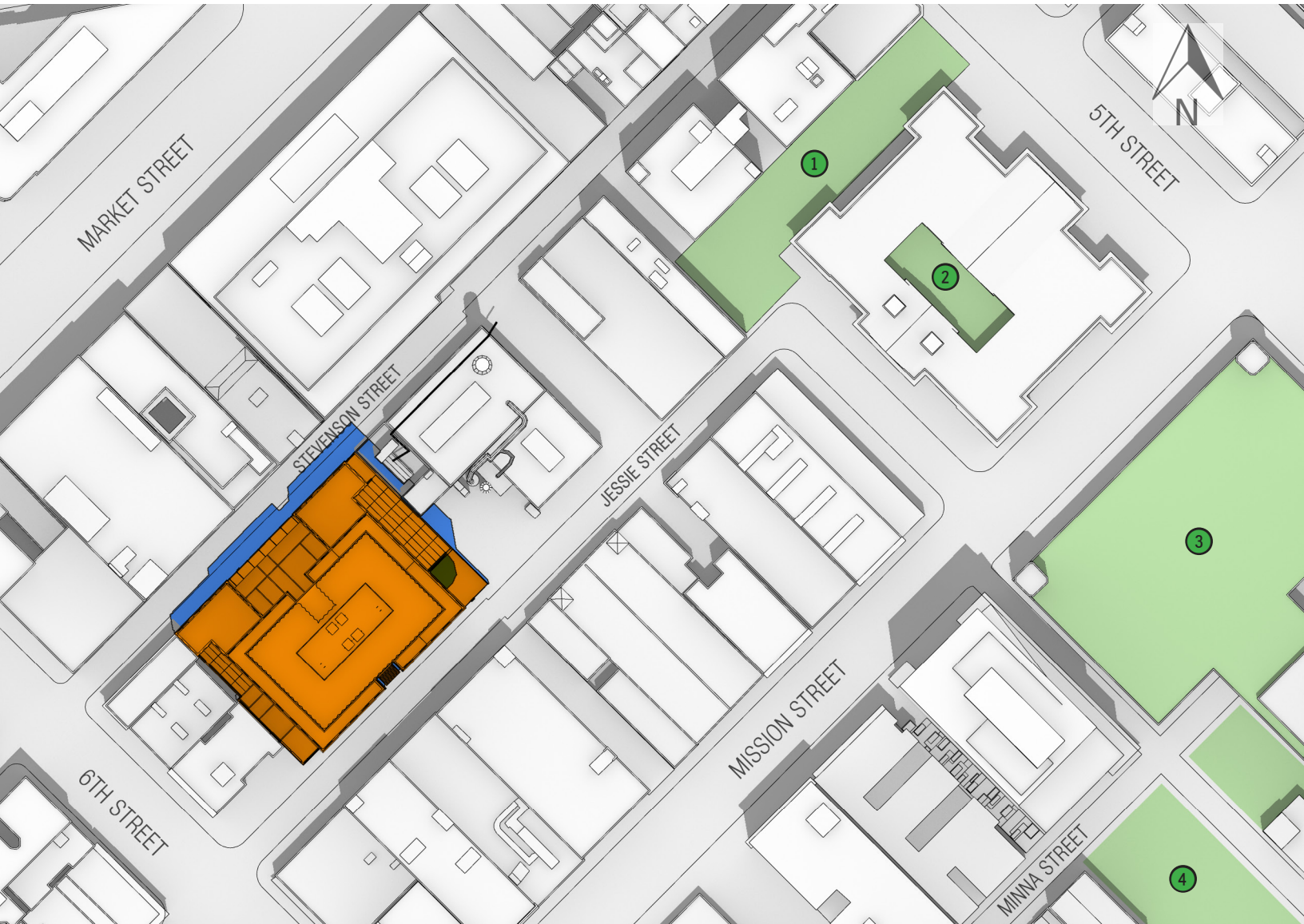
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

1.8

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

1:00 PM

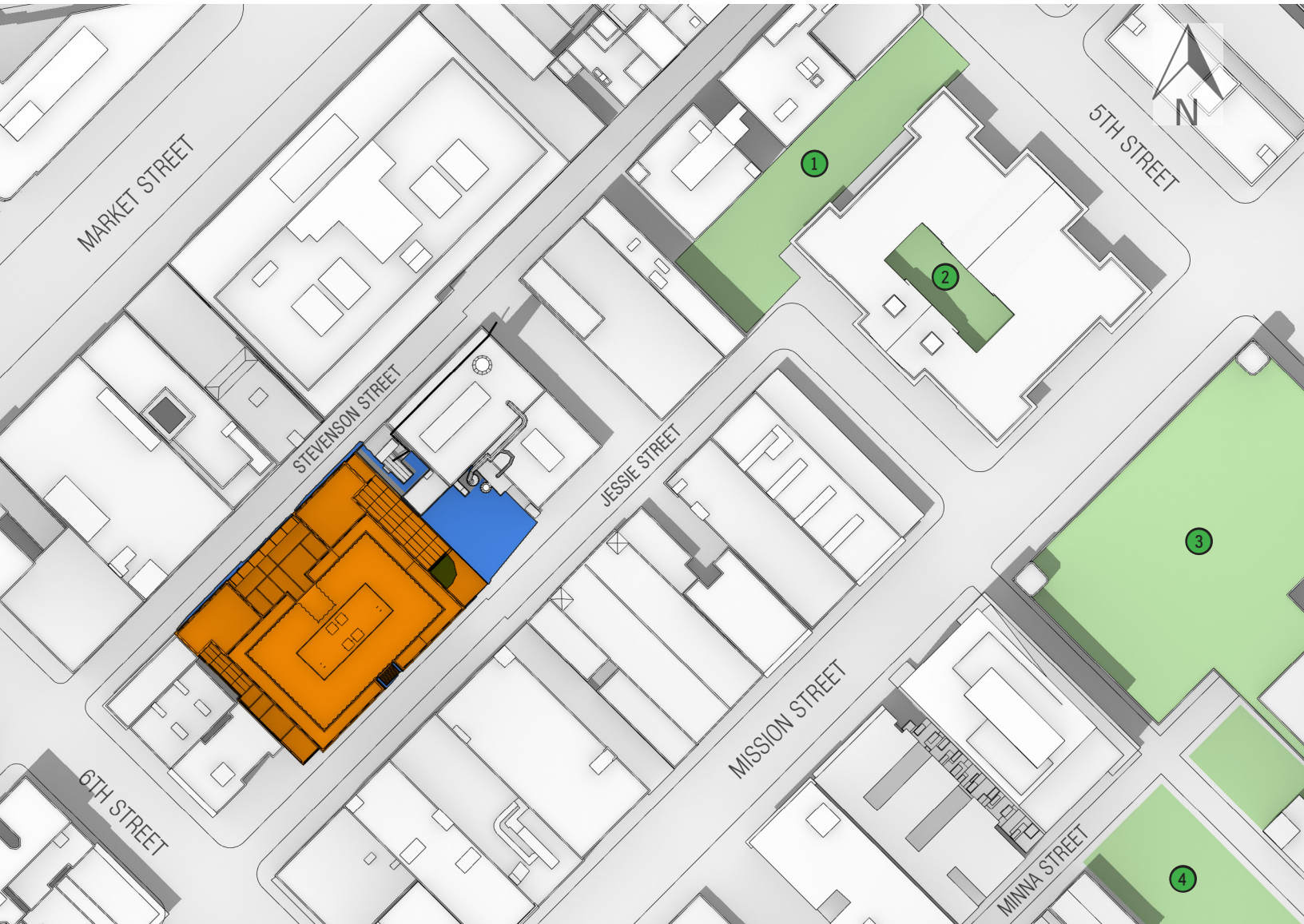
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.9

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

2:00 PM

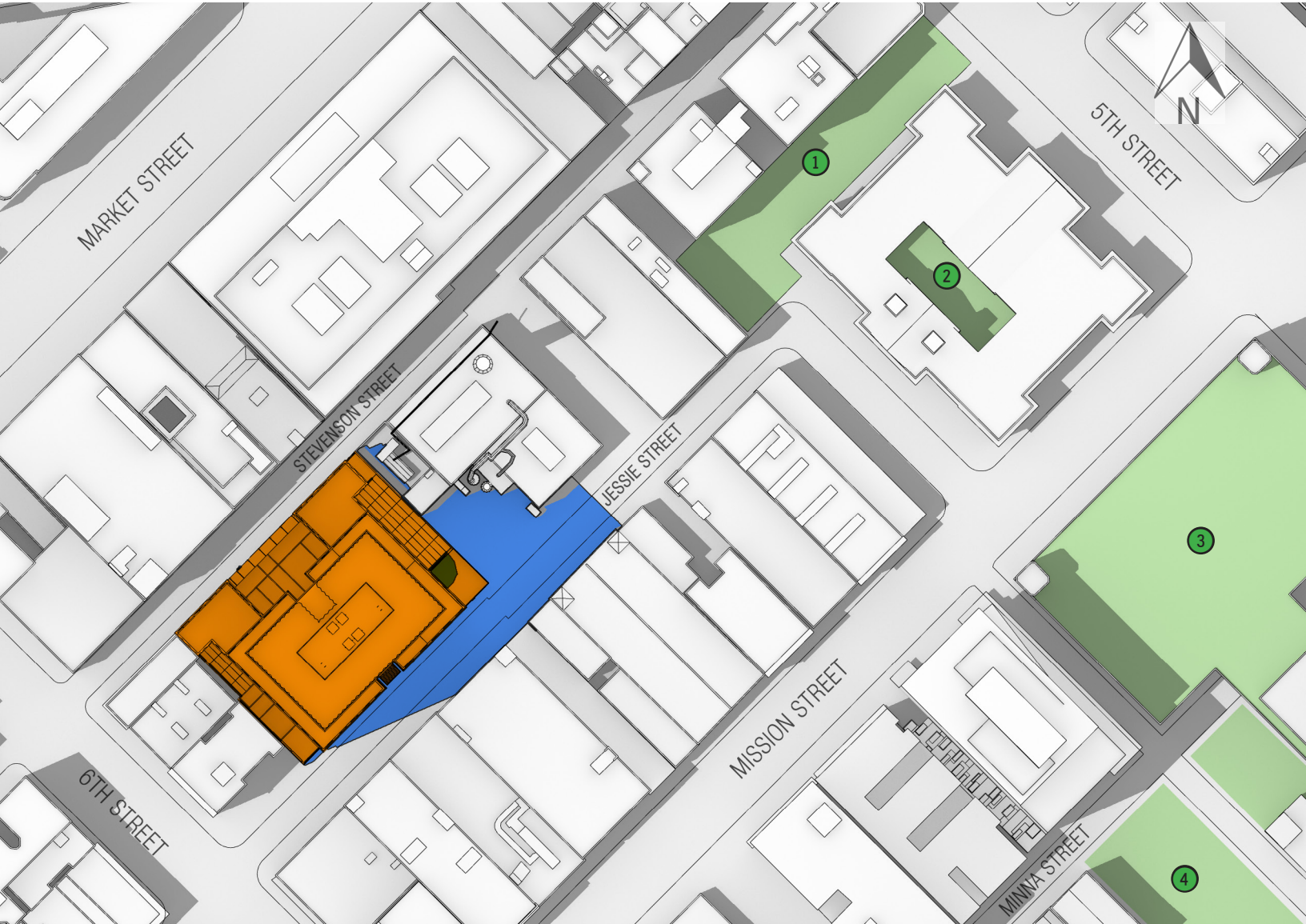
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

1.1

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

3:00 PM

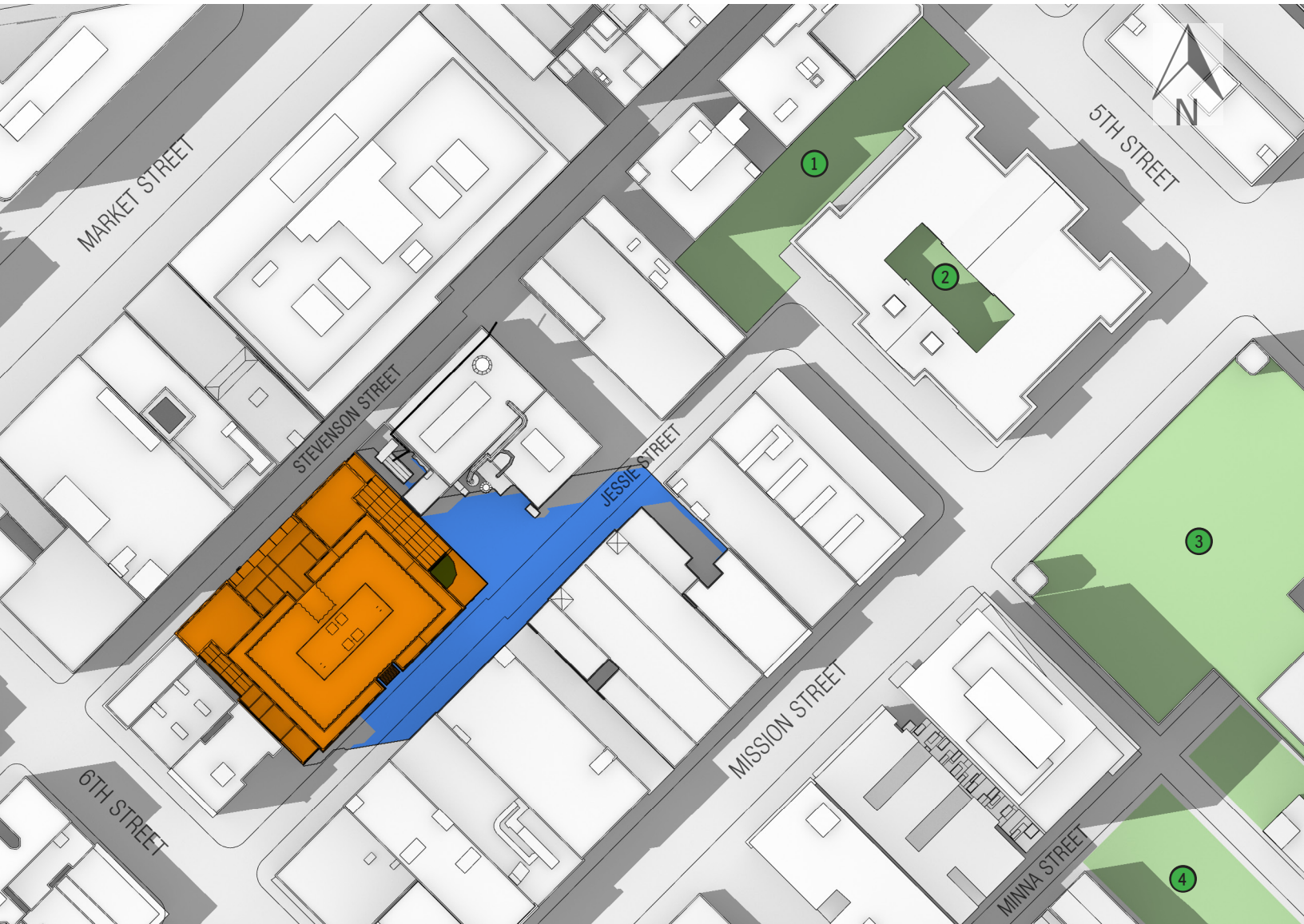
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.11

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

4:00 PM

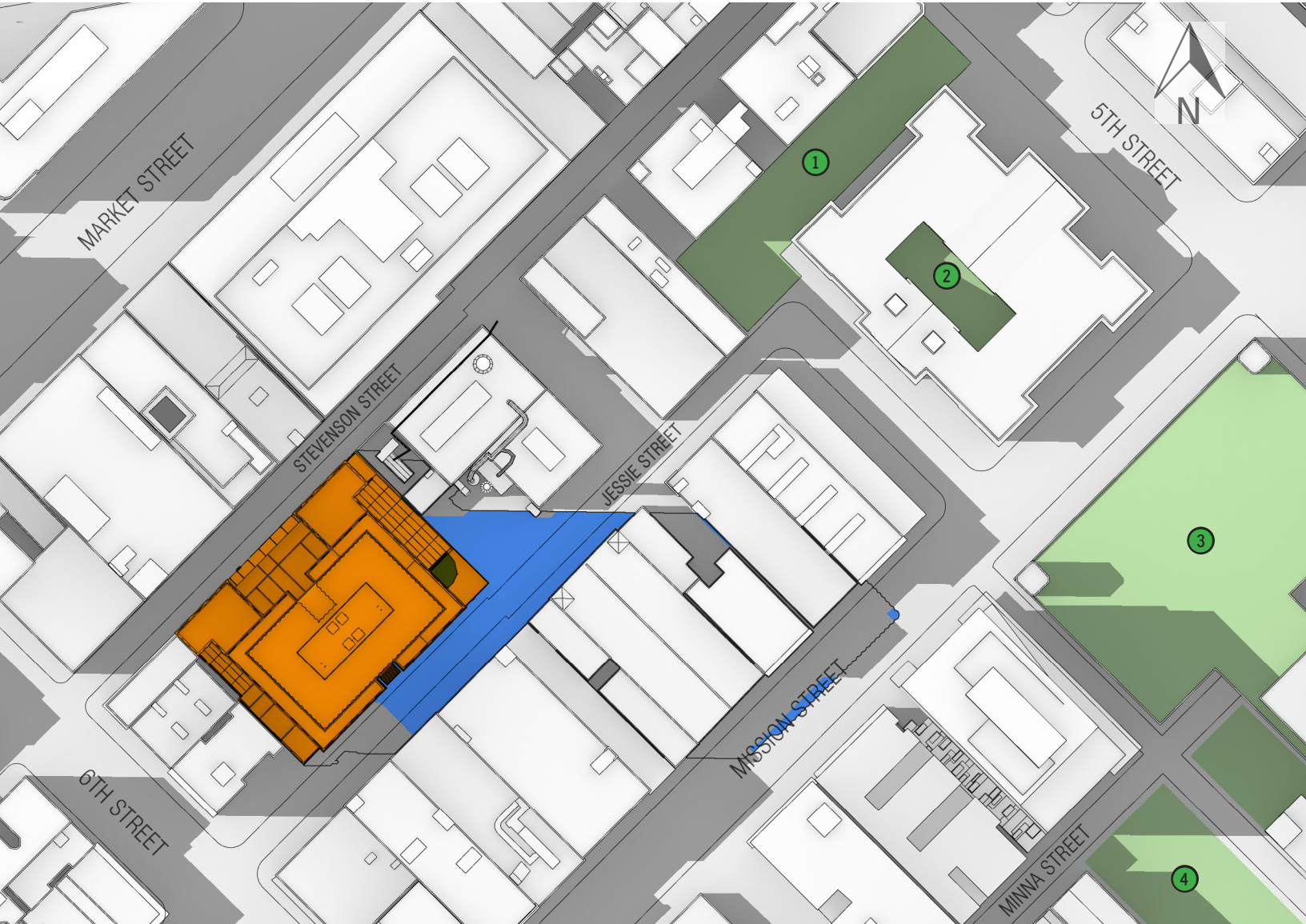
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.12

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

5:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.13

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

6:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.14

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

7:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

1.15

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Summer Solstice



SUMMER SOLSTICE
JUNE 21

7:36 PM

-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project

-  Parks and Open Spaces (Jurisdiction)
-  1 Mint Plaza (POPOS)
-  2 Mint Building Courtyard (POPOS)
-  3 SF Chronicle Rooftop (Future POPOS)
-  4 Mary Plaza (Future POPOS)

2.1

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

7:57 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.2

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

8:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- ① Mint Plaza (POPOS)
- ② Mint Building Courtyard (POPOS)
- ③ SF Chronicle Rooftop (Future POPOS)
- ④ Mary Plaza (Future POPOS)

2.3

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

9:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

2.4

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

10:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.5

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

11:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.6

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

12:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

2.7

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

1:00 PM

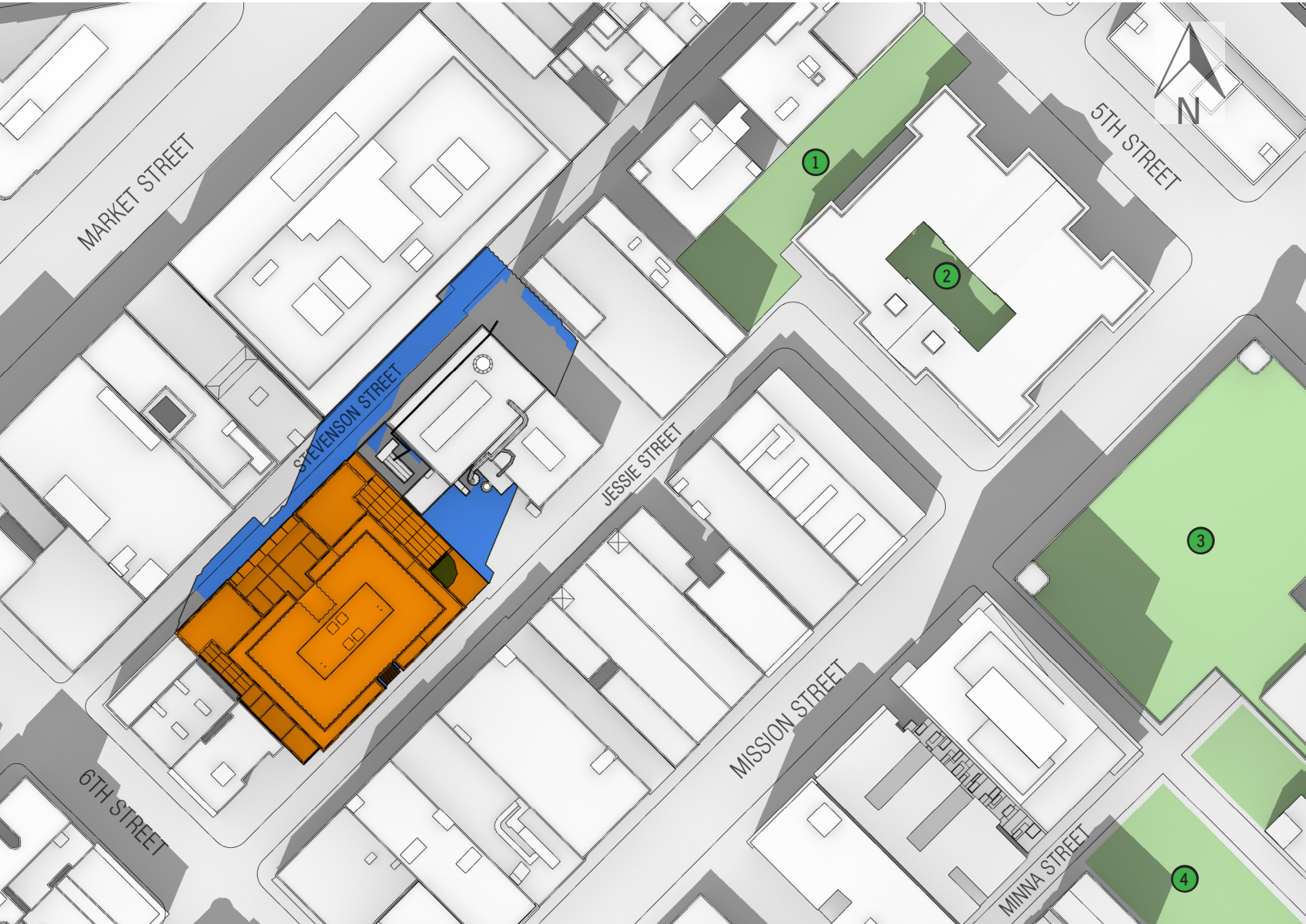
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.8

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

2:00 PM

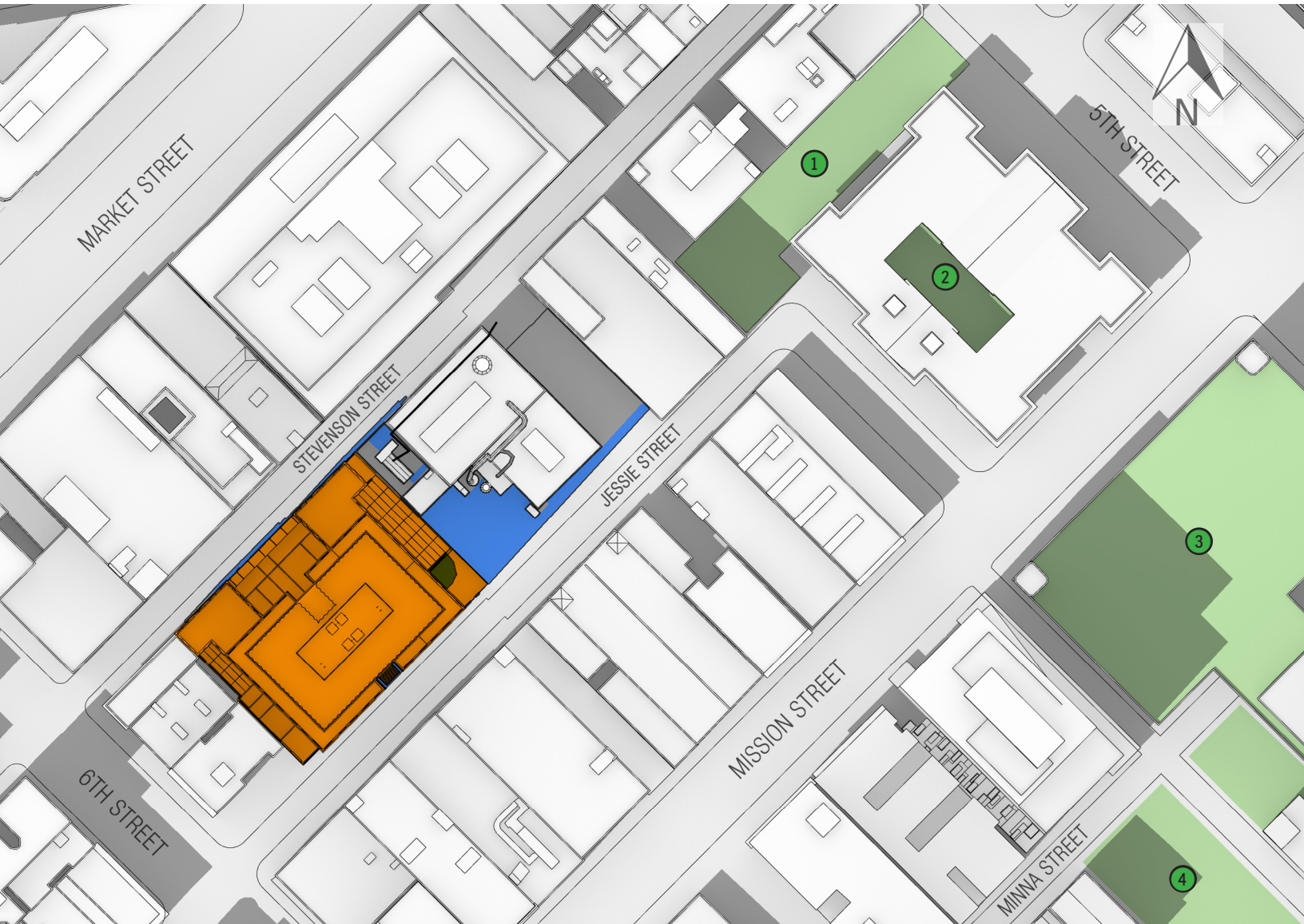
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.9

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

3:00 PM

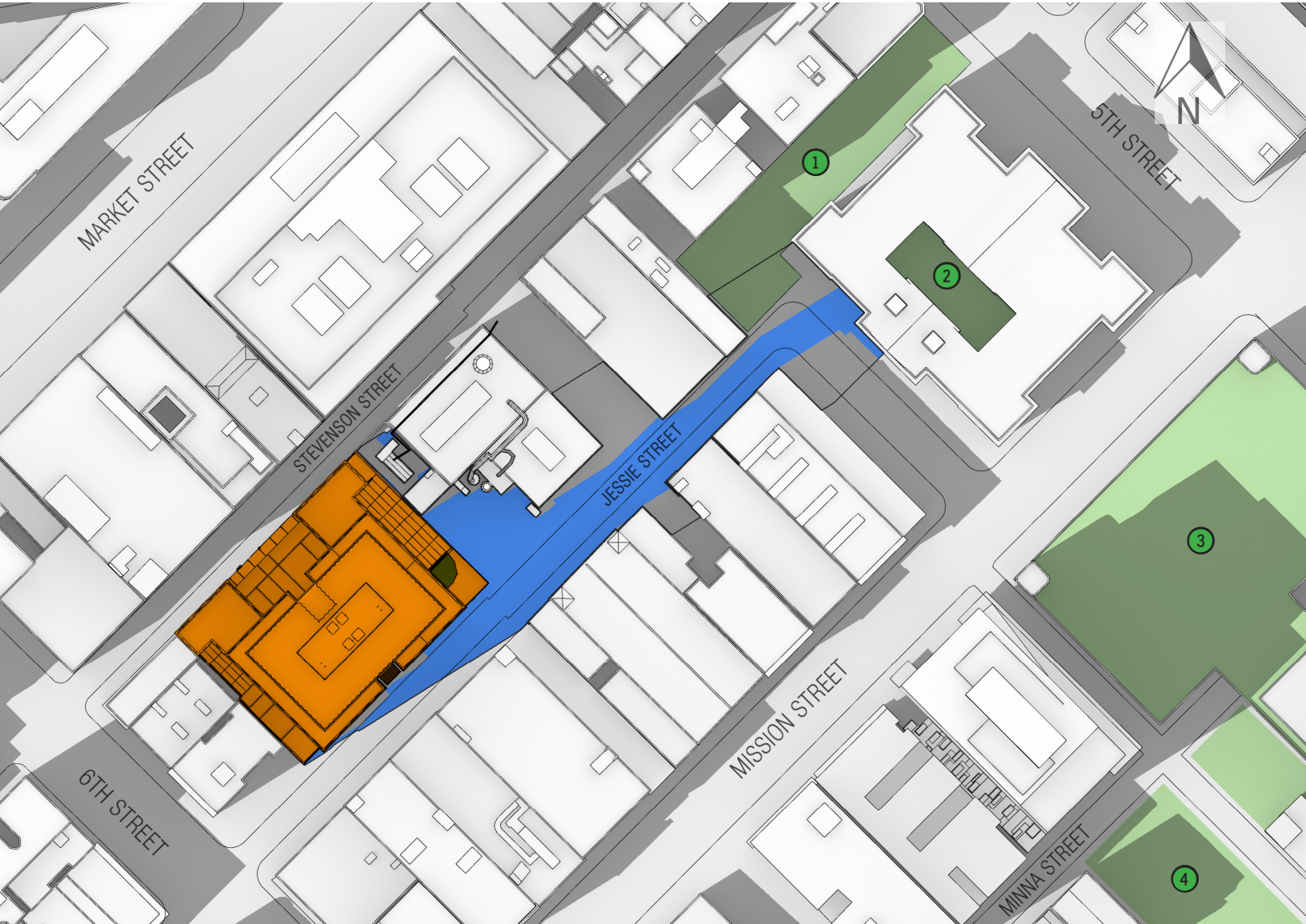
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
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- 4 Mary Plaza (Future POPOS)

2.1

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

4:00 PM

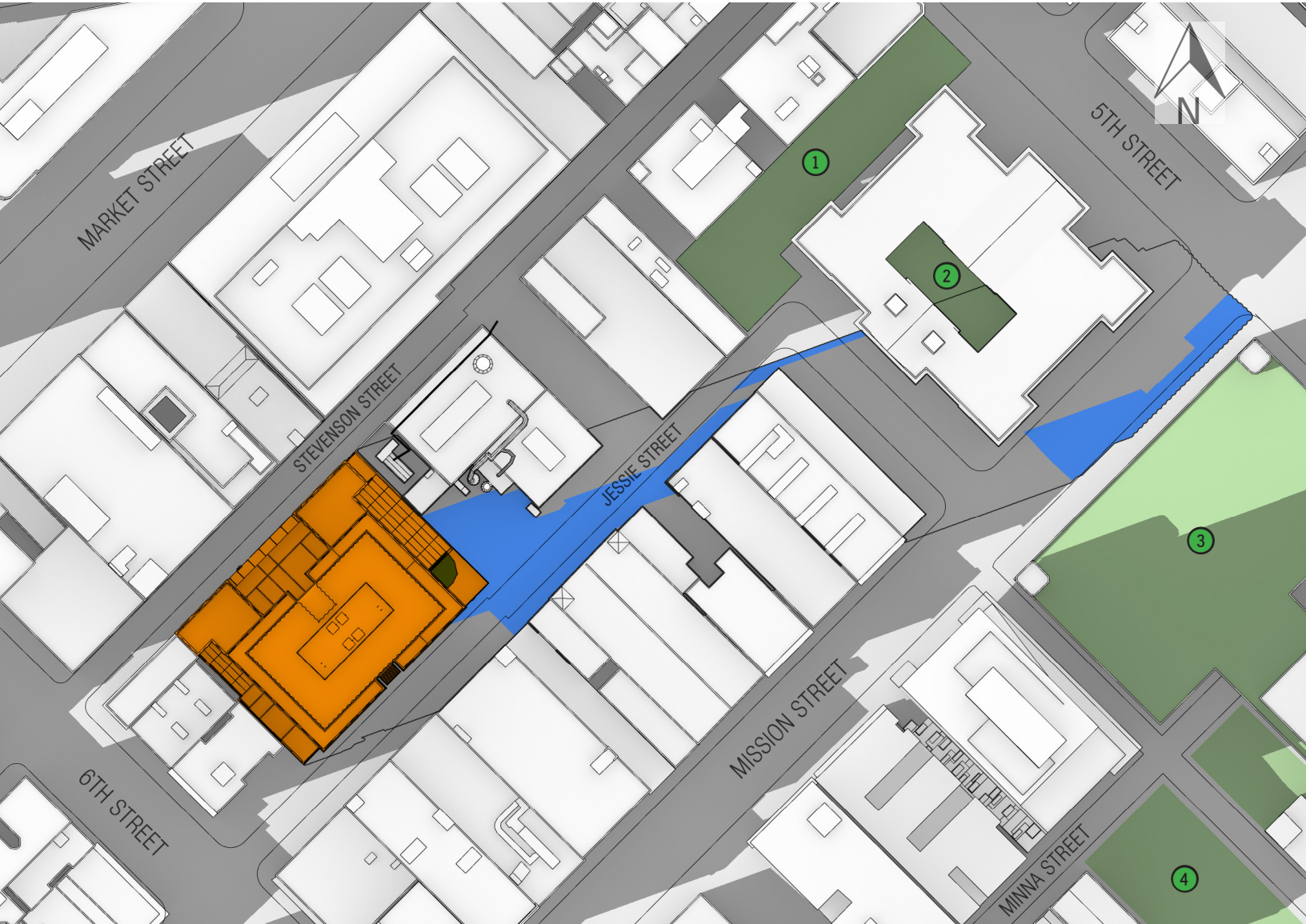
- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.11

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

5:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.12

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



**APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20**

6:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

2.13

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams near the Fall/Spring Equinoxes



APPROX. FALL EQUINOX (SPRING SIMILAR)
SEPTEMBER 20

6:09 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.1

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

8:19 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- ① Mint Plaza (POPOS)
- ② Mint Building Courtyard (POPOS)
- ③ SF Chronicle Rooftop (Future POPOS)
- ④ Mary Plaza (Future POPOS)

3.2

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

9:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.3

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

10:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

3.4

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

11:00 AM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.5

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

12:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.6

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

1:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.7

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

2:00 PM

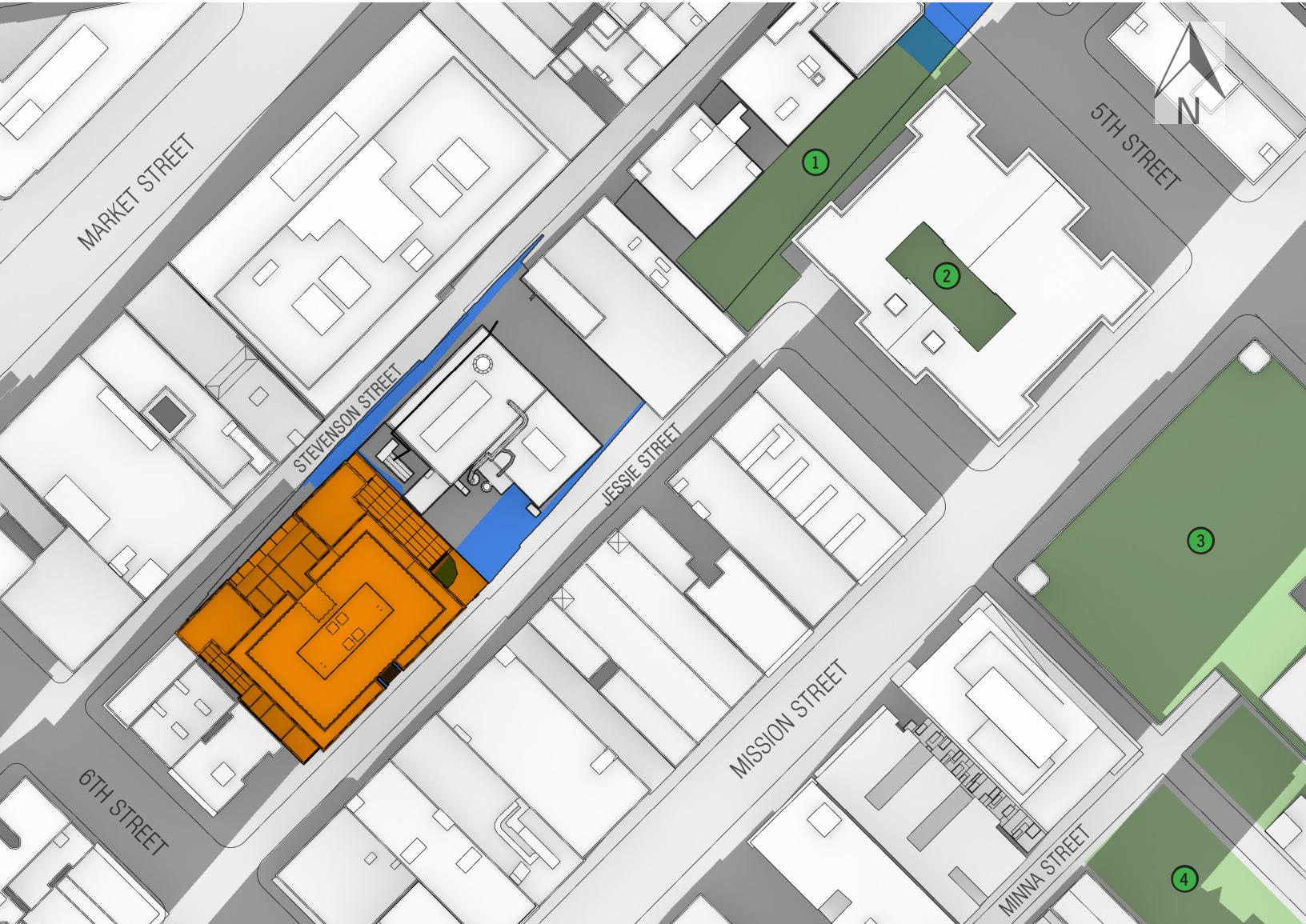
-  Proposed Project
-  Existing (current) Shadows
-  New Shading by Proposed Project

-  Parks and Open Spaces (Jurisdiction)
 -  Mint Plaza (POPOS)
 -  Mint Building Courtyard (POPOS)
 -  SF Chronicle Rooftop (Future POPOS)
 -  Mary Plaza (Future POPOS)

3.8

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

3:00 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
- 1 Mint Plaza (POPOS)
- 2 Mint Building Courtyard (POPOS)
- 3 SF Chronicle Rooftop (Future POPOS)
- 4 Mary Plaza (Future POPOS)

3.9

469 STEVENSON STREET / MINT BUILDING COURTYARD

Shading diagrams on the Winter Solstice



WINTER SOLSTICE
DECEMBER 20

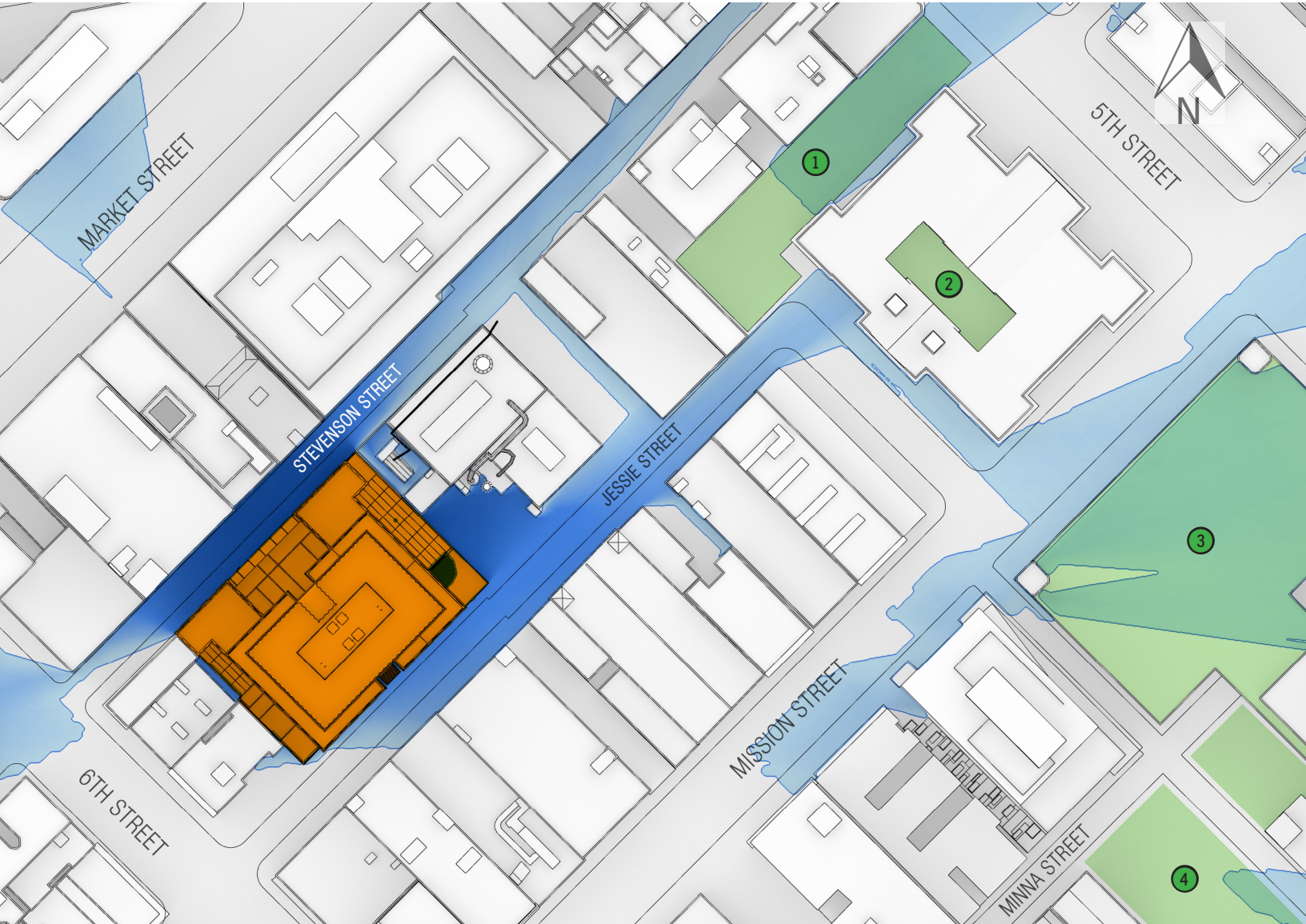
3:54 PM

- Proposed Project
- Existing (current) Shadows
- New Shading by Proposed Project

- Parks and Open Spaces (Jurisdiction)
 - ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

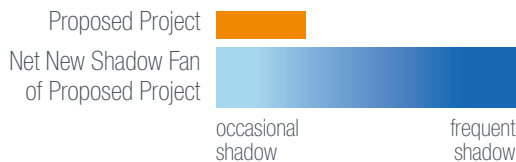
FAN-1 469 STEVENSON STREET / MINT BUILDING COURTYARD

Full year net new shadow fan diagram factoring in the presence of existing shadows



SHADOW FAN DIAGRAM AFFECTED AREAS DURING SECTION 295 TIMES

FULL YEAR



- Parks and Open Spaces (Jurisdiction)
- ① Mint Plaza (POPOS)
 - ② Mint Building Courtyard (POPOS)
 - ③ SF Chronicle Rooftop (Future POPOS)
 - ④ Mary Plaza (Future POPOS)

ATTACHMENT G

**Socioeconomic Effects of 469 Stevenson
Street Market-Rate Development**

FINAL DRAFT

Prepared for:

Build

Prepared by:

ALH | ECON

ALH Urban & Regional Economics

September 2020

October 12, 2020

Mr. Tyler Kepler
Vice President, Acquisitions and Capital Markets
Build
315 Linden Street
San Francisco, CA 94102

**Re: Socioeconomic Effects of Market-Rate Development Associated with 469
Stevenson Street Project, San Francisco, CA – FINAL DRAFT**

Dear Mr. Kepler:

ALH Urban & Regional Economics (ALH Economics) is pleased to present this report examining the potential gentrification and displacement impacts of your proposed 469 Stevenson Street project in San Francisco, CA. The purpose of the study is to address the project's potential socioeconomic impacts on residential gentrification and displacement as they relate to potential physical changes in the environment. The study's research and findings are intended to complement materials the Planning Department of the City and County of San Francisco is preparing pursuant to the entitlement and California Environmental Quality Act (CEQA) process for the 469 Stevenson Street project.

It has been a pleasure working with you on this project. Please let me know if there are any questions or comments on the analysis included herein.

Sincerely,



Amy L. Herman
Principal

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APPENDIX B: EXHIBITS

APPENDIX C: HOUSING PRODUCTION IMPACTS ON HOUSING COSTS LITERATURE OVERVIEW

APPENDIX D: GENTRIFICATION AND DISPLACEMENT LITERATURE OVERVIEW

APPENDIX E: NOTES ON SAN FRANCISCO HOUSING PRODUCTION TIME SERIES DATA

I. INTRODUCTION AND SUMMARY OF FINDINGS AND CONCLUSION

INTRODUCTION

Build is proposing development of a 495-unit multifamily apartment project with 4,000 square feet of ground floor retail space at 469 Stevenson Street, the current site of a surface parking lot (the “Project”). The Environmental Impact Report (EIR) for the Project received some public comments expressing concerns about residential gentrification and displacement occurring as a result of Project development. Similar concerns were expressed during some public hearings. The City and County of San Francisco (City) Planning Department (Planning Department) is preparing a response to these concerns, and ALH Urban & Regional Economics (ALH Economics) has been engaged to assist the Planning Department in preparing the response.

This report looks at residential development patterns in San Francisco and in the area surrounding the 469 Stevenson Street Project to assess the amount of development occurring in the area historically and presently in conjunction with the Project. The report also looks at historic and current rents in San Francisco to further provide perspective on the existing market in which the planned rental units at the Project and surrounding areas will be developed. These new market-rate units can be evaluated in the context of literature and research findings probing whether market-rate rental housing production such as the Project results in making rental housing less affordable for existing residents, which concerns interested parties who believe residential displacement and gentrification may result from the development of market-rate housing.

Accordingly, this report includes the following:

- Identification of residential pipeline projects within a 1.0-mile radius of 469 Stevenson Street (e.g., the Project and cumulative projects);
- Review of historical development trends in San Francisco and key Project areas;
- Overview of pricing trends in San Francisco’s rental housing market;
- Review of literature on the relationship between housing production and housing costs, as well as gentrification and residential displacement; and,
- Conclusions regarding gentrification and displacement from new market-rate development.

A summary of findings and conclusions is presented below.

SUMMARY OF FINDINGS AND CONCLUSION

The summary of findings presented in the report for each section is provided below, including a general conclusion for the overall research and analysis effort.

Residential Pipeline

Information provided by the Planning Department as of the first quarter 2020 indicates that there is a substantial amount of net new residential development under construction, entitled, or planned within a 1.0-mile radius of 469 Stevenson Street. Specifically, there are 89 projects with a total of 15,726 units (referred to in the report as the Pipeline). About 27% of the

Pipeline, comprising 4,254 units, are under construction and therefore have the greatest certainty of delivery, while 40% of the Pipeline, nearly 6,200 units, do not have entitlements and have much less certainty.

The amount of the development in the Pipeline is consistent with historic trends. According to the annual Housing Inventory reports published by the Planning Department, the two planning districts located in the 1.0-mile radius, – i.e., Planning District 9 (South of Market) and Planning District 4 (Downtown) - represented 65% of the City's net new housing units from 2001 to 2019. In all, nearly 33,000 net new units were completed in these two districts over this time period. In most years, these two districts rank as the top two citywide in terms of net new residential development.

Residential Rent Trends

The City has experienced strong apartment rent increases over the past 20+ years. From 1996 to 2016, average rents at larger complexes increased at an annual average rate of 5.5%. The inflation-adjusted annual increase over this time was 2.9%. Thus, rents increased at a rate of 2.6% per year over inflation. In 2016, market-rate apartment rents in San Francisco began to slow citywide, with some sources reporting a modest rental decline. More moderate rent growth followed from 2017 through 2019. However, these data do not capture rental units in smaller buildings and/or units subject to rent control, which are insulated from short-term annual rent increases. Nonetheless, they provide insight into potential future long-term trends.

Since the onset of the COVID-19 pandemic, the apartment market has sharply softened due to job losses and associated economic contraction, household consolidations, and remote working, all resulting in a strong decline in rents. However, rents in San Francisco remain the highest in the nation and are about 2.5 to 2.7 times the national average.

Great uncertainty over the timing of a vaccine and how and when the economy will recover exists but historic trends suggest that the economy and market will recover, and increases in rents will resume, albeit modestly at first.

Residential Displacement and Gentrification

ALH Economics reviewed academic and related literature as well as case studies to examine whether market-rate apartment production at and around 469 Stevenson Street will impact rents of existing properties and make housing less affordable for existing residents. The findings generally coalesce around the following conclusions:

- Housing production does not result in increased costs of the existing housing base, but rather helps suppress increases in rents and home prices in existing buildings;
- Failure to increase housing stock to accommodate demand resulting from job growth and a generally increasing population will result in greater competition for existing housing, with higher income households outbidding lower income households and otherwise exerting upward price pressure on existing housing; and,
- Both market-rate and affordable housing development help to suppress price appreciation and reduce displacement.

Past research studies have suggested that further analysis on the relationship between development, affordability, and displacement at the highly localized level is required to understand the rate at which it occurs in very small, localized areas. Two subsequent studies, however, studied and analyzed this localized impact and found that rents of existing apartment projects immediately near new market-rate apartment buildings declined upon completion of the market-rate units in the immediate surrounding area for a duration of up to three years after completion of the new units.¹

Additional literature on the topic of gentrification and the causal relationship between market-rate residential development and gentrification and displacement was also reviewed. These studies indicate that experts in the field generally appear to unite around the understanding that there is weak causation between gentrification and displacement. Displacement can occur without gentrification, and displacement is not inevitable, with public policy tools available to stabilize communities. In some instances, studies suggest that existing low-income households in a gentrifying neighborhood may benefit from gentrification because of neighborhood improvements perceived to be of value and increased housing satisfaction. Finally, some experts also conclude that the ability for residents to relocate or move (i.e., mobility rates) are not distinguishable between neighborhoods experiencing gentrification and neighborhoods not experiencing gentrification.

The overall conclusion resulting from the literature review is that there is no evidence to support the concern that new market-rate development will cause gentrification or displacement. The findings overwhelmingly suggest that while some displacement may occur, it is not the inevitable result of gentrification, and that many factors influence whether or not displacement occurs.

Conclusion

The study findings indicate that the Project is being developed in the portion of the City of San Francisco historically characterized by the greatest amount of residential development. In addition to the Project, there are a number of other new multifamily residential projects currently planned. Apartment rents in San Francisco have risen strongly over time, but have moderated more recently, and have sharply softened since the onset of the COVID-19 pandemic. However, high percentage of existing San Francisco apartment residents living in older units are insulated from rental increases due to San Francisco's rent control provisions. Case study research in San Francisco as well as academic and related research suggests that market-rate housing production such as the 469 Stevenson Street Project is not likely to cause an increase in rents in nearby housing units. Some research even suggests interim reductions in rents among nearby units. These and other literature findings suggest there is no evidence to support concern that new market-rate development will cause gentrification or displacement. Therefore, this study concludes that the evidence indicates that development of the Project is not likely to result in residential displacement and gentrification that will lead to socioeconomic impacts warranting further review under CEQA.

¹ These are findings in newer studies conducted in 2019, and thus are not previously discussed in other reports prepared and submitted to the City by ALH Urban & Regional Economics for other projects, such as projects in the Mission District.

II. RESIDENTIAL PIPELINE AND RENTAL MARKET TRENDS

This report section reviews residential pipeline projects within a 1.0-mile radius of the 469 Stevenson Street project. Historical development trends are reviewed to determine the rate of nearby housing development compared to the City as a whole. This section also presents a brief overview of Citywide historic rental housing trends within the context of the existing market in which the Project's planned rental units will be delivered.

RESIDENTIAL PIPELINE

In order to evaluate the potential risk of gentrification resulting from development of the 469 Stevenson Street project, ALH Economics examined the Project's development context, including the pipeline of future residential development in a relevant surrounding area. To accomplish this, the Planning Department Pipeline for the first quarter of 2020² was examined to identify proposed residential projects near 469 Stevenson Street. Projects were identified based on their location and approval status, including number of net new units, both market-rate and affordable, and net new retail space included in the project. Specifically, the following type of projects are included:

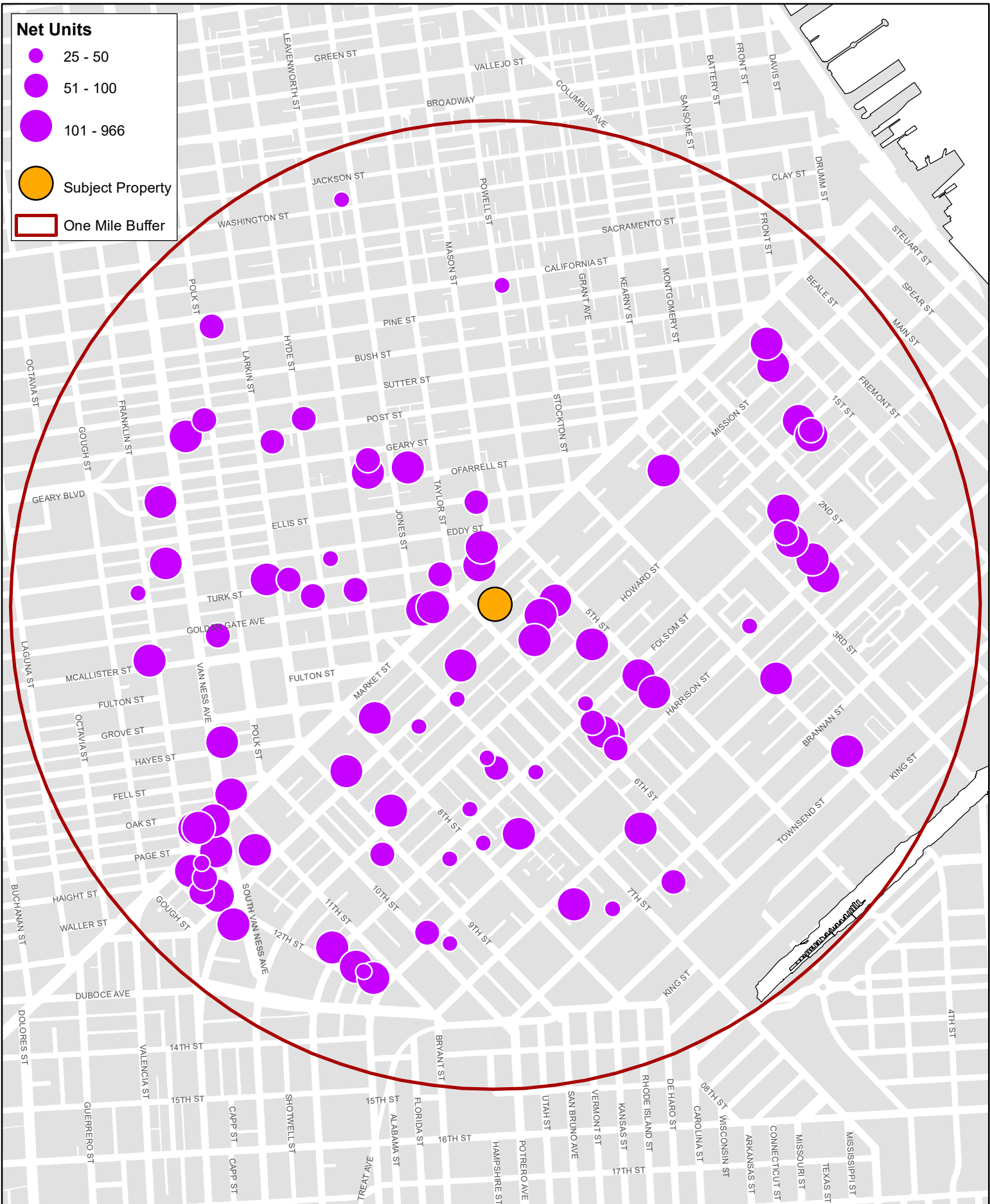
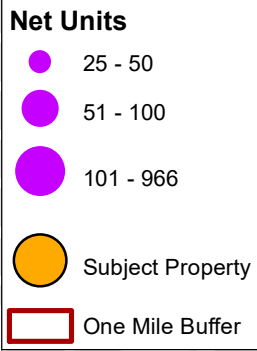
- Projects that are under construction
- Projects that have received Planning/Department of Building Inspection entitlements but have not yet broken ground
- Projects that have filed applications, but are still under review

The projects reflected in the analysis include projects of 25 or more net dwelling units. This threshold was selected because this is the threshold for "Large Projects" as defined by the San Francisco Inclusionary Housing Program.

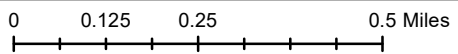
The projects reflected in the analysis also were identified based on a site radius of 1.0-mile. This radius was selected to encompass the entire Filipino Cultural Heritage District, which is bounded by Market Street to the northwest, 2nd Street to the northeast, Brannan Street to the southeast, and 11th Street to the southwest. The 1.0-mile radius includes a large portion of the San Francisco Planning Department's District 9 – South of Market and some of District 4 – Downtown, which is north of Market Street. The projects and their net unit counts are listed in Exhibit 1 in Appendix B and are mapped on Map 1 on the next page.

Map 1 identifies the project locations, while Table 1, following Map 1, summarizes the projects by number of net units per project. These groupings correspond to the Map 1 groupings, with the exception of Table 1, which breaks down the 101+ unit category into two categories (101 to 249 Units and 250 Units and Larger) due to the number of projects with more than 100 units.

²See <https://data.sfgov.org/Housing-and-Buildings/SF-Development-Pipeline-2020-Q1/5s89-azqa> for the database.



Project Site - 469 Stevenson Street
Pipeline Projects
 SAN FRANCISCO



Source: SF Planning 2020 Q1 Development Pipeline

Table 1
Summary of Pipeline Projects Net New Units

Project Size and Status	No. of Projects	Total Net Units	Units by Type	
			Market Rate	Affordable
Projects 250 Units and Larger				
Under Construction	5	2,129	1,945	184
Entitled (1)	6	2,034	1,625	409
Non-entitled (2)	8	4,111	3,613	498
Total	19	8,274	7,183	1,091
Projects 101 to 249 Units				
Under Construction	12	1,848	1,693	155
Entitled (1)	13	1,972	1,625	347
Non-entitled	7	1,380	1,045	335
Total	32	5,200	4,363	837
Projects 51 to 100 Units				
Under Construction	2	114	99	15
Entitled (1)	13	1,002	808	194
Non-entitled	6	491	440	51
Total	21	1,607	1,347	260
Projects 25 to 50 Units				
Under Construction	4	163	157	6
Entitled (1)	7	267	238	29
Non-entitled	6	215	184	31
Total	17	645	579	66
Pipeline				
Total	89	15,726	13,472	2,254

Source: See Exhibit 1.

(1) Entitled projects includes those that are approved, have applied for building permits, have approved building permits, or have building permits issued.

(2) Includes 469 Stevenson Street.

Information extracted from the examined Pipeline projects indicates a total of 15,726 net new housing units in 89 projects. This includes 13,472 market-rate units and 2,254 affordable housing units. The affordable units comprise 14.3% of all net new units in the 1.0-mile radius. Although planned tenure information was not available for all of the affordable projects, most of the affordable housing units that provided tenure detail are rental.

Over half of the units (8,274 units) presented in Table 1 are in larger projects with 250 or more units. There are 19 of these larger projects, about one-half of which (8 projects with approximately 4,100 units) do not have entitlements. This includes the 469 Stevenson Street project. The next largest category in terms of unit counts is 101 to 249 units, with 5,200 units – about one-third of the total – in 32 projects. The smaller categories – 51 to 100 units and 25 to 50 units – have smaller unit counts of 1,607 and 645 units, respectively.

This Pipeline reflects potential interest in new housing production in the South of Market and Downtown districts. However, because of the nature of development and the development process in the City, the Pipeline units may not all be developed. About 40% of the units in the Pipeline, about 6,200 units,³ do not currently have entitlements, which increases the speculative nature of these projects. Moreover, the timing of development is uncertain as only a portion of the Pipeline units that are built will be delivered to the market in any given year. Some of the projects in the Pipeline have also been in process for 10 or more years and while some may be extreme cases, it highlights the time it takes from planning application to product delivery. Uncertainty over the future during the current COVID-19 pandemic only heightens the timing of development potentially pushing out delivery of new units by years.

HISTORIC RESIDENTIAL COMPLETIONS

As the preceding review indicates, the Pipeline is fairly healthy, with a range of projects in various stages of development, with the potential to stretch out over several years. In order to provide context for this amount of prospective development activity, ALH Economics reviewed historic residential development trends, Citywide and in the neighborhood areas germane to 469 Stevenson Street. As will be shown by these data, these neighborhoods have traditionally provided a significant amount of San Francisco's new residential development, i.e., these are the neighborhoods where development happens in San Francisco, as shown by historic trends.

Historically, based upon the City's Housing Inventory reports, a total of 49,231 net new housing units were built Citywide from 2001 through 2019, as shown in Table 2, on the next page. Nearly half of these units were built in District 9 – South of Market, or 23,324 net new units, while another 8,963 net new units were built in District 4 – Downtown. These are the two districts that are within the 1.0-mile radius of the project (see next section). These are two of the most active districts in the City in terms of new residential development, representing nearly two-thirds of total net new units during this period.

The net new units equate to an average 2,591 units per year Citywide, comprising 1,228 units in South of Market, and 472 units in Downtown. Since 2010, new development has boosted the South of Market District's housing units by 61% - from 22,847 units to 36,704 units. In the Downtown District, new development since 2010 has increased the total units from 31,840 to 36,062, for a 13% increase.⁴ In comparison, the City as a whole gained 26,778 net new housing units between 2010 and 2019, comprising a total boost of 7.3%.⁵ These figures

³ By contrast, 4,254 units, or 27% of the Pipeline total, are under construction. These units have the greatest certainty of delivery in the next few years.

⁴ Per the City's Housing Inventory for 2010 for both the South of Market and Downtown districts. See http://default.sfplanning.org/publications_reports/2010_Housing_Inventory_Report.pdf.

⁵ Per the City's Housing Inventory for 2010 the City had an estimated 368,346 housing units in 2010. See http://default.sfplanning.org/publications_reports/2010_Housing_Inventory_Report.pdf.

indicate that both the South of Market and Downtown districts since 2010 represented key new housing development locations in the City. In most years, these two districts typically rank #1 and #2 in terms of net new units each year out of the City's 15 Planning Districts.

Table 2
City of San Francisco, Housing Inventory Reports
Net New Housing Units: Citywide, District 9 -South of Market, and District 4 - Downtown
2001 Through 2019

Year	Citywide	District 9	District 4	Subtotal	Ratio to Citywide		Rank	
		South of Market	Downtown		District 9	District 4	District 9	District 4
2001	1,779	(1)	(1)	(1)	(1)	(1)	(1)	(1)
2002	2,408	2,056	1,493	3,549	31%	22%	1	2
2003	2,496	(1)	(1)	(1)	(1)	(1)	(1)	(1)
2004	1,487	861	23	884	58%	2%	1	14
2005	1,855	968	385	1,353	52%	21%	1	2
2006	1,914	902	259	1,161	47%	14%	1	3
2007	2,567	1,363	176	1,539	53%	7%	1	4
2008	3,263	1,509	1,109	2,618	46%	34%	1	2
2009	3,454	1,523	1,135	2,658	44%	33%	1	2
2010	1,230	285	161	446	23%	13%	1	4
2011	269	21	(31)	(10)	8%	-12%	4	15
2012	1,317	701	192	893	53%	15%	1	2
2013	1,960	521	486	1,007	27%	25%	1	2
2014	3,514	1,892	895	2,787	54%	25%	1	2
2015	2,954	1,525	814	2,339	52%	28%	1	2
2016	5,046	2,832	304	3,136	56%	6%	1	5
2017	4,441	2,276	601	2,877	51%	14%	1	3
2018	2,579	1,220	701	1,921	47%	27%	1	2
2019	4,698	2,869	260	3,129	61%	6%	1	5
Totals	49,231	23,324	8,963	32,287	47%	18%		
Annual Avg.	2,591	1,228	472	1,699	47%	18%		

Sources: San Francisco Planning Department, "San Francisco Housing Inventory" for years 2001 through 2019; and ALH Urban & Regional Economics. Housing Inventory reports are available at <https://sfplanning.org/resources>. Citywide amounts for 2001 to 2019 are found in Table of 2 of the 2019 report. District amounts are found in Table 25 (2001-2004 report), Table 24 (2005 to 2016 reports), Table 26 (2017 report), and Table 28 (2018 and 2019 reports).

(1) The San Francisco Planning Department's "Housing Inventory 2001-2004" report presents four years of data. However, 2004 is the only year for which information is presented separately. Data for 2001, 2002, and 2003 are grouped together. For presentation purposes, these data are consolidated under the year 2002 in this table.

However, in the recovery from the Great Recession especially, these rates of development did not keep pace with housing demand, resulting in strong rental rate surges from 2010 through 2015, with a slight pullback in 2016, followed by more growth through 2019.

OVERVIEW OF RENTAL HOUSING MARKET TRENDS

The following is a brief overview of the historic trends for rental housing in the City. It is based on a review of available databases for tracking rents and provides background context on the existing market, in which the planned rental units at 469 Stevenson Street and surrounding areas will be delivered.

Historic San Francisco Apartment Rent Trends

Over time, research shows that in San Francisco and across the nation, apartment rents have been consistently rising. In San Francisco, the data show that there are often years of strong rent increases, followed by periods of slow rent increases or even rent declines. In general, though, the overall trend is one of rising rents.

RealAnswers, a data information company (previously named RealFacts, Inc.), tracked these trends generally for the San Francisco apartment market for a 21-year period. RealAnswers tracked “investment grade”⁶ properties with 50 or more units, which, as of December 2016,⁷ was 24,066 units, or about 11% of San Francisco’s 2016 renter-occupied housing units.⁸ These properties were only a portion of San Francisco’s rental stock, typically representing newer, high-quality properties, and probably did not include many units influenced by San Francisco’s rent control provision. They provide reasonably representative rental trends for newer market-rate rental stock in San Francisco but would not have been representative of typical rent paid by most San Franciscans, as RealAnswers did not capture rental units in smaller buildings and/or subject to rent control, which make up a large number of the City’s rental units.. A recent Planning Department analysis indicates that 71% of San Francisco’s market-rate rentals are subject to rent control.⁹ While some new construction has occurred since this time, marginally lowering the percentage of rent-controlled units in the City since newer units are not subject to rent-control, the current percentage of units subject to rent control likely remains relatively close to this figure.

Figure 1 on the next page shows the average investment grade apartment market rents annually from 1996 to 2016. Again, this does not capture rental units in smaller buildings and/or subject to rent control. During this 21-year period, rents for the apartment type captured in the data increased at an average annual rate of 5.5%. In absolute terms, this represented a near tripling of rents, from an average of \$1,235 in 1996 to \$3,571 in 2016. The Consumer Price Index for the San Francisco-Oakland-San Jose area increased at an annual average rate of 2.9% from 1996 to 2016.¹⁰ Thus, rents in the unit type category captured by RealAnswers increased at a rate of 2.6% per year over inflation. This time included some periods of strong rental rate growth (1996-1997, 1999-2000, 2010-2014), as well as a few periods marked by declining rents (2000-2003 and 2008-2010); however, over time rents continued to trend upward.

⁶ Investment grade properties are typically newer and larger apartment complexes that appeal to institutional investors such as real estate investment trusts and pension funds. While some institutional grade apartment complexes may be older and have rent-controlled units, the majority are constructed after 1979 and thus are not subject to rent control. However, these complexes may have a portion of inclusionary below-market rental units. Reported rents are for the market-rate units only.

⁷ RealAnswers ceased operation after this date, thus more current information based on these properties is not available.

⁸ Pursuant to the U.S. Census for 2016. See:

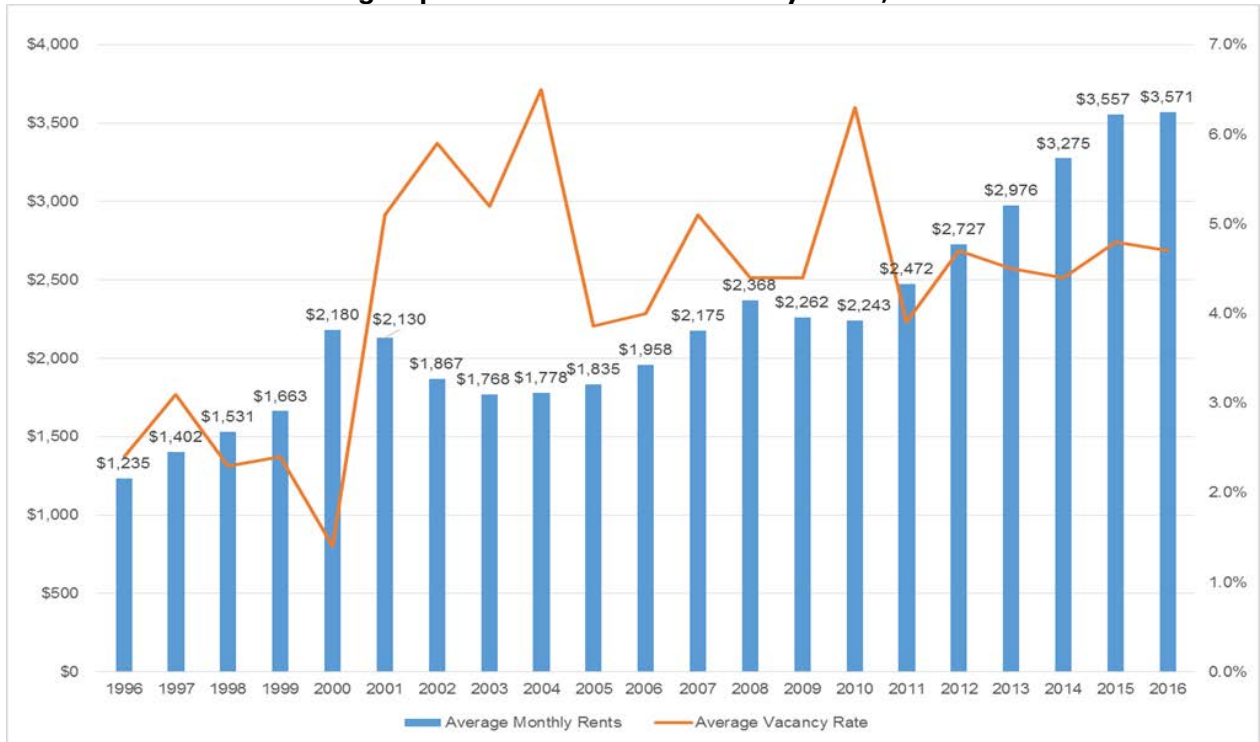
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

⁹ This percentage is pursuant to City of San Francisco Planning Department research in late 2017/early 2018.

¹⁰ Source: U.S. Department of Labor, Bureau of Labor Statistics; San Francisco-Oakland-San Jose Consumer Price Index, All Items, 1982-1984+100 for All Urban Consumers. November 15, 2016.

During the 21-year time frame, the average vacancy rate was 4.3%. Although the data set tracked by RealAnswers ends in 2016, it does present a 21-year history of the San Francisco apartment market for larger, newer, buildings that provides insight into potential future long-term trends.

Figure 1
San Francisco Average Apartment Rents and Vacancy Rates; 1996 to 2016



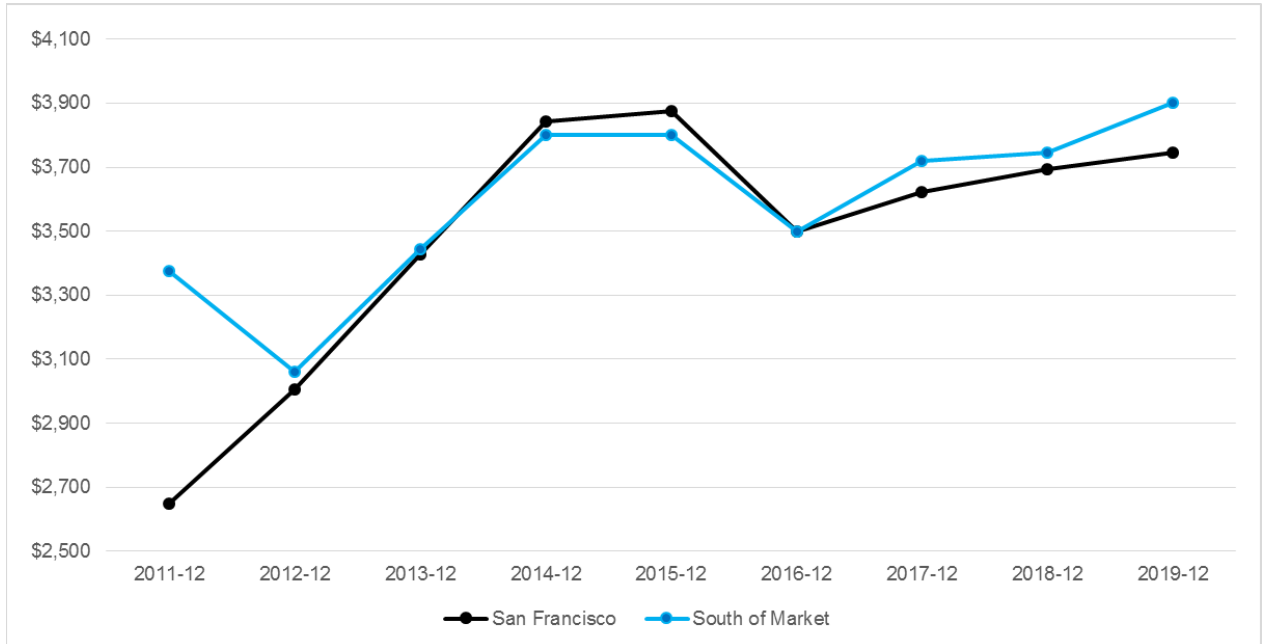
Sources: RealAnswers; and ALH Urban & Regional Economics.

As shown by Figure 1, San Francisco rents, which had been experiencing strong increases, slowed down in 2016. In 2014, average rent increased 10% over the prior year, followed by an 8.6% increase in 2015, and a 0.4% increase in 2016. This slowdown in the rental market for the represented investment grade rental units is mirrored in other rental real estate sources, including Zillow, a national real estate and rental marketplace firm that tracks over 450 markets. However, in contrast to RealAnswers, Zillow does not track or sample the same units over time. Instead, Zillow reports apartment listings by unit type, and thus comprises a different random set of units every month. As such, the Zillow trend may be less robust than the earlier RealAnswers trend. Zillow also provided data by neighborhood, in contrast to RealAnswers.

Figure 2 on the next page presents annual median market rent trends in San Francisco buildings based on Zillow data. This time period extends from December 2011 to December 2019 and is based on listings in buildings with five or more units. The Zillow data confirm strong rental increases from 2011 through 2014, but indicate a tapering off of rent increases in 2015, followed by a modest decline in 2016, and more moderate rental rate growth from 2017 through 2019. The Zillow listings are based on vacant units. As such, the unit rents reset

and are presumably market-rate and not subject to rent control, which may not be the case with all the sample units in the RealAnswers dataset.

Figure 2
San Francisco and South of Market Median Listed Rents in Buildings with 5 or More Units;
2011 to 2019



Sources: Zillow.com; and ALH Urban & Regional Economics.

According to the Zillow dataset, by the end of 2019, the median market rent in San Francisco was \$3,746. In the South of Market neighborhood, as defined by Zillow, where the 469 Stevenson Street project is located, the rent by the end of 2019 was \$3,900. The higher median rent in the South of Market neighborhood is likely due to the preponderance of newer apartments in this area, which command higher rents.

Current San Francisco Apartment Rent Trends

Since the onset of the COVID-19 pandemic in early 2020, the apartment market in San Francisco has weakened due to a variety of factors associated with the pandemic, such as job loss and young adults moving back home. Many major Bay Area companies have also relaxed their policies for working from home, which has encouraged employees to disperse and has allowed workers to live anywhere, including lower cost cities.

Zumper, a San Francisco-based national rental listing company that also maintains apartment management resources for landlords, publishes a monthly national rent report tracking the top 100 metropolitan areas. The data are based on active listings. The latest report, “Zumper National Rent Report: September 2020,” indicated that median rents in San Francisco have

decreased by 14% (one-bedroom) to 15% (two-bedroom) over the past year. As the report was published on August 31, 2020, the data reflect August rents.

The September 2020 Zumper report states that “Both San Francisco and New York reached the lowest price points they ever have since Zumper started tracking median prices in 2014.”¹¹ The rent declines in San Francisco are some of the most severe compared to other metropolitan areas in the country, as well as compared to the national average. Despite the declines over the past year, San Francisco’s rents remain the highest in the nation and are about 2.5 to 2.7 times the national average.

Zumper reports that the national median rent for a one-bedroom unit in August 2020 was \$1,233, while that for a two-bedroom unit was \$1,490. In San Francisco, the median rent for a one-bedroom unit in August 2020 was \$3,040, while that for a two-bedroom unit was \$4,070.

Neighborhood Trends

Zumper has historically published a “Mapped: San Francisco Neighborhood Rent Prices” report indicating the relative rent levels in different San Francisco neighborhoods. The most recently published report in Summer 2019¹² found the most expensive neighborhood in San Francisco was South Beach, at a median monthly rent of \$3,900 for a one-bedroom unit, with South of Market as the second most expensive at \$3,800. The median monthly rent for neighborhoods lining the north side of Market included \$3,740 for a one-bedroom unit in the Financial District, the most expensive market, followed by Downtown at \$3,270 and Civic Center at \$3,380. The Tenderloin was one of the least expensive neighborhoods in San Francisco with a median monthly rent of \$2,400 for a one-bedroom unit.

Conclusions

San Francisco is currently seeing a slide in market rents as a result of the COVID-19 pandemic. As the impact of the pandemic on the local, regional, and national economy continues to evolve, it is difficult to forecast at this point the length and depth of the market slide. It is reasonable to anticipate that the economy will recover when a course of treatment has been established and a vaccine has been fully tested and released to the public. Based on historic market trends, including periods of severe downturn such as the “dot-com bust” and the Great Recession, there is no reason to believe that the San Francisco apartment market, which has shown resiliency in the past, will not continue to be resilient in the future. Once the market recovery gains a foothold, rental rates are expected to increase once again. Nonetheless, due to rent control, many San Franciscan’s will be insulated from short-term annual increases that occur in the market recovery.

¹¹ Zumper National Rent Report: September 2020, published August 31, 2020; see <https://www.zumper.com/blog/zumper-national-rent-report-september-2020/>. While the report makes a reference to its data going back to 2014, Zumper does not provide trend data in its reports. It only presents the most recent monthly rents with a year-over-year change.

¹² <https://www.zumper.com/blog/mapped-san-francisco-neighborhood-rent-prices-summer-2019/>

III. HOUSING PRODUCTION IMPACTS ON HOUSING COSTS, DISPLACEMENT, AND GENTRIFICATION

The following examines whether market-rate housing production at 469 Stevenson Street and the surrounding area will result in making housing less affordable for existing residents, and thus contribute to displacement and gentrification. It is based on review of existing literature on the subjects of housing production, displacement, and gentrification, as well as case study analysis, including independent research.

LITERATURE REVIEW ON HOUSING PRODUCTION, DISPLACEMENT IMPACTS, AND GENTRIFICATION

This section includes summaries of two different discrete literature reviews shedding light on research and academic perspectives on the impact of market-rate housing production on residential pricing trends, residential displacement, and gentrification. The papers or reports referenced are cited in appendices, which also include individual summaries of each resource and links to each document.

Housing Production Impacts

ALH Urban & Regional Economics identified 11 papers or reports authored by state and local policy analysts as well as urban planning and real estate and urban policy academics and independent research organizations that best address the question of the impact of housing production on housing costs, or pricing, with some displacement implications. The dates of these studies are between March 2015 and December 2019. They include studies on several topics, including understanding the dynamics for pricing, the impact of availability of affordable housing, and the relationship between home production and displacement. These papers or reports are identified in Appendix C.

The findings from the studies or reports reviewed generally coalesce in the conclusion that housing production does not result in increased costs of the existing housing base, but rather helps suppress upward pressure on existing apartment rents and home prices. Further, they find that both market-rate and affordable housing development help to suppress price appreciation and reduce displacement, both in general and in small, localized community areas.

Such is the case with California Legislative Analyst's Office (LAO) studies from 2015 and 2016.¹³ At the more general level, in 2015, the LAO found that a relationship exists between increasing home production and reducing housing costs in California communities, including home prices and apartment rents. In 2016, the LAO presented evidence from within California that construction of new, market-rate housing can lower housing costs for low-income households. In like manner, a 2015 City and County of San Francisco Office of Economic Analysis report on the effects of a temporary moratorium on market-rate housing in the City's Mission District found that suppressing residential production results in increasing the cost of the existing housing stock, and that market-rate housing construction drives down

¹³ See Appendix C, Resources #1 and #2.

housing prices and increases the number of housing units that are affordable.¹⁴ This report presented a conclusion indicating that during the 2001-2013 period, new market-rate housing did not make nearby housing more expensive in San Francisco.

While not based on any original research, a White House Development Toolkit compiled in 2016, and prepared for the purpose of addressing local barriers to housing development, indicated that markets with high demand would likely be characterized by housing strategies including new multifamily housing construction.¹⁵ The introduction of such strategies, including development of market-rate housing, were said to be expected to help slow cost growth in existing housing, thus acknowledging that the production of market-rate housing can help slow the rate of rental cost increases in existing, rental housing markets.

These and other research studies suggested that further analysis was required to best understand the relationship between development, affordability, and displacement at the localized level, especially including understanding how market-rate housing production impacted housing prices in very small, localized areas. Two papers published in 2019 managed to study and analyze this localized impact, and found that rents of existing apartment projects immediately near new market-rate apartment buildings declined upon completion of the market-rate units in the immediate surrounding area. One of these papers was prepared by the W.E. Upjohn Institute, which examined data on new construction of market-rate rental apartment buildings and outcomes for 11 major cities, including San Francisco, examined rent trends in existing buildings within 1 to 2 city blocks of newer buildings after new building completion.¹⁶ The study findings indicate that new construction of market-rate apartment buildings reduces rents in nearby buildings by 5% to 7%. This reduction was noted beginning in the same year as building completion, and noted to persist for at least up to three years thereafter, leading the study authors to conclude that new buildings slow rent increases rather than initiate or accelerate them. Another 2019 study examining new construction trends in New York City from 2003-2013 also found a dampening effect on rental prices attributable to new construction.¹⁷ This study, prepared by an NYU Ph.D. student, found that for every 10% increase in the housing stock, rents decrease 1% within 500 feet of the newly built property.

These more highly localized studies produced statistically significant results demonstrating that market-rate housing production helps suppress rental rate increases in existing, nearby housing, rather than cause existing housing price increases, thereby minimizing the risk of displacement of existing households.

Housing Production and Displacement

Making the jump from examining the impact of housing production on pricing to an impact on residential displacement, the 2016 LAO study referenced above concluded that more private development is associated with less displacement. Another resource from 2016, a paper prepared by Monkkonen from the University of California at Los Angeles, addressed many considerations about housing affordability, summarizing earlier findings by multiple

¹⁴ See Appendix C, Resource #3.

¹⁵ See Appendix C, Resource #5.

¹⁶ See Appendix C, Resource #10.

¹⁷ See Appendix C, Resource #11.

researchers that constraining the supply of housing increases rents.¹⁸ He further indicated that increasing the supply of market-rate housing, as well as affordable housing, reduces displacement. More specific to San Francisco, a 2016 study by Zuk and Chapple, academics at the University of California at Berkeley, Institute of Governmental Studies, includes San Francisco-specific findings, especially with regard to impacts on housing displacement.¹⁹ Their findings, which expand on the 2016 LAO findings, conclude that market-rate housing development reduces housing pressures at the regional scale and is associated with reduced displacement pressures. In San Francisco in particular, Zuk and Chapple conducted case study analysis of two San Francisco block groups in the South of Market Area, seeking to probe the question of housing production, affordability, and displacement at the local level. At the more granular, block group level, their findings were inconclusive, leading them to conclude that the development of market-rate housing (as well as subsidized housing) does not have a significant impact on displacement. They further suggest that in strong markets such as San Francisco, the unmet need for housing is so severe that housing production alone cannot solve the displacement problem.

A 2017 study Chapple and Zuk as well as other authors started to explore the link between new development and gentrification (this subject is more thoroughly addressed below and in Appendix D). In this study, they indicate that gentrification observed in Bay Area transit-served neighborhoods over the past 15+ years was not caused by new development, as relatively limited development occurred during this time period in these neighborhoods.²⁰ Instead, the study indicates that proximity to fixed rail transit stations has a significant impact on gentrification, although the research findings indicated this impact is more prominent in Los Angeles, particularly Downtown Los Angeles, than in the San Francisco Bay Area.

Gentrification Literature Survey Overview

ALH Economics also identified and reviewed academic and associated literature more specifically focused on gentrification. These papers study and address many aspects of gentrification, some of which include defining gentrification, since how one defines gentrification impacts how it is analyzed, including the effects and consequences of gentrification, housing development, and affordability. The primary purpose of this review was to identify papers that most succinctly or directly address the relationship between market rate residential development and gentrification and displacement to assist ALH Economics in evaluating the question of: does market rate residential development **cause** gentrification and displacement?

ALH Economics identified 12 papers or articles that provide a succinct and germane discussion on the topic. A detailed and thorough discussion and literary review of each of these papers is included in Appendix D. These papers span the 2004 to 2020 time period, comprising a longer time period than the papers focusing more exclusively on housing production, indicating that gentrification and to a lesser extent displacement have been subjects of academic interest for quite some time. While there are many other studies and articles that analyze gentrification and displacement, and seek to find a relationship between the two phenomena, the cited articles not only provide a representative sampling and

¹⁸ See Appendix C, Resource #6.

¹⁹ See Appendix C, Resource #4.

²⁰ See Appendix C, Resource #7.

discussion of other papers and associated commentaries, but provide a solid overview and analysis of the subjects by leading experts in the field.

Based on review of these studies, as summarized in the Appendix D literature review, extensive analysis has been conducted for more than the past decade exploring causation between gentrification and displacement. In general, leading experts in the field appear to unite around the understanding that there is weak causation between gentrification and displacement, with some experts concluding that the ability for residents to relocate or move (i.e., mobility rates) are not distinguishable between neighborhoods experiencing gentrification and neighborhoods not experiencing gentrification. The literature further demonstrates that displacement can occur without gentrification, and that displacement is not inevitable, with public policy tools available to stabilize communities. Moreover, some studies also suggest that in some instances, existing low-income households in a gentrifying neighborhood may benefit from gentrification because of neighborhood improvements perceived to be of value and increased housing satisfaction.

Literature Survey Conclusions

The overall conclusion reached from conducting the literature review on housing production, displacement, and gentrification impacts, is that concerns that gentrification might result from development of new market-rate development at 469 Stevenson Street, and the surrounding area in general, causing displacement, **are not supported by the evidence in the academic literature.** The findings overwhelmingly suggest that while some displacement may occur, it is not the inevitable result of gentrification, and that many factors influence whether or not displacement occurs.

HOME PRODUCTION CASE STUDY ANALYSIS AND FINDINGS

To build on the literature review findings, this section includes select case study analysis and findings that explore the relationship between housing production and market-rate housing costs. The focus of this section is analysis specific to San Francisco, but also includes several additional case studies associated with other areas where rising residential prices relative to housing production has also been explored, either in depth or on a more qualitative basis.

San Francisco

To further examine the question of the impacts of housing production on housing costs at the local level, especially apartment rents, ALH Urban & Regional Economics strove to identify readily available data points local to San Francisco and the South of Market and Downtown Neighborhoods that are most relevant to 469 Stevenson Street. These data points focused on residential unit production and rental price time series trends.²¹

ALH Economics compiled a time series of unit production data in San Francisco from 2006 onward from the City's annual Housing Inventory reports. This included all net units produced by neighborhood. ALH Urban & Regional Economics also compiled a time series of the number of occupied rental units from 2010 onward for San Francisco and the census tracts defining the Mission District, pursuant to the American Community Survey (ACS). Median and

²¹ See Appendix E for notes on San Francisco housing production times series data.

average rents for these occupied units were also compiled from the ACS from 2010 onward. In addition, a time series of San Francisco apartment rents was prepared based on the Housing Inventory reports as well as Zillow and RealAnswers, with the latter tracking prices and price changes for a 20-year period, but ending in 2016.

ALH Economics prepared several analyses looking at housing production data and apartment rents in San Francisco, South of Market, and Downtown. The purpose of these analyses was to identify any relationships between the amount or rate of housing production and the change in apartment rental rates. One analysis in particular examined median rent changes per the ACS and associated changes in occupied housing units. Housing unit changes tracked by the ACS and the City of San Francisco were both examined. In addition, rent changes in San Francisco overall were examined relative to overall housing production rates, not just by City subarea.

The results of the analyses comparing local housing production and apartment rent trends were inconclusive. **No specific trends were identified for the City, South of Market, or Downtown, suggesting that housing production neither has an impact on increases in rent nor rent suppression.** This finding does not conflict with the conclusions of the above-cited studies on housing production and costs, such as the California Legislative Analyst's Office.

As demonstrated by the studies summarized above, and reviewed in detail in Appendix C, a more detailed analysis evaluating many other variables is needed to determine if there is a relationship between housing production (specifically apartments) and apartment rents. Other variables that measure changes in the local economy, such as jobs, wages, and unemployment, should be included, but conducting a more rigorous analysis on a sub-city (e.g., neighborhood) basis is challenging because of the difficulty in developing a time series of reliable rent data for market-rate units by sub-area. Existing data are useful but are somewhat limited for various reasons, such as: sample units comprise a random set of units being marketed at the time and do not comprise a consistent stock of units being sampled; the units rely on self-reported data; units reflect rents suppressed by rent control and thereby under report market rent increases; or as with the American Community Survey (ACS) data, the rental rates are presented as ranges, and top out at a figure that does not adequately reflect San Francisco's market rent profile.

Because of the limitations in the data, the ALH Economics analysis of the impacts of housing production on housing costs in San Francisco, South of Market, and Downtown is inconclusive and does not add to the existing literature findings. While further analysis is needed at the micro-level, the existing literature, such as the California Legislative Analyst's Office (LAO) studies, does demonstrate that at the metropolitan level, market-rate housing production, as well as affordable housing production, helps suppress existing home prices and rents, and increases the number of housing units available to households with lower incomes.

Other Cities

Many other cities throughout the United States grapple with understanding where displacement is occurring in their city and how gentrification impacts displacement, and explore approaches to mitigate displacement. An oft-cited means of reducing displacement is

the creation or preservation of affordable housing, priced to protect the most vulnerable residents. These considerations are often combined with concerns about promoting economic mobility for all, as displacement is deemed less likely to occur if household income grows along with the neighborhood's rising values.

Less common in the reports and studies prepared by or about other cities are findings or strategies regarding how new housing development impacts displacement, or rental rates of existing housing units, which is a core consideration at issue in San Francisco. ALH Economics conducted a search to identify case study examples of cities, journalists, or urbanists that broadened their examination or discussions to include the dimensions of new housing development and pricing relative to gentrification, including how to balance revitalization, which is perceived to be positive for communities, with reducing displacement risks. Following are summaries of some of the materials found to most directly include incorporation of new market-rate housing development, along with affordable housing development in their analysis and findings.

Seattle. A January 2018 Seattle Times article reported findings that the Seattle region comprising King and Snohomish counties experienced a 48% increase in rents over the previous five years, with Seattle leading the nation in rent hikes in 2016 and early 2017.²² While the annual rent still increased modestly from a year earlier (4.5%), the quarterly average rental rate dropped significantly for the first time this decade, comprising a 2.9% decline in December 2017 compared with the prior quarter. During the same period, the region's vacancy rate grew 0.8%, reaching 5.4% in December 2017, comprising the highest vacancy rate since 2010. Vacancy rates were reported to be higher among the existing apartment stock in neighborhoods experiencing new apartment development. In parallel, the biggest rent decreases were mostly in the popular Seattle neighborhoods experiencing the greatest new construction, with rents dropping more than 6% from the prior quarter in many neighborhoods.

While the surge in rental rates was attributed to strong job and population growth, The Seattle Times article attributed the changing rental market dynamics to the strong growth in rental unit supply, with many new projects under construction and supply growing faster than demand. As a result, some new apartments are remaining vacant. While some longer-term rental rate growth is anticipated for this market, several market analysts anticipate growth will be similar to the rate of inflation, rather than any accelerated market growth. Thus, rental rates in Seattle are anticipated to moderate pursuant to the achievement of relative market equilibrium between supply and demand.

This trend in Seattle suggests that rental unit pricing is influenced negatively by new rental unit construction, i.e., as new production occurs, pricing increases become more moderate or drop, suggesting that new development helps dampen pricing increases and does not result in increased rents elsewhere.

Prior to this recent market trend in Seattle, Sightline.org published a paper in 2016 by Dan Bertolet that focused on Seattle housing market dynamics and displacement.²³ The paper's

²² Mike Rosenberg, Seattle Times (seattletimes.com), "Seattle-area rents drop significantly for first time this decade as new apartments sit empty," January 12, 2018, Updated January 13, 2018.

²³ Dan Bertolet, Sightline.org, "Displacement: The Gnawing Injustice at the Heart of Housing Crises, What can we actually do about it?," August 10, 2016.

purpose was to lay out evidence on displacement in Seattle and assess strategies for community protection from displacement. The author's premise is that "the root cause of displacement is a shortage of homes, and the only real solution is to build lots more housing of all types, to bolster those efforts with public support for those most vulnerable, and to precisely target preservation efforts in places justified by the protection of cultural communities or the opening of economic opportunities." One focus of Bertolet's paper is the distinction between "physical displacement" and "economic displacement," with the former associated with old buildings making way for new ones, and the latter occurring when rising rents force tenants to move elsewhere. The author then indicates the two forms of displacement could precipitate "cultural displacement," when people move because neighbors and culturally related businesses have left the area.

A good portion of Bertolet's efforts was associated with the demolition of low-cost housing as new housing development opportunities arise in Seattle. As this is not a key issue relative to concerns about displacement in San Francisco and the Mission District, the following focuses on other aspects of the Bertolet's research and findings more associated with economic displacement, although some of the paper's conclusions and findings are based upon comingling consideration of both types of displacement.

Bertolet makes many statements associated with the impact of housing production on displacement and rent trends. Among these are the following:

- "Legal restrictions on housing construction create a situation in which the need for homes increasingly outstrips the supply of homes available to rent or purchase. And this enforced housing shortage creates a preservation paradox: conservation of existing inexpensive private-market housing ... Does not reduce displacement. It only rearranges where the displacement happens – and can even increase its occurrence."
- "In a bidding war for scarce homes... the only way everyone can come out with a place to live is if there are enough new dwellings added for everyone who is bidding.... Ultimately, no action is more effective at curtailing displacement across an entire city than creating more housing choices for the diverse families and individuals who need them."
- "In terms of net housing gained versus housing lost, redevelopment is a big win for reversing Seattle's housing shortage and relieving upward pressure on prices caused by unmet demand. More homes to accommodate more families at lower prices is a simple formula for less displacement overall."

After examining data regarding new home development by zone in Seattle, such as commercial zone, neighborhood commercial + midrise zone, etc., versus homes lost to demolition, Bertolet concludes that the data indicate that to minimize overall displacement, Seattle should allow as many kinds of new housing at as high a density as possible given site characteristics. He further indicates that halting development to save existing housing may provide a short-lived benefit for some, but only at the expense of many more times families who will see their rents rise faster. While the context for this comment pertains to preserving homes versus demolition for higher density housing opportunities, this finding could equally pertain to a scenario of restricting versus allowing new residential development.

Bertolet's paper continues with additional discussion regarding rental housing price dynamics, the preservation of affordable housing, the process by which filtering reduces economic

displacement both in the short-term and the long-term, the benefits of building more subsidized affordable housing, and the need for consideration of other approaches beyond new housing development to equitably address displacement pressures in some culturally sensitive communities. Specifically, Bertolet states that “Tackling displacement requires a “both/and” approach; build lots and lots of new housing, and provide support for communities most vulnerable to change.” Thus, Bertolet recognizes that culturally sensitive communities have unique needs, but that new housing development is critical to the minimization of economic displacement.

Bertolet’s paper was written during a period characterized by strong growth in Seattle’s rental rates. However, Bertolet’s position that net new housing development could relieve upward pressure on prices appears to be borne out by the trends reviewed in the January 2018 Seattle Times article, i.e., declining rental rates coinciding with dramatic increases in new housing supply and associated forecasted modest rental rate growth consistent with inflation.

Denver. In May 2016, Denver’s Office of Economic Development (OED) engaged in a study titled “Gentrification Study: Mitigating Involuntary Displacement.” This was a far-reaching and multi-faceted study, that conducted a review of what strategies and tools can be employed to reduce displacement. As part of the study, Denver’s OED looked at other cities around the U.S. to see how communities are balancing the benefits of thoughtful development in a way that helps protect the most vulnerable residents and promotes economic mobility for all. Pursuant to the review conducted by Denver’s OED of conditions in Denver and practices in other cities such as Portland, Sacramento, Seattle, Los Angeles, and others, the study highlights the following ideas for Denver:

- **Affordable Housing** – Increases in rental and for-sale housing prices outpaced income growth in many households, thus making public investment critical to increase Denver’s supply of affordable housing across a wide spectrum of income levels;
- **Middle-Skill Jobs** – Displacement is less likely if household income grows along with the neighborhood’s rising values, thus career-directed workforce training is key to helping people get the credentials they need to meet employers’ needs;
- **Support Small Business** – Nurturing aspiring and existing small business owners is a powerful economic tool for sustaining healthy, diverse urban neighborhoods;
- **Focus on Vulnerable Neighborhoods** – Armed with the ability to predict where displacement threatens in the new future, both public and private investment can drive future decisions to preserve and protect unique neighborhoods while fueling the development they need to build opportunity, income and jobs.²⁴

Denver’s OED study puts forth several recommendations, forming a platform for action. These include:²⁵

- **There is no single solution** – Gentrification is most often the result of complex market forces, and there is no quick fix for a city to benefit from neighborhood

²⁴ Extracted from the Denver Office of Economic Development summary brochure “Gentrification Study: Balancing revitalization, reducing displacement. See <https://www.denvergov.org/content/dam/denvergov/Portals/690/Reports%20and%20Studies/GEN T%20STUDY%20051816.pdf> for full study.

²⁵ Ibid.

revitalization while completely avoiding the involuntary displacement that gentrification can bring;

- **Investment in affordable housing continues to be a critical need** – This includes creating a funding source, preserving affordable housing, land banking, and fiscal policy and grants to protect existing homeowners; and
- **Access to broader economic opportunity needs to be considered within every public investment** – Including provide technical support to neighborhood businesses, tie business incentives to targeted community engagement, expand awareness and exposure to career-path options, support entrepreneurship, and preserve industrial space for targeted uses with the potential to create middle-skills jobs.

As is clear from these summary points, one major thrust of Denver’s approach is to support economic growth, of individuals as well as businesses, as a means of combating displacement. A very succinct statement in the full report addresses this by saying “Investing aggressively in affordable housing is critical, but housing-based strategies must also be paired with strategies to build existing residents’ economic capacity. With the right strategies and supports, neighborhood reinvestment offers the potential to create new economic opportunity for existing residents. **Keeping investment out of some neighborhoods to avoid gentrification while the rest of the city prospers is not a positive strategy for the long-term success of neighborhood residents.**”²⁶

This statement is supported by the study’s summary of two Brookings Institution studies, one titled “The Anti-Poverty Case for Smart Gentrification” from 2015 and the other titled “Dealing with Neighborhood Change: A Primer on Gentrification and Policy Choices” from 2001. Of these studies, the full Denver report says “Both Brookings studies underline that a policy approach that seeks to simply stop or slow investment will not provide the greatest benefit to a city’s lower-income residents. Rather, policymakers should undertake strategies that allow residents to stay in place as investments in their communities create new economic opportunity. This report recommends strategies to both create greater access to affordable housing in gentrifying neighborhoods, and to create entry points for residents to benefit from new investments in their communities.”²⁷

While the thrust of the Denver study is more on how creating opportunities for economic growth can help mitigate displacement, rather than the impact of how other trends such as the development of market-rate housing can help preserve lower cost housing opportunities, this study does suggest that halting development in general is not a productive strategy and does not aid in reducing or minimizing residential displacement.

UK. The notion that the provision of new housing will help damp down increases in housing costs is not universally accepted. One such example of this dissenting opinion is made clear in a January 2018 article in Britain’s daily newspaper “The Guardian” by Ann Pettifor, a Director of Policy Research in Macroeconomics (PRIME), a network of economists concerned with Keynesian monetary theory and policies. This article, printed in a newspaper and not reviewed or vetted as occurs with academic journal studies, is heavily grounded in discussion about London’s real estate market, especially for houses, and thus is not easily transferrable to a

²⁶ “Gentrification Study: Mitigating Involuntary Displacement,” Denver Office of Economic Development, May 2016, page 7.

²⁷ Ibid, page 14.

U.S. market like San Francisco. However, the major thrust of Pettifor's argument is that throughout the UK, increases in housing supply, and a contraction of demand due to a decline in the number of households, has not dampened prices.

To support this statement, Pettifor presents a few scant figures regarding the number of households in the UK, and the number of dwellings. The only housing cost information presented includes an 11% increase in home prices in Ireland in 2006, when more than 90,000 homes were built in a country with 4 million people.²⁸ Thus, Pettifor's discussion is more qualitative than it is quantitative, wherein she states that the key to making housing more affordable in the UK is not to build more, but to stop the flow of cash flooding into expensive areas. She believes that building more without doing this will not reduce prices, and that the market will simply absorb more cash.

The crux of Pettifor's argument is that speculation in the London property market is fueling stratospheric house price rises, not a shortage of supply, and that this has been exacerbated by government subsidies, tax breaks, and global and non-resident buyers funneling cash into London property.²⁹ To stop the flow of cash, Pettifor recommends implementing a tax on property speculation and taxing speculative capital flows in and out of Britain, which would create a managed fall in property prices. Pettifor believes the resulting bubble deflation will achieve a more affordable housing market, and that the money getting channeled toward speculative property investment could instead be used to drive investment in capital and social infrastructure to generate growth in productive, skilled, better-paid employment.

Aside from the fact that Pettifor provides no analytical support for her opinions, she promulgates a stance that would require a change in national taxation policy that in her opinion would also cause a largescale decline in property values. Without more substantial information and data, it is not possible for a reader of Pettifor's article to understand how she reached her conclusions. Moreover, the approach she recommends involving a national taxation policy change is not an approach that can be implemented at the local level in the United States, where concerns about the impact of affordable housing supply and market-rate pricing are most acute. Further, the implementation of a policy that would guarantee wholesale property value reduction, such as promoted by Pettifor, does not address the connection between construction costs and pricing, which is not addressed herein but which also factors into the context of pricing for new housing development.

CONCLUSION

The literature review and case study examination findings generally coalesce around the following conclusions:

- Housing production does not result in increased costs of the existing housing base, but rather helps suppress increases in rents and home prices in existing buildings;
- Failure to increase housing stock to accommodate demand resulting from job growth and a generally increasing population will result in greater competition for existing housing, with higher income households outbidding lower income households and otherwise exerting upward price pressure on existing housing; and,

²⁸ "Why building more homes will not solve Britain's housing crisis," The Guardian, January 27, 2018, by Ann Pettifor.

²⁹ Ibid.

- Both market-rate and affordable housing development help to suppress price appreciation and reduce displacement.

Experts in the field of gentrification generally appear to unite around the understanding that there is weak causation between gentrification and displacement. Displacement can occur without gentrification, and displacement is not inevitable, with public policy tools available to stabilize communities. The overall conclusion resulting from the literature review is that there is no evidence to support the concern that new market-rate development will cause gentrification or displacement. The findings suggest that while some displacement may occur, it is not the inevitable result of gentrification, and that many factors influence whether or not displacement occurs.

The literature review indicates that there is no evidence to support the concern that gentrification associated with new market-rate development will cause gentrification or displacement. The findings overwhelmingly suggest that while some displacement may occur, it is not the inevitable result of gentrification, and that many factors influence whether or not displacement occurs.

In conclusion, the evidence included in this report indicates that development of the 469 Stevenson Street project is not likely to result in residential displacement and gentrification ~~that will lead to socioeconomic impacts warranting further review under CEQA.~~

ASSUMPTIONS AND GENERAL LIMITING CONDITIONS

ALH Urban & Regional Economics has made extensive efforts to confirm the accuracy and timeliness of the information contained in this study. Such information was compiled from a variety of sources, including interviews with government officials, review of City and County documents, and other third parties deemed to be reliable. Although ALH Urban & Regional Economics believes all information in this study is correct, it does not warrant the accuracy of such information and assumes no responsibility for inaccuracies in the information by third parties. We have no responsibility to update this report for events and circumstances occurring after the date of this report. Further, no guarantee is made as to the possible effect on development of present or future federal, state, or local legislation, including any regarding environmental or ecological matters.

The accompanying projections and analyses are based on estimates and assumptions developed in connection with the study. In turn, these assumptions, and their relation to the projections, were developed using currently available economic data and other relevant information. It is the nature of forecasting, however, that some assumptions may not materialize, and unanticipated events and circumstances may occur. Therefore, actual results achieved during the projection period will likely vary from the projections, and some of the variations may be material to the conclusions of the analysis.

Contractual obligations do not include access to or ownership transfer of any electronic data processing files, programs or models completed directly for or as by-products of this research effort, unless explicitly so agreed as part of the contract.

APPENDIX A: ALH URBAN & REGIONAL ECONOMICS QUALIFICATIONS

FIRM INTRODUCTION

ALH Urban & Regional Economics (ALH Economics) is a sole proprietorship devoted to providing urban and regional economic consulting services to clients throughout California. The company was formed in June 2011. Until that time, Amy L. Herman, Principal and Owner (100%) of ALH Economics, was a Senior Managing Director with CBRE Consulting in San Francisco, a division of the real estate services firm CB Richard Ellis. CBRE Consulting was the successor firm to Sedway Group, in which Ms. Herman was a part owner, which was a well-established urban economic and real estate consulting firm acquired by CB Richard Ellis in late 1999.

ALH Economics provides a range of economic consulting services, including:

- fiscal and economic impact analysis
- CEQA-prescribed urban decay analysis
- economic studies in support of general plans, specific plans, and other long-range planning efforts
- market feasibility analysis for commercial, housing, and industrial land uses
- economic development and policy analysis
- other specialized economic analyses tailored to client needs

Since forming ALH Economics, Ms. Herman's client roster includes California cities, counties, and other public agencies; educational institutions; architectural, environmental, and other real estate-related consulting firms; commercial and residential developers; non-profits; and law firms. A select list of ALH Economics clients includes the following:

- the cities of Concord, Pleasanton, Tracy, Dublin, Inglewood, Petaluma, and Los Banos, the Office of Community Investment and Infrastructure as Successor Agency to the Redevelopment Agency of the City and County of San Francisco, Alameda County Community Development Agency, the Alameda County Fair, Bay Area Rapid Transit District, East Bay Community Energy, and The Presidio Trust;
- the University of California at Berkeley, Stanford Real Estate, The Primary School, The Claremont Colleges Services, and the University of California at Riverside;
- Environmental Science Associates (ESA), Dudek, Group 4 Architecture, Research + Planning, Inc., Paul Halajian Architects, LSA Associates, Raney Planning and Management, Inc., First Carbon Solutions - Michael Brandman Associates, and Infrastructure Management Group, Inc.;
- Catellus Development Corporation, Maximus Real Estate Partners, New West Communities, Build, Inc., Arcadia Development Co., KB Home, Howard Hughes Corporation dba Victoria Ward LLC, Blu Homes, Inc., Kimco Realty, Align Real Estate LLC, Centercal, Carvana Co., and Trammell Crow Residential;
- Costco Wholesale Corporation, One Medical, Golden State Lumber, Public Storage, Home Depot, and Lifetime Fitness;
- Gresham Savage Nolan & Tilden, PC, Remy Moose Manley, Pelosi Law Group, Sedgwick LLP, Coblentz Patch Duffy & Bass LLP

Throughout her more than 30-year career, Ms. Herman has managed real estate consulting assignments for hundreds of additional clients, including many California cities, corporations, residential, commercial, and industrial real estate developers, and Fortune 100 firms.

PRINCIPAL INTRODUCTION

Ms. Amy Herman, Principal of ALH Economics, has directed assignments for corporate, institutional, non-profit, and governmental clients in key service areas, including commercial market analysis, fiscal and economic impact analysis, economic development and redevelopment, location analysis, strategic planning, and policy analysis. During her career spanning over 30 years, Ms. Herman has supported client goals in many ways, such as to assess supportable real estate development, demonstrate public and other project benefits, to assess public policy implications, and to evaluate and maximize the value of real estate assets. In addition, her award-winning economic development work has been recognized by the American Planning Association, the California Redevelopment Association, and the League of California Cities.

Prior to forming ALH Economics, Ms. Herman worked for 20 years as an urban economist with Sedway Group and then CBRE Consulting's Land Use and Economics practice. Her prior professional work experience included 5 years in the Real Estate Consulting Group of the now defunct accounting firm Laventhol & Horwath (L&H), preceded by several years with the real estate consulting firm Land Economics Group, which was acquired by L&H. During the course of her career, Ms. Herman has established a strong professional network and client base providing access to contacts and experts across a wide spectrum of real estate and urban development resources.

Ms. Herman holds a Master of Community Planning degree from the University of Cincinnati and a Bachelor of Arts degree in urban policy studies from Syracuse University. She pursued additional post-graduate studies in the Department of City and Regional Planning at the University of California at Berkeley. A professional resume for Ms. Herman follows.

EXPERIENCE CONDUCTING URBAN DECAY STUDIES

Description of Services

The Principal of ALH Economics, Amy L. Herman, has performed economic impact and urban decay studies for a number of retail development projects in California. These studies have generally been the direct outcome of the 2004 court ruling *Bakersfield Citizens for Local Control ("BCLC") v. City of Bakersfield* (December 2004) 124 Cal.App.4th 1184, requiring environmental impacts analyses to take into consideration the potential for a retail project as well as other cumulative retail projects to contribute to urban decay in the market area served by the project. Prior to the advent of the Bakersfield court decision, Ms. Herman managed these studies for project developers or retailers, typically at the request of the host city, or sometimes for the city itself. Following the Bakersfield decision, the studies have most commonly been directly commissioned by the host cities or environmental planning firms conducting Environmental Impact Reports (EIRs) for the projects. Studies are often conducted as part of the EIR process, but also in response to organized challenges to a city's project approval or to Court decisions ruling that additional analysis is required.

The types of high volume retail projects for which these studies have been conducted include single store developments, typically comprising a Walmart Store, The Home Depot, Target

store, and other club retail stores. The studies have also been conducted for large retail shopping centers, typically anchored by one or more of the preceding stores, but also including as much as 300,000 to 400,000 square feet of additional retail space with smaller anchor stores and in-line tenants.

The scope of services for these studies includes numerous tasks. The basic tasks common to most studies include the following:

- defining the project and estimating sales for the first full year of operations;
- identifying the market area;
- identifying and touring existing competitive market area retailers;
- evaluating existing retail market conditions at competitive shopping centers and along major commercial corridors in the market area;
- conducting retail demand, sales attraction, and spending leakage analyses for the market area and other relevant areas;
- forecasting future retail demand in the market area;
- researching the retail market's history in backfilling vacated retail spaces;
- assessing the extent to which project sales will occur to the detriment of existing retailers (i.e., diverted sales);
- determining the likelihood existing competitive and nearby stores will close due to sales diversions attributable to the project;
- researching planned retail projects and assessing cumulative impacts; and
- identifying the likelihood the project's economic impacts and cumulative project impacts will trigger or cause urban decay.

Many studies include yet additional tasks, such as assessing the project's impact on downtown retailers; determining the extent to which development of the project corresponds with city public policy, redevelopment, and economic development goals; projecting the fiscal benefits relative to the host city's General Plan; forecasting job impacts; analyzing wages relative to the existing retail base; and assessing potential impacts on local social service providers.

Representative Operational Projects

Many high volume retail or other commercial projects for which Ms. Herman has prepared economic impact and urban decay studies are listed below. These include projects that are operational, with the projects listed alphabetically by the city in which they are located.

- Alameda, Alameda Landing, totaling 285,000 square feet anchored by a Target (opened October 2013), rest of center opening starting in 2015
- American Canyon, Napa Junction Phases I and II, 239,958 square feet, anchored by a Walmart Superstore, prepared in response to a Court decision; project opened September 2007
- Bakersfield, Gosford Village Shopping Center, totaling 700,000 square feet, anchored by a Walmart Superstore, Sam's Club, and Kohl's; Walmart store opened March 18, 2010, Sam's Club and Kohl's built earlier
- Bakersfield, Panama Lane, Shopping Center, totaling 434,073 square feet, anchored by a Walmart Superstore and Lowe's Home Improvement Warehouse; Walmart store opened October 2009, Lowe's store built earlier
- Bakersfield, Silver Creek Plaza, anchored by a WinCo Foods, totaling 137,609 square feet, opened February 28, 2014

- Carlsbad, La Costa Town Square lifestyle center, totaling 377,899 square feet, anchored by Steinmart, Vons, Petco, and 24 Hour Fitness, opened Fall 2014
- Citrus Heights, Stock Ranch Walmart Discount Store with expanded grocery section, 154,918 square feet; store opened January 2007
- Clovis, Clovis-Herndon Shopping Center, totaling 525,410 square feet, anchored by a Walmart Superstore, opened March 2013
- Concord, Lowe's Commercial Shopping Center, totaling 334,112 square feet, anchored by a Lowe's Home Improvement Warehouse and a national general merchandise store; EIR Certified December 2008 with no subsequent legal challenge; store opened January 2010
- Concord, Veranda Shopping Center, a 375,000-square foot center anchored by a Whole Foods 365 Market, Movie Theater, and upscale apparel retail, opened October 2017, with 365 Market opening December 2017
- Dublin, Persimmon Place, 167,200 square feet, anchored by Whole Foods, opened 2015
- Folsom, Lifetime Fitness Center, a 116,363-square-foot fitness center including an outdoor leisure and lap pool, two water slides, whirlpool, outdoor bistro, eight tennis courts, outdoor Child Activity Area, and outdoor seating, opened April 2017
- Fresno, Park Crossing (formerly Fresno 40), totaling 209,650 square feet, July 2015
- Gilroy, 220,000-square-foot Walmart Superstore, replaced an existing Discount Store; store opened October 2005, with Discount Store property under new ownership planned for retail redevelopment of a 1.5-million-square-foot mall
- Gilroy, Lowe's Home Improvement Warehouse, 166,000 square feet; store opened May 2003
- Hesperia, Main Street Marketplace, totaling 465,000 square feet, anchored by a Walmart Superstore and a Home Depot, Walmart under construction, opened September 2012
- Madera, Commons at Madera, totaling 306,500 square feet, anchored by a Lowe's Home Improvement Warehouse; project opened July 2008
- Oakland, Safeway expansion, College & Claremont Avenues, 51,510 square feet total, comprising a 36,787 square-foot expansion, opened January 2015
- Oakland, Rockridge Safeway expansion and shopping center redevelopment (The Ridge), including total net new development of 137,072 square feet, opened September 2016
- Oroville, Walmart Superstore, 213,400 square feet, replacing existing Walmart Discount Store, opened April 2017
- Rancho Cordova, Capital Village, totaling 273,811 square feet, anchored by a Lowe's Home Improvement Warehouse; phased project opening, January 2008 – July 2008
- Sacramento, Delta Shores, 1.3- to 1.5-million square feet, anchored by a lifestyle center; phased project opening beginning September 2017
- Sacramento, Downtown Commons, mixed-use entertainment complex with 682,500 square feet of retail space adjoining new Golden 1 Center for the Sacramento Kings; initial tenant 2016, additional tenants beginning November 2017
- Sacramento, Land Park Commercial Center, proposed commercial center with a 55,000-square-foot relocated and expanded full service Raley's grocery store and pharmacy and seven freestanding retail buildings comprising 53,980 square feet, Raley's opened April 2020
- San Francisco, Chase Center, prepared response to comments regarding impacts on Oakland Arena, opened September 2019

- San Jose (East San Jose), Home Depot Store, 149,468 square feet; store opened October 2007
- San Jose, Lowe's Home Improvement Warehouse (redevelopment of IBM site), up to 180,000 square feet, store opened March 2010
- San Jose, Almaden Ranch, up to 400,000 square feet, anchor tenant Bass Pro Shop opened October 2015
- Sonora, Lowe's Home Improvement Warehouse, 111,196 square feet; store opened December 2010
- Sonora, Sonora Crossroads, Walmart Discount Store expansion to a Superstore, net increase of 30,000 square feet, groundbreaking May 2017
- Ukiah, Costco, 148,000-square-foot warehouse membership store, groundbreaking September 2017, opened July 2018
- Victorville, The Crossroads at 395, totaling 303,000 square feet, anchored by a Walmart Superstore, opened May 2014
- Victorville, Dunia Plaza, totaling 391,000 square feet, anchored by a Walmart Superstore and a Sam's Club, replacing existing Walmart Discount Store, opened September 2012
- West Sacramento, Riverpoint Marketplace, totaling 788,517 square feet, anchored by a Walmart Superstore, Ikea, and Home Depot; phased openings beginning March 2006
- Willows, Walmart Superstore totaling 196,929 square feet, replacing existing Walmart Discount Store (subsequently scaled back to a 54,404-square-foot expansion to existing 86,453-square-foot store), opened March 2012
- Walnut Creek, The Orchards at Walnut Creek, mixed-use project including up to 225,000 square feet of retail space, opened September 2016
- Woodland, Home Depot Store, 127,000 square feet; store opened December 2002
- Yuba City, Walmart Superstore, 213,208 square feet, replacing existing Discount Store; store opened April 2006. Discount Store site backfilled by Lowe's Home Improvement Warehouse



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SELECT OTHER CLIENTS

- Alameda County Fair
- Arcadia Development Company
- Catellus Development Corporation
- CenterCal Properties
- Claremont University Consortium
- City of Dublin
- Dudek
- Environmental Science Associates
- Equity One
- First Carbon Solutions (formerly Michael Brandman Associates)
- Gresham Savage Nolan & Tilden
- Howard Hughes Corporation
- City of Inglewood
- LSA Associates
- Maximus Real Estate Partners
- The Primary School
- Remy Moose Manley
- Ronald McDonald House
- Signature Flight Support
- Syufy Enterprises
- City of Tracy

Amy L. Herman, Principal of ALH Urban & Regional Economics, has provided urban and regional consulting services for approximately 35 years. During this time, she has been responsible for directing assignments for corporate, institutional, non-profit, and governmental clients in key service areas, including fiscal and economic impact analysis, economic development and redevelopment, feasibility analysis, location analysis, strategic planning, policy analysis, and transit-oriented development. Her award-winning economic development work has been recognized by the American Planning Association, the California Redevelopment Association, and the League of California Cities.

Prior to forming ALH Urban & Regional Economics in 2011, Ms. Herman's professional tenure included 20 years with Sedway Group, inclusive of its acquisition by CB Richard Ellis and subsequent name change to CBRE Consulting. Her prior professional work experience includes five years in the Real Estate Consulting Group of the now defunct accounting firm Laventhol & Horwath (L&H), preceded by several years with the land use consulting firm Land Economics Group, which was acquired by L&H.

Following are descriptions of select consulting assignments managed by Ms. Herman.

ECONOMIC IMPACT ANALYSIS

Alameda County. Prime consultant for a complex team that prepared a Local Development Business Plan for the newly launched East Bay Community Energy Community Choice Aggregation program for Alameda County. ALH Economics components included economic impact and financial analysis of the local development program components.

University of California. Conducted economic impact studies and frequent updates for five University of California campuses: Berkeley, Davis, Riverside, San Francisco, and San Diego. Prepared models suitable for annual updates by campus personnel.

Hospital Council of Northern and Central California. Prepared an analysis highlighting the economic impacts of hospitals and long-term care facilities in Santa Clara County. The analysis included multiplier impacts for hospital spending, county employment, and wages. Completed a similar study for the Monterey Bay Area Region.

Bay Area Rapid Transit District. Completed economic impact analysis of BART's operations in the San Francisco Bay Area region.

Various EIR Firms. Managed numerous assignments analyzing the potential for urban decay to result from development of major big box stores, shopping centers, and sports venues. The analysis comprises a required Environmental Impact Report component pursuant to CEQA.

FISCAL IMPACT ANALYSIS

Stanford Research Park. Analyzed historic and current fiscal contributions generated by the Stanford Research Park real estate base and businesses to the City of Palo Alto, Santa Clara County, and the Palo Alto Unified School District.

City of Concord. Structured and managed fiscal impact analysis designed to test the net fiscal impact of multiple land use alternatives pertaining to the reuse of the 5,170-acre former Concord Naval Weapons Station, leading to possible annexation into the City of Concord, California.

Kimco Realty. Prepared fiscal impact analysis of plans to renovate and redevelop part of Westlake Shopping Center and infill development of a 179-unit apartment project adjoining the shopping center.

Sycamore Real Estate Investments, LLC. Prepared a fiscal impact model for client implementation, to test the General Fund net fiscal impacts of alternative land use mixes.

Residential and Commercial Developers. Prepared fiscal impact studies for new development projects, including residential, office, and mixed-use projects, demonstrating the net fiscal impact on the respective city's General Fund and local school districts.

AMY L. HERMAN
Principal

ECONOMIC DEVELOPMENT AND PUBLIC FINANCE

Infrastructure Management Group. Contributed to due diligence analysis of the proposed Transbay Transit Center to support evaluation of requested bond loan adjustment requests to support project construction.

Alameda County. Managed numerous assignments helping Alameda County achieve its economic development goals for the County's unincorporated areas through surplus site disposition assistance, including market analysis and financial due diligence for residential and commercial mixed-use developments.

Office of Community Investment and Infrastructure as Successor Agency to the Redevelopment Agency of the City and County of San Francisco. Managed financial analysis estimating the tax payments in lieu of property taxes associated with UCSF development of medical office space in the former Mission Bay Redevelopment Project area.

LAND USE POLICY

Union City Property Owner. Provided an independent analysis regarding the reasonableness of the City of Union City continuing to reserve a key development area for office and/or R&D development in the context of the General Plan Update.

Alameda County Community Development Agency. Provided analysis and input regarding the Ashland and Cherryland Business District Specific Plan requirements for non-residential floor space in mixed-use development sites over 10,000 square feet

DCT Industrial Trust (Subsequently acquired by ProLogis, Inc.). Performed economic analysis on a proposed change to the Newark Zoning Ordinance regarding permitted industrial uses. The analysis demonstrated the market, fiscal, and economic impacts that could result from the proposed zoning ordinance change.

City and County of San Francisco. Under direction of the San Francisco Planning Department, conducted analysis and literature review regarding residential and commercial displacement, especially they pertained to two planned Mission District mixed-income apartment projects.

DEVELOPMENT FEASIBILITY

China Harbour Engineering Company Ltd. (CHEC). Prepared a market assessment and development feasibility analysis for the potential development of a 5.54-acre parking lot at the West Oakland BART Station in Oakland, CA for CHEC, the development entity selected by BART to pursue joint development of the site pursuant to an Exclusive Right to Negotiate Agreement.

Align Real Estate, LLC. Prepared independent economic analysis of a proposed residential development in San Francisco on the site of several buildings, including one considered an historic resource pursuant to CEQA. The analysis tested several project alternatives, focusing on net developer margin as an indicator of financial feasibility.

Build, Inc. Conducted financial analysis comparing the development of a prospective San Francisco residential site as a "stand-alone" project compared to a larger "combined lot" project that would incorporate unused floor-area-ratio from an adjacent property.

Various Residential Developers. In support of fiscal impact studies, prepared residential market analysis examining historical development and pricing trends, absorption, and forecasting demand by product type. Prepared achievable pricing estimates by residential unit type and size.

EDUCATION

- Bachelor of Arts degree in urban studies, magna cum laude, Syracuse University.
- Master of Community Planning degree from the University of Cincinnati.
- Advanced graduate studies in City and Regional Planning at the University of California at Berkeley.

APPENDIX B: EXHIBIT

Exhibit 1
Planned Multifamily Residential Projects
One Mile Radius from 469 Stevenson Street
San Francisco Planning Department Development Pipeline, First Quarter Update, 2020

Project Status (1) Project Name/Address	Project Entitled	Date of Status Update	Market-Rate Units		Affordable Units		Affordability Target	Tenure Type
			Total (2)	Net	Total (2)	Net		
Projects Under Construction								
1500 - 1580 Mission St	Yes	3/26/2020	540	540	110	110	50% AMI	Rental
Trinity Plaza	Yes	3/30/2020	501	501	74	74	55% AMI	Rental
30 Otis St	Yes	3/27/2020	404	404	0	0		
1144 - 1150 Harrison St	Yes	3/31/2020	381	381	0	0		
1066 Market St	Yes	2/19/2020	303	303	0	0		Unknown
950 - 974 Market St	Yes	3/31/2020	242	242	0	0		
333 12th St	Yes	3/16/2020	200	200	21	21	AMI Undeclared	Rental
1028 Market St	Yes	3/10/2020	186	186	25	25	55% AMI	
706 Mission St	Yes	3/30/2020	185	185	0	0		Rental
975 Bryant St	Yes	3/26/2020	185	185	30	30	55% AMI	
Oceanwide (Mission St Tower)	Yes	3/9/2020	156	156	0	0		
1532 Harrison St	Yes	3/24/2020	136	136	22	22	90% AMI	Rental
830 Eddy St	Yes	1/10/2020	126	126	18	18	55% AMI	Rental
200 Van Ness Ave	Yes	3/2/2020	117	117	0	0		
1546 - 1564 Market St	Yes	3/31/2020	109	109	13	13	90% AMI	Ownership
363 6th St	Yes	6/21/2019	104	104	12	12	55% AMI	Rental
345 6th St	Yes	11/25/2019	102	102	14	14	55% AMI	Rental
555 Golden Gate Ave	Yes	3/24/2020	60	60	7	7	55% AMI	Rental
1145 Polk St	Yes	3/27/2020	54	54	8	8	55% AMI	
875 California St / 770 Powell St	Yes	3/6/2020	44	44	0	0		
1174 - 1178 Folsom St	Yes	3/9/2020	42	42	0	0		
119 7th St	Yes	3/11/2020	39	39	0	0		
349 8th St	Yes	2/19/2020	38	38	6	6		Ownership
Sub-totals			4,254	4,254	360	360		
Building Permits Issued or Approved								
941 Mission St	Yes	8/2/2019	302	302	91	91	50% AMI	Rental
1270 Mission St	Yes	10/17/2019	299	299	64	64	55% AMI; 90% AMI	Rental
1068 Mission St	Yes	6/5/2019	254	254	254	254		
1001 Van Ness Ave	Yes	1/2/2020	239	239	0	0		
1601 Mission St	Yes	4/4/2019	220	220	0	0		
19 - 25 Mason St & 2 - 16 Turk St	Yes	12/5/2018	155	155	0	0		
833 Bryant St	Yes	11/20/2019	146	146	146	146	50% AMI	Rental
1298 Howard St	Yes	7/3/2018	155	130	34	9	55% AMI	Rental

continued on the next page

Exhibit 1
Planned Multifamily Residential Projects
One Mile Radius from 469 Stevenson Street
San Francisco Planning Department Development Pipeline, First Quarter Update, 2020

Project Status (1) Project Name/Address	Project Entitled	Date of Status Update	Market-Rate Units		Affordable Units		Affordability Target	Tenure Type
			Total (2)	Net	Total (2)	Net		
Building Permits Issued or Approved, continued								
555 Howard St	Yes	11/28/2018	127	127	10	10	90% AMI	
5th St / Clara St / Shipley St	Yes	12/21/2018	123	123	18	18	90% AMI	
500 Turk St	Yes	12/28/2018	122	122	121	121	55% AMI	
Oceanwide (First St Tower)	Yes	7/5/2017	112	112	0	0		
145 Leavenworth St	Yes	12/7/2018	94	94	0	0		
377 6th St	Yes	11/30/2018	90	90	12	12	55% AMI	Rental
655 Folsom St	Yes	8/12/2019	89	89	0	0		
58 Tehama St / 555 Howard St	Yes	11/28/2018	80	80	13	13	90% AMI	Ownership
135 Hyde St	Yes	6/28/2019	72	72	10	10	55% AMI	
1394 Harrison St	Yes	7/20/2018	68	68	0	0		
651 Geary St	Yes	12/4/2018	52	52	6	6	90% AMI	
1075 & 1089 Folsom St	Yes	12/20/2019	48	48	12	12	LOW	Rental
807 Franklin St	Yes	12/31/2018	48	47	5	5		
230 7th St	Yes	3/8/2019	40	40	5	5	55% AMI	
980 Folsom St	Yes	2/27/2019	34	34	4	4	90% AMI	
469 Eddy St	Yes	11/30/2018	28	28	3	3	90% AMI	Ownership
768 Harrison St	Yes	11/13/2018	26	26	0	0		
Sub-totals			3,023	2,997	808	783		
Building Permits Filed								
657 Harrison St	No	12/6/2019	489	489	0	0		
1540 Market St	No	12/9/2016	304	304	0	0		
1621 Market St	No	5/1/2019	185	185	0	0		
450 O'Farrell St	Yes	10/29/2018	176	176	23	23	55% AMI;	
300 5th St	No	8/21/2019	130	130	20	20		
1200 Van Ness Ave	No	9/26/2016	107	107	0	0		
53 Colton St	No	11/12/2019	96	96	0	0		
888 Post St	No	12/23/2019	76	76	76	76		
220 9th St	No	12/27/2018	74	74	0	0		
1125 Stevenson St	No	11/14/2018	64	64	64	64		
Sub-totals			1,701	1,701	183	183		
Planning Application Approved								
5M	Yes	1/4/2016	386	386	0	0	90% AMI;	Ownership
301 6th St	Yes	10/6/2017	95	95	13	13	55% AMI;	
229 Ellis	Yes	5/22/2018	52	52	0	0		
1601 - 1637 Market St / 53 Colton St	Yes	10/20/2017	44	44	0	0		
Sub-totals			577	577	13	13		

continued on the next page

Exhibit 1
Planned Multifamily Residential Projects
One Mile Radius from 469 Stevenson Street
San Francisco Planning Department Development Pipeline, First Quarter Update, 2020

Project Status (1) Project Name/Address	Project Entitled	Date of Status Update	Market-Rate Units		Affordable Units		Affordability Target	Tenure Type
			Total (2)	Net	Total (2)	Net		
Planning Application Filed								
10 South Van Ness Ave	No	4/11/2016	966	966	0	0		
655 4th St	No	5/17/2016	960	957	0	0		
469 Stevenson St	No	8/23/2018	495	495	94	94		
95 Hawthorne St	No	9/28/2016	392	392	55	55	Low/Moderate	Rental
598 Bryant St	No	4/10/2019	353	353	54	54		
98 Franklin St	No	1/10/2018	345	345	69	69		
30 Van Ness Ave	No	4/9/2018	333	333	83	83		
457 Minna	No	11/28/2018	270	270	143	143		
650 Harrison St	No	4/4/2018	245	245	35	35		
1560 Folsom St	No	10/29/2018	230	230	44	44		
667 Folsom St, 120 Hawthorne St, 12	No	10/25/2019	230	230	0	0		
921 Howard St	No	3/28/2018	203	203	203	203		
600 McAllister St	No	7/31/2019	196	196	25	25		
Transbay Parcel F	No	2/14/2017	165	165	0	0		
550 O'Farrell St	No	10/15/2018	111	111	28	28		
1567 California St	No	8/15/2018	100	100	9	9		
262 7th St	No	5/6/2016	96	96	17	17	90 AMI	Rental
468 Turk St	No	11/4/2019	91	91	0	0		
57 Taylor St	No	10/23/2015	190	78	0	0		
955 Post St	No	12/9/2016	69	69	17	17		
755 Brannan St	No	5/1/2017	57	57	8	8	Low/Moderate	Rental
828 Brannan St	No	4/14/2016	50	50	9	9	Low	
351 12th St	No	4/6/2018	48	48	8	8		
1245 Folsom St	No	3/22/2016	37	37	7	7	80% AMI; 105% AMI; 130% AMI	Rental
222 Dore St	No	NA	30	30	3	3		
1145 Mission St	No	12/29/2016	25	25	4	4		
1320 Washington St	No	12/20/2018	25	25	0	0		
Sub-totals			6,312	6,197	915	915		
Grand Totals			15,867	15,726	2,279	2,254		

Sources: City of San Francisco Planning Department; and ALH Urban & Regional Economics.

(1) Projects are classified as Under Construction, status of building permit (Issued, Approved, or Filed), or Planning Application filed.

(2) Projects are listed in descending order of total number of units, by Project Status.

APPENDIX C: HOUSING PRODUCTION IMPACTS ON HOUSING COSTS LITERATURE OVERVIEW

IDENTIFIED REPRESENTATIVE LITERATURE

ALH Urban & Regional Economics reviewed many studies and papers to identify the resources that best address the question of the impact of housing production on pricing. The resources found to be among the most relevant to this question include studies on several topics, including understanding the dynamics for pricing, increasing the availability of affordable housing, and understanding the relationship between home production and displacement. Based upon this review of the literature and related studies, 11 papers or reports (including document links) stand out regarding their consideration of this issue. These papers or reports were primarily authored by state and local policy analysts as well as urban planning and real estate and urban policy academics and independent research organizations, and include the following:

1. Mac Taylor, Legislative Analyst, California Legislative Analyst's Office, "California's High Housing Costs: Causes and Consequences," March 17, 2015.
<http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf>
2. Mac Taylor, Legislative Analyst, California Legislative Analyst's Office, "Perspectives on Helping Low-Income Californians Afford Housing," (February 2016).
<http://www.lao.ca.gov/Reports/2016/3345/Low-Income-Housing-020816.pdf>
3. City and County of San Francisco, Office of the Controller-Office of Economic Analysis, "Potential Effects of Limiting Market-Rate Housing in the Mission," (September 10, 2015).
http://sfcontroller.org/sites/default/files/FileCenter/Documents/6742-mission_moratorium_final.pdf
4. Miriam Zuk, Karen Chapple, "Housing Production, Filtering and Displacement: Untangling the Relationships," University of California, Berkeley, Institute of Governmental Studies Research Brief (May 2016).
http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf
5. Housing Development Toolkit, The White House, Washington, September 2016
https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf
6. Paavo Monkkonen, Associate Professor Urban Planning, University of California Los Angeles, "Understanding and Challenging Opposition to Housing Construction in California's Urban Areas," Housing, Land Use and Development Lectureship & White Paper, December 1, 2016.
<http://uccs.ucdavis.edu/uccs-crre-housing-policy-brief-white-paper>
7. Karen Chapple, Paul Waddell, and Daniel Chatman, with Miriam Zuk, "Developing a New Methodology for Analyzing Potential Displacement," Prepared for the California Air Resources Board and the California Environmental Protection Agency, by the University of California, Berkeley and the University of California, Los Angeles, April 26, 2017.
http://www.urbandisplacement.org/sites/default/files/images/arb_tod_report_13-310.pdf

8. Vicki Been, Ingrid Gould Ellen & Katherine O'Regan (2019) Supply Skepticism: Housing Supply and Affordability, *Housing Policy Debate*, 29:1, 25-40, DOI: 10.1080/10511482.2018.1476899
<https://doi.org/10.1080/10511482.2018.1476899>

9. Evan Mast. "The Effect of New Market-Rate Housing Construction on the Low-Income Housing Market," Upjohn Institute Working Paper 19-307. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research. July 1, 2019.
<https://doi.org/10.17848/wp19-307>

10. Brian J. Asquith, Evan Mast, and Davin Reed. "Supply Shock Versus Demand Shock: The Local Effects of New Housing in Low-Income Areas." Upjohn Institute Working Paper 19-316. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research. December 19, 2019.
<https://doi.org/10.17848/wp19-316>

11. Xiaodi Li, "Do New Housing Units in Your Backyard Raise Your Rents?," NYU Wagner and NYU Furman Center, October 26, 2019.
https://docs.wixstatic.com/ugd/7fc2bf_ee1737c3c9d4468881bf1434814a6f8f.pdf

The findings from the 11 studies or reports reviewed below generally coalesce in the conclusion that housing production does not result in increased costs of the existing housing base, but rather helps suppress upward pressure on existing home prices and rents. Further, the studies or reports find that both market-rate and affordable housing development help to suppress price appreciation and reduce displacement. Research studies prior to approximately 2019 have suggested that the rate at which this occurs in very small, localized areas requires further analysis to best understand the relationship between development, affordability, and displacement at the highly localized level. However, two recent studies published in 2019 managed to study and analyze this localized impact, and found that rents of existing apartment projects immediately near new market-rate apartment buildings declined upon completion of the market-rate units in the immediate surrounding area, for a duration of at least up to one to three years after completion of the new units. The studies further indicate that the gentrification observed in Bay Area transit-served neighborhoods over the past 15+ years was not caused by new development, as relatively limited development occurred during this time period in these neighborhoods.

Following is a brief synopsis of the cited studies or reports with a focus on housing production and housing costs, emphasizing where possible on rental housing, as this is most applicable to the 469 Stevenson Street project and the relevant projects in the current pipeline in the 1.0-mile radius area around the 469 Stevenson Street project site. The key findings of each study or report are highlighted.

REPRESENTATIVE LITERATURE REVIEW

California Legislative Analyst's Office (LAO) (Resources #1 & #2)

March 2015 Study. The LAO's March 2015 study has the stated purpose of providing the State Legislature with an overview of the state's complex and expensive housing markets, including multifamily apartments. The study addresses several questions, including what has caused housing prices to increase so quickly over the past several decades and assessing how

to moderate this trend. This study is focused on statewide and select county trends, and especially focuses on coastal metro areas, which includes San Francisco.

As a way of setting the framework, and as an example of how housing prices in California are higher than just about anywhere else in the country, the study demonstrates that California's average rent is about 50% higher than the rest of the country, and that housing prices are 2.5 times higher than the national average. As a major finding, regarding how building less housing than people demand drives high housing costs, the study cites the following:

"California is a desirable place to live. Yet not enough housing exists in the state's major coastal communities to accommodate all of the households that want to live there. In these areas, community resistance to housing, environmental policies, lack of fiscal incentives for local governments to approve housing, and limited land constrains new housing construction. A shortage of housing along California's coast means households wishing to live there compete for limited housing. This competition bids up home prices and rents. Some people who find California's coast unaffordable turn instead to California's inland communities, causing prices there to rise as well. In addition to a shortage of housing, high land and construction costs also play some role in high housing prices."³⁰

The study makes many findings, including pertaining to the impacts of affordable housing programs, but specifically addresses how building less housing than people demand drives high housing costs, citing that the competition resulting from a lack of housing where people want to live bids up housing costs. While the study concludes that the relationship between growth of housing supply and increased housing costs is complex and affected by other factors, such as demographics, local economics, and weather, it concludes that statistical analysis suggests there remains a strong relationship between home building and prices. A major study finding presented in the paper indicates that:

"after controlling for other factors, if a county with a home building rate in the bottom fifth of all counties during the 2000s had instead been among the top fifth, its median home price in 2010 would have been roughly 25 percent lower. Similarly, its median rent would have been roughly 10 percent lower."³¹

Thus, the LAO study concludes, as a result of conducting statistical analysis, that **a relationship exists between increasing home production and reducing housing costs, including home prices and apartment rents.**

February 2016 Study. In response to concerns about housing affordability for low-income households following release of the 2015 study, LAO's February 2016 follow-up study offers additional evidence that facilitating more private housing development in the state's coastal urban communities would help make housing more affordable for low-income Californians. As cited by the LAO:

"Existing affordable housing programs assist only a small proportion of low-income Californians. Most low-income Californians receive little or no

³⁰ Mac Taylor, California Legislative Analyst's Office, "California's High Housing Costs: Causes and Consequences," March 17, 2015, page 3.

³¹ Ibid, page 12.

assistance. Expanding affordable housing programs to help these households likely would be extremely challenging and prohibitively expensive. It may be best to focus these programs on Californians with more specialized housing needs—such as homeless individuals and families or persons with significant physical and mental health challenges.

Encouraging additional private housing construction can help the many low-income Californians who do not receive assistance. Considerable evidence suggests that construction of market-rate housing reduces housing costs for low-income households and, consequently, helps to mitigate displacement in many cases. Bringing about more private home building, however, would be no easy task, requiring state and local policy makers to confront very challenging issues and taking many years to come to fruition. Despite these difficulties, these efforts could provide significant widespread benefits: lower housing costs for millions of Californians.³²

In this paper, the LAO presents evidence that construction of new, market-rate housing can lower housing costs for low-income households. Highlights of this evidence are as follows:

- Lack of supply drives high housing costs, such that increasing the supply of housing can alleviate competition and place downward pressure on housing costs; and
- Building new housing indirectly adds to the supply of housing at the lower end of the market, because a) housing becomes less desirable as it ages; and b) as higher income households move from older, more affordable housing to new housing the older housing becomes available for lower income households.

Further, the LAO cites that the lack of new construction can slow the process of older housing becoming available for lower-income households, both owners and renters. The LAO additionally presents analysis demonstrating that when the number of housing units available at the lower end of a community's housing market increases, growth in prices and rents slows. This is demonstrated by comparative analysis of rents paid by low-income households in California's slow growth coastal urban counties and fast growing urban counties throughout the U.S., especially with regard to comparative rent burden as a share of income.

Finally, the LAO **paper concludes that more private development is associated with less displacement.**³³ The LAO cites that the analysis of low-income neighborhoods in the Bay Area suggests a link between increased construction of market-rate housing and reduced displacement. Specifically, the study found that between 2000 and 2013, census tracts with an above-average concentration of low-income households that built the most market-rate housing experienced considerably less displacement. Further, the findings show that displacement was more than twice as likely in low-income census tracts with little market-rate housing construction (bottom fifth of all tracts) than in low-income census tracts with high construction levels (top fifth of all tracts).³⁴ The LAO theorizes that one factor contributing to

³² Mac Taylor, California Legislative Analyst's Office, "Perspectives on Helping Low-Income Californians Afford Housing," February 2016, page 1.

³³ The LAO defines a census tract as having experienced displacement if (1) its overall population increased and its population of low-income households decreased or (2) its overall population decreased and its low-income population declined faster than the overall population (see LAO, 2016, page 13).

³⁴ Ibid, page 9.

this finding is that Bay Area inclusionary housing policies requiring the construction of new affordable housing could be mitigating displacement, but that market-rate housing construction continues to appear to be associated with less displacement *regardless* of a community's inclusionary housing policies.³⁵ In communities without inclusionary housing policies, in low-income census tracts where market-rate housing construction was limited, the LAO also found displacement was more than twice as likely than in low-income census tracts with high construction levels.³⁶ This relationship between housing development and displacement remains statistically valid even after accounting for other economic and demographic factors.

City and County of San Francisco, Office of Economic Analysis (Resource #3)

In 2015, at the request of the Board of Supervisors, the Office of Economic Analysis (OEA) prepared a report on the effects of a temporary moratorium, and an indefinite prohibition, on market-rate housing in the Mission District of San Francisco, pursuant to an 18-month moratorium being put on the November 2015 ballot. Accordingly, a report was prepared focusing on the effects of such actions on the price of housing, the City's efforts to produce new housing at all income levels, eviction pressures, and affordable housing. It also explores if there are potential benefits of a moratorium, such as reducing tenant displacement, discouraging gentrification, preventing nearby existing housing from becoming unaffordable, and preserving sites for permanently affordable housing.

The primary focus of this study is on addressing the impacts of a moratorium on the availability and provision of affordable housing, on which the study finds that a temporary moratorium would:

“lead to slightly higher housing prices across the city, have no appreciable effect on no-fault eviction pressures, and have a limited impact on the city's ability to produce affordable housing during the moratorium period. At the end of the moratorium, these effects would be reversed, through a surge of new building permits and construction, and there would be no long-term lasting impacts of a temporary moratorium.”³⁷

In other words, the study found that suppressing residential production results in increasing the cost of the existing housing stock. In a similar vein, the study states:

“market rate housing construction drives down housing prices and, by itself, increases the number of housing units that are affordable.”³⁸

Another study conclusion included finding no evidence that anyone would be evicted so that market-rate housing could be built in the Mission over the next 18 to 30 months as none of the identified planned housing units included in the analysis would require the demolition of any existing housing units.³⁹ Finally, the study stated:

³⁵ Ibid.

³⁶ Ibid, page 10.

³⁷ City and County of San Francisco, Office of the Controller-Office of Economic analysis, “Potential Effects of Limiting Market-Rate Housing in the Mission,” September 10, 2015, page 1.

³⁸ Ibid, page 28.

³⁹ Ibid.

"We further find no evidence that new market-rate housing contributes to indirect displacement in the Mission, by driving up the value of nearby properties. On the contrary, both in the Mission and across the city, new market rate housing tends to depress, not raise, the value of existing properties."⁴⁰

This finding regarding price impacts was the result of statistical modeling, with a statistically significant result indicating that ***new market-rate housing did not make nearby housing more expensive in San Francisco during the 2001-2013 period.***⁴¹

University of California Berkeley, Institute of Governmental Studies (Resource #4)

The cited study by Zuk and Chapple, from the Center for Community Innovation at UC Berkeley's Institute of Governmental Studies, builds on other studies prepared by the authors addressing gentrification in the Bay Area region. The purpose of this research brief is to add to the discussion on the importance of subsidized and market-rate housing production in alleviating the current housing crisis, and to especially probe the relationship between housing production, affordability, and displacement. This study specifically expands on the analysis prepared by the LAO in "Perspectives on Helping Low-Income Californians Afford Housing" (February 2016), wherein the LAO study was performed using a data set compiled by Zuk and Chapple for their Urban Displacement Project. Specifically, Zuk and Chapple seek to test the reliability of the LAO's findings taking into consideration yet one more additional variable, e.g., production of subsidized housing. Zuk and Chapple also seek to determine if the LAO's noted regional trends regarding the impact of housing production on housing costs and displacement hold up at the more localized neighborhood level.

In general, Zuk and Chapple's findings largely support the argument that building more housing reduces displacement pressures, and agree that "market-rate development is important for many reasons, including reducing housing pressures at the regional scale and housing large segments of the population."⁴² They advance the understanding of this trend by concluding that market-rate housing production is associated with reduced displacement pressures, but find that subsidized housing production has more than double the impact of market-rate units. They further find that, through filtering, market-rate housing production is associated with near term higher housing cost burdens for low-income households, but with longer-term lower median rents.

Zuk and Chapple further probe the question of housing production, affordability, and displacement at the local level, including case study analysis of two San Francisco block groups in SOMA. Their findings at this granular geographic level are inconclusive, from which they conclude that "***neither the development of market-rate nor subsidized housing has a significant impact on displacement. This suggests that indeed in San Francisco, and by extension similar strong markets, the unmet need for housing is so severe that production alone cannot solve the displacement problem.***"⁴³ They further cite that drilling down to local case studies, they "see that the housing market dynamics and their impact on

⁴⁰ Ibid.

⁴¹ Ibid page 26.

⁴² Miriam Zuk, Karen Chapple, "Housing Production, Filtering and Displacement: Untangling the Relationships," University of California, Berkeley, Institute of Governmental Studies Research Brief (May 2016), page 4.

⁴³ Ibid, page 7.

displacement operate differently at these different scales”⁴⁴ and that detailed analysis is needed to clarify the complex relationship between development, affordability, and displacement at the local level.⁴⁵

White House, Housing Development Toolkit (Resource #5)

This White House document was prepared in 2016 as a tool kit to address local barriers to housing development, which reduce the ability of many housing markets to respond to growing demand and result in the growing severity of undersupplied housing, in turn jeopardizing housing affordability for working families. The document discusses the prevalence of local barriers to housing development, the effects of local barriers to housing development, a framework for modern housing strategies, and provides a toolkit for taking action. The toolkit highlights actions states and local jurisdictions have taken to promote healthy, responsible, affordable, high-opportunity housing markets. Relative to the topic of housing production impacts on housing costs, or rents, in the framework for modern housing strategies portion of the document the authors state:

“In markets with high demand but currently inelastic supply, these modern housing approaches are likely to lead to more new housing construction, including multifamily rental construction. Though much of that housing would likely be market-rate housing, its introduction into the marketplace would help slow cost growth in existing and otherwise affordable housing.”⁴⁶

This statement acknowledges an understanding at a high level of government, in a document meant to be instructive to state and local jurisdictions, that the production of market-rate housing can help slow the rate of growth in existing, and affordable rental housing markets.

Paavo Monkkonen, PhD., University of California Los Angeles (Resource #6)

Monkkonen’s study is itself a review of other studies, summarizing key study findings and using the information to shape state policy recommendations to address housing affordability. The key topic of Monkkonen’s study is that housing in California is unaffordable to most households, and that limited construction relative to robust job growth is one of the main causes. Monkkonen, an Associate Professor of Urban Planning at the UCLA Luskin School of Public Affairs, says it best in summing up the purpose of his study and highlights of his findings, as follows:

“Housing affordability is one of the most pressing issues facing California. In the intense public debate over how to make housing affordable, the role of new supply is a key point of contention despite evidence demonstrating that supply constraints — low-density zoning chief among them — are a core cause of increasing housing costs. Many California residents resist new housing development, especially in their own neighborhoods. This white paper provides background on this opposition and a set of policy recommendations for the state government to address it. I first describe how limiting new construction makes all housing less affordable, exacerbates spatial inequalities, and harms the state’s economic productivity and environment. I

⁴⁴ Ibid, page 10.

⁴⁵ Ibid, page 1.

⁴⁶ “Housing Development Toolkit,” September 2016, The White House, Washington, page 12.

then discuss the motivations for opposing more intensive land use, and clarify the way the role of new housing supply in shaping rents is misunderstood in public debates.”⁴⁷

Monkkonen states that “constraining the supply of housing increases rents.”⁴⁸ He cites academic studies from the 1970s and 1980s that found a significant impact of restrictive zoning on housing prices and more sophisticated studies from the 2000s and 2010s that demonstrate that regulations such as historic preservation and low-density zoning increase prices. He states that higher housing prices help homeowners through increased equity, but hurt renters, which tend to have lower incomes than existing homeowners. He further cites studies that found that limiting population growth through low-density zoning (as a means of limiting housing production) hampers economic productivity because it restricts the labor pool, pushing people out and preventing newcomers.

Monkkonen states that if no new housing stock is available in desirable locations that high-income residents will renovate and occupy older housing that might otherwise be inhabited by lower-income residents. Thus, he concludes that “[t]he prevention of new construction cannot guarantee that older housing will remain affordable.”⁴⁹ He further cites several studies from 2008 and later that demonstrate that “housing markets with more responsive supply mechanisms experience less price growth and are able to capture the economic benefits of a booming economy.”⁵⁰ Monkkonen cites the Zuk and Chapple finding that these metropolitan scale trends may be less pronounced at the neighborhood level, depending upon the nature of the new housing built. But he also reinforces their finding that **increasing the supply of market-rate housing and, more importantly, affordable housing, reduces displacement.**

Karen Chapple, Paul Waddell, and Daniel Chatman, with Miriam Zuk, University of California, Berkeley and the University of California, Los Angeles (Resource #7)

This April 2017 paper is a very extensive and comprehensive review of theory and research regarding the relationship between fixed-rail transit neighborhoods and displacement, using case studies in Los Angeles and the San Francisco Bay Area to examine patterns of neighborhood change in relation to transit proximity. The impetus behind this study is to assess the impact of pursuing more compact, transit-oriented development as a key strategy to achieve greenhouse gas reductions through regional sustainable communities strategies (SCS), in compliance with State of California climate change legislation. As noted in the study’s Executive Summary, “Concern has been raised that such development and investment patterns may result in heightened property values and the displacement of low income households.”⁵¹

A key objective of the study was to examine “the relationship between fixed-rail transit neighborhoods and displacement in California by modeling past patterns of neighborhood

⁴⁷ Paavo Monkkonen, “Understanding and Challenging Opposition to Housing Construction in California’s Urban Areas,” December 1, 2016, page 1.

⁴⁸ Ibid, page 5.

⁴⁹ Ibid page 6.

⁵⁰ Ibid.

⁵¹ Karen Chapple, Paul Waddell and Daniel Chatman, with Miriam Zuk, “Developing a New Methodology for Analyzing Potential Displacement,” April 26, 2017, page vi.

change in relation to transit proximity.”⁵² The report also sought to analyze the relationship between displacement and travel behavior. The many types of variables included in the study’s quantitative and qualitative case study analysis included neighborhood-level data, address-level data, and parcel-level data. The neighborhood-level analysis included variables such as demographic, housing, and socioeconomic characteristics; movement in/out of neighborhood; and public housing unit counts and Section 8 voucher recipients (all neighborhood-level datasets). The address-level analysis included variables such as number of housing units constructed; number of jobs, establishments, and business sales; number of evictions by type; and presence of a rail station. The parcel-level analysis included numerous variables probing changes associated with a plot of land, such as transaction history, land-use changes, new residential structure construction, major renovations, and conversions of apartments to condominiums. These data, along with other data constructs, were inputs to the investigators’ development of proxies to assess different types of displacement (e.g., economic, physical, and exclusionary). The study years represented by the data reflected 2000 to 2013.

A heavy focus of the study was to assess vehicle miles traveled (VMT) among different groups relative to their transit proximity. But in addition, its findings have bearing on the knowledge base associated with residential gentrification and displacement. Aside from the findings associated with VMT, some of the case study findings associated with examining gentrification and displacement in fixed-rail transit neighborhoods included the following:

- “Gentrification in Los Angeles and the Bay Area transit neighborhoods cannot be attributed to new residential development, as the vast majority of transit neighborhoods in both Los Angeles and the Bay Area experienced relatively little residential development from 2000 to 2013. In the Bay Area, over half of market rate residential development occurred in tracts that did not gentrify.”⁵³

The preceding is a very high-level summary of just one small aspect of a detailed and well-researched study. It is, however, one of the findings most relevant to the issue being addressed by this literature review regarding the relationship between home construction, increasing rents, and displacement.

Vicki Been, Ingrid Gould Ellen, and Katherine O’Regan, NYU University School of Law, NYU Wagner School, NYU Furman Center (Resource #8)

This 2019 article is not based on empirical research and data, but rather seeks to review arguments on both sides of the housing supply and demand debate questioning the premise that increasing the supply of market-rate housing will result in housing that is more affordable. The authors indicate that their intention is to take skeptics of this premise seriously, and assess a range of arguments associated with land-use regulations, housing supply, housing affordability, and effects of limiting housing supply. They seek to address a range of arguments typically made by supply skeptics and review what research has shown about housing supply and its effect on affordability. In so doing, they review many research papers and sort them by argument, one argument being that the only increase in housing supply that will help alleviate the affordable housing crisis is housing that is truly affordable to low-income and working-class people, i.e., this argument rejects the notion that building housing at one price point has any significant effect on the price of housing in other submarkets, or if it does,

⁵² Ibid.

⁵³ Ibid, page 91.

it takes decades for units to age and filter down to lower priced market segments.⁵⁴ Another argument among the many they address includes one wherein skeptics argue that “even if additional supply could help make housing more affordable in the short run, it won’t in the long run because the additional supply will induce more demand, especially among buyers or renters wealthier than the existing residents in the neighborhood.”⁵⁵

After giving a range of viewpoints fair consideration, across a range of arguments, and citing research findings about housing supply and its effect on affordability, the authors acknowledge that many of the arguments are plausible, and that research findings do not fully counter all of them. However, on the topic of housing production impacts on pricing, they cite:

“the preponderance of evidence suggests that easing barriers to new construction will moderate price increases and therefore make housing more affordable to low- and moderate-income families. Moreover, supply restrictions inhibit the ability of workers to move to areas with growing job opportunities. Allowing more new housing thus is critical both to ease affordability pressures and to reduce other negative results of constricted supply.”⁵⁶

While this finding is not spot on relative to the impact of market-rate apartment development, in comparison to other types of housing development, the authors further cite empirical research findings on filtering, citing findings from a study of low-income renters in the United States, where among affordable units in 2013, 19% had been higher rent units as recently as 2005, demonstrating that filtering noticeably accounted for increases to the supply of the affordable housing stock. To this, the authors concluded that “new construction is crucial for keeping housing affordable, even in markets where much of the new construction is itself high-end housing that most people can’t afford. A lack of supply to meet demand at the high end affects prices across submarkets and makes housing less affordable to residents in lower-cost submarkets.”⁵⁷ Finally, at the time these authors prepared their review, they specifically called out the preceding 2016 LAO study that addressed the link between market-rate construction and lower displacement rates, and indicated that the findings suggest “that for neighborhoods in high-demand cities, blocking market-rate construction may place greater pressures on the existing stock.”⁵⁸

To summarize, this study lands on the side of concluding that the existing body of research shows that additions to supply are critical to moderate price increases. Yet, as with most studies of this nature, it also concludes that more research on the topic is necessary, especially examining how changes in housing supply affect rents. Another topic that the study indicates requires more research pertains to concerns that new development will spur gentrification or local price or rent increases. This study suggests that while neighbors of proposed new developments fear displacement from rent increases, “there is little hard evidence of displacement.”⁵⁹ Thus, these authors suggest there are still many research gaps on topics

⁵⁴ Vicki Been, Ingrid Gould Ellen & Katherine O’Regan (2019) Supply Skepticism: Housing Supply and Affordability, *Housing Policy Debate*, 29:1, 25-40, DOI:, page 28.

⁵⁵ *Ibid*, page 29.

⁵⁶ *Ibid*, page 26.

⁵⁷ *Ibid*, page 29.

⁵⁸ *Ibid*, page 31.

⁵⁹ *Ibid*, page 34.

germane to the socioeconomic effects pertinent to 469 Stevenson Street that could benefit from further rigorous research.

W.E. Upjohn Institute (Resources #9 & #10)

July 2019 Study. Evan Mast of the Upjohn Institute prepared a working paper in July 2019 that explored the short-term impact of filtering in the housing market, with short-term defined as the three- to five-year timeframe rather than the decades more typically probed in academic research. Mast used data on household address histories in Chicago to examine a migration chain of household moves, including address history data of 52,000 residents of new multifamily buildings, to shed light on the effect of new market-rate housing on the market for lower-income housing. Among the several findings in Mast's study, one of the key findings indicated that new construction opens the housing market in low-income areas by reducing demand. A simulation model developed by Mast suggested that building 100 new market-rate units could "create 70 equivalent units in neighborhoods with household incomes below the metro area median, and 39 in neighborhoods with household incomes from the bottom fifth."⁶⁰ Mast further indicates this should open these housing markets and lower prices, all else being equal, although his study did not include direct estimation of these implied effects. Yet Mast believes his study findings have important policy implications, and he concludes that they suggest "that new construction reduces demand and loosens the housing market in low and middle-income areas, even in the short run."⁶¹ This type of finding suggests that development at 469 Stevenson Street and the Pipeline projects would not directly lead to increased pricing at other rental units, nor displacement of renters in existing units.

December 2019 Study. Building somewhat on Mast's July 2019 study, the December 2019 Upjohn Institute study prepared by Asquith, Mast, and Reed examines the local effects of new market-rate housing in low-income areas using microdata on large apartment buildings, rents, and migration. The study authors state that "Prior research has shown that new market-rate housing construction improves regional housing affordability, but there is little evidence on how it affects the immediately surrounding neighborhood."⁶² Thus, this study goes further than the earlier analysis by examining data on new construction of market-rate rental apartment buildings and outcomes for 11 major cities, examining rent trends in existing buildings near newer buildings after the new building completion, as well as in-migration from low-income areas.

Data on new market-rate apartment buildings were provided by Real Capital Analytics, and included 1,483 buildings with over 50 units completed in 2010-2019. The 11 major cities in the study's sample included Los Angeles, San Francisco, Seattle, and Portland, among others. Impacts on existing buildings were measured by census tract, defined for study purposes as a neighborhood. This study focused on buildings developed in low-income central city

⁶⁰ Evan Mast, "The Effect of New Market-Rate Housing Construction on the Low-Income Housing Market," Upjohn Institute Policy Briefs, July 23, 2019, page 4.

⁶¹ Evan Mast. "The Effect of New Market-Rate Housing Construction the Low-Income Housing Market," Upjohn Institute Working Paper 19-307. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research. July 1, 2019, Abstract.

⁶² Brian J. Asquith, Evan Mast, and Davin Reed. "Supply Shock Versus Demand Shock: The Local Effects of New Housing in Low-Income Areas." Upjohn Institute Working Paper 19-316. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research. December 19, 2019, page 21.

neighborhoods (defined for study purposes as median household incomes below the area median income), as the primary purpose of the study was to contribute to the literature on the effects of new housing supply in low-income areas, as they are perceived as the crux of the policy debate on gentrifying areas or areas of concern with rental price increases spurred by new construction. Rent effects were measured based on buildings completed in 2015 and 2016, to ensure the availability of a sufficient time period to study rental price impacts. The study impacts were analyzed for up to a three-year period. Zillow was the data source of rents in existing buildings. Migration effects were based on buildings completed in 2014 and 2015. Address data for migration analysis were obtained from Infutor Data Solutions.

The study included many statistical measures to control for biases in the data, such as controlling for builders choosing to develop in areas with rising incomes or rising rents. These are included in full detail in the paper. The findings reported in the study, based upon three different approaches to the analysis, indicate that new construction of 50+ unit market-rate apartment buildings reduces rents in nearby buildings by 5% to 7%. Buildings are considered nearby if they are within one or two city blocks (<250 meters). The control group of buildings, where the impact of rent changes was not analyzed relative to individual buildings, was located further away, within an 8- to 10-minute walk from each subject building (250-600 meters). This reduction, or negative effect was noted beginning in the same year as building completion, and noted to persist for at least the three years thereafter. Further, the authors conclude that "Contrary to common concerns, new buildings slow local rent increases rather than initiate or accelerate them."⁶³

As a corollary to the rental impact, this study also examined migration impacts, and found that "new buildings increase low-income in-migration, implying that improved affordability can foster more integrated, economic diverse neighborhoods that may provide low-income residents with greater economic mobility."⁶⁴ The authors suggest that apart from their implications for rent, the in-migration results suggest that "construction allows more low-income households to move to or remain in the sample neighborhoods, most of which appear to be gentrifying."⁶⁵

In conclusion, the authors state that they find that "the concerns that motivate opposition to new market-rate housing are mostly unfounded. While there is a strong observed correlation between new construction, rising rents, and demographic change, this is because new buildings are typically constructed in areas that are already changing. When these new buildings are completed, they actually slow rent increases and demographic change in the nearby area."⁶⁶ The authors further indicate that preventing the construction of new housing in a neighborhood attractive to higher-income households will not keep these households out of a neighborhood. Instead, such prevention will lead them to outbid lower-income households for whatever housing is already available in that neighborhood, thereby raising rents for everyone and lowering the ability of low-income households to stay in or move to the area. "By contrast, if new housing is built, many high-income households will choose this option instead of a nearby existing unit, reducing rent and out-migration pressures in the area."⁶⁷ Thus, the overall conclusion of this study is that contrary to common concerns, new residential building construction slows local rent increases rather than initiates or accelerates them.

⁶³ Ibid, Abstract, page 0.

⁶⁴ Ibid, page 22.

⁶⁵ Ibid, page 20.

⁶⁶ Ibid, page 22.

⁶⁷ Ibid.

Xiaodi Li, NYU Wagner and NYU Furman Center (Resource #11)

This study, first published by Xiaodi Li, an NYU PhD student in October 2019, was sponsored by Fannie Mae's Economic & Strategic Research Group.⁶⁸ The study, titled "Do New Housing Units in Your Backyard Raise Your Rents?," was designed to contribute to the debate on the topic addressing whether the production of new housing units helps or hurts nearby residents with respect to the impact of housing supply changes on housing cost burdens. Thus, this study was designed to answer the following questions:

- does new development relieve unmet local housing demand and thus reduce local housing costs; or
- does new housing supply attract high-income residents and new amenities, driving up prices and leading to gentrification and displacement?

This study was designed using a combination of data across New York City from 2003-2013 (from a 2000-2017 NYC Building Permit dataset), with the variables including new construction permits, certificates of occupancy, building rental income, housing sales, and new restaurants, among other variables. The study focused on examining the impact of new rental high-rise construction, defined as newly built market-rate residential properties with more than six floors, on surrounding area rents and unit sales prices of properties between 500 and 1,000 feet away. There are over 10,000 residential properties included in the dataset.

The results, based on econometric analysis, indicated that after building completion, rental income in nearby properties within 500 feet decreased 1.6% one year after the completion, "significantly and persistently."⁶⁹ This is in comparison to other areas lacking additions in new supply. Overall, the study found that "for every 10% increase in the housing stock, rents decrease 1% and sales prices also decrease within 500 feet."⁷⁰ This paper also explored the effect of new construction on the opening of new restaurants, cafes, and coffee shops within the 500 foot radius of the newly completed building. It found a positive amenity affect, with an increase in such openings, even while residential rents in existing buildings declined.

These study results are highly localized, as they are statistically significant only within 500 feet of the newly developed properties. This distance is relevant in the New York City market because of the density of construction in New York City. While properties may not be as close in San Francisco, thus limiting the transferability of the findings to San Francisco or other markets, the findings advance the literature, and are suggestive of useful direction for comparable research in other communities.

⁶⁸ Later citations appeared on other dates in other resources, including December 2019 and June 2020.

⁶⁹ Xiaodi Li, "Do New Housing Units in Your Backyard Rase Your Rents?", page 15.

⁷⁰ Ibid, page 0.

APPENDIX D: GENTRIFICATION AND DISPLACEMENT LITERATURE OVERVIEW

IDENTIFIED REPRESENTATIVE LITERATURE

ALH Economics reviewed numerous papers, articles, or book chapters that address gentrification and residential displacement. While there are many papers or articles that are germane to the question of the relationship between the two phenomena, ALH Economics identified 12 that provide a solid overview and analysis of the subject by leading experts in the field as well as a representative sampling and discussion of other papers and associated commentaries. In some cases, the most relevant portion of the paper is the literature review, as this portion summarizes numerous other studies that also grapple with the question of the relationship between gentrification and displacement. In order of publication date, the specific papers reviewed herein for this purpose (and document links), include the following:

1. Lance Freeman and Frank Braconi, "Gentrification and Displacement: New York City in the 1990s", *American Planning Association. Journal of the American Planning Association*; Winter 2004; 70, 1; ProQuest Direct Complete, page 39.
<http://www.astudentoftherealestategame.com/wp-content/uploads/2010/09/Freeman%2520and%2520Braconi%25202004%2520Gentrification%2520in%2520NY.pdf>
2. Terra McKinnish, Randall Walsh, Kirk White. "Who Gentrifies Low-Income Neighborhoods?" National Bureau of Economic Research Working Paper 1403 (May 2008).
<http://www.nber.org/papers/w14036>
3. Ingrid Gould Ellen, Katherine M. O'Regan, "How Low Income Neighborhoods Change: Entry, Exit, and Enhancement," *Regional Science and Urban Economics*, Volume 41, Issue 2 (March 2011).
<http://www.sciencedirect.com/science/article/pii/S0166046211000044> (abstract)
4. Silva Mathema, "Gentrification: An Updated Literature Review," Poverty & Race Research Action Council (October 2013).
http://prrac.org/pdf/Gentrification_literature_review_-_October_2013.pdf
5. Harvard University, Kennedy School of Government, Shorenstein Center on Media Politics and Public Policy, "Gentrification, Urban Displacement and Affordable Housing: Overview and Research Roundup," (August 2014).
<http://journalistsresource.org/studies/economics/real-estate/gentrification-urban-displacement-affordable-housing-overview-research-roundup>
6. Joe Cortright, "How Governing got it wrong: The problem with confusing gentrification and displacement," *Cityobservatory.org* Commentary (June 2, 2015).
<http://cityobservatory.org/how-governing-got-it-wrong-the-problem-with-confusing-gentrification-and-displacement/> [comments on *Governing Magazine*, "The 'G' Word: A Special Series on Gentrification" (February 2015)
<http://www.governing.com/topics/urban/gov-gentrification-series.html>]

7. Richard Florida, "The Complicated Link Between Gentrification and Displacement," *Citylab* (Atlantic Magazine), September 8, 2015.
<http://www.citylab.com/housing/2015/09/the-complicated-link-between-gentrification-and-displacement/404161/>
8. University of California, Berkeley, "Urban Displacement Project," (funded by the U.S. Department of Housing and Urban Development for the Bay Area Regional Prosperity Plan and the California Air Resources Board) (December 2015).
http://www.urbandisplacement.org/sites/default/files/images/urban_displacement_project_-_executive_summary.pdf
9. Miriam Zuk, Karen Chapple, "Housing Production, Filtering and Displacement: Untangling the Relationships," University of California, Berkeley, Institute of Governmental Studies Research Brief (May 2016).
http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf
10. Lei Ding, Jackelyn Hwang, Eileen Divringi, "Gentrification and Residential Mobility in Philadelphia," Discussion Paper: Federal Reserve Bank of Philadelphia, (September 2016).
https://www.philadelphiafed.org//media/communitydevelopment/publications/discussion-papers/discussion-paper_gentrification-and-residential-mobility.pdf?la=en
11. Derek Hyra, "Commentary: Causes and Consequences of Gentrification and the Future of Equitable Development Policy," *Cityscape*, Volume 18, Number 3, Office of Policy Development and Research, U.S. Department of Housing and Urban Development, pp. 169-177 (November 2016).
<https://www.huduser.gov/portal/periodicals/cityscpe/vol18num3/index.html>
12. Sue Easton, Loretta Lees, Phil Hubbard, and Nicholas Tate, "Measuring and mapping displacement: The problem of quantification in the battle against gentrification," *Urban Studies*, 2020 Vol. 57(2) 286-306.
<https://journals.sagepub.com/doi/full/10.1177/0042098019851953>

As noted, there are many other studies and articles that analyze gentrification and displacement, and seek to find a relationship between the two phenomena. A number of these other studies were reviewed, including materials more recent than some of those cited, but they were not found to advance the thinking or the research findings of the resources reflected in this document. The cited articles, with summary reviews following, are considered a representative sampling of some of these papers and associated commentaries.

REPRESENTATIVE LITERATURE REVIEW

The 12 representative articles are summarized below, in order of their publication. In many cases, excerpts are provided directly from the studies, as this comprises the most succinct and direct method of presenting the study findings. It should be noted that much of the concern in the literature regarding gentrification pertains to impacts on lower-income or disadvantaged households and/or ethnic minorities, and thus the findings are often presented in this context. Accordingly, these findings may not be directly transferable residential districts such as South of Market or Downtown, lacking these characteristics. However, in the absence of studies conducted more specific to these types of neighborhoods, the following studies provide

general insight into what the academic community is finding regarding the relationship between gentrification and displacement.

1. Lance Freeman, Columbia University, and Frank Braconi, then Executive Director of Citizen Housing and Planning Council, New York City, 2004.

This article is one of the most oft-cited papers in the literature about gentrification and displacement. It was authored in 2004 by Lance Freeman, Ph.D., then Assistant Professor in the Urban Planning Department of the Graduate School of Architecture, Planning, and Preservation at Columbia University, and Frank Braconi, then Executive Director of the Citizen Housing and Planning Council in New York City, a nonpartisan policy research organization focusing on housing, planning, and economic development issues in city, state, and federal politics.

This paper presents findings on a study of gentrification and displacement in New York City in the 1990s. Freeman and Braconi conducted the study to advance the research findings on the relationship between residential displacement and gentrification, citing various results from prior studies with disparate and inconclusive findings regarding the relationship between the two phenomena. Using New York City as their subject, Freeman and Braconi set out to study the following:

“To discern how gentrification is related to displacement, we examined the relationship between residence in a gentrifying neighborhood and residential mobility among disadvantaged households. If gentrification increases displacement, all other things being equal, we should observe higher mobility rates among disadvantaged households residing in gentrifying neighborhoods than among those residing elsewhere in the city.”⁷¹

The statistical analysis completed by Freeman and Braconi included many variables on housing and demographic characteristics, as well as neighborhood classifications. There are many findings from this study, with some particularly germane to San Francisco, given the market presence of rent control, in both New York City and San Francisco. Some of the verbatim findings of the study, are as follows:

- “Rent stabilization is by far the more common form of rent regulation in New York City. Our results indicate that poor tenants in such units are insignificantly less likely to exit than those in unregulated units. Rent stabilization does appear, however, to substantially reduce the odds that a less-educated household will move from their dwelling unit during any given time period. We also tested in our regressions a variable interacting residence in a rent-regulated unit and in a gentrifying area and found that it was not significant. This indicates that while rent regulation tends to decrease tenant mobility, it does not do so more in gentrifying areas than in others.”⁷²

⁷¹ Lance Freeman and Frank Braconi, “Gentrification and Displacement: New York City in the 1990s”, American Planning Association. Journal of the American Planning Association, Winter 2004, page 42.

⁷² Ibid, page 45.

- “We found that increases in rent are indeed related to the probability of a household moving. But as was the case with the seven gentrifying neighborhoods, these increases were associated with a *lower* probability of moving rather than a higher one.”⁷³
- “Gentrification has typically been depicted as a process of higher socioeconomic households displacing disadvantaged households. Indeed, some have defined gentrification as this type of displacement... The assumption behind this view is that displacement is the principal mechanism through which gentrification changes the socioeconomic character of a neighborhood. The results presented here, ..., suggest that a rethinking of the gentrification process is in order. Insofar as many of the other reasons people change residence (marriage or divorce, change of job, want a bigger unit, want to own, etc.) would not be expected to diminish as their neighborhood gentrifies, the reduced mobility rates we find in gentrifying neighborhoods are inconsistent with a process dependent on the massive displacement of disadvantaged residents. Rather, demographic change appears to occur primarily through normal housing succession and may even be slowed by a below-normal rate of exit by existing residents.”⁷⁴

There are other findings of this and subsequent studies on gentrification by Freeman. Some of these findings are included in the summaries below of other studies, many of which include literature reviews. However, in their conclusion, Freeman and Braconi state the following:

“Our analysis indicates that rather than speeding up the departure of low-income residents through displacement, neighborhood gentrification in New York City was actually associated with a lower propensity of disadvantaged households to move. These findings suggest that normal housing succession is the primary channel through which neighborhood change occurs. Indeed, housing turnover may actually be slowed by the reduced mobility rates of lower-income and less-educated households. The most plausible explanation for this surprising finding is that gentrification brings with it neighborhood improvements that are valued by disadvantaged households, and they consequently make greater efforts to remain in their dwelling units, even if the proportion of their income devoted to rent rises.”⁷⁵

2. Terra McKinnish, University of Colorado at Boulder; Randall Walsh, University of Colorado at Boulder; and Kirk White, Duke University, 2008

In May 2008, three academics prepared a working paper for the National Bureau of Economic Research. These academics include Terra McKinnish, Ph.D., Professor of Economics at the University of Colorado at Boulder, Randall Walsh, Ph.D., Assistant Professor of Economics at the University of Colorado at Boulder (now Associate Professor of Economics at University of Pittsburgh, Department of Economics), and Kirk White, Ph.D., now Economist in the Business Economic Research Group, Center for Economic Studies (formerly of the USDA and US Census Bureau).

This paper uses confidential Census data, specifically the 1990 and 2000 Census Long Form data, to study the demographic processes underlying the gentrification of low-income urban neighborhoods during the 1990's. In contrast to previous studies, the analysis is conducted at

⁷³ Ibid, page 48.

⁷⁴ Ibid.

⁷⁵ Ibid, page 51.

the more refined census-tract level with a narrower definition of gentrification and more closely matched comparison neighborhoods. The analysis is also richly disaggregated by demographic characteristic, uncovering differential patterns by race, education, age, and family structure that would not have emerged in the more aggregate analysis in previous studies. The areas included in the study were the 72 Consolidated Metropolitan Statistical Areas in the United States with populations of at least 500,000 in 1990, and thus includes a national sample.

The results provide no evidence of disproportionate displacement of low-education or minority householders in gentrifying neighborhoods.⁷⁶ But the study did find evidence that gentrifying neighborhoods disproportionately retain black householders with a high school degree. More specifically, "The bulk of the increase in average family income in gentrifying neighborhoods is attributed to black high school graduates and white college graduates. The disproportionate retention and income gains of the former and the disproportionate in-migration of the latter are distinguishing characteristics of gentrifying U.S. urban neighborhoods in the 1990's."⁷⁷

This paper also included a literature review, with the authors citing that the literature most related to their study is that pertaining to the link between gentrification and out-migration in low-income neighborhoods. For this purpose, they review three specific studies, pertaining to 2002 analysis of Boston by Vigdor, a 2004 study by Freeman and Braconi in New York City, and a 2005 analysis by Freeman of a sample of U.S. neighborhoods. Of the Vigdor study, the authors state "He finds no evidence that low-income households are more likely to exist the current housing unit if they are located in a gentrifying zone."⁷⁸ Of the Freeman and Braconi study they cite that "Identifying seven neighborhoods in Manhattan and Brooklyn that gentrified during the 90's, they find that low-income households in the gentrifying neighborhoods were less likely to move than low-income households in non-gentrifying neighborhoods."⁷⁹ Finally, of the 2005 Freeman study, which extended the preceding work to a sample of U.S. neighborhoods, and thus required a broader definition of gentrification for study purposes, they state "He gain finds little evidence that gentrification is associated with displacement of low-income households."⁸⁰ Thus, in conclusion regarding this portion of their literature review, the authors cite the following: "This literature investigates whether there is empirical evidence to support the widely held belief that gentrification causes the displacement of low-income minorities from their neighborhoods. The most recent studies, although constrained by data limitations, find little evidence of displacement."⁸¹

3. Ingrid Gould Ellen and Katherine M. O'Regan, NYU, Wagner Graduate School and Furman Center, 2011

In March 2011 Ingrid Gould Ellen, Ph.D., and Katherine M. O'Regan, Ph.D., published an article on gentrification and displacement in the journal *Regional Science and Urban Economics*. At the time, Ellen was the Paulette Goddard Professor of Urban Policy and Planning and Director of the Urban Planning Program, NYU and O'Regan was Professor of Public Policy and Planning at NYU's Wagner Graduate School of Public Service (Regan is now Assistant Secretary for Policy Development and Research at the U.S. Department of Housing and Urban Development). The research in this paper was conducted while the authors were Special

⁷⁶ Terra McKinnish, Randall Walsh, Kirk White. "Who Gentrifies Low-Income Neighborhoods?" National Bureau of Economic Research, Working Paper 1403, May 2008, page 3.

⁷⁷ Ibid, page 2.

⁷⁸ Ibid, page 4.

⁷⁹ Ibid.

⁸⁰ Ibid, page 5.

⁸¹ Ibid, page 4.

Sworn Status researchers of the U.S. Census Bureau at the New York Census Research Data Center.

The purpose of this paper was to examine whether the economic gains experienced by low-income neighborhoods in the 1990s followed patterns of classic gentrification, i.e., through the in-migration of higher income white, households, and out migration (or displacement) of the original lower income, usually minority residents, spurring racial transition in the process.⁸² An abstract of this paper, published on-line, cites the following summary finding:

“Using the internal Census version of the American Housing Survey, we find no evidence of heightened displacement, even among the most vulnerable, original residents. While the entrance of higher income homeowners was an important source of income gains, so too was the selective exit of lower income homeowners. Original residents also experienced differential gains in income and reported greater increases in their satisfaction with their neighborhood than found in other low-income neighborhoods. Finally, gaining neighborhoods were able to avoid the losses of white households that non-gaining low income tracts experienced, and were thereby more racially stable rather than less.”

Further, as cited in the study findings, Ellen and O’Regan state:

“The picture our analyses paint of neighborhood change is one in which original residents are much less harmed than is typically assumed. They do not appear to be displaced in the course of change, they experience modest gains in income during the process, and they are more satisfied with their neighborhoods in the wake of the change. To be sure, some individual residents are undoubtedly hurt by neighborhood change; but in aggregate, the consequences of neighborhood change — at least as it occurred in the 1990s — do not appear to be as dire as many assume.”⁸³

4. Silva Mathema, Poverty & Race Research Action Council, 2013

In October 2013, while a Research Associate with the Poverty & Race Research Action Council in Washington, D.C., Silva Mathema, Ph.D., prepared an updated literature review on gentrification, with a focus on the theories and realities of gentrification. Upon reviewing close to 30 cited papers on many aspects of gentrification, Mathema provides the following summary of recent gentrification research:

“Some studies have found little to no evidence of gentrification-induced displacement and laud gentrification for promoting urban revival and development (Betancur 2011). Using American Housing Survey’s data on residential turnover, Ellen and O’Regan (2011) did not find increased displacement of vulnerable original residents in neighborhoods that experienced large economic gains during the 1990s. They also did not observe any drastic change in racial composition of the neighborhoods in the 1990s. This finding is significant because gentrification is usually associated with exodus of low-income minority residents from transitioning neighborhoods. In fact, there was increase in level of neighborhood satisfaction among original residents in growing neighborhoods. Similarly, Freeman’s (2009) research suggests that

⁸² <http://www.sciencedirect.com/science/article/pii/S0166046211000044>.

⁸³ See paper excerpt cited in: <https://journalistsresource.org/studies/economics/real-estate/gentrification-urban-displacement-affordable-housing-overview-research-roundup>

gentrification does not impact neighborhood level diversity negatively. Likewise, McKinnish (2010), analyzing the census tract data, found no evidence of displacement among minority households in gentrifying neighborhoods. In fact, he suggested that these diverse neighborhoods were attractive to middle class black families who were likely to move into these areas.”⁸⁴

Mathema concludes by recognizing that gentrification has received renewed attention from policymakers, and states that localities experiencing such transformations will “need to be cognizant of the main players, the state of gentrification, and historical and racial context of the neighborhood, to be able to design programs that aim to promote social justice and equitable development in the gentrifying neighborhoods.”⁸⁵

5. Harvard Shorenstein Center Project, 2014

In 2014 the Harvard Shorenstein Center Project published an overview and research roundup on gentrification, urban displacement, and affordable housing. The roundup includes an overall summary of the literature prepared by the Center along with links and synopses of a selection of eight studies on gentrification and its effects, a few of which included analysis of displacement.

The Center’s overall summary references that the first longitudinal studies quantifying trends in gentrification generally found that low-income resident displacement due to gentrification was limited. They state the following about Lance Freeman’s 2005 study:

“In 2005, Lance Freeman of Columbia University published an influential nationwide study that found that low-income residents of gentrifying urban neighborhoods were only slightly more likely to leave than those in non-gentrifying neighborhoods — 1.4% versus a 0.9%.”⁸⁶

They further indicated, however, that in 2008 Freeman indicated that more research was needed, and that “The empirical evidence [on gentrification] is surprisingly thin on some questions and inconclusive on others.”⁸⁷

This roundup cites other study findings, such as the following:

- “Recent studies of neighborhood change have examined other effects of gentrification on low-income residents. Research published in 2010 and 2011 found evidence that gentrification could boost income for low-income residents who remained and also raised their level of housing-related satisfaction.
- Even if the proportion of low-income residents displaced by gentrification is low, research indicates that the aggregate number displaced can be high and the consequences of displacement particularly harmful. A 2006 study estimated that about

⁸⁴ Silva Mathema, “Gentrification: An updated Literature Review,” Poverty & Race Research Action Council, October 2013, page 3.

⁸⁵ Ibid, page 5.

⁸⁶ Harvard University, Kennedy School of Government, Shorenstein Center on Media Politics and Public Policy, “Gentrification, Urban Displacement and Affordable Housing: Overview and Research Roundup,” August 2014.

⁸⁷ Ibid.

10,000 households were displaced by gentrification each year in New York City. Follow-up interviews found that among those displaced, many ended up living in overcrowded apartments, shelters or even became homeless.”⁸⁸

These somewhat contrary statements indicate the literature is at odds, with limited definitive results. Toward this end, the roundup states:

“The major studies on gentrification share several important limitations: They have not consistently examined the fate of displaced low-income residents; they do not look at the effects of gentrification over multiple decades; and most use data from the 1980s and 1990s — preceding major increases in rental prices throughout the 2000s and before the Great Recession. There is also no consensus on how to measure gentrification, so existing studies may be missing important demographic transitions in U.S. neighborhoods.”⁸⁹

6. Joseph Cortwright, City Commentary, cityobservatory.org, 2015

Economic Analyst Joseph Cortright, President and Principal Economist of Impresa, a Portland-based consulting firm specializing in metropolitan economies, knowledge-based industries, and education policy, recently authored an on-line commentary addressing the confusion between gentrification and displacement. This commentary was in response to a series on gentrification published by *Governing Magazine* in February 2015.

In his commentary, Cortright states that:

“There’s precious little evidence that there has been, in the aggregate, any displacement of the poor from the neighborhoods *Governing* flags as “gentrifying.” If there were displacement, you’d expect the number of poor people in these neighborhoods to be declining. In fact, nationally, there are more poor people living in the neighborhoods that they identify as “gentrifying” in 2013 than there were in 2000. *Governing’s* gentrifying neighborhoods have gained poor AND nonpoor residents according to Census data. And even after “gentrifying,” these neighborhoods still have higher poverty rates, on average, than the national average.

Careful academic studies of gentrifying neighborhoods, by Columbia’s Lance Freeman and the University of Colorado’s Terra McKinnish, show that improving neighborhoods actually do a better job of hanging on to previous poor and minority residents than poor neighborhoods that don’t improve. The University of Washington’s Jacob Vigdor has estimated that even when rents go up, existing residents generally attach a value to neighborhood improvements that more than compensates for the higher costs.”⁹⁰

Cortright further addresses other study findings, pertaining to poverty and gentrification, but these are separate from the discussion regarding the relationship between displacement and gentrification.

⁸⁸ Ibid.

⁸⁹ Ibid.

⁹⁰ Joe Cortright, “How *Governing* got it wrong: The problem with confusing gentrification and displacement,” *Cityobservatory.org* Commentary, June 2, 2015.

7. Richard Florida, Martin Prosperity Institute at the University of Toronto, and Global Research Professor at New York University, 2015

Richard Florida, Ph.D., Professor of Business and Creativity, Rotman School of Management, University of Toronto, authored a commentary on gentrification and displacement in 2015 in *CityLab*, an on-line publication of *The Atlantic Magazine*. This commentary pertains to an August 2015 review of gentrification, displacement, and the role of public investment, published by the Federal Reserve Bank of San Francisco, and authored by academics from UC Berkeley and UCLA, but also includes summaries of other study findings regarding gentrification and displacement. Florida begins by citing some of the findings of Lance Freeman of Columbia University, including the first study cited in this section. Florida states the following about Freeman's work:

"Perhaps the foremost student of gentrification and displacement is Lance Freeman of Columbia University. His 2004 study with Frank Braconi found that poor households in gentrifying neighborhoods of New York City were less likely to move than poor households in non-gentrifying neighborhoods. This of course may have to do with the fact that there are less poor households in gentrifying neighborhoods to begin with. Still, the authors concluded that "a neighborhood could go from a 30% poverty population to 12% in as few as 10 years without any displacement whatsoever." In a subsequent 2005 study, Freeman found that the probability that a household would be displaced in a gentrifying neighborhood was a mere 1.3 percent. A follow-up 2007 study, again with Braconi, examined apartment turnover in New York City neighborhoods and found that the probability of displacement declined as the rate of rent inflation increased in a neighborhood. Disadvantaged households in gentrifying neighborhoods were actually 15 percent less likely to move than those in non-gentrifying households.

And, in a 2009 study, Freeman found that gentrifying neighborhoods are becoming more racially diverse by tracking neighborhood change from 1970-2000 (although he does note that cities overall are becoming more diverse as well). Freeman also discovered that changes in educational diversity were the same for both gentrifying and non-gentrifying areas. Ultimately, while some residents were displaced from 1970-2000, gentrifying neighborhoods were generally more diverse when it came to income, race, and education as opposed to non-gentrifying neighborhoods."⁹¹

Florida also references findings that suggest gentrification can reduce displacement. Specifically, he states:

"Counterintuitively, several studies have even found that gentrification can in some cases reduce displacement. Neighborhood improvements like bars, restaurants, waterfronts, or extended transit can and sometimes do encourage less advantaged households to stay put in the face of gentrification. A 2006 study found that displacement accounted for only 6 to 10 percent of all moves in New York City due to housing expenses, landlord harassment, or displacement by private action (e.g. condo conversion) between 1989 and 2002. A 2011 study concluded that neighborhood income gains did not significantly predict household exit rates. What did predict

⁹¹ Richard Florida, "The Complicated Link Between Gentrification and Displacement," *Citylab* (*Atlantic Magazine*), September 8, 2015.

outmigration was age, minority status, selective entry and exit, and renting as opposed to buying.”⁹²

In further discussing study findings, Florida cites that “Indeed, displacement is becoming a larger issue in knowledge hubs and superstar cities, where the pressure for urban living is accelerating. These particular cities attract new businesses, highly skilled workers, major developers, and large corporations, all of which drive up both the demand for and cost of housing. As a result, local residents - and neighborhood renters in particular - may feel pressured to move to more affordable locations.” This Florida comment followed general reference to findings from the Urban Displacement Project at UC Berkeley, which has authored many articles about gentrification, and sought to develop indicators that would identify census tracts in the Bay Area that are at risk of displacement and/or gentrification. In particular, Florida provides a link to a paper written by one of his colleagues, which seeks to distill some of the Urban Displacement Project findings (see <http://www.citylab.com/housing/2015/08/mapping-gentrification-and-displacement-in-san-francisco/402559/>). The author of this document, Tanvi Misra, who is a CityLab colleague of Florida’s, summarizes Karen Chapple of the Urban Displacement Project’s findings as follows, demonstrating the complex relationship between gentrification and displacement:

“Displacement can be physical (as building conditions deteriorate) or economic (as costs rise). It might push households out, or it might prohibit them from moving in, called exclusionary displacement. It can result from reinvestment in the neighborhood — planned or actual, private or public — or disinvestment.

Thus, displacement is often taking place with gentrification nowhere in plain sight. In fact, stable neighborhoods at both the upper and lower ends of the income spectrum are experiencing displacement.”⁹³

See a review below regarding some of the findings from the Urban Displacement Project.

8. University of California, Berkeley, Urban Displacement Project, 2015

The Urban Displacement Project at the University of California at Berkeley is research and action initiative of UC Berkeley in collaboration with researchers at UCLA, community based organizations, regional planning agencies and the State of California’s Air Resources Board. The project aims to understand the nature of gentrification and displacement in the Bay Area and Southern California. The studies prepared by this project have spawned a great many papers, both by the Urban Displacement Project and by others commenting on its findings and analyzing its datasets. This paper, in particular, is an Executive Summary including a succinct literature review, summary of case studies, brief comment on anti-displacement policy analysis, and summary methodology overview. This paper states that “As regions across California plan for and invest in transit oriented development, in part as a response to SB 375 and the implementation of their Sustainable Communities Strategies, communities are increasingly concerned about how new transit investment and related new development will affect the lives of existing residents, particularly low-income communities of color.”⁹⁴ Thus, the

⁹² Ibid.

⁹³ See <http://www.citylab.com/housing/2015/08/mapping-gentrification-and-displacement-in-san-francisco/402559/>.

⁹⁴ University of California, Berkeley, “Urban Displacement Project,” December 2015, page 1.

Urban Displacement Project “analyzed the relationship between transit investment and neighborhood change, identifying factors that place neighborhoods at risk of displacement and mapping Bay Area neighborhoods according to levels of risk.”⁹⁵

The Urban Displacement Project defines gentrification as the influx of capital and higher-income, higher-educated residents into working-class neighborhoods, and says it has already transformed about 10% of Bay Area neighborhoods, with displacement, which can be physical or economic, occurring in 48% of Bay Area neighborhoods.⁹⁶ The Urban Displacement Project indicates that displacement, whether physical or economic, may result from disinvestment as well as investment, and thus is often taking place in the absence of visible gentrification.

This paper cites several key study findings from the Urban Displacement Project.

- Regionally, there has been a net gain in 94,408 low-income households between 2000 and 2013. However, there has been a concurrent loss of almost 106,000 naturally-occurring affordable housing units (where low-income people pay 30% or less of their income on rent).
- More than half of low-income households, all over the nine-county region, live in neighborhoods at risk of or already experiencing displacement and gentrification pressures.
- The crisis is not yet half over: More tracts are at risk of displacement in the future compared to those already experiencing it (in other words, the number of tracts at risk of displacement are 123% higher than the numbers already experiencing it).
- Still, more than half of neighborhoods in the nine-county Bay Area are quite stable, or just becoming poorer.
- In low-income areas, this is due to a combination of subsidized housing production, tenant protections, rent control and strong community organizing.
- Displacement extends far beyond gentrifying neighborhoods: The Bay Area’s affluent neighborhoods have lost slightly more low-income households than have more inexpensive neighborhoods – a story of exclusion.
- We are losing “naturally occurring” affordable housing in neighborhoods often more quickly than we can build new housing.
- There is no clear relationship or correlation between building new housing and keeping housing affordable in a particular neighborhood.⁹⁷

Notably, this paper identifies “exclusionary displacement” as what occurs when households are prohibited from moving in.

Beyond these key findings, this Executive Summary includes a summary literature review. This literature review does not shed much light on the question of displacement’s relationship to gentrification, other than citing that despite analytic challenges in measuring displacement, “most studies agree that gentrification at a minimum leads to exclusionary displacement and may push out some renters as well.”⁹⁸ However, this paper provides a few comments on case studies performed for nine Bay Area neighborhoods, and presents these additional findings (among others):

⁹⁵ Ibid.

⁹⁶ Ibid.

⁹⁷ Ibid, page 2.

⁹⁸ Ibid, page 3.

- Gentrification may not precede displacement. Gentrification is often assumed to be a precursor to residential displacement, yet in many of our cases we found that displacement precedes gentrification and that the two processes are often occurring simultaneously.
- Gentrification and displacement are regional. Although gentrification and displacement are often seen as a neighborhood or local phenomenon, our cases show that they are inherently linked to shifts in the regional housing and job market.
- Despite continued pressures and much anxiety, many neighborhoods that expected to be at risk of displacement — such as East Palo Alto, Marin City and San Francisco’s Chinatown — have been surprisingly stable, at least until 2013, the most recent year with available data. This is likely due to a combination of subsidized housing production, tenant protections, rent control and strong community organizing.
- Policy, planning and organizing can stabilize neighborhoods. Many of the cases have shown remarkable stability, largely due to strengths of local housing policy, community organizing, tenant protections and planning techniques.

This Executive Summary concludes with the following statement: “Even though many Bay Area neighborhoods are at risk of displacement or exclusion, such change is not inevitable. Subsidized housing and tenant protections such as rent control and just-cause eviction ordinances are effective tools for stabilizing communities, yet the regional nature of the housing and jobs markets has managed to render some local solutions ineffective.”⁹⁹

9. Miriam Zuk and Karen Chapple, University of California, Berkeley, Institute of Governmental Studies, 2016

This research brief provides a summary of research into the relationship between housing production, filtering, and displacement based on analysis of an extensive dataset for the San Francisco Bay Area developed by the Urban Displacement Project at UC Berkeley. It was prepared by Zuk, Ph.D., Director and Senior Researcher, and Chapple, Ph.D., Professor of City and Regional Planning, both with the Center for Community Innovation at UC Berkeley’s Institute of Governmental Studies. The study’s findings regarding the impacts of market rate housing production on housing costs are discussed in a separate chapter in this report (see Chapter V. Housing Production Impacts on Housing Costs). However, the findings in this article also have relevancy to the question of the relationship between gentrification and displacement.

To the extent that new housing development can be construed as gentrification, the summary findings of this study are as follows:

- “At the regional level, both market-rate and subsidized housing reduce displacement pressures, but subsidized housing has over double the impact of market-rate units.
- Market-rate production is associated with higher housing cost burden for low-income households, but lower median rents in subsequent decades.

⁹⁹ Ibid, page 4.

- At the local, block group level in San Francisco, neither market-rate nor subsidized housing production has the protective power they do at the regional scale, likely due to the extreme mismatch between demand and supply. Although more detailed analysis is needed to clarify the complex relationship between development, affordability, and displacement at the local scale, this research implies the importance of not only increasing production of subsidized and market-rate housing in California's coastal communities, but also investing in the preservation of housing affordability and stabilizing vulnerable communities."¹⁰⁰

In brief, this study appears to conclude that at the local level in San Francisco, the relationship between gentrification and displacement is indeterminate, and deserving of additional analysis to best probe the relationship.

10. Lei Ding, Federal Reserve Bank of Philadelphia, Jackelyn Hwang, Princeton University, and Eileen Divringi, Federal Reserve Bank of Philadelphia, 2016

This academic paper was prepared for the Federal Reserve Bank of Philadelphia in September 2016 by the following authors: Lei Ding, Ph.D., Community Development Economic Advisor, Community Development Studies & Education Department of the Federal Reserve Bank of Philadelphia; Jackelyn Hwang, Ph.D., Postdoctoral Research Fellow at Princeton University (forthcoming Assistant Professor of Sociology at Stanford University, September 2017); and Eileen Divringi, Community Development Research Analyst in the CDS&E Department of the Federal Reserve Bank of Philadelphia.

This paper also includes an extensive literature review section, with a topic specifically focused on gentrification and residential displacement, siting that residential displacement has been a central point of contention surrounding gentrification. In framing the review, the authors state:

"As neighborhoods gentrify and new residents of a higher socioeconomic status relative to incumbent residents move in and housing values and rents rise, housing and living costs may lead less advantaged incumbent residents to move out of the neighborhood against their will. Most existing studies on the population composition of gentrifying neighborhoods find that demographic changes take place at the aggregate neighborhood level. This implies that long-term, less advantaged residents are indeed moving out of the neighborhood. Further, anecdotal accounts show that residents move out of gentrifying neighborhoods by choice or through eviction as landlords increase rents, property taxes increase as local home values and rents rise, or because developers offer existing residents relatively large cash sums and then renovate the properties for larger profits (Newman and Wyly, 2006; Freeman, 2005). Few studies, however, have examined the moves of individual residents in gentrifying neighborhoods to support this."¹⁰¹

The authors then proceed to review approximately ten studies exploring different aspects of the issue, many of which were cited by other authors reviewed above, as well as in this current

¹⁰⁰ Miriam Zuk, Karen Chapple, "Housing Production, Filtering and Displacement: Untangling the Relationships," University of California, Berkeley, Institute of Governmental Studies Research Brief May 2016, page 1.

¹⁰¹ Lei Ding, Jackelyn Hwang, Eileen Divringi, "Gentrification and Residential Mobility in Philadelphia," Discussion Paper: Federal Reserve Bank of Philadelphia, September 2016, page 3.

analysis. While each study has its strengths and weaknesses, and unique data constraints, the authors conclude this literature review by stating:

“Overall, existing studies generally do not find evidence of elevated rates of mobility among less advantaged residents compared with similar residents in low-income neighborhoods that do not gentrify. The findings suggest that residential moves from gentrifying neighborhoods reflect normal rates of housing turnover among less advantaged residents and that the neighborhood-level demographic changes are largely due to the in-migration of high socioeconomic status residents.”

Some of the perceived weaknesses in these studies, or alternate explanations for not detecting higher mobility rates, are among the reasons the authors conducted their study, examining residential mobility in Philadelphia from 2002 – 2014. As noted by the authors in the study conclusions:

“This case study of Philadelphia leverages a unique data set to shed light on the heterogeneous consequences of gentrification on residential mobility patterns. Our findings contribute to debates on gentrification and displacement by uncovering important nuances of residential mobility associated with the destinations of movers, vulnerable subpopulations, the pace of gentrification, and economic cycles. Previous studies have not explored these important dimensions of gentrification nor have they examined these patterns as gentrification has grown and expanded relative to its past since the late 1990s.

We find that gentrifying neighborhoods in Philadelphia, especially those in the more advanced stages of gentrification, have higher mobility rates on average compared with nongentrifying neighborhoods, but these movers are more likely to be financially healthier residents moving to higher-quality neighborhoods. Consistent with other recent studies of mobility and gentrification (Ellen and O’Regan, 2011; Freeman, 2005; McKinnish et al., 2010), we generally do not find that more vulnerable residents in gentrifying neighborhoods have elevated rates of mobility. As discussed earlier, Philadelphia has a number of distinct features that may mitigate the pace of residential displacement, such as its high vacancy rates and property tax assessment practices. It is also possible that displacement among vulnerable residents has not yet occurred during the study period or could be better observed when more comprehensive data are available. The slightly higher mobility rates among low-score residents in neighborhoods already in the more advanced stages of gentrification lend support for this. It is also possible that we do not observe displacement occurring within census tracts, but, if this is the case, localized moves, though still costly, among vulnerable residents in gentrifying census tracts may have less negative consequences for these residents who would still be proximate to the increased amenities that come with gentrification (McKinnish et al., 2010).

When more vulnerable residents move from gentrifying neighborhoods, however, they are more likely than their counterparts in nongentrifying neighborhoods to move to neighborhoods with lower incomes than the neighborhoods from where they move. These results suggest that gentrification redistributes less advantaged residents into less advantaged neighborhoods, contributing to the persistence of neighborhood disadvantage. Therefore, even though we do not observe higher mobility rates among

these groups, the results still demonstrate that gentrification can have negative residential consequences for these subpopulations.”¹⁰²

11. Derek Hyra, American University, 2016

In this paper published in November 2016, Hyra, Ph.D., an Associate Professor in the Department of Public Administration and Policy at American University, cites that the causes and consequences of gentrification, e.g., an influx of upper-income people to low-income areas, are complex and multilayered.¹⁰³ He further states that perhaps the most controversial gentrification topic is its residential displacement consequences.¹⁰⁴ However, he cites that there is near empirical consensus that “mobility rates among low-income people are equivalent in gentrifying versus more stable low-income neighborhoods.”¹⁰⁵ In supporting this statement he cites no less than six studies conducted between 2004 and 2015 (several of which are also cited herein). Hyra believes this should not be interpreted as evidence gentrification is not related to a shrinking supply of affordable housing units, but rather that low-income people tend to move at a high rate from all neighborhood types. While Hyra believes understanding the relationship between gentrification and residential displacement is critical, he believes other important gentrification consequences exist, and he spends the balance of his short paper on exploring other potential consequences, such as political and cultural displacement, and discussing potential future research questions. These research questions and investigations include exploring the role of race in supply and demand-side gentrification explanations, as well as future investigations and governmental policy reforms to increase the changes that low- and moderate-income people benefit from the process of gentrification, such as providing affordable housing opportunities and supporting community-led organizations.¹⁰⁶

12. Sue East, Loretta Lees, Phil Hubbard, and Nicholas Tate, University of Leicester, UK and King’s College London, UK, 2020

This paper published in the *Journal Urban Studies* serves as yet another study that surveys the literature on the effects of residential gentrification and displacement. As such, this paper does not add to the academic knowledge base regarding methods of measuring or defining displacement or identifying instances of or causes of gentrification. The article examines a range of the existing empirical research that has attempted to quantify displacement and seeks to review the quantitative methodologies used to measure the extent of gentrification-induced displacement. In the course of the study, the paper also discusses how various researchers identify neighborhoods that have experienced gentrification, developed means to identify displacement, including gentrification-induced displacement, and discussed data limitations, especially given the limitations of governmental data sources and their lack of generation with a frequency suitable to support optimal research on displacement. One of the paper’s conclusions is that the question of quantifying displacement “has long vexed

¹⁰² Ibid, pages 42 and 43.

¹⁰³ Derek Hyra, “Commentary: Causes and Consequences of Gentrification and the Future of Equitable Development Policy,” November 2016, page 170.

¹⁰⁴ Ibid, page 171.

¹⁰⁵ Ibid.

¹⁰⁶ Ibid, page 173.

gentrification researchers.”¹⁰⁷ The authors proceed to say that while gentrification-induced displacement has been recognized as a phenomenon for decades, progress in its quantification has been very slow, in part due to the difficulty in identifying neighborhoods undergoing gentrification as well as the difficulty in tracking individuals who have been displaced. Until such data are more readily available, through space and across time, the authors argue, the extent of residential gentrification-induced displacement will remain largely unrecorded and invisible. However, the authors conclude by stating that while the quantitative study of displacement remains difficult, if more novel data sources become available as well as emergent methods involving the processing of larger amounts of micro data and GIS data, “patterns and processes of displacement can be inferred through existing data sources, as well as data generated from those who themselves have experienced displacement.”¹⁰⁸ In more simplistic words, this paper suggests that research to advance the literature on population displacement in the context of gentrification is confounded by limitations and complications in existing methods in measuring displacement.

¹⁰⁷ Sue Easton, Loretta Lees, Phil Hubbard, and Nicholas Tate, “Measuring and mapping displacement: The problem of quantification in the battle against gentrification,” *Urban Studies*, 2020 Vol. 57(2) 286-306, page 299.

¹⁰⁸ *Ibid*, page 286.

APPENDIX E: NOTES ON SAN FRANCISCO HOUSING PRODUCTION TIME SERIES DATA

A consistent and thorough source of a time series of housing production data includes the City of San Francisco Housing Inventory reports, prepared by the San Francisco Planning Department on an annual basis. These reports track net unit production by neighborhood, with the potential to create a time series of data extending back more than a decade. There are yet other sources of data regarding San Francisco's residential inventory, including the American Community Survey, an annual publication of the U.S. Census Bureau, which samples annual trend data and presents estimated data points, such as the number of occupied rental units in San Francisco by census tract, which can then be aggregated into neighborhoods, or approximations thereof. The American Community Survey samples data and then presents information annually; however, the annual data most resemble a running average, with each year's data presentation comprising an average of the cited year and several prior years. Thus, the data are more of an amalgamation than an annual accounting, and as referenced, are based on sampling rather than a more comprehensive census, which still only occurs every 10 years, with the last one with results reported occurring in 2010, as the 2020 census is currently in process.

There are also several sources of information on apartment rents. In addition to estimating occupied rental units, the American Community Survey also presents information on median rent by census tract as well as the number of units available for rent within select rental price bands, such as \$0 - \$499, \$500-\$999, \$1,000-\$1,499, \$1,500- \$1,999, and \$2,000+. The rent range band tops out at \$2,000+, thus there is no way to generate an estimated average rent without developing an assumption regarding the average unit rent in the \$2,000+ range. Another, less localized source includes the City of San Francisco annual Housing Inventory reports, which include a time series of data regarding average rents for two-bedroom apartments in San Francisco, with some Bay Area comparison. Similar data are included on average prices for 2-bedroom homes in San Francisco and the Bay Area. In addition, data information companies such as RealAnswers track apartment rents over time, with RealAnswers in particular providing a reliable time series of average rents by unit type and all units. However, this data source is not comprehensive, as it focuses on larger, investment grade properties, with a minimum 50-unit count, and this resource ceased operation after 2016. Other sources also provide a time series of data, but do not track the same set of housing units over time, and thus provide informative, but potentially less reliable findings.