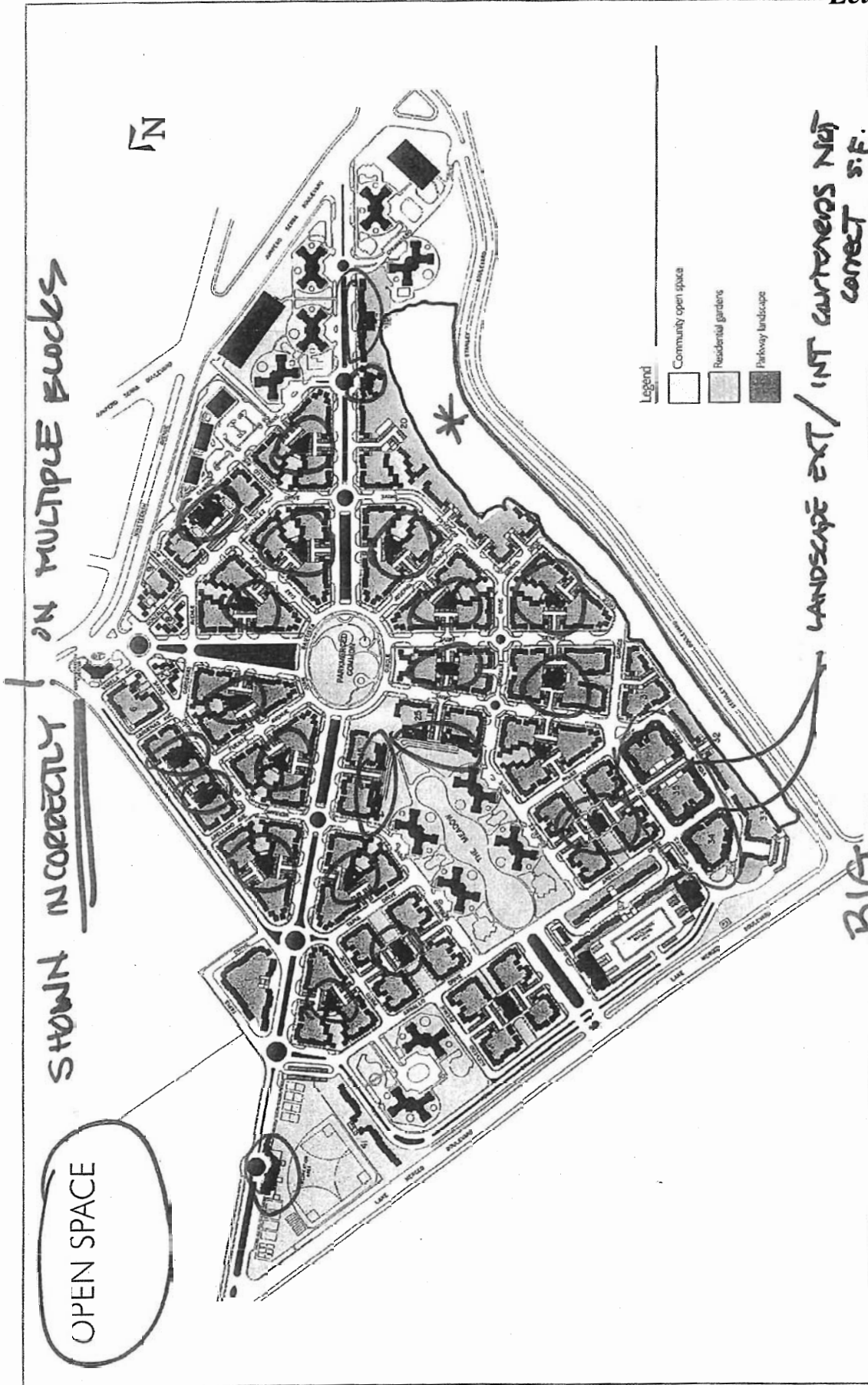




DEAR

→  
②  
PROPOSED NEW TRANSIT  
LINKS OPTIONS TO CONNECT  
NOW TO DALLAS CITY  
AND FUTURE LINKS NORTH/SOUTH WESTERN S.F.



PARKMFCFD

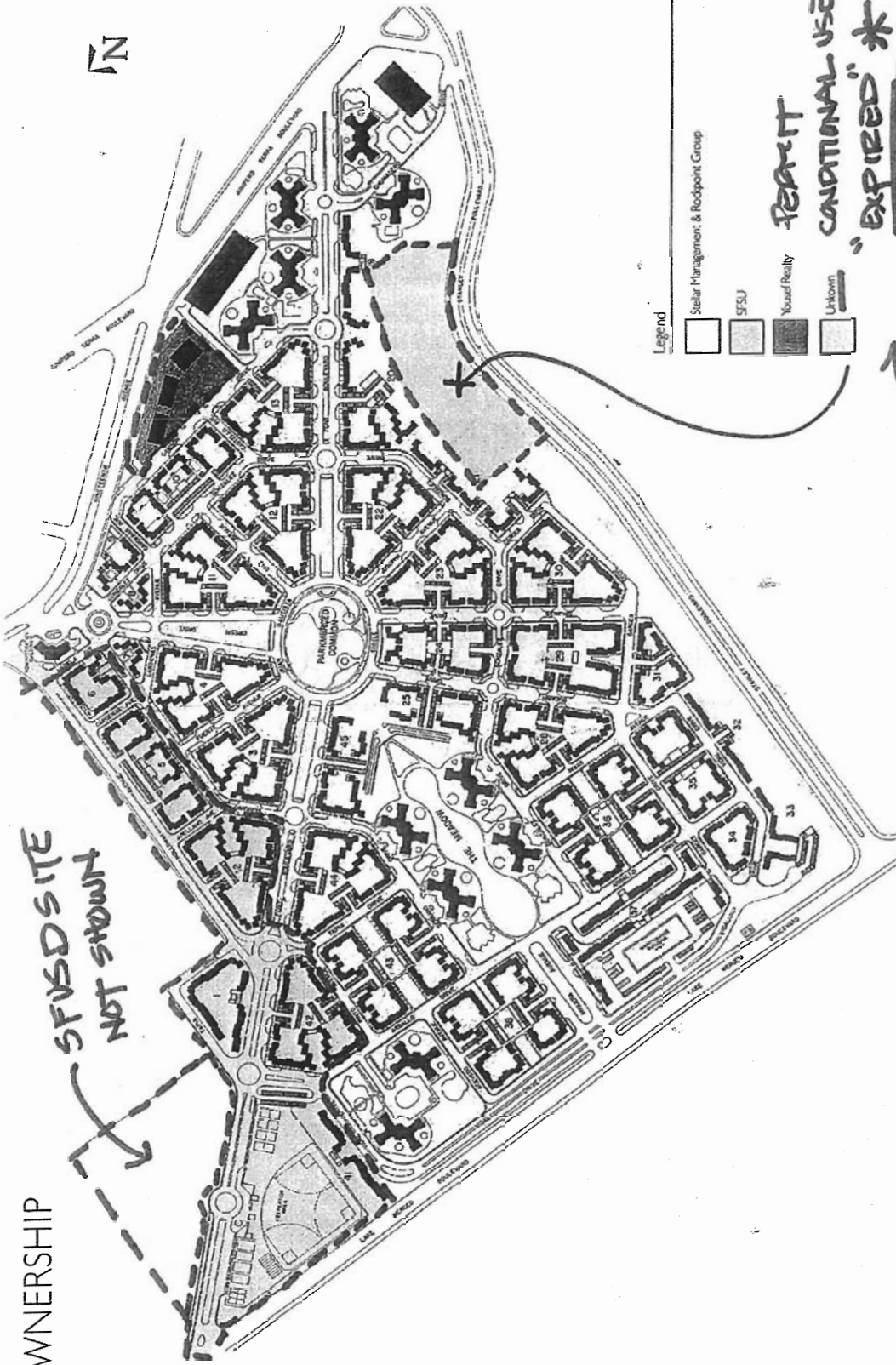
DATE: 11/11/2011

→ PACÉ + TURNBULL  
STUDY \*

Letter 54

OWNERSHIP

SFUSD SITE  
NOT SHOWN



Legend

- Stellar Management & Rodpoint Group
- SFSD
- Young Realty
- Unknown
- PERMIT
- CONDITIONAL USE
- "EXPIRED" \*

PARKMERCED  
San Francisco, California

PAGE 17 TURNBULL  
Architecture Historic Preservation Urban Planning

PRIOR OWNER OF PARKMERCED  
RON ZEFF / CARMEL  
PROPERTIES

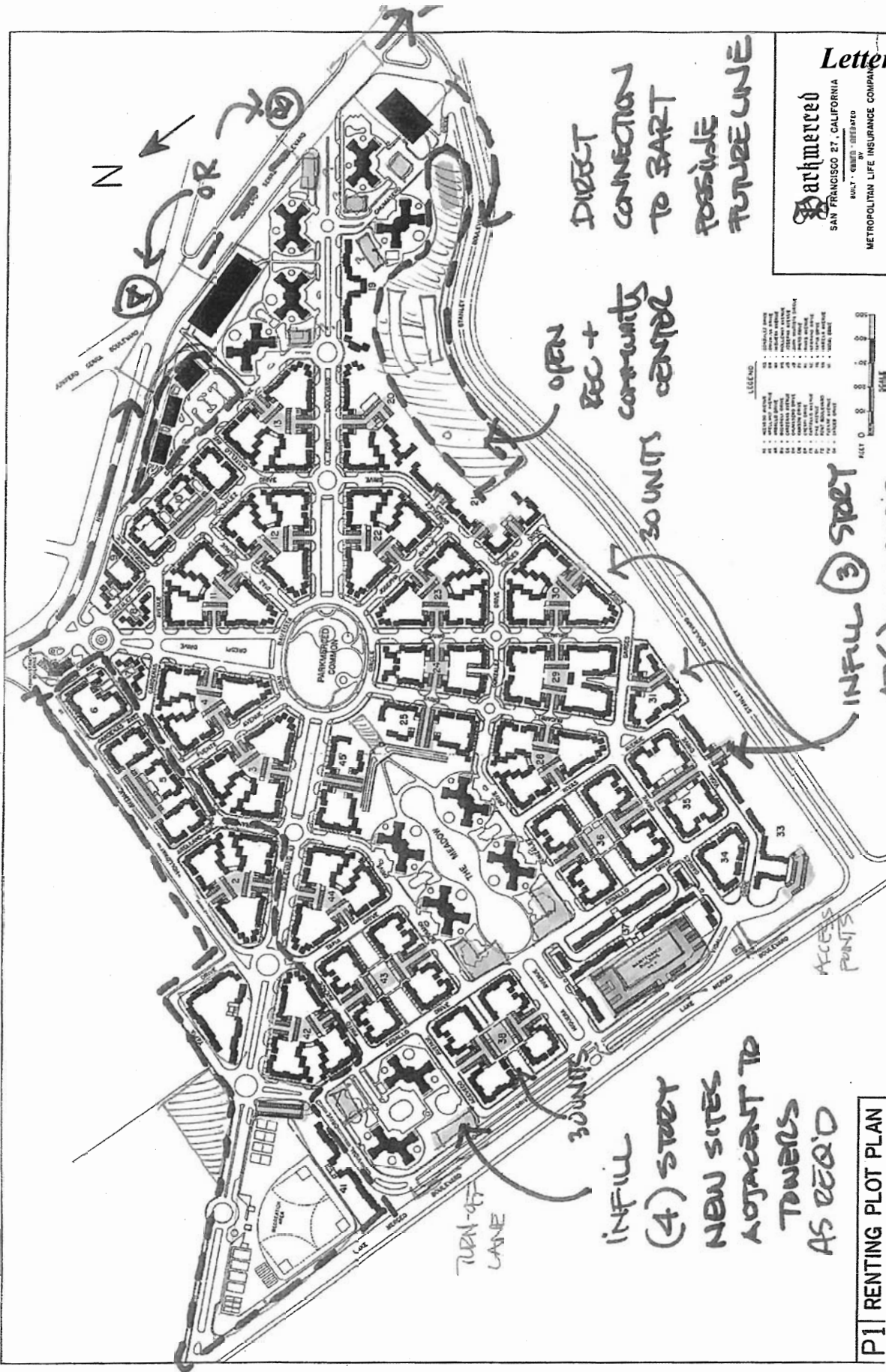
PEIR - LAND OWNERSHIP  
ERRORS NOT NOTED &  
CORRECTED



Letter 54

Barthmored  
SAN FRANCISCO 27, CALIFORNIA

BUILT - 1965 - 1967  
METROPOLITAN LIFE INSURANCE COMPANY

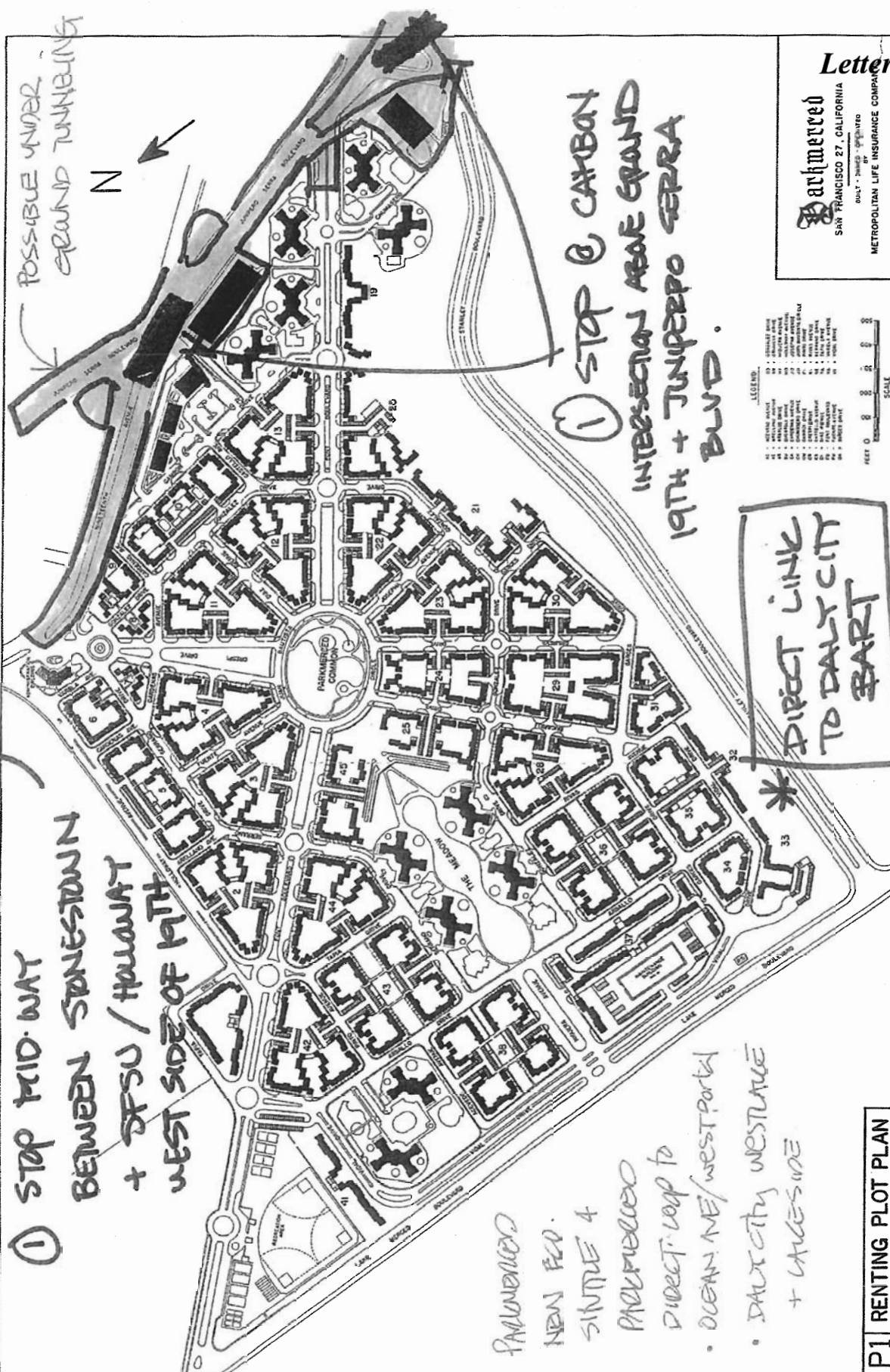
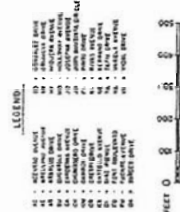


P1 RENTING PLOT PLAN

ALTERNATIVE #6 - "LANDSCAPE PRESERVATION"  
ALTERNATIVE - BEST OPTION SIM TO GA

Archmerred  
SAN FRANCISCO 27, CALIFORNIA

ONLY - JAMES J. JACOBY  
BY  
METROPOLITAN LIFE INSURANCE COMPANY



① STOP MID-WAY  
BETWEEN STANESSTOWN  
+ DFSU / HALLWAY  
WEST SIDE OF 19TH

① STOP @ CAMBAY  
INTERSECTION ABOVE GRAND  
19TH + JUNIPERO SERRA  
BLVD.

DIRECT LINK  
TO DAILY CITY  
BART

PARKMEERED  
NEW REP.  
SUTURE 4  
PARKMEERED  
DIRECT-LOP TO  
• OCEAN NE/WESTPORT  
• DAILY CITY WESTPORT  
+ AUGUSTINE

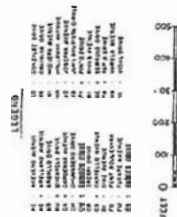
P1 RENTING PLOT PLAN

ALTERNATIVE #7 - REDUCED MUNI-STOP'S  
A DIRECT REGIONAL TRANSPORTATION  
ALTERNATIVE

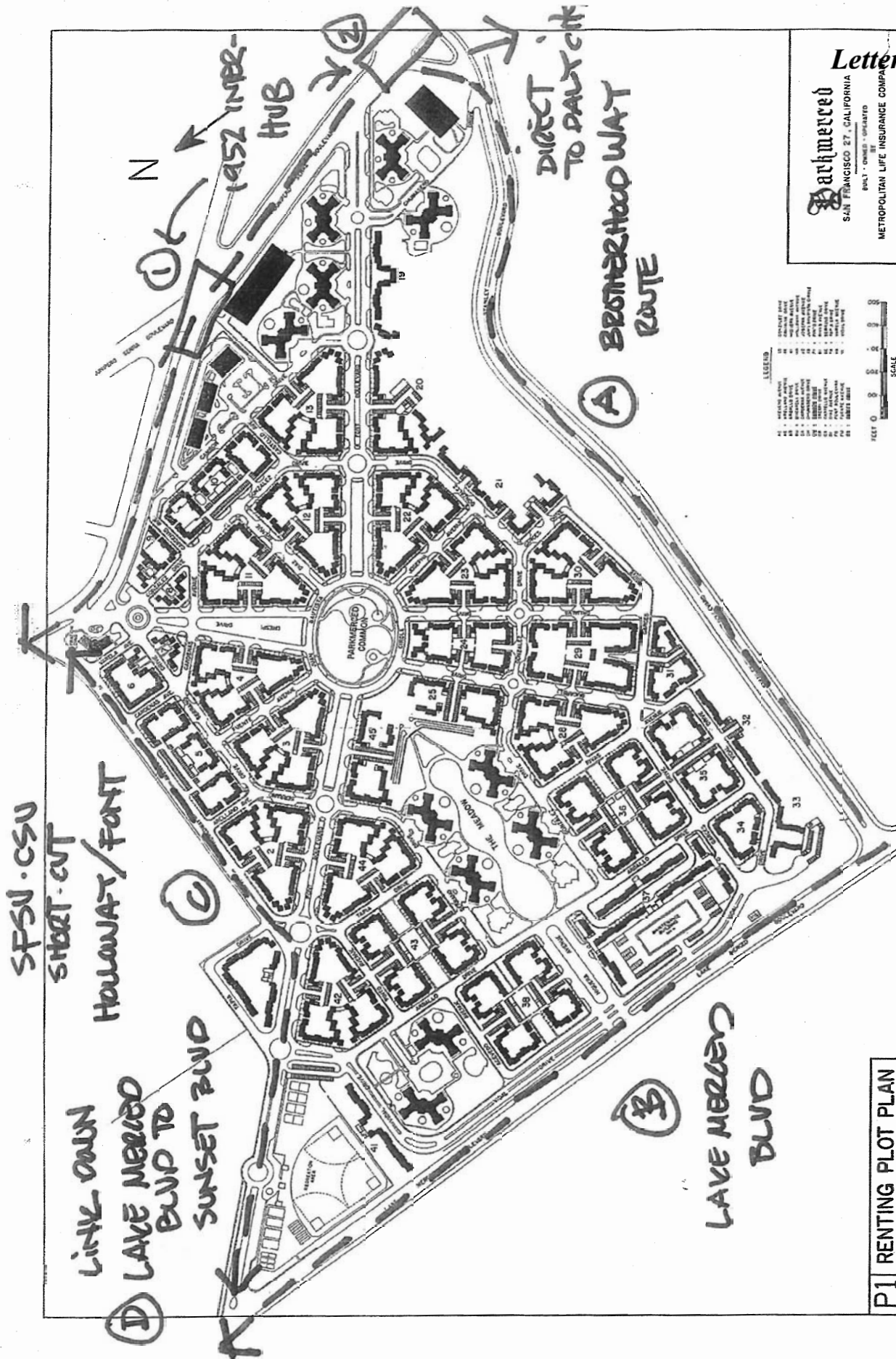
Letter 54

**Barthmored**  
SAN FRANCISCO 27, CALIFORNIA

BARTHMORED  
METROPOLITAN LIFE INSURANCE COMPANY



P1 | RENTING PLOT PLAN



ALTERNATIVE #8 - TRANSPORTATION (NEW TRANSIT LINES) ALTERNATIVE



- STONESTOWN
- SFSU - CSU PEIR BORDERS
- WEST PORTAL
- OCEAN AVE

- LAKESIDE STOPPING
- MISC SITES IN HOME - ANDER AREAS
- STONESTOWN APARTMENTS

- INFILL PER AL7#6
- CAMBON
- BROTHERHOOD
- SFSU SITE
- BOO BROTHERHOOD
- PARKING LOTS
- PARK BROTHERHOOD

\* CLOSE ① OF ③  
 CAR CURSES  
 FOR PARKING INFILL IN DISTRICT



Barthmored  
 SAN FRANCISCO 27, CALIFORNIA  
 METROPOLITAN LIFE INSURANCE COMPANY  
 BUILT - OWNED - OPERATED

P1 | RENTING PLOT PLAN

ALTERNATIVE #9 - "EQUITY DENSITY" DEVELOPMENT ALTERNATIVE





**Barlmered**

SAN FRANCISCO 27, CALIFORNIA

ROBT. GARDNER - OWNER

METROPOLITAN LIFE INSURANCE COMPANY

54.C.42

HIS GUT  
INSTINCT  
MAY BE RIGHT!!!

TO PARKMERGED!

FIRST  
REACTION

# ALTERNATIVE #11 - TOWER DEMOLITION

P1 | RENTING PLOT PLAN

NOTE

CRAIG HARTMAN  
OF SOM TO DESIGN  
A NEW ARRANGEMENT  
+ REPAIRMENT OF  
THE EXISTING TOWERS  
ADDING 8-16 STORIES  
MINIMUM TO THE EXISTING  
BUILDINGS

SIDE NOTE:

I HEARD HE LIVES  
TO DESIGN "PENCIL THIN"  
ELEGANT TOWERS WHICH  
IS HIS + SON'S SPECIALTY  
SEE TRANSBART TERMINAL  
DESIGNS, AND IT WAS HIS

LEGEND

- 1. EXISTING PLOT
- 2. EXISTING BUILDING
- 3. EXISTING DRIVE
- 4. EXISTING PARKING
- 5. EXISTING WALKWAY
- 6. EXISTING FENCE
- 7. EXISTING LIGHT
- 8. EXISTING SIGN
- 9. EXISTING TREE
- 10. EXISTING POOL
- 11. EXISTING LAKE
- 12. EXISTING GOLF
- 13. EXISTING RAIL
- 14. EXISTING HIGHWAY
- 15. EXISTING AIRPORT
- 16. EXISTING MOUNTAIN
- 17. EXISTING OCEAN
- 18. EXISTING SKY
- 19. EXISTING SUN
- 20. EXISTING MOON
- 21. EXISTING STAR
- 22. EXISTING PLANET
- 23. EXISTING GALAXY
- 24. EXISTING UNIVERSE

SCALE

0 100 200 300 400 500 600 700 800 900 1000

FEET

0 100 200 300 400 500 600 700 800 900 1000

FEET

0 100 200 300 400 500 600 700 800 900 1000

FEET

0 100 200 300 400 500 600 700 800 900 1000

FEET

**Barlmered**

SAN FRANCISCO 27, CALIFORNIA

BUILT - 1980 - 1985

METROPOLITAN LIFE INSURANCE COMPANY

LEGEND

1	RENTING AREA
2	RENTING AREA
3	RENTING AREA
4	RENTING AREA
5	RENTING AREA
6	RENTING AREA
7	RENTING AREA
8	RENTING AREA
9	RENTING AREA
10	RENTING AREA
11	RENTING AREA
12	RENTING AREA
13	RENTING AREA
14	RENTING AREA
15	RENTING AREA
16	RENTING AREA
17	RENTING AREA
18	RENTING AREA
19	RENTING AREA
20	RENTING AREA
21	RENTING AREA
22	RENTING AREA
23	RENTING AREA
24	RENTING AREA
25	RENTING AREA
26	RENTING AREA
27	RENTING AREA
28	RENTING AREA
29	RENTING AREA
30	RENTING AREA
31	RENTING AREA
32	RENTING AREA
33	RENTING AREA
34	RENTING AREA
35	RENTING AREA
36	RENTING AREA
37	RENTING AREA
38	RENTING AREA
39	RENTING AREA
40	RENTING AREA
41	RENTING AREA
42	RENTING AREA
43	RENTING AREA
44	RENTING AREA
45	RENTING AREA
46	RENTING AREA
47	RENTING AREA
48	RENTING AREA
49	RENTING AREA
50	RENTING AREA
51	RENTING AREA
52	RENTING AREA
53	RENTING AREA
54	RENTING AREA
55	RENTING AREA
56	RENTING AREA
57	RENTING AREA
58	RENTING AREA
59	RENTING AREA
60	RENTING AREA
61	RENTING AREA
62	RENTING AREA
63	RENTING AREA
64	RENTING AREA
65	RENTING AREA
66	RENTING AREA
67	RENTING AREA
68	RENTING AREA
69	RENTING AREA
70	RENTING AREA
71	RENTING AREA
72	RENTING AREA
73	RENTING AREA
74	RENTING AREA
75	RENTING AREA
76	RENTING AREA
77	RENTING AREA
78	RENTING AREA
79	RENTING AREA
80	RENTING AREA
81	RENTING AREA
82	RENTING AREA
83	RENTING AREA
84	RENTING AREA
85	RENTING AREA
86	RENTING AREA
87	RENTING AREA
88	RENTING AREA
89	RENTING AREA
90	RENTING AREA
91	RENTING AREA
92	RENTING AREA
93	RENTING AREA
94	RENTING AREA
95	RENTING AREA
96	RENTING AREA
97	RENTING AREA
98	RENTING AREA
99	RENTING AREA
100	RENTING AREA



GREEN SPACE

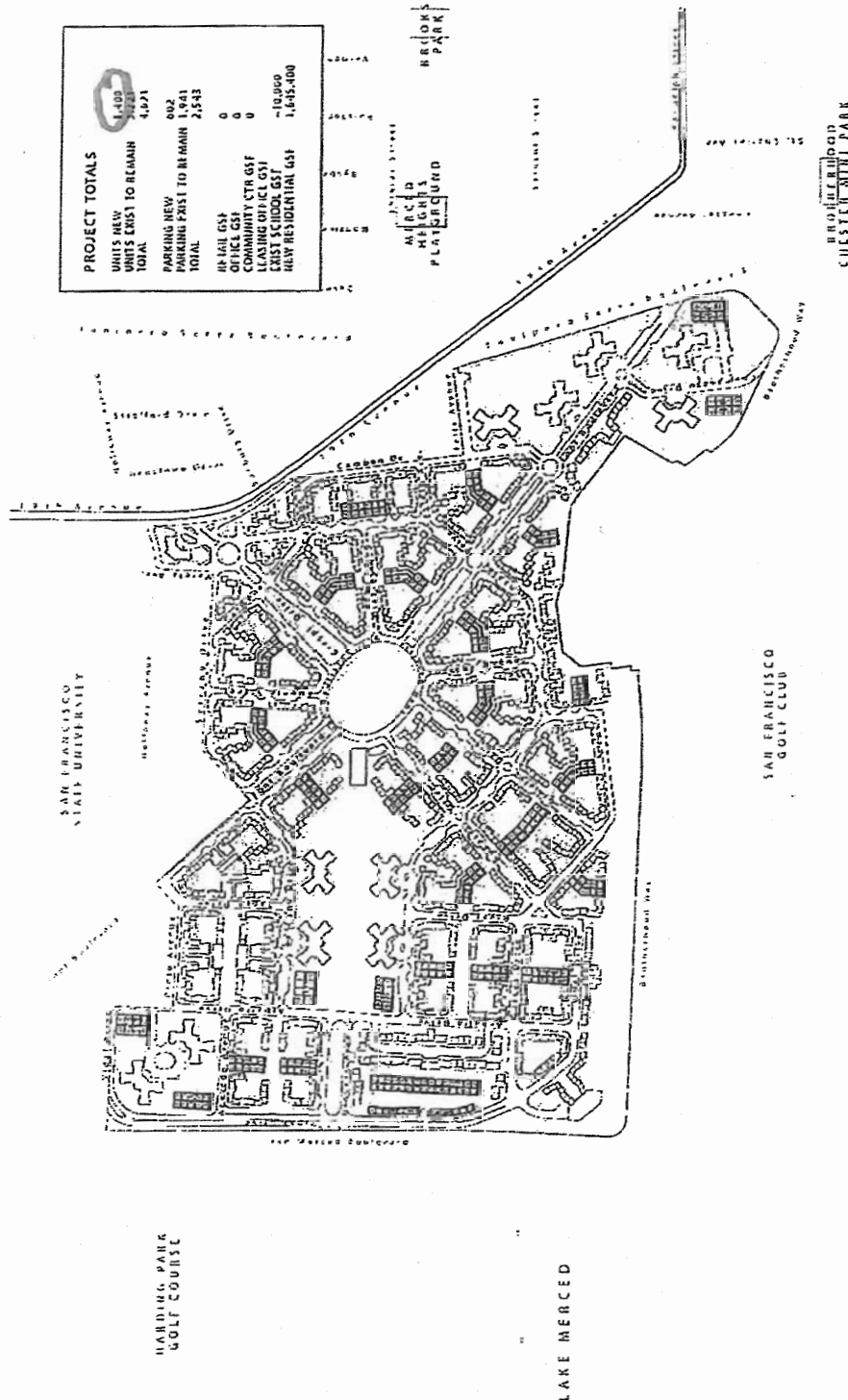
INFILL DENSITY

PUBLIC PARK

N

P1 | RENTING PLOT PLAN

DRAFT



PROPOSED PROJECT WITH DEVELOPMENT ALTERNATIVE

PAGE + TURNBULL OPTION "Ga"  
INFILL OPTION (REJECTED)  
BT ST-PLAN / + PROT SPANOR



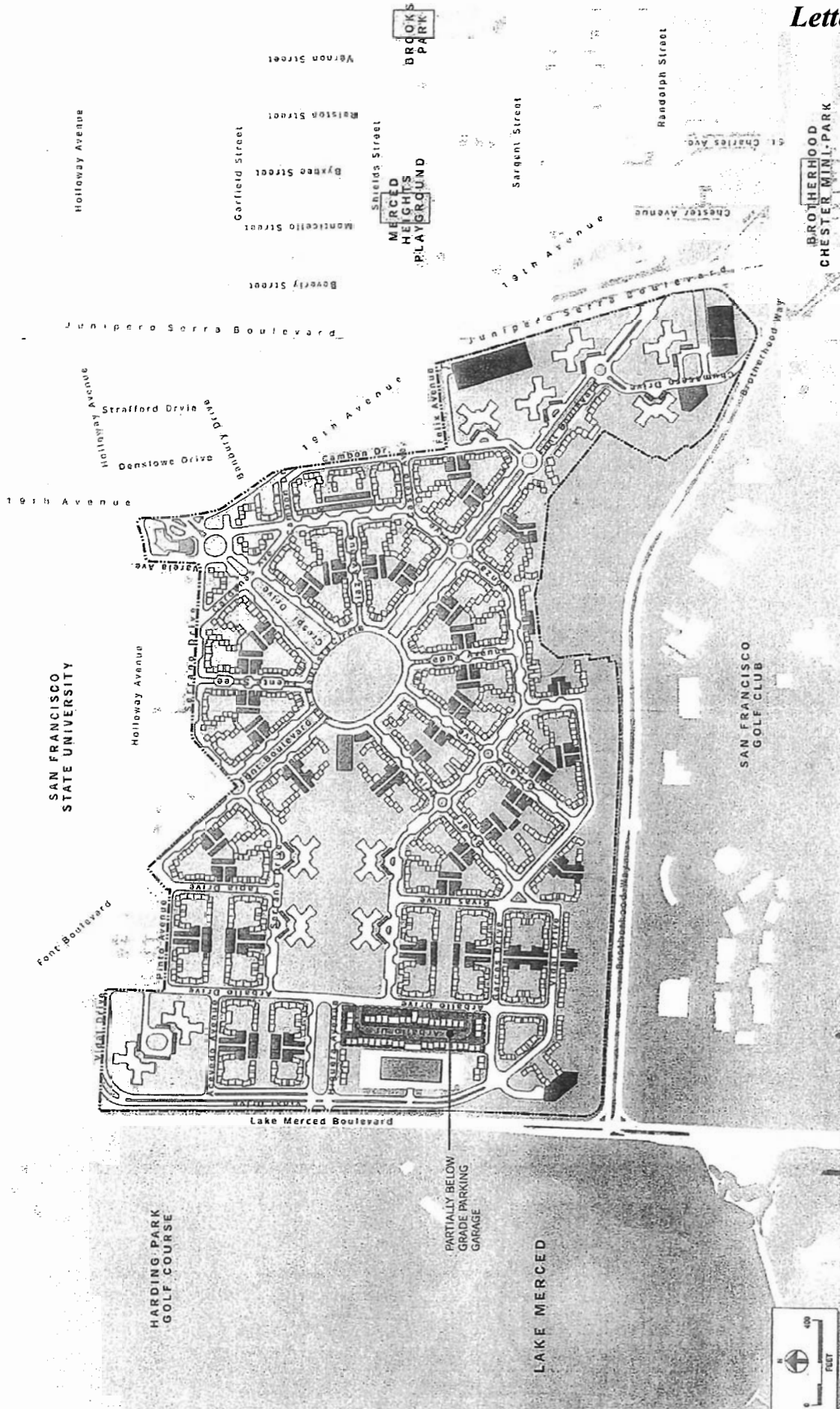
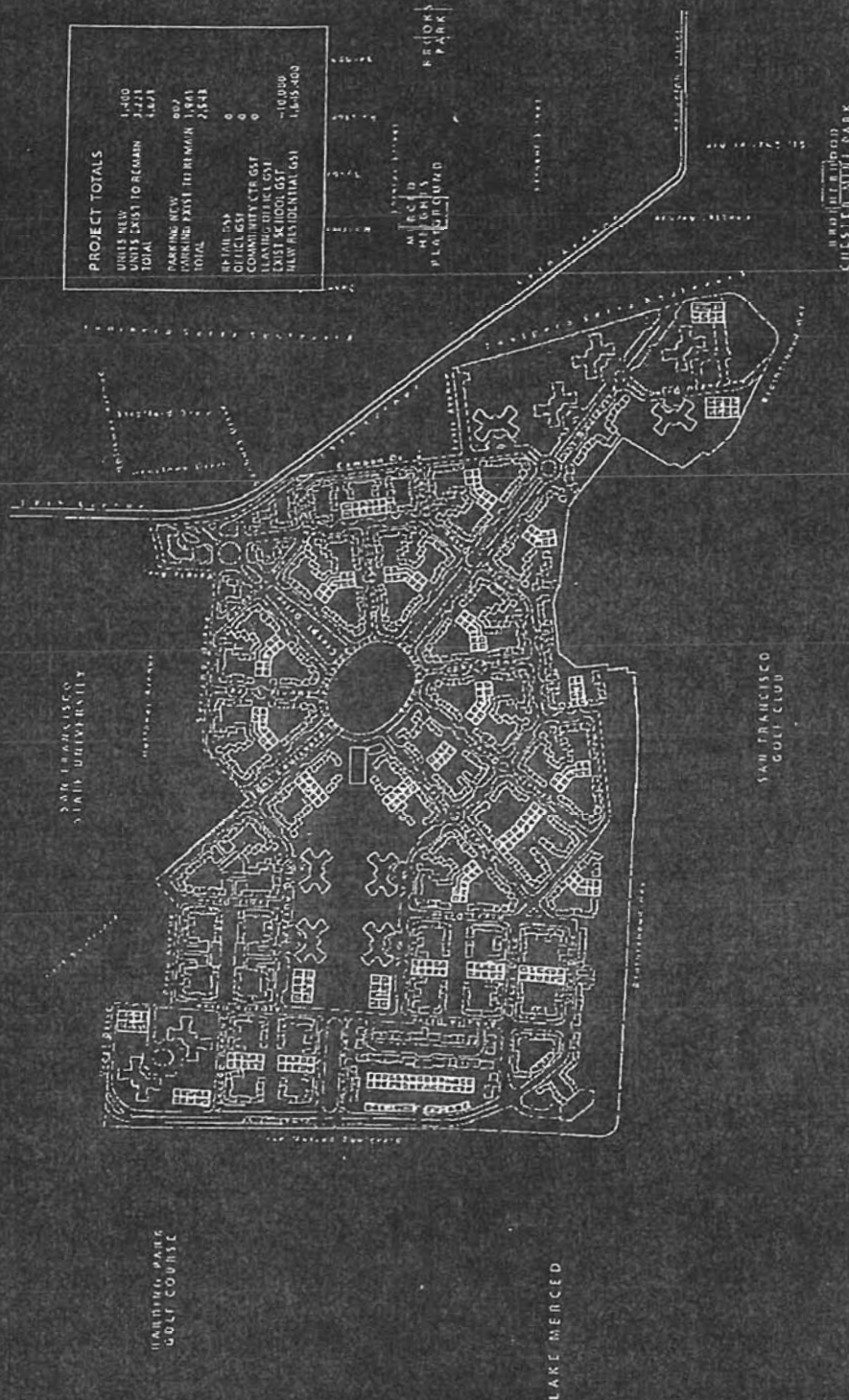


DIAGRAM OF (E) PARKING  
SHOWS INFILL POTENTIAL  
CLEARLY.

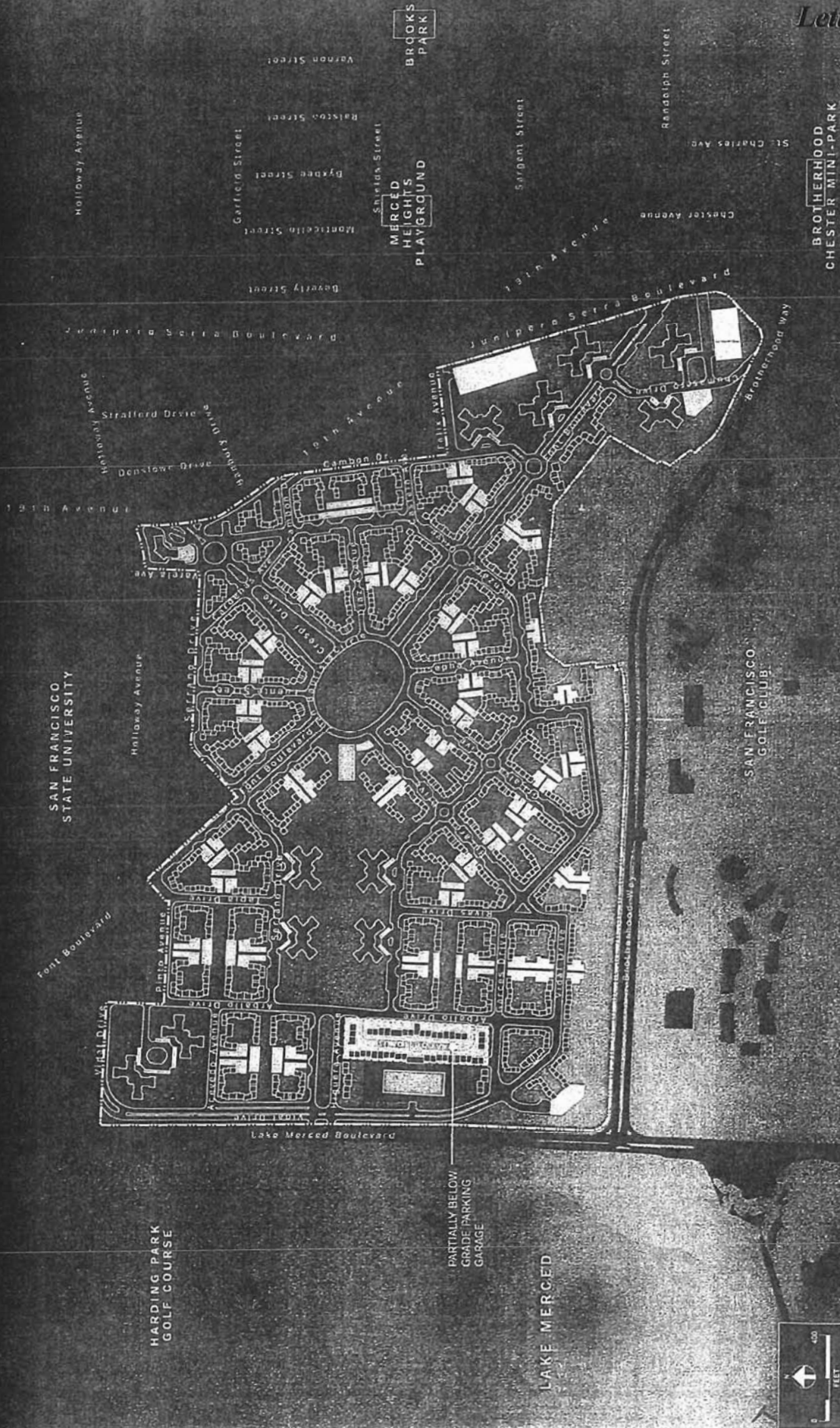
507

**DRAFT**

PROJECT TOTALS	
UNITS NEW	1,400
UNITS EXIST TO REMAIN	2,271
TOTAL	3,671
PARKING NEW	807
PARKING EXIST TO REMAIN	1,941
TOTAL	2,748
OFFICE GSF	0
COMMUNITY CTR GSF	0
LEARNING CTR GSF	0
EXIST SCHOOL GSF	10,000
NEW RESIDENTIAL GSF	1,400,000











Attn: Mr. Bill Wycko Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Suite 400 S.F., CA 94103

RE: Parkmerced - CASE #2008.00021E

June 18, 2009

Written Comments on Scoping Hearing NOP/EIR documents submitted by ;  
[Aaron Goodman Tenant @ 405 Serrano Drive Apt. #11-H SF, CA 94132]

Mr. Bill Wycko @ SF Planning

The following Issues/Concerns have been raised repeatedly by myself and other residents, community members, and preservationist organizations in the ongoing Parkmerced "Vision" meetings noted as "200+ community and neighborhood meetings to date", they have been raised specifically during the San Francisco State University Masterplan EIR process, and ignored by the CSU planners in regards to the cumulative effects of development on the original unique landscaped masterplanned garden rental community of Parkmerced due to the use of a programmatic EIR that ignored the landscape and Parkmerced original outline as noted by Anthea Hartig Director of the National Trust for Historic Preservation memo to Roberta Achtenberg of the CSU regents see (Appendix Exhibit -D) . The current "Parkmerced Vision" project does the same in how it ignores the prior sold-off sites, and fails to recognize the integrity and cohesiveness of the prior community as a designed district, with its unique landscape internal courtyards, and beaux-arts layout as a masterfull example of residential urban planning. (see Appendix Exhibit -B and C)

The following issues are by no means all-inclusive but represent specific issues we have raised to the ongoing project, and process that have not been explained or addressed adequately in the NOP/EIR document, or prior EIR by the SFSU / CSU Masterplan, and the Parkmerced "Vision" project document. They are separated by topics that do connect and inter-relate, and I have given specific issues under each topic and summary that need to be addressed/informed by the Parkmerced EIR, the Planning Dept., the newly appointed Historic Preservation Commission, and the revisions of the Housing Element, Preservation Element, Open-Space Element, and Discretionary Review changes being currently proposed that affect the overall concept, method and process of review and approval, and issue of the need for rental housing , the current lack of new well-designed and integrated open space, and sustainable practice of preservation methods that have been ignored in the presentations to date. I have also attached specific memo's and documents to raise the issue of there importance and need to be included in the overall discussion of impacts, and process that has occurred to date.

54.D.1

Preservation - Parkmerced has a high degree of significance in terms of the landscape design (see appendix exhibit -H and Memo Submitted by the TCLF organization) , urban planning, and history of this site in San Francisco + in relation to the housing development of garden cities across the united states. Parkmerced was an initial transit orientated development, and one of the first integrated apartment communities in SF. With proper and adequate restoration-rehabilitation-rennovation-preservation of the site and its buildings, site elements, and landscape layout. Parkmerced through the Secretary of the Interior's Standards and funding by the Mills Act, for rehabilitation, this project proposal can help obtain significant improvements to the sustainability, financial assistance, safety, accessibility, and program requirements of the owner, in addition to preserving an important local state and national resource.

- a. Parkmerced constitutes a "historical resource" within the meaning of CEQA and has been noted by many Preservationist Organizations to be a solid possible candidate to the National Register as a historic site/district. The EIR must contain a fair and thorough discussion of (1) the historical nature and values of this resource and (2) the degree to which the proposed project(s) will effect a significant adverse change in the significance of the resource. As part of the discussion the EIR should evaluate (1) the history, design and significance of the Parkmerced Landscape design as an architectural and urban planning resource, embodying distinctive unique characteristics of the modern movement and modern landscape design in SF. (2) the larger issues of designing for housing density, + essential rental housing current needs in San Francisco, and (3) the Parkmerced entire original layouts eligibility to be listed in the California Register of Historic Resources, or the National Register of Historic Places, and any local register of historic landmarks, places, districts, or resources. (4) an accurate review of the quality, uniqueness and condition of the interior garden courtyards in the historic resources analysis of the proposed project(s).
- b. The proposed project(s) (Parkmerced Vision and SFSU Masterplan) involves the demolition of the low 2-story garden apartment units and landscaped open space throughout the complex. The demolition of a historic structure or cultural resource represents a significant, unmitigable impact on the environment. (CEQA Guidelines Section 15064) Public agencies carefully consider any potentially feasible alternative which may avoid or minimize a significant environmental impact. (Cal. Pub. Res. Code Section 21002 + CEQA Section 15126.6) Note that the EIR must contain a fair and thorough discussion of potentially feasible alternatives which do not involve demolition.
- c. The Parkmerced original development was part of a larger original layout of Parkmerced that includes the sites sold off by prior owners to the San Francisco State University (CSU), Cambon Drive Shopping Center Area Proposal, and 800 Brotherhood Way Development proposal, and 700 Font SFUSD Frederick Burke Elementary School Site (also proposed for development). There are many past, present and reasonably foreseeable future projects that must be identified in the EIR, and which must be considered in terms of the cumulative impacts of all the projects (including the proposed project) affecting (1) the masterplanned community of Parkmerced, (2) the overall density and open space effects of these developments on all the proposed CEQA sections per (CEQA section 15355)

54.D.1  
con't

Housing – Parkmerced's original layout and density consisted of over 3,221 units of housing when the total masterplanned community is taken into account prior to the sale(s) of units to SFSU/CSU this original number of units should be the basis for determining housing composition, density, amenities and open-space needs of the original complex outline. The city is per the SF General Plan currently not in compliance with the Housing Element for 2004 legal filings have been made in regards to the lack of affordable, and low-middle income housing especially RENTAL housing being built in SF. The EIR must take into account the current housing needs of the city based on the following issues.

- a. Predatory Equity lending has not been addressed by the city and county of San Francisco in regards to the purchase and quick increases in rents on formerly affordable areas of rental housing in San Francisco. (see Appendix Exhibit – I ) Carmel Partners bought Parkmerced in 1999 for \$300 million from Leona Helmsley. Carmel properties had invested approx. \$35 million to update the property and sold off 153 units to SFSU for \$20 million. Parkmerced Investors LLP purchased the property in October of 2005 for \$687 million by Stellar Management and the Rockpoint Group, from a prior purchase by JP Morgan (Chase) + Carmel Properties Joint Venture.

- b. The 800 Brotherhood Way site was sold off to the prior owners of Parkmerced Carmel Properties/Olympic View Realty through a back-room deal, and a proposal for approximately 200 units of market rate housing was proposed for a site that did not per city and state laws have a full Environmental Impact Report that included possible future development on adjacent sites, and whose Conditional Use permitting was questioned by Judge Quentin Kopp and concerns raised over the lack of an EIR and the impropriety of the issuing of memo's of determination after the noted expiration of the Conditional Use (see Appendix Exhibit - J). The site conditional use for 800 Brotherhood Way should be expired and require a new CU to be issued that takes into account all the additional/new proposed developments in this area, and upon Parkmerced's original outline as a possible historic district. Images of the prior site condition historically show the use of the site by Parkmerced's original developer, and possibly tenant use.
- c. Predatory Equity is when speculators overpay for prior affordable, or essential housing with borrowed money, convert the housing for rich people or more affluent people, and flip the units to allow for increased sales, or quick increased rental profits. Stellar Management which owns Riverton Apartments in NYC, and Peter Cooper Village Stuyvesant Town in NYC, are also "overleveraged" apartments that Stellar Management has attempted to purchase and inflate for increased profits. Stellar has consistently noted that there is no financial connection between the east coast and west coast operations of Stellar Management, the current financial status of is in question based on the issues noted and lack of maintenance and work on the SFSU/CSU owned apartment complex purchases as well. If the Riverton Apartments was built in 1944 as affordable housing, and the recent purchase was \$250 million which placed it in financial question, what state of financial over-stepping has occurred at Parkmerced at the price of 700 million? The current increased rents based on student move-outs and renovations in 2006/2007 show a major change that has occurred in rents, and increased un-affordability of an essential rental neighborhood for the city of SF. Parkmerced has already seen drastic increases in rents, and cuts in services through loss-of-use, and reduction in grounds and maintenance staffing. Foreclosure would be the next issue depending on the state and condition of the current loans of 700 Million. How is the city investigating this issue and its effects on the rental housing market. When new units are not built and existing units are 'gentrified' than rent-control laws are being circumvented.
- d. The SFSU / CSU Masterplan involved the purchasing of over (1,000) units of rent-controlled essential housing in San Francisco in this district. SFSU/CSU purchased the Stonestown Apartment complex which is 697 units of housing for \$156 Million, and UPS University Park South (part of the original layout of Parkmerced) 66 Units of housing for approximately 11 million. The SFSU purchased blocks include a large open-space recreational area, and prior community center for tenants, the blocks noted as #1,2,5,6,41,42 on the Parkmerced map attached (Appendix Exhibit - A) (The original Unit totals of Parkmerced should be used to calculate housing density levels, amenities required, and open space requirements)
- e. The Memorandum of Understanding between SFSU/CSU and SF City Agencies on the 29<sup>th</sup> and 30<sup>th</sup> of October 2007 (Appendix Exhibit - E) did not take into account the loss of essential housing, open-space, and recreation and community center loss-of-use, and the effects on the community of Stonestown, and Parkmerced residents in the traffic, parking, transit, housing, and open space loss-of-use in the purchase of the recreation site and grounds of the original development of Parkmerced.
- f. Parkmerced's consistent large increases in rental unit costs based on no local vacancy decontrol laws, and the SFSU Masterplan and Approved Enrollment Increases must be addressed in terms of the overall effect(s) on essential housing stock, and un-affordability to

54.D.1  
con't

students, seniors, families, disabled, and local community residents. The CSU increases in tuition have been doubled in the past 10 years from 1999-2000 to today based on the obvious impacts of the SFSU Foundation's purchase of the Parkmerced blocks (UPS) and Stonestown units (UPN) that have led to gentrification, and displacement of existing tenants, and un-affordability levels for current and incoming families, students and immigrants seeking housing options in SF.

- g. The proposed new housing mix of rental and for sale units, does not represent a significant benefit to existing citizens of San Francisco. The market rate rents, and sale prices are typically over-priced and not within reach of local communities. Affordable levels stated by the Mayor's Office of Housing refer to the low-income levels and typically do not provide sufficient mixture in terms of rental units at low-mid income ranges.
- h. There is no guarantee that any later sale of the property would be required to carry over the prior agreement in terms of non-passthrough of capital improvements, or rent-control protection of existing tenants.
- i. New rent-controlled units are required with significant vacancy de-control laws to prevent what has occurred since the sale of the UPS and UPN properties. The overall increase in rents is directly attributable to renovations and student move-outs which allow the owner to inflate market rents in the Parkmerced complex.
- j. Existing market rents in SF, have been noted to be around \$3,000 or more per month for 1-2 bedroom units in new construction areas or where developments were switched from for-sale to apartment units. These prices are extremely inflated, and are un-obtainable by typical working class, low-middle income families in SF. Seniors on fixed incomes, and students relying on shared accommodations also will be drastically affected by the inability to find local rental units at affordable levels. Although not a "down-town" rental development Parkmerced still asks for similar rental levels based on inflated downtown prices for units.
- k. Parkmerced proposes an increase of 8,025,063 g.s.f. of new residential units on site. There is no guarantee that the new units will be of the same size, or with similar quality and size of the private patios and landscaped shared areas. There needs to be quantifiable numbers in relation to old units vs. new units with measurements on sizes of units currently.
- l. Proposed Target Demographic – to date there is little information on who will be renting or living in the proposed new units, based on the large increased current rents and prices per s.f. of construction costs typically assigned to new construction for price determination. The city already has acknowledged the over-building of high-end for sale homes, and the overall loss of affordable low-mid income rental housing has not been quantified or data provided.

54.D.1  
con't

Open Space / Density – The overall cumulative effect(s) per CEQA on open space and density proposed must be calculated for the Parkmerced community based upon its original outline. The existing conditions cited does not accurately represent the masterplanned community of Parkmerced which was originally a layout of 191.5 acres and the stated reduction of Parkmerced due to sold parcels brings the development area to 112-116 approx. The open space that was part of the original layout has been sold and must be considered in terms of the open space and density of the original planned development as a master-planned self contained community. The sale of the open-space and recreation area of Parkmerced to SFSU/CSU, Cambon Drive Shopping Commercial Center, and 800 Brotherhood Way represent a large loss of open space per unit. The diagram included as "open-space" does not show or designate how the development is being calculated for its open space areas (see Figure 5 Existing open space plan). There are many variations of interior and exterior spaces that should be considered, the inclusion of hard-scape, walkways, raised planters, deck areas, playgrounds, and walkablepaths and



curbs help to define the open space of parkmerced as a walkable community integrated with the automobile as a planned community. The central courtyards of the pie-shaped and rectangular shaped blocks are not colored green in this Figure 5 and include hard and soft landscape elements, former play structures, and laundry drying communal areas for social activity and leisure, and are considered open space areas with plantable zones, and prior play and functioning areas of the site. The Community Center for Parkmerced which site between Font Boulevard, Vidal Drive and Lake Merced Boulevard on the Font side of the SFSU purchased block was a well-used community amenity that due to neglect was turned removed as a tenant amenity, it was utilized for a long time as a community Montessori School and only recently due to the sale to SFSU was converted to non-tenant use which is still technically a "loss-of-use" of a prior large scale amenity to tenants. SFSU typically locks the fields and does not allow access to the manicured softball field, and has neglected the basic maintenance and care of the community building, tennis courts, handball walls, planter boxes, and smaller site amenities that should be a part of the MOU negotiated with city agencies. The total open space lost to the SFSU proposal must be considered as well as the Cambon drive, and 800 Brotherhood way proposals based on obvious original Metropolitan Life Insurance Co. plaque signs and similar landscape elements and features on the SFSU purchased blocks, at the Cambon drive as a commercial and open space areas, and historic aerial photos which show the 800 brotherhood way area as a planted and adjoining component to Parkmerced, that had originally a future planned addition for the parkmerced community matching the original scale and character of the existing town-houses. (This loss of open space, and the possible inclusion of 800 Brotherhood way into a future planned extension of Parkmerced's open space or developable space should be included as mitigated measures to decrease the loss of open space as a option).

54.D.1  
con't

- a. The attached plan of parkmerced (see Appendix exhibit - A) shows the original boundaries of Parkmerced at 191.5 acres.
- b. Page 3 of the NOP/EIR document states the open space @ 75 acres or approx. (3,269,300 square feet) of existing open space in a network of lawns, courtyard areas, private open space, and playgrounds (See Figure 5; Existing Open Space Plan in the NOP document)
- c. Table 1 Project Summary Table, notes that open space is reduced from 3,269,300 g.s.f. to 2,964,200 g.s.f. in area. This is approx. only noted as a about 7 acres or -305,100 g.s.f. loss of open space. There are no indications as to how this number was achieved. Accurate information on the numerical break-down in plan and table/chart methods are required to understand the basis for these numbers.
- d. The open spaces lost to land-sales to CSU/SFSU, 800 Brotherhood, 700 Font, and Cambon Drive Shopping Area, are not included in the overall open space calculation and must be included to provide accurate tallies and density numbers.
- e. The hard-scape and soft-scape of landscape elements in the open space are not denoted in the summary.
- f. The interior courtyards shown in the typological pie-shaped, and square blocks, are not colored green which thus denotes that they were excluded in the overall calculation. These areas are also open space and must be calculated correctly in the overall gross square footage lost to development and to ascertain the accurate density level of the original Parkmerced development.
- g. If the development is proposed as a community benefit district, in terms of its open space. Parkmerced currently shares and has access, to surrounding neighborhoods, than the need to have the open spaces maintained by the SF Recreation and Parks Department would be required as a public park zone. This should be a mitigation measure due in part to Parkmerced's inability to maintain its existing landscaped areas on site. Additionally a sub-

tax on local neighborhoods should be imposed due to public access to any proposed "shared-public-greenways-parks-plazas-playgrounds-dogruns-organicfarms" and open space amenities constructed so that the fair-share of costs are brought equally upon benefitting home-owners, and renters alike.

- h. Measurements on the existing vs. new courtyards, in terms of size, scale, area, plantings, and design style or features are not noted in the proposed transition to new landscaped roof decks and balconies. Accurate dimensional areas of existing units must be calculated to determine the replacement value of open space provided or re-parcelled throughout the site as open area. The statement that open areas will be placed on the sloping south portion of the site, seems to ignore the benefit of preserving the open space as it exists as a shared commodity, and community space. Balconies tend to be private, and roof gardens tend also to be locked, and non-accessible.
- i. There is also a roof-garden or "sun-deck" view area that has been "blocked off" by the management in the private Arballo area western mid-block side. This area served prior as open space and also is not calculated. (This was recently closed off with enclosed construction in May/June of 2009)
- j. The 800 Brotherhood Way area in aerial photographs (see the website [www.historicaireals.com](http://www.historicaireals.com) with a search of "800 Brotherhood Way") shows that planting and walking paths existed there prior. It was noted that some areas served as planting areas, for Thomas Dolliver Church prior to and during the landscaping work of the courtyards. Additional research should be conducted to verify the area in question and ascertain the use of the plinth area on this site prior to any redevelopment. There was no EIR of the 800 Brotherhood Way conditional use development proposal. Subtle changes in legal description of the properties on the southern side of Holloway allowed for the change in use on the north side of a right-of-way and public park area. This should be fully investigated due to the intentional sale of this land to a prior owner to promote density and sub-division of the original Parkmerced site. Investigation on the transaction, existing site review, and a full EIR on the proposed project should be made a part of any allowed conditional use, or repermitting of this site.
- k. The project site is denoted as containing over 1,500 trees (298 significant trees, 189 street trees, and over 1,000 interior trees. These surveys by Hort. Science were commissioned by the Parkmerced Investors, and does not recognize significant trees removed, or replaced on site during the past 2 years or based on natural tree failure (such as adjacent to 405 Serrano Drive). There are no "landmarked" trees due to the current supervisor, and prior and current owners refusal to recognize the trees on their private property.
- l. Tree canopy has been frequently "reduced" through tree-topping, or trimming to the point of killing many trees on site. This poor landscaping work was conducted for many years, and resulted in ongoing tree-deaths, toppling, and removal from the site.
- m. New trees and landscaping on site implemented post Leona Helmsley included palm-trees, and new entry area trees on the tower renovations by the Parkmerced Investors LLP that are highly allergic and should not be retained due to the pollen inducing content of these trees, and the non-matching plantings that do not retain or help maintain the existing integrity of the landscape design of the site. There is no need to plant native species on the site, as the majority of the plantings done were based on tested and strong local plant types by Thomas Dolliver Church that would survive in the microclimate of this area. A close attention to the landscape layout and planting types is required to maintain integrity and not induce native species that may change the character and scale of the landscape elements originally planted on site. A halt to all current landscape interventions and

54.D.1  
con't

permitting by the planning dept. or owner should be instigated to ensure that the effects of the consistent ad-hoc landscape "improvements" are not deteriorating or affecting the integrity of the landscape design intentionally or un-intentionally.

**Sustainability** – The Parkmerced Plan does not provide sustainable alternatives to the proposed 100% demolition and total-tear-down of all 2-story units within the complex, streets, infrastructure, and landscape elements. The EIR must consider the overall loss of materials based on the renovations that have already occurred on site to date, re-roofing, re-siding, trim-work, painting, and interior renovations and building upgrades to the town-house units. There has not been an accurate accounting for the amount of construction debris, and materials removed from the site due to ongoing renovations and unsustainable land-fill that has occurred based on the renovations to date. Materials that contractors removed from the units included valuable antique stoves, refrigerators, metal steel cabinetry, stainless steel countertops, wood finishes, tile work, fixtures, door hardware, carpeting, lighting fixtures, linoleum, asbestos materials, sinks, faucets, closets, storage systems, and current renovations that remove wall demolitions between kitchen and living room areas. Sometimes this material in the towers was noted placed in the garbage chutes, and in other cases there was no accounting of how the materials were recycled or disposed of if any. The overall cumulative effects of demolition per CEQA must be ascertained in terms of the SFSU proposed demolition of resources, and the Parkmerced "renovations" that have occurred in sequence due to changes in ownership, in order to accurately determine the sustainability of the destruction in materials or to provide accurate data in environmental terms to ascertain carbon impact due to demolition. If over 1,538 units of existing apartments are destroyed, and the proposed destruction of the brand new Montessori School at 80 Juan Bautista Circle, and the local community garden and administration building at 19<sup>th</sup> and Holloway (3711 19<sup>th</sup> Ave) are included as even initial issues, the over-all "sustainability" of this proposed project is highly questionable. Alternatives to demolition MUST be considered to ensure accurate and balanced methods of preservation and "green" sustainable densification occurs per CEQA and LEED.

54.D.1  
con't

- a. Page 31 NOP/EIR, Under the "7 key areas" stated there is no mention of preservation, renovation, rehabilitation, restoration as sustainable methods of repairing the neighborhood sustainably.
- b. Preservation is the most sustainable method in terms of building and construction and is a viable mitigation and alternative to a "TOTAL-TEAR-DOWN" of the entire neighborhood and should be investigated as more than one option in the process and proposal.
- c. A second alternative of tearing down the towers, and retaining the existing garden units should be examined in terms of density, and material losses.
- d. A third alternative would be in demolishing the existing parking garages, and townhouse parking areas, and allowing density along or within the major street axis routes of Font and Crespi, while building 3-6 story bar-buildings in place of the removed structures throughout the complex. Alternatives here could reduce the overall demolition on site, installing smaller modern styled studio towers or mini-studio and 1-2 bedroom units with below or above garden areas, reducing street traffic and promoting bicycle and walking areas along existing street routes on site. Possibly new employee or Parkmerced employee units throughout the complex can be provided for in each block integrating the local work-force with local housing within the communities reducing traffic and outside site commuting, in the internal courtyards over existing laundry and parking structures. This is especially notable as large areas within the rectangular blocks which could be redensified significantly by height increases and minimal tear-down of 1-4 units maximum in each area.

- e. There has been no calculations on the massive renovations to date, and what energy losses would be incurred if these renovations on the townhouses are destroyed in a tear-down.
- f. Page 31 NOP, states that the existing buildings are inefficient by current standards. There has been no investigation on the possible energy increase through adequate insulation or changes on existing townhouse units to provide insulation values that meet current standards. Adequate investigation on the current heat loss of units has not been published or determined. Simple unit analysis and suggested improvements can make these townhouse units extremely energy efficient. This is a sustainable alternative to demolition that must be analyzed to determine the cost basis for renovating and providing energy efficient townhouse units.
- g. Recent implementation of traps, and steam fittings in the towers was done by the Parkmerced Investors LLP. Some of these implemented fittings cause noise, and tenant disturbance, resulting in tenant displacement, the change in piping sizes can be attributable to the sound and leaks due to poor quality restorations of existing units. Many homeowners in historic buildings install or renovate radiator systems and steam piping to home units. Efficient insulation, proper sizing and trap installation for adequate pressurization, and sealing of these pipes would solve many of the issues related to the leaks, and heat loss. Modern internal pipe sealing can deal with hard to reach piping areas between floors.
- h. Page 32 NOP, sun-shade and wind design are already a part of the layout and design of Parkmerced's plan. The micro-climate existing is extremely hard to design for, and new buildings built in the SFSU area show the problems with mold, and mildew that have been the cause of lawsuits due to density increases on the SFSU/CSU site that caused respiratory issues to teachers in the construction of buildings adjacent to the teacher's offices.
- i. Page 33 NOP, notes that the Parkmerced area "does not contain any substantial retail uses". This is negligent in the comments based on our prior well-serving retail area at Cambon drive. The current owner has instigated maintenance and physical upgrades, and has acquired new local business interests and tenants. If this site were reviewed as a significant alternative retail wise, this could solve the retail missing on site. A proposal that densifies this area with additional small scale rentable retail shops, promoting local businesses, and uses friendly to the community, with shared community areas on a second or even third level could assist in increasing the commercial use of this area and prevent the destruction of more integral housing and landscape designs on site. The Landscape design of the commercial area should be retained and restored, and concepts that work within the existing buildings structure and layout, could assist in sub-dividing and providing multiple commercial and retail tenant options on site improving the commercial area. Direct access provided by alternative options for accessing this site from 19<sup>th</sup> avenue through Cambon and Felix Avenue by locating the proposed Gonzalez SF Muni stop outside of Parkmerced on 19<sup>th</sup> Avenue between Banbury Drive and Felix Avenue would provide a central community station stop on the eastern side of the Parkmerced complex, attract commercial tenants at the Cambon Drive Commercial area, and provide a stop within walking distance to SFSU, Homes and Businesses off of 19<sup>th</sup> Avenue on its Eastern side. Coupled with a central station stop between Holloway and Stonestown for SFSU on the western side of the street for SFSU students would reduce the distance and wait time for trains which would be slowed down by going through a dense neighborhood area.
- j. The original SFSU Masterplan noted the possibility of placing the site muni platform directly adjacent to the campus on its eastern edge which would create direct access to the university buildings. By building on Parkmerced areas students are still required to cross Holloway which is a longer distance and promotes driving. By extending or routing the Muni

54.D.1  
con't



system down Buckingham and around the northern and western side of Parkmerced back up brotherhood Way there would be additional "looping" or routing created that would cut down on driving to destinations around the campus site.

- k. The installation of a new commercial corridor along crepi conflicts with the neighborhood residential use. Additionally proposed retail along Buckingham and Holloway by the SFSU Masterplan would decimate local business in Stonestown, Ocean Ave, and West Portal. Adjacent neighborhood retail at Cambon, Westlake, and Brotherhood Way (METNA + OMI) business corridors would also suffer from increased new retail proposed which is not sustainable re-use of existing and local areas already built.
- l. [www.builditgreen.org](http://www.builditgreen.org) Green Point Rated Program - A missing component in the sustainability issues presented to date is the actual wear and tear of the stated "past their usefull life-span" suggested by the development team. To date there has been no full report published on the existing condition of the townhouse units. Prior to deciding which alternative or method would be "sustainably sound" it is important to determine based on the rennovations that have occurred by Leona Helmsley (windows throughout property), rennovations in 2002 as noted in the SF Business Times Article, and the current rennovations to date.
- m. The SF Planning department has under there purview the "Soundness Report Requirements" document that is meant for the proposed demolition of a residential structure subject to the planning commission policy requiring mandatory discretionary review shall provide a soundness report. We request that such mandatory discretionary review of the project be a requirement due to the size and effects proposed, and a report be immediately documented by a third party that would analyze ALL rennovations to date including all removed from site construction waste sent off site due to rennovations, carbon footprint issues, delivery and trucking of debris and materials to and from site, and ongoing renovations and materials installed, so that an accurate picture of the existing conditions and affects of the rennovations is ascertained to determine accurately the sustainability of the proposed development.
- n. An example of this issue was the recent garbage collection changes, that removed trash bins, replaced them with metal containers, new signage, new concrete pads, bollards, flyers, collection pails, wooden enclosures, metal hardward, and new F-150 Pick-up trucks to move the materials across the site, including a new street-sweeper F-350 truck purchased to clean streets. Numerous changes have been noted as possible "future" pass-throughs to tenants, although the mandatory statement has not been confirmed, nor compliance with ADA and sanitary issues due to reported health hazard issues in some towers.

54.D.1  
con't

**Parking + Traffic** – It is to the point of absurdity to note or place the blame of automobile traffic as "originating from parkmerced" as noted on page 2 of the NOP from the Planning Dept. The majority of the traffic and parking problems originate from the SFSU/CSU campus and the Universities use of Parkmerced as de-facto dormitories. Students and families typically bring more than one car to a shared unit in parkmerced, or UPS. Numerous students drive to campus and park there cars during and after regular school hours in the Parkmerced and UPS areas. Families also typically work 1-2 jobs, and will not relinquish there automobiles which can be seen in the reduced on-street parking where tenants circle as much as the students to avoid paying for on-site parking in the Parkmerced "garages". The MOU between SFSU/CSU and the city and county of SF is negligent in determining the actual number of cars driven and parked in the Parkmerced community. It is most notable w hen students have left in May-June prior to the start of the summer session when streets are deserted, and there is huge open areas of parking and empty streets in Parkmerced. A simple street aerial photo series during typical hours of school operation, versus the break periods on campus can show adequately the impact of parking by SFSU in the neighborhood of Parkmerced. A typical block on visual review myself was reduced from 11-12 cars in a single parking zone strip area to 2 or 3 cars of local residents in some cases, with some streets along Holloway or in the 4-hour parking zones of the western portion of the site along Vidal being almost 100% empty on some vacation days. The majority of day-trips taken from Parkmerced

should be noted as being directly attributable to cuts in MUNI SFMTA services notably the M-Line and 17-Parkmerced bus routes, which was stated clearly in an article of the review of Muni's on-time performance in 2009 by Rachel Gordon of the SF Chronicle. The M-Line and 17-Parkmerced bus were the most under-served and infrequent lines in the system. This fact coupled with the cuts to additional routing on the 28, 29, 88, 18, and prior direct bus route from Parkmerced to downtown, has in fact isolated Parkmerced from the prior amenity serving transportation lines that served this area as a transit orientated development. The reduction, and elimination of commercial services at Cambon drive shopping area, and adjacent amenities such as the public school at 700 Font through its dilapidation and eventual sale has hastened the conversion from a walking self-contained community to a reliance on infrequent transportation service, and car use. The SF Muni TEP projects cuts in service routing on the 17-Parkmerced line isolates 6 towers and numerous garden units of seniors, and disabled tenants whom now are forced to rely on auto, or assisted transportation rather than city services that were in place for decades. It is essential that a full audit of the prior services and cuts be made, and that accurate review of the SFMTA Muni TEP project and cuts be looked at in terms of compliance with ADA and basic services that were provided for prior in this planned community.

- a. Parking noted per the NOP states there are 1,540 underground stalls, 1,507 townhouse spaces, 151 maintenance and office spaces, and 1,591 public on-street spaces.
- b. These totals do not state any recorded tally of SFSU impacts on the district daily. The MOU and SFSU/CSU masterplan note that in June 2009 they would report back on the impacts and possible fair-share costs of the parking and traffic impacts on the parkmerced community.
- c. UPN Stonestown apartments loss of street and parking areas. (not mentioned) which directly affects the Parkmerced and surrounding neighborhoods with students looking for free, and open parking zones.
- d. Parking is noted as increasing by 6,252 spaces, off-street, and by 90 spaces on-street. This ignores the demolition of the SFSU parking structure, and proposed density increases and commercial zoning proposed by the SFSU/CSU masterplan along Buckingham, and Holloway, which would increase parking and traffic density with the additional commercial zones on crespí.
- e. Page 23-24 notes that the parking increases will be placed primarily on the eastern side of the site. There is no indication that parking trips, by SFSU students or Parkmerced residents would decrease due to provided new amenities proposed. Job commuting to the south-bay, and to SFSU is still a major existing problem, that would not be resolved by additional parking on site. The proposed new parking would only aggravate the existing on-site street parking and underground parking problems Parkmerced currently faces due to crime, car-break-ins, and vandalism. The total current existing parking crime is directly attributed to students leaving belongings in cars, and not being aware of the existing crime, and parking regulations that leads to traffic, tickets, and poor-parking by non-residents throughout the site, reducing existing parking on street areas. Non-striping of parking areas on site, has been consistently suggested to help curtail poor-parking on street spaces. A on-street parking waiver for existing tenants can be easily implemented so that non-local street parkers are easily identifiable and enforcement can be made stricter to enforce mass-transit use.
- f. Page 18 notes site access would be expanded to provide additional access points around the edge of the site to better integrate Parkmerced with its surroundings. Parkmerced was and still is integrated as a community within the district, it represents a variation on the typical linear street patterns, and provides a unique beaux arts street plan that provides a secluded

54.D.1  
con't

neighborhood of rental units as a "bedroom community" in this district. Street noise and the introduction of additional points of entry into Parkmerced will only promote the area as a by-pass route for 19<sup>th</sup> avenue, and lakemerced boulevard. This is not a benefit to the community, and will increase dangers to school sites, and seniors that live in the community.

- g. No analysis is made for the impacts on increased commercial areas by the SFSU Masterplan on Buckingham and Holloway, in addition to the Crespi drive commercial zoning proposed. This will back-up additionally the turning off of 19<sup>th</sup> avenue and use of side streets to cut through the neighborhood endangering residents, school children, and especially disabled and senior tenants on site.
- h. The "round-a-bouts" are consistently noted in negative terms by the Architect, however most tenants note that it is an efficient and sustainable system that is frequently integrated in European new built communities to reduce breaking, and stop/start exhaust of vehicles. The planting of trees by SFSU on circles along Font affect the integrity of the original design, and represent negative landscape changes that actually hinder the visual site-lines across these medians so drivers see on-coming cars and can signal the vehicles the drivers intent to circle in front of other cars. The right of way is easily designated by the car within the circle. Cars entering the circles must give way to cars pedestrians and bicycles already within or entering the circle. The beaux-arts street layout allows for a more exclusive private neighborhood that deters non-community members from driving through the area at high speed. The walkability of the neighborhood is enhanced by the site-lines, and axial and joining side streets that break the monotony of the basic typical SF street grid. Alternatives that look at the street design based on the urban planning and character of streets in the SF General Plan should be looked at to determine the quality of space created as a whole district.
- i. The DPT should have logs of the "E" parking permits in the neighborhood of Parkmerced and how many residents currently have parking permits or spaces reserved in the existing garages. The number of University Parking Permits for UPN, UPS, and Campus Parking should also be a definitive number and accessible to determine the parking loads on the UPS and Parkmerced site. The impact of the parking and traffic impacts should be part of the MOU updates as stated, and accordingly the University, Parkmerced, the city and the community should be informed of these impacts, and ascertain if the suggested fair-share fees were biased in favor of the university, vs. the benefit of the local community.

54.D.1  
con't

**Transportation Proposed Changes** – The M-Line route change proposed by the developer should be thoroughly investigated in terms of mitigation measures that by-pass the Parkmerced district area as a neighborhood keeping it as a mitigation measure that retains the "city-within-a-city" concept and "quiet suburban feel" to the original area. The transit services intact, and provides direct connecting access through a route that circles lakemerced, so that services are provided to the Lakeside Apartments and Condos, in addition to the homes and lake-merced access as a watershed. A significant re-routing should look seriously at the 1952 interchange at 19<sup>th</sup> and Brotherhood Way so that routing could be brought to the Daly City Bart Station, and additional north to south sunset routing that connects the malls at Westlake, along Sloat Blvd, possibly on the St. Francis Circle Line, and through Sunset Boulevard possibly linking to the L-Line or N-Line end points for north to south transportation along 19<sup>th</sup> Avenue or another major thoroughfare. It is important to note that the SF Muni TEP does not review on-time performance and impacts due to changes in the T-Third Street Services to the Ball-park, and how this has affected M-Line turn-around times inbound and outbound. The reduction in frequency of M-Line service is often and problematic for families and students who need timely service to our

neighborhood. The Parkmerced plan and SFSU masterplan do not look cohesively at the benefits to routing muni along alternative routes such as Buckingham, through the Stonestown site, around Lake Merced, or SFSU, or providing quick direct connection to Daly City Bart and an intermodal station stop at the border between daly city and SF. Lake Merced Hill home/condo units, and Lakewood Apartments are also seeing reduced transportation options and are city neighborhood developments.

- a. Page 18 notes that the M-line station re-route into parkmerced is meant to replace the existing SFSU station, and address the overcrowding issues at the current station, affording SFSU students easier access. The MOU noted the need for "fair-share" impacts, and if this station is to truly benefit students as the primary benefactor, perhaps the station option should be shown also as a mitigation measure within SFSU property on the north side of Holloway at the proposed demolition of the buildings on the SE corner of campus, adjacent to the SFSU administration building. If access to students is the primary intent, than as a mitigation measure perhaps the immediate installation of two-sided platforms, or two-sided entry onto the existing platforms at SFSU and Stonestown would initially help alleviate the dangerous conditions that seniors, students, families, and disabled riders face daily due to negligence on the part of city agencies to remove existing fare-boxes, and provide adequate areas for loading and unloading the current trains. This improvement since primarily a SFSU benefit and crowding issue during peak hours should be paid for by the SFSU/CSU organization due to increased enrollment.
- b. A second mitigation alternative would be burying the 19<sup>th</sup> avenue intersection from Holloway to the 19<sup>th</sup> and Brotherhood interchange to develop multi-layered parking and transit hubs below grade at the 1952 interchange, or along the split in areas where Junipero Serra Blvd. and 19<sup>th</sup> Ave. intersect through to the banbury drive or Holloway intersection. This could provide an alternative that sinks the traffic under the transit providing a more useable and safe at grade pedestrian crossing and zone that allows for increased green-space to the east of 19<sup>th</sup> neighborhoods as a possible park, adjacent to the cambon retail area.

54.D.1  
con't

Proposed Design Concept / Planning Code Height Limits / Special Use District – the proposed SUD district, and design guidelines or Design Development Document propose allowing multiple or variety of design styles in a prior homogenous and simple typology and aesthetics in terms of the masterplanned community of Parkmerced. The Scale and character of homes and the landscape elements would be dwarfed by the total densification project proposed. A quick stroll down Serrano drive, would show how the intended development by SFSU which included 4-story residential over a retail floor would increase the heights way above both the tree canopy, and adjacent low-scale development. Street sections have not been provided or shown that accurately depict the entire build-out density. The Parkmerced "Vision" meetings had only "ghostline" images of the outline in axonometric and a few images of streets along the proposed open space and retail areas which conceals the true size and scale of the streets proposed. The street sections shown in presentations also did not address the buildings and were mainly street patterned options. To show accurate scale modeling, and scaled sections of proposed new streets is critical across the site to convey to the community the density proposed and changes to the zoning and height limits. Canyon-like urban spaces and U-shaped 3-4 story density would drastically alter the character and charm of this prior low-scale residential community. The visual connectiveness, of the design buildings, the cuppola's on the short brick masonry buildings and the simple palette of materials and finishes, would be altered by varying designs finishes, and styles of new architecture that would be hard pressed to blend in or work effectively between the existing and newer finishes shown in multiple presentations by SOM in the 200+ design meetings. The simple existing short



brick buildings and beaux arts street layout provides a landscaped building character that blends well in size and height allowing tenants to see and recognize the street areas based on major axis routes, the Juan Bautista Circle, and the arrangement of pie-shaped and block shaped units that scale closely in density. The overall design concept to date was developed without community based planning or implementation of changes based on the communities input. There was no "trace-paper" or pens provided to directly suggest or alter the plan proposed. Comments were "recorded" by the planning and owners team, and often they were not accurately re-typed into the online versions of the meeting comments by the community. There were also many meetings where the "community" of Parkmerced was not noted or invited off-site to adjacent neighborhoods, so that their input appears prevalent in the changes shown to include "for-sale" units, and altered access to "open" the site which typically was against all prevailing tenants wishes in the past (see general historical articles on the attempts to condo-convert Parkmerced and the creation of the PRO group initially). The initial design concept was retained throughout the process, and only minor alterations that are perceived as zoning and project sponsor related changes, are noted in the numerous presentations. Alternatives that set up working groups, that can directly suggest through drawing the proposed location and changes is suggested, in addition to recognizing the issue of turning Parkmerced into another "Mission-Bay" development.

Water – proposed grey-water recycling has not been implemented by the owners during roof-rennovations of parking garages, and roofed areas of the townhouse units. Water was used to "clean" roof tops of plant growth using pressure water sprayers. New installed water systems done in 2002 already leak, and exhibit signs of poor installation and location, due to consistent re-working of these installed upgrades that tenants fought on prior "pass-throughs" for irrigation systems. The suggested comments raised in the meetings to provide test areas, for installation and determination of water retention methods possible on site was mentioned to test the sustainability, and usability of the water for re-irrigation of existing planted areas on the property. The consistent use of "capital projects" and the proposal to remove the (under 10 year old) "Cadillac of irrigation systems" as described by the prior management and how it was installed that was a major pass-through battle for tenants proposes again to tax residents for poorly installed and implemented irrigations systems on site by prior owners onto new and existing tenants. This re-working also currently affects the plantings and is being used as reason to tear into larger areas to re-work and re-plant entrances, and surrounding site landscape elements.

54.D.1  
con't

- a. Bioswales have been implemented at Lake Merced (see eastern side of Lake Merced at the renovated parking lot) by the SFPUC this site shows the poor maintenance and installation of these details, which blocks drains, and creates a muddy sticky mess. If the SFPUC cannot efficiently install bioswales, then the Parkmerced group would not be able to maintain and keep clean such areas. Tall grass areas were installed in front of towers, and they already are refuse "collectors" and show little manageability in terms of growth.
- b. Bioswale edges and irrigated deeper drainage edges on lawns was suggested as an alternative to assist in water collection on site. Suggestions on roof-top water retention being implemented during renovations was not implemented or investigated.
- c. Juan Bautista Circle is considered the "heart" of Parkmerced and is used by many tenants for social events, walking, and playing areas. The removal of this green space with a large bioswale pond, is unacceptable and alternative locations, and or methods should be investigated to provide a solution that integrates the towers, parking structures, and existing roofs through sloped surfaces, and proper drainage systems.
- d. Central energy distribution is problematic in earthquakes, or when systems fail, and the installation of new boilers, and equipment should be noted in terms of sustainability. The

installation of water heater units in individual restrooms would provide direct control and accessible maintenance in units for the water and gas systems.

**Geological** - It is noted under section 31 that substantial excavation would occur for below grade parking areas. The effect on this work could jeopardize the existing tower units. Investigation into the sub-structure of the existing towers is required to determine earthquake and subsiding of these foundations, in an earthquake. Alternatives to the proposed densification should include alternate sites for parking both along or under 19<sup>th</sup> ave, at the 19<sup>th</sup> and Brotherhood Interchange, or at the 800 Brotherhood Way site. Accurate analysis of the soils conditions and structural capacity of the existing towers is required to determine the stability due to older construction, and subsoil conditions that are not acceptable to large dense urban designs. As a watershed area, and dune area prior in history, the area where towers are proposed are identified in the Building Departments site maps as susceptible to liquefaction. Alternative sites, and means that look at tearing down the existing towers, and providing stable or less excavation on site, along with lower heights and densities would assist in lessening the geological impact on the overall site. It has been noted by other tenants during the hearings for 800 Brotherhood Way that was approved without an EIR, that the carcinogens along Brotherhood way is due to a prior railroad route that existed along this area, and excavations in this neighborhood may cause toxins to be released adjacent to existing housing.

**Project Approvals** – there is no mention of the DR review updates occurring currently and that the process, and the actual approval route is unclear due to Prop. J. and an unseated Historic Preservation Commission. There is no noted review of Landscape Trees for “landmarking” eligibility. There is no noted review of the project as a national register landmark candidate or as a possible local or state landmark site. There is no noted review of the prior approved projects such as the SFSU/CSU masterplan, and how joint impacts are being investigated and analyzed for determining the actual need to mitigate, or deny approval of projects based on negative impact.

54.D.1  
con't

- a. The housing element 2004 was noted to be in non-compliance, and is undergoing update work, in what way will the adequate need for housing based on the lack of low-middle income units be defined, and by what body will this be ascertained due to the prior legal issue of compliance with the housing element and basic need to provide rental units as an “option” or balanced approach to housing development.
- b. Emergency Egress from the city and county of SF. This routing and egress from the city of SF funnels out along 19<sup>th</sup> ave. This issue was brought up prior during the SFSU Masterplan by the Brotherhood Way Organizations, in what ways will the increased density be analyzed and by which agency in order to determine adequate evacuation and open space areas, for medical emergencies such as earthquakes, tsunamis, and other major disasters?
- c. The existing towers retained, have not been seismically strengthened and were built prior to many current rebar, and safety standards for concrete construction. How are the egress routes and buildings of the existing parkmerced towers, being reviewed for structural capacity and resistance based on the geological proposed changes, and density increase in terms of foundation work property wide? What agency will investigate the soils composition and possible effects on existing unstable towers, built on non-bedrock foundations.
- d. Preservationists mentioned in the scoping hearing “section 106” and other required possible issues/approvals that the current document does not address.

**Potential Environmental Issues** – the proposed project *WILL* result in huge significant environmental effects. The importance of reviewing all possible alternatives that promote preservation, and sustainable density, and retention preservation of the open space and landscaped areas should be considered primary due to the uniqueness, and need to ascertain the sustainability of the proposed total tear-down of the neighborhood.

- a. The no-project alternative should be seriously considered as a primary or acceptable solution due to environmental impacts, the issue of historical landmarking, and this district being the most dense neighborhood in SF.
- b. The preservation alternative should be analyzed and a solid visual solution reached with preservation groups that provides for the preservation of all landscape courtyards, and or site features, of at least 50-75% of the site.
- c. Other alternatives should include; (1) demolishing the towers due to instability, and redensifying the tower areas to allow a height increase to 100ft or more to obtain density projections required by the project owner. (2) land-swaps to obtain additional adjacent land areas. (Ex: Stonestown, or UPN proposed density along 19<sup>th</sup> avenue between Stonestown and Holloway). (3) sinking the 19<sup>th</sup> avenue area between stern grove and brotherhood way, to provide additional density, vertical construction, new parks, and connective light-rail and transit options in the western district. (4) densifying on the 1952 cloverleaf area of brotherhood and 19<sup>th</sup> avenue up to SFSU or Stonestown to mitigate height density proposed, and provide additional new housing and retail opportunities along with a traffic and transit solution along 19<sup>th</sup> avenue to doyle drive.
- d. Joint impacts of all proposed projects must be ascertained, and any possible mitigation measures investigated by all projects, and sponsors to prevent the destruction of the masterplanned community of Parkmerced.
- e. Waste and the accurate accounting for demolition, materials thrown-out, energy required for demolition and reconstruction in terms of stored energy, and the ongoing renovations and work that has occurred as capital improvements in Parkmerced's past should be made part of the documentation to ascertain the need and consistent pass-throughs that have affected the sustainability, and ongoing displacement of tenants.
- f. Noise is a huge issue to this densification, based on the impacts of the SFSU area on parkmerced as a prior bedroom community. Currently the SFSU Taskforce was initiated to deal with these issues, however there is no current control on student housing or the use of Parkmerced as dormitories and fraternity/sorority houses, or Party Circuit Pads for the club-scene in SF. The proposed vibrant street life, is in direct opposition to what was the original intent of Parkmerced as a garden rental apartment community. The most "sensitive receptors" on site or adjacent are the existing tenants, and all efforts should be made including looking into SFSU mandated dormitory construction for 1-3<sup>rd</sup> year students on there existing pre-land-purchase sites of SFSU's campus. Increased vehicle traffic, wind turbines, and co-generational plant construction should also be investigated due to increased noise levels in urban areas based on density increases.
- g. Air-Quality must be investigated due to the demolition of housing units known to contain asbestos and other hazardous chemicals. Recent renovations of the towers

54.D.1  
con't

carpeted over existing asbestos tiles. Tearing down all existing townhouses and parking structures will also increase air-toxins in the district and affect seniors, children and those with asthmatic symptoms. All available mitigation measures and alternatives should be considered based on the BVHP Bay –View Hunters Point Project and similar air-quality concerns.

- h. Wind density -will also increase turbulence based on density levels proposed. The low-scale existing housing has not been investigated based on wind effects, and a full report on wind density and proposed changes should be made to review the impact of towers on existing wind and migratory routes on site.
- i. Shadow/Glare – glare and shadow of increased density, also along brotherhood Way religious groups should be investigated due to density proposals on the southern portion of the site.
- j. Community Services – our community center was removed and sold off prior by Parkmerced owners, the current “club-house” does not provide adequate community meeting area for the tenants organization. Access to these community buildings is limited, and often not available due to the use of many portions of the Vidal drive and Leasing offices for current rental staff, and renovations departments further restricting community use and access to services and areas prior.
- k. Reviewing additional density levels and there impacts on local schools, libraries, parks and recreation, fire/medical/police services must also be reviewed due to the impact we have seen in emergency services being called repeatedly to Parkmerced Towers due to parties, and construction work and new systems installed.
- l. Energy Use – has already increased due to implementation of new fixtures, and equipment in the tower units. The overall energy increases has not been ascertained by independent auditing of the existing system improvements.
- m. Agriculture – will be impacted especially if the increased and new housing displaces more residents that must relocate to the valley areas of California. Agriculture has already been impacted in California due to expansive development in the valley areas. The displacement of renter’s and tenants of urban areas has already had a large impact on agriculture that has not been determined statewide, based on development and density projects. Increased costs of existing parkmerced housing has already displaced, and gentrified the community, which impacts the agricultural regions of the state.
- n. The project has already instigated legislation locally 081281 by the SF BOS that implements the area as a priority development designation area. The application was filled in negligently and is attached (see appendix exhibit – K)
- o. Joint Impacts on the possible integrity of the landscape of the Parkmerced masterplanned community must be adequately addressed in terms of mitigations.
- p. All mitigation measures, must be investigated to the fullest in terms of proposed design solutions. The no-project alternative, preservation alternative(s) and compliant housing element alternatives should be investigated and proposed fully as solutions that provide mitigated solutions to the proposed project.

54.D.1  
con't



**Plans & Policies** – The SF General Plan is not in compliance in the 2004 Housing Element. Also due to ongoing changes with the SF General Plan under the Housing Element and Preservation Element Policies currently undergoing changes. Including notification, and discretionary review policy this project is being pushed through prior to implementation of these policies so it can be “grandfathered in” vs being forced to revamp the design based on community input. The 200+ meetings do not represent “Community Based Planning” and show an absolute disregard for issues and concerns raised repeatedly during the Parkmerced meetings. Community based planning is only meaningful when neighborhood organizations are the primary catalyst for the changes requested. There opinions and issues must be visibly integrated into the design concept. The current concept has not responded to issues of options or variations that has been requested repeatedly.

- a. The Housing Element is currently not in compliance due to the lack of affordable, and low-middle income rental units not being created yearly since 1999. This imbalance of housing rental units is a discrimination against renters, and socio-economic discrimination city-wide in the developments implemented.
- b. There must be noted the need to balance the developments citywide with integrated rental units, and a balance of 50-50 rental and for-sale units of all income levels in large scale developments. The increase in pied-a-terre \$800,000+ units built citywide shows a total lack of adequate housing being built.
- c. The U.S. Department of Housing and Urban Development and Section 8.1 of the SF General Plan discuss the “OPTION” of rental vs. for-sale housing. The need to have the choice of a home or apartment living situation, is a requirement, and must be met to be non-discriminatory in the development of housing citywide. The real-estate interests, bankers, investors, developers, and architects, have prolonged the imbalanced growth of the urban housing situation in SF. To be in compliance means that larger integration of rental housing in new construction, and existing neighborhoods must be achieved throughout the city in an equal balance in all neighborhoods.
- d. The FOCUS/ABAG submitted application for priority development designation by SFMTA Tilly Chang was filled in negligently, and noted incorrectly that Parkmerced was already an area plan, and no other noted project area plans were noted. This legislation should be revoked and an investigation into the approval process for this legislation initiated to determine the negligent parties, and to revoke the approved legislation. (see appendix exhibit K)
- e. The Approved 800 Brotherhood Way development was done without an EIR, this approval should be revoked pending a new EIR that looks at all joint or adjacent developments per CEQA, and reviews the impacts on the prior Parkmerced masterplanned community. (see Appendix exhibit G)
- f. ABAG FOCUS ties land-use policy and transportation issues at a regional level, and effects San Francisco’s ability to build and provide essential housing due to the lack of open space and buildable land. The densification process that this forces urban areas to address, has not been looked at in terms of historic districts and preservation as at risk elements in the density push that occurs. Understanding the Housing Element provisions in the context of federal and state laws, and the need to provide equal development throughout neighborhoods and urban areas, with the option of renting as an equal development base as for-profit/sales housing.

54.D.1  
con't

- g. SB375 does not address preservation as a "green" solution with supportive tax and financial assistance to speculators who have purchased urban areas pre-emptively to densify and profit off of state legislation that dictates denser urban development in existing neighborhoods and low-mid income rental areas of the city, utilizing predatory equity lending for acquiring and displacement of neighborhoods.
- h. The SF General Plan Housing Element 2004 Scoping Hearing EIR the issues of equity, economic discrimination, insufficient review of the diversity of housing needs in SF, in regards to tenancy/occupancy/tenure/vocational/institutional needs were raised at these meetings. The SF General Plan is in non-compliance as long as the ongoing gentrification, and destruction of sound rental neighborhoods occurs, and increased renovations, and rent increases exceed the yearly rent-board allowable increases. A rent-rollback, or significant stop in housing construction should occur until a more balanced approach to housing is codified, and instigated city-wide.
- i. The SF General plan is ignored in terms of numerous sections of the Open Space Element, Housing Element, and Urban Design Element. Whole sections of which are apparently ignored by the development team in identifying and considering alternatives that meet the SF General Plan elements and provisions. It appears the SF General Plan is being explicitly ignored on numerous grounds a selection is shown below in items J, K, L, M. (see SF General Plan online for specific section on each noted a response on how the SF General Plan is being primarily met through the proposed development addressing whether it meets a majority of key points in the SF General Plan should be ascertained.
- j. *The SF General Plan / Urban Design Element - is ignored including several sections cited here; Objective 1 Street Patterns, sections 1.1, 1.2, 1.3, 1.4, 1.5, 1.7, Objective 2 Conservation, sections 2.2, 2.4, 2.5, 2.6, 2.7 (Parkmerced is a qualifying unique and special area and district, and would qualify to be listed under the noted sites), 2.8, 2.9, 2.10. Objective 3 Moderation of proposed new development, sections 3.1, 3.2, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, Objective 4 Neighborhood Environment, sections 4.1, 4.2, 4.5, 4.6, 4.7, 4.8, 4.10, 4.11, 4.12, 4.13, 4.14, 4.15*
- k. *The SF General Plan / Open Space Element is ignored including several sections cited here; Objective 1 The Bay Region, sections 1.3 (new located parks), 1.4 (regional green-belt), Objective 2 Citywide system, sections 2.1, 2.2, 2.3, 2.4 (through transit access), 2.6, 2.7, 2.8, 2.9, 2.12, 2.13, Objective 3 shoreline, sections 3.3, (western shoreline and estuaries such as lake merced not mentioned), Objective 4, Neighborhoods, sections 4.1, 4.2, 4.3, 4.4 (Parkmerced's loss of open space), 4.5 (already exists in parkmerced), 4.6, 4.7.*
- l. *The SF General Plan / Housing Element is ignored including several sections cited here; Objective 1 Housing Supply, sections 1.1, 1.4, 1.5, 1.6, 1.7, 1.9 (SFSU/CSU Masterplan and lack of housing addressed in the MOU), Objective 2, section 2.1 (Parkmerced), 2.3, Objective 3, section 3.1, 3.2, 3.3, 3.4, 3.5 (Parkmerced towers), 3.6 (Parkmerced), Objective 4 section 4.1 (equal balanced development throughout the neighborhood including single family home areas), 4.2, 4.4 (neighborhood character or scale), 4.6, Objective 6 section 6.1, 6.2, 6.3, 6.4, 6.5, Objective 7 section 7.1, 7.2, 7.3, Objective 8 [especially the sentence stating households should be able to choose the form of tenure most suitable to their needs, from either a rental or an ownership housing stock... leading to patterns of economic and racial segregation.] section 8.1, 8.2, 8.3, 8.4 (economic integration throughout San Francisco), 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, Objective 9, section 9.2, Objective 11 sections 11.1, 11.2, 11.3, 11.4 (SFSU Masterplan), 11.5, 11.6, 11.7, 11.8, 11.9, 11.10, Objective 12 sections 12.1, 12.2, 12.3, 12.4, 12.5*

54.D.1  
con't

- m. *The SF General Plan Environmental Protection is ignored including several sections cited here; Objective 1 General, sections 1.4, Objective 4 sections 4.2 (development of urban mass transportation systems in the western side of the city), Objective 7 Land, sections 7.1, 7.2, 7.5, Objective 8 sections 8.2, 8.3, Objective 9 sections 9.1, 9.3, 9.5 (expand the electric trolley network in the western neighborhoods), 9.6 (Parkmerced is a residential neighborhood), Objective 10 section 10.1, Objective 11 section 11.3, Objective 12 sections 12.2, 12.3, 12.4, Objective 13 sections 13.1 (Parkmerced townhomes), 13.2, 13.3, Objective 15 section 15.1 (SF Muni TEP cuts services and increases auto use), 15.3 (Parkmerced had prior a school, recreation and adequate work access and shopping prior), Objective 17 section 17.1, 17.2, Objective 19 section 19.1 (waste reduction audit of Parkmerced renovations to date is suggested), Objective 21 section 21.1, 21.2, Objective 22 section 22.1, 22.2*
- n. Based on the massive demolition of the existing neighborhood and total-tear-down of the 2-3 story units on site, by both the SFSU Masterplan and the Parkmerced Vision plan, we request mandatory discretionary review and a thorough analysis of the current status of the existing housing through a "Soundness Report" by a third party, in addition to analysis by an outside "green-certified" consultant to review the overall impacts to the environment based on the on-going renovations to date, including work done in 2002 as part of the sales of the prior portions of Parkmerced. A suggested method is through the "green-point-rated-calculator program" by Build it Green or other third party review to determine overall building waste due to renovations and proposed demolition to determine the "sustainability" and "green-eco-friendliness" of the options being presented so that the best solution is obtained, including the options of the tower removal and replacement vs. the existing low-scale total tear down proposed.

54.D.1  
con't

In summary the use of programmatic cultural resource mitigation used by the SFSU/CSU planners in their programmatic EIR, vs. a project specific analysis, was ignoring the Parkmerced development as a possible National landmark Candidate. Parkmerced Investors LLP, recently noted the completion of the Historic Preservation Analysis by Page & Turnbull. This report was not made public, nor was it an accessible piece of information as part of the NOP/EIR, and discussion on the issues pertaining to Parkmerced and its possible inclusion as a National Landmark. The NOP/EIR was 73 pages, and was not issued to all notified community members, or translated to the immigrant community on site. We have a large Russian, and Asian immigrant community and the lack of information being translated is a concern. My request and note to Rick Cooper on the availability and translation of information was not as denied in a response from the planning dept. although it is obvious that the community is not receiving a full document, or has been notified or allowed to review in a public area the information submitted to the planners. The NOP/EIR was also sent out simultaneously to the student move-out at SFSU thus reducing the comments and notification by students moving off-site or out of the area student input on costs of housing, and impacts on transit, parking, open space, and amenities are key in determining the use and concerns of the community.

Joint Impacts on the Parkmerced community and development, in terms of its original layout of 191.5 acres must be ascertained through proper joint EIR review, and project impacts. Ignoring this is ignoring the landscape as a masterfull design of elements and invidual courtyards. The future of essential housing relies on the comprehension of past endeavors. Please look at seriously, and consider these issues as major concerns, in the process, and development of this EIR + NOP.

Alternative(s) suggested are easily modeled and can provide great options or design inducing alternatives, and additional data that would benefit the discussion and resolution of the proposed concerns mentioned above (see Appendix exhibit O for some very rough examples of alternatives that were mentioned in an initial conversation with the lead Architect Craig Hartman SOM and Seth Mallen Stellar Management). The fact that only one presentation scheme has been developed represents the developer "maximizing" his solution and profit margins, while providing little ability of community organizations or neighborhood concerns from being adequately addressed has nothing to do with COMMUNITY PLANNING. We strongly suggest that as part of the EIR process alternative schemes or options are required to be developed to a similar level so that community and preservationist organizations may also weigh in on the total tear down and the benefits of a more balanced approach.

54.D.1  
con't

In final comment, I want to state for the NOP/EIR scoping record that the National Register Nomination for Parkmerced is underway. The tenants PRO organization in addition to preservationist organizations are concerned that the full entire landscape and site as a cultural resource has been in-adequately reviewed as an entire site and district for its contributory factors to the city of San Francisco.

The nomination of Parkmerced to the National Register of Historic Places is "pending", and all possible alternatives should be reviewed to determine the best alternative(s) to promote preservation and a balanced approach to the proposed total-tear-down of the garden units. It is troubling that the current owner continues to work "un-abated" on the site after consistent letters in a genuine "un-controlled" situation that threatens to alter consistently the INTEGRITY and COHESIVENESS of the LANDSCAPE DESIGN, an immediate halt to permitting, and renovation work on all CSU state and Parkmerced related projects must be seriously by local and state agencies should be considered due to the consistent disregard by Parkmerced management and the SFSU Masterplanners on serious issues regarding national landmark status, so that the impacts of such proposed changes and minor or major alterations that are on-going without review are reviewed fairly, equally and according to proper CEQA analysis.

Sincerely,



Aaron Goodman

Cc: (\*\*NOTE:copy of memo sent w/o appendix sections attached to the following Agencies) SF Board of Supervisors, SF Planning Commission , SF Historic Preservation Commission, SF City Attorney's Office, The Cultural Landscape Foundation President Charles Birnbaum, Anthea Hartig Western Director of the National Trust for Historic Preservation, Cindy Heitzman Exec. Director of the California Preservation Foundation, SF Preservation Consortium, SF Heritage Exec. Director Jack Gold, Docomomo Andrew Wolfram, State Office of Historic Preservation Dwight Dutschke, PRO File



Appendix:

Exhibit A- Map of Parkmerced (Metropolitan Life-Insurance Company)

Exhibit B- SF Heritage News "The Case for Preservation @ Parkmerced"

Exhibit C - Docomomo Documentation of the Modern Movement "Parkmerced A Modern Landscape Masterpiece under Assault."

Exhibit D- Memo from Anthea Hartig of the National Trust for Historic Preservation on the SFSU / CSU masterplan EIR document, noting the programmatic vs. project specific EIR

Exhibit E- copy of the Memorandum of Understanding between SFSU/CSU and the City Agencies

Exhibit F- SF Board of Supervisors Legislation 081004, 081005, 081281 and the Focus/ABAG application and legislation for Priority Development Designation in District 7. (memos attached regarding and outlining the concerns of the PRU organization on the lack of 30 day notice for 081281 and the errors in the ABAG/FOCUS application that was sent to the SF Board of Supervisors without accurate information attached. A revised version with attached memos and maps was filed at a later date and was not what was issued to community groups at the hearing date for the SF BOS Land-Use Committee.)

Exhibit G - SF Board of Supervisors Legislation on 800 Brotherhood Way File No. 051227 Motion No. M05-112 which was a large project adjacent to Parkmerced approved without an EIR as required by CEQA.

Exhibit H - The Cultural Landscape Foundation [www.tclf.org](http://www.tclf.org) exhibit guide image on the Marvels Of Modernism "Landscapes @ Risk" 2008 highlighting Parkmerced San Francisco, California and Memo of Support by the TCLF President C.Birnbaum.

Exhibit I - Predatory Equity "the survival guide" by the Center for Urban Pedagogy, NYC [www.makingpoliticypublic.net](http://www.makingpoliticypublic.net) that highlights the issue of Stellar Management and large scale apartment complexes in NYC that were renovated by the same organization that is working on Parkmerced. Riverton Apartments NYC, and Peter Cooper Village Stuyvesant Town NYC are both properties that have similar issues in regards to speculation, renovations, increased rents, university impacts and tenant concerns. SF Business Times Article on the purchase from Leona Helmsley by Carmel Properties that initiated sales of Parkmerced for "renovations" and "upgrades" that have been reduced or are proposed to be demolished.

Exhibit J - The Westside Observer Volume 21 Number 5 June/July 2009 "Where's The Brotherhood" by Quentin Kopp (page 1 and 4) and copy of the Letter of Determination by Larry Badiner of the SF Planning Dept.

Exhibit K - Bulletin No. 19 submitted October/November 2007 (Parkmerced) to the SF Landmarks Preservation Advisory Board LPAB (note: no response received to date from the newly appointed HPC, Planning Commission, or prior LPA3 on the status of this submission / document length prevents inclusion or attachment only the initial submission and memo is attached for reference)

Exhibit L - SFSU website image showing purchased properties units and approx. dates of purchase and additional notation, memos from the SFSU President and SFSU Foundation on the original purchase financing that has been since sold back to the CSU system and is State Property which must review projects per preservation section PRC 5024

Exhibit M - Images and Advertisement from Parkmerced's original flyers and images showing original color (white) that highlighted the landscape design, and amenities that were part of the original development.

Exhibit N - Open Space (approx. diagram) of open space areas on site 191.5 acres vs. Figure 5 Diagram of open space 116 Acres

Exhibit O - Rough Examples of Alternative demo/development option(s) a) tower demolition and retention of existing townhouses, b) parking area, and partial demo of town-houses as required to achieve density c) perimeter density with the retention of the majority of Parkmerced blocks.

Exhibit P - SF Planning Department "Soundness Report Requirements" - See also website [www.builditgreen.org](http://www.builditgreen.org) and the USGBC website for information on demolition issues related to Green Building and calculating material waste and carbon footprint impacts.

[\*\*\*NOTE: Appendix information was submitted to the SF Planning Dept. for the Scoping Hearing EIR for submittal as items to be considered and included for reference in relation to the NOP/EIR, and forthcoming Draft EIR. Additional copies of items above are available upon request.]

NOT INCLUDED / SUBMITTED PRIOR



Aaron Goodman  
405 Serrano Dr. Apt.#11-H  
San Francisco, CA 94132  
Email: [amgodman@yahoo.com](mailto:amgodman@yahoo.com)

Attn: Rick Cooper, Senior Environmental Planner  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

March 10, 2010

RE: 19<sup>th</sup> Ave Corridor Study (Publication Date: February 12, 2010)  
Public Meeting Date: February 24, 2010 (7 Hills Conference Center 6-8pm @ SFSU)  
Public Comment Period: February 12-26, 2010 (**EXTENDED to March 12<sup>th</sup>, 2010**)

Mr. Rick Cooper SF Planning Department;

I write to you the following issues/comments, submitting comments as an individual tenant of Parkmerced, on the published 19<sup>th</sup> Avenue Corridor Study.

- 1) Page 2 of 187 - The notification memo, notes only the SF Board of Supervisors Resolutions Nos 080014 and 080014 (on page 2 of 187) and notes the legislation as 081004 and 081005 (on page 7 of 187 which I believe is the correct numbers) and does not include any reference to the equally important legislation 081281 tacked on without 30 day community notice per the notification rules on legislation. This legislation allowed an improperly filled in document to be submitted by Tilly Chang, with incorrect items filled in to submit for cross-county transit funding, without proper review and documentation of the errors in the documents submitted. The area of the Parkmerced development and SFSU/CSU project were NOT part of any SF General Plan area, and on the Citywide Action plan were not included when the legislation was initially sponsored by Supervisor Sean Elsbernd. There is concern that the proper process was not followed in regards to the issuing of the legislation tacked on, and that the SFMTA has made prior agreements with private entities on the future routing of transit through a residential neighborhood without reviewing the best direct alternatives for regional transit connections and assessing public and community input adequately on the direct point-A to point-B extension of the M-Line to Daly City or Colma Bart, or the creation of a new transmodal station and new lines between SFSU/Parkmerced and Brotherhood Way including tunneling and/or overpass work and development of significant Level T5 projects that could alleviate the impacts on a community of placing (3) station stops in a .18 mile radius. The actual Land-Use hearing that included the Sustainable Transportation & Land-Use Integration document by the SFMTA, which as noted was highly flawed, in missing key issues of development projects and proposals that need to be

54.E.1  
con't

- reviewed cumulatively, and transit first policies, that to date have not been implemented effectively by the SFMTA.
- 2) Page 2 of 187 - The initial memo notes that ALL reasonably foreseeable developments located along the 19<sup>th</sup> Ave. corridor study area be prepared and continually updated , to date the projects on One Capital Ave. in the METNA area of District 11, and the recent bankruptcy of Stonestown and possible new buyers and development similar at a min. to the prior stonestown development and possible maximum build-out by new future owners, should be an initial level of future additional development that has NOT been considered in the current analysis. The Sloat Blvd. development site is outside the boundary area however like the Balboa Park site affects transit along John Muir Drive, and Lake Merced Boulevard. The site is across from the SF Zoo is not listed as a reasonable foreseeable adjacent development though in the noted boundaries of the area of study and should be included based on auto increase for this site and the use of the two malls in Merced Manor, and Daly City Westlake, and Stonestown as Regional Shopping Hubs or commercial attracting areas.
  - 3) Page 2 of 187 – The public meeting was not notified through any large scale process, multiple districts, and organizations were not provided with information on the singular public meeting, and the location and time during a work week and evening early commute hours, including a difficult to reach area of SFSU from public transit makes the notice, and meeting held unacceptable in current notice and location of meetings for public access and comment period.
  - 4) Page 7 of 187 – A simple review of current public sentiment on the Transportation systems is available on [www.marchonmuni.org](http://www.marchonmuni.org) which denotes general public negativity towards current transit systems and the problems people are facing with commutes, traffic, parking, and mass transit in San Francisco. The M-Line was noted in a recent article by Rachel Gordon of the SF Chronicle as one of the WORST served lines in SF, the Parkmerced 17-Bus was also listed in similar concern, due to cut-backs and lack of frequency
  - 5) Section B page 7 of 187 – notes that any larger projects (such as a prior and possible future Stonestown [current owner bankrupt, so assured that this property will be sold, and eventually developed by a new owner to an “unknown max. capacity”] and Capital One Project recently submitted should be included). The controls are noted for 18 months, which end directly when the EIR for Parkmerced is scheduled for issuance. Concerns have been raised based on public services, the closure of the public school at 700 Font, the response time for fire, and ambulance services to parkmerced, and public service such as mass-transit, and open space as a quality of life concern for the community of Parkmerced.
  - 6) Section B page 7 and 12 of 187 – does not note that the 800 Brotherhood Way development does not currently have easement rights over Parkmerced, and the conditional use permit for this site has expired. Judge Quentin Kopp sent memo’s and attended a prior SF Planning Commission hearing directly as a member of the Brotherhood Way Religious Organizations, to notify Zoning Administrator L. Badiner of the concerns of this site, and the expiration of the development rights, and inappropriateness of the SF Planning Dept’s issued Notice of Determination memo. This is NOT a developable site currently the owner is Ron Zeff of Carmel Properties a prior owner of Parkmerced, who received the lot for an un-disclosed sum, and has not been reachable regarding the transfer of this land to develop the parcel as an open park

54.E.1  
con't



space due to the loss of open space to SFSU/CSU along Font, and proposals to elevate the dry-creek bed along brotherhood way, as a regional connective park-space to the METNA neighborhoods in the SFPUC proposed water projects.

- 7) Map on Page 9 of 187 – Does not include current zoning of these neighborhoods, and the zoning maps of the SF Planning Dept. should be included for reference to residential zoned areas, to better comprehend the effects of projects on low-scaled areas. Equity density and development should be a mandate of the multiple projects in this district and direct impact on parkmerced as an eligible national register site. Alternative sites, and spreading of development impacts should be a part of the transit/traffic improvements. The map also currently does not show heavy or major impact traffic points currently.
- 8) Page 10 of 187 – does not indicate in the “housing” areas the Condo-development adjacent to the SF Golf Club along Lake Merced Blvd.
- 9) Page 10 of 187 – does not indicate the Pomoroy Center to the west side of Lake Merced, and North of the Pump House.
- 10) Page 10 of 187 – does not indicate the current recent closure of the great highway due to erosion concerns, and the traffic impacts that occurred on the surrounding streets during recent muni track work, that backed up significantly areas in the sunset, along with the doyle drive project.
- 11) Page 10 of 187 – does not indicate concerns for larger gatherings at Stern Grove, the prior creek bed and natural drainage areas on stonestown or brotherhood way that were prior direct areas providing water to the Lake Merced areas.
- 12) Page 11 of 187 – does not indicate the METNA neighborhood Merced Extension Triangle Network Association, the Brotherhood Way Peace Park, the landscape design and open space of Parkmerced which is eligible for the national register, and was noted by The Cultural Landscape Foundation in its “marvels of modernism, landscapes at risk in 2008” as one of the exceptional sites and unique public project by Thomas Dolliver Church with Robert Royston assisting. The Parkmerced area as a masterplanned community and district, and Parkmerced Residents Organization are also not noted as a neighborhood area or group.
- 13) Page 12 of 187 – Does not denote the UNIQUE designs of the interior courtyards, hardscape and softscape elements of Parkmerced, eligible for the national register of historic places as a cultural landscape site. The sale of land has NOT occurred over “MANY DECADES” but over the last 10-15 years with the majority of sub-sales occurring in 2000-2003 to SFSU/CSU which has been a significant point of contention in terms of a lack of “fair-share” impacts being assessed through the decision by City of Marina vs. CSU.
- 14) Page 12 of 187 – the section on SFSU does not denote the NUMBER of students living in Stonestown (University Park North) and Parkmerced purchased sites University Park South, Parkmerced (proper) and adjacent neighborhoods to comprehend the full impact of expansion on traffic, transit, parking in the district. Many streets are EMPTY when school is out, and the largest impact to transit, traffic and parking in the district especially along Junipero Serra Blvd. and Lake Merced Blvd., Parkmerced Stonestown, and other adjacent streets is caused directly by SFSU.

54.E.1  
con't

- 15) Page 12 of 187 – Does not indicate a number of housing units on the PRIOR not expanded original boundaries of the university, and the acquired total units of housing through expansion by the SFSU Foundation.
- 16) Page 12 of 187 – does not note that it served as a primary modern elementary school “Frederick burke elementary” and a walkable public amenity planned and advertised as part of Parkmerced’s original development. The reduction in families and children in Parkmerced has caused the demise of this school, and the current reduced enrollment at the Montessori Children’s center that was prior located across from this site in the Parkmerced open recreation site purchased by SFSU. The adjacency and direct walking access by residents to this school has caused residents of parkmerced to drive their kids to school increasing traffic in the neighborhoods.
- 17) Page 12 to 14 of 187 – No mention of the Montessori Children’s Center (40 years in operation) or the Cambon Drive Shopping center and proposed development prior are noted in the discussion.
- 18) Section D – Page 15 of 187 – incorrectly notes parkmerced as 152 acres, original size and layout should be shown as 191.2 acres, and include parcels sold off, as the individual EIR’s negate the sold off lands, and in a cumulative review the joint impacts on parkmerced’s masterplanned community must be assessed.
- 19) Section D – Page 15 of 187 – does not state any “NEGATIVE” issues about the routing of transit into parkmerced, the majority of NEGATIVE comments received in the initial scoping hearing on the proposed project. It does not state anything on the environmental concerns of a total-tear-down of the neighborhood, and overall loss of 2/3rds of the communities open space over time. It does not denote the loss of one of the few public examples of Churches unique work and the array of designs and ideas present in the courtyard landscaped elements. There is no mention of the concerns on the current lack of new rental units being built citywide, at low-middle initial affordable levels.
- 20) Page 16 of 187 – incorrectly notes the Cambon project as a possible future development, currently the owner has renovated commercial business in this area, and may look at future densification over the prior allowances due to parkmerced’s heights proposed. There also has been ZERO coordination with this owner in regards to transit and traffic issues, and the possibility of development rights and using this commercial area as the central commercial area of parkmerced as an alternative development design per CEQA.
- 21) Page 16 of 187 – Numbers of FTE and attending students are SKEWED, and do not correctly or accurately note the attendance and traffic/parking/transit impacts of the university on adjacent neighborhoods. The preferred growth alternative by the university demolishes the majority of bought UPS (Parkmerced) areas, and portions of Stonestown. The SFSU Masterplan does not address regional and local impacts on housing and open space, and MOU’s (Memorandums of Understanding) reached between city and CSU agencies DID NOT include neighborhood and community groups to determine the impacts, and “fair-share” costs per City of Marina vs. CSU. Additional work on the UPS blocks is not per the Dept. of the Interior Standards, and the CSU/SFSU housing group has initiated landscape changes that negatively affect the parkmerced communities original landscape elements, without a formal review of site by site changes

54.E.1  
con't

- proposed, the EIR submitted by CSU was Programmatic and not Project Specific and ignored the community of Parkmerced as a masterplanned community built prior to the university.
- 22) Section 2 – Utilities and Public Service A. Water – no mention is made on the impacts of removing landscape and replanting large areas of landscape as water intensive. No break-down of water use in shared housing SFSU facilities, or student units in Parkmerced is noted. Typically there is greater and higher use of water in shared units with 6-8 students in a 2-3 bedroom. Water use of the golf courses in the district are not accurately shown. The Table 2.A.3 inaccurately shows low existing and new water demand of SFSU and Stonestown, and Parkmerced. There is no acceptable model that shows water supply as sufficient, for the proposed future density shown. This model neglects the suburban withdrawal of water due to uncontrolled sprawl in the valley areas which removes large quantities of urban water supply paid for by local taxes for transportation and services.
- 23) Section 2 B – Wastewater Treatment & Stormwater – no mention is made of the lack of financing and controls for review and maintenance for new bioswales and systems noted, currently the bioswales on the north side of lake merced are negligently managed and suffer from lack of maintenance and care. No proposed funding is noted for the large scale sewer issues of the city of SF, and notable sewage run-off occurs in heavy rains.
- 24) Section C - Police Protection Services – CSU police staff numbers and incidents are not cumulatively provided and analyzed for impacts based on increased student population in Parkmerced and Stonestown apartment communities. Speeding, failing to yield to pedestrians at intersections is a common issue in parkmerced, with minimal enforcement.
- 25) Section D page 41 of 187 – Fire Protection and Medical Emergency Services- the conclusion reached on fire and emergency services is false. The impacts of emergency response times due to increased false alarms in towers, and distance to medical facilities and traffic increases greatly the response time of both emergency vehicles. The SFFD was noted driving often to the wrong tower (355 vs. 405) on emergency alarms, as no exterior signal is notable for the emergency. Tower collapse and density in Parkmerced would make access to areas more difficult with response times. The response time for ambulance services in parkmerced also is beyond acceptable levels currently. Densification only will exacerbate the issue.
- 26) Section E – Recreation and Park Facilities – (page 44 of 187) – This segment ignores completely the loss of open space in the Parkmerced area, through sale of land and the reduction of open space due to proposed density of development proposed. The 191 acres in Parkmerced was reduced through sale of land, which is not indicated, and not counted as a negative impact. This is incorrect and should be changed to note that Parkmerced is eligible as a national register site per the CEQA historic analysis done recently but yet unpublished in the Parkmerced EIR by Page and Turnbull. The open space features lost include land that served as open space and was sold off to developers (800 brotherhood) and the University Park South Blocks, Cambon Site, and recreation and community building site across Font from the University Housing (north of Block 41 on the Parkmerced prior maps). This loss-of-use was NOT notified to tenants and no repayment or reduction of rents was noted or recorded for the community based on a lack of notification on this prior sale.

54.E.1  
con't



- 27) There is also in this section no discussion of the noted SFPUC projects proposed which could provide new linkages to the METNA and Parkmerced areas, through acquisition of the 800 Brotherhood Way or open space site of SFSU/CSU (due to there current financial troubles).
- 28) There is no note of the density currently of Parkmerced residents due to the reduction of space, and increase in shared student population on site. This Park-per-Resident ratio noted on page 44 of 187 is incorrect and unconfirmable. The city has not determined the density level currently of parkmerced versus other single family neighborhoods. Parkmerced's density is quite higher than most areas of the city, and the increased population proposed demands additional open space provisions for new park and rec. facilities for the community.
- 29) New Corridor Study Area Recreational Facilities and Open Space – (page 50 of 187) does not accurately note the concern of residents and preservationists on the Parkmerced and SFSU/CSU projects on the original outlay of Parkmerced as an eligible national register site. The Brotherhood Way project as noted prior has its conditional use expired, and must re-apply. The 700 Font site is unknown, and the Stonestown site density, and open space is also unknown.
- 30) The SFPUC projects proposed for low-scale water conservation projects focused on daylighting the old creek-bed along brotherhood way, and creating catch basins at 800 brotherhood, and stonestown sites. (information should be included on the SFPUC proposed initial projects for water conservation outside of Parkmerced and SFSU's proposals.)
- 31) Corridor Study Area Recreation Assesment – page 51 of 187 – does not state a distinct number or ratio of open space to RESIDENT, and only gives a general number citywide. The loss of open space is not stated, and MUST be calculated for the effects on the Parkmerced community, and areas that lack large scale open space amenities that are functional like METNA Merced Extension Triangle Network Association. There is NO POSSIBLE WAY that the development projects would NOT have an affect on existing open space areas like Lake Merced. There is a definitive need to create new facilities and open space, and the stonestown, YMCA, and open space areas of 800 Brotherhood, and SFSU currently are not sufficient or provide decent recreational updated amenities for the existing density and communities of Stonestown and Parkmerced.
- 32) Section F – Public Schools – Page 52 of 187 – The proposed changes in assignment are not indicated, and the concern for the elimination of the Frederick Burke Elementary school is not noted. The SFMTA Land-Use application ignored the Montessori Children's Center at 80 Juan Bautista Circle which prior was located for 40 years at the open space prior recreation site and community building of Parkmerced along Font. The reduction of children in Parkmerced is attributable to the increased student population, and quality of life issues that arose from this increase in Stonestown and Parkmerced with little intervention by the city agencies on university impact on housing stock. The public school conditions are considered "over-crowded" currently and increased population would only demand action in regards to this concern.
- 33) Section 3 – Transportation and Circulation – page 58 of 187 – It was noted at the held Feb. 24<sup>th</sup> meeting that the transportation issues and circulation are at a critical state in our district. The need for Level tier-5 federal changes in the 800 brotherhood intersection, and direct connection from Point A to Point B along 19<sup>th</sup> ave. out to daly city or colma regional bart is EXTREMELY important to be implemented PRIOR to the increase and development proposed.

54.E.1  
con't



The item ignores a recent new development proposed in District 11, and the Balboa Park Plan along with development out at Sloat Blvd. which also impacts the District traffic and transportation needs. The 800 Brotherhood Way project as noted prior had its CU expire and should not be included. The Cambon site also may change its eventual proposal, and should be considered a primary site for density and transit routing on its eastern side directly above, and where there is a defunct garage used by Parkmerced tenants. There are also additional sites not noted along 19<sup>th</sup> ave. in terms of transportation assessment needs for the 1952 interchange at Brotherhood Way and Junipero Serra out to Daly City, and an older overpass from the METNA neighborhood. These represent significant regional challenges in terms of infrastructure that require initial change prior to development.

- 34) The transportation changes proposed are primarily "roadway" widening projects, and a reroute of public transit through a residential neighborhood placing THREE station stops in a .18 mile radius. This is unacceptable and unheard of in residential areas, and has been opposed by our community group as unequivocally affecting our neighborhood in a negative manner. The dog-leg and shift proposed is a reduction of service, and safety concern due to the on-grade proposed lines and large "cross-overs" along Holloway/Crespi, and up at Cambon across Junipero and 19<sup>th</sup> Ave.
- 35) It is key to noted under page 59 of 187 – that there has been 3 iterations of Tier 4 scenarios, proposed by the ownership of Parkmerced. This does NOT include iterations suggested by community members and the tenants organization which also suggested a DIRECT ROUTE along 19<sup>th</sup> Ave through tunneling portions along 19<sup>th</sup> and Junipero Serra to allow for egress of autos, and above or at grade mass-transit routing. The options to place the station stops A) directly mid-span on SFSU property between Buckingham and Holloway on 19<sup>th</sup> B) to place a second stop above the Cambon Commercial Area at the intersection between 19<sup>th</sup> and Junipero Serra, which could provide a new plaza and entry area to the city, increased development potential, and direct connection to increased density on Cambon, SFSU, and future sites at the 1952 interchange air-rights also was suggested, and has not been accurately or investigated for potential. The SFPUC Rail Safety memo, received as part of a "public-records-request" noted that this is a concern, and that the MOST EFFECTIVE and BENEFICIAL routing is along the existing lines and out on 19<sup>th</sup> Ave. through tunneling. Its "cost-prohibitiveness" was noted as the cause of not following this iteratino in planning for Tier 5 scenario to date. There should be a Tier 4D and 4E that looks at locating station stops OUTSIDE of Parkmerced along 19<sup>th</sup> Ave. and promotes future routing along Brotherhood Way, or Sunset Blvd. through Stonestown to assist in development of new rail lines that can alleviate traffic and congestion in the area.
- 36) The note that Tier 5 will be conducted later is NEGLIGENT by city and state officials in recognizing and funding efforts to place this as a priority need area based on impacts of regional transit, and concerns of the district in terms of traffic/parking/transit concerns. This should be addressed IMMEDIATELY as part of this report and survey and included in its determination.
- 37) The LOS service Intersection Conditions is a flawed system for analysis of traffic/transit issues. The need to look at school hours at SFSU/CSU, and the impacts and change based on school hourse is not sufficiently noted, nor the increase of all sites cumulatively on transit and traffic.

54.E.1  
con't



- 38) Transit Conditions – page 60 of 187 – does not note the concern of M-Line and 17-Parkmerced reductions in services, proposed construction at the St. Francis Circle, and ongoing TEP SFMUNI cuts that disservice our area.
- 39) Parking Conditions – page 62 of 187 – “well-used” is not correct, OVERBURDENED is correct, as the parking conditions in Parkmerced have not been addressed by this document. The garage on Parkmerced’s Higuera is 95% empty, students and residents fight for spaces consistently, and streets are over-full with students circling the block during campus hours for spots. The DPT has not re-striped the area, or implemented SFPARK in the neighborhood. The streets are City owned yet not enforced, and upkeep is minimal on painting parking areas, curb-cuts, accessibility routes, and parking zones. The elimination of a large parking structure by the SFSU/CSU masterplan is NOT noted, and should be included. The streets of Parkmerced are close to EMPTY when SFSU/CSU is not in session, and the impacts were not included in the MOU with City agencies on the impacts on transit and traffic by SFSU/CSU per City of Marina vs. CSU. Parking conditions would SIGNIFICANTLY worsen and be unimproved by any proposed changes to date.
- 40) The Traffic Study – page 64 of 187 – ignores the side traffic that occurs outside of the Study area Boundary, the expanded study area, includes some major traffic concerns due to side routes taken to avoid congestion on 19<sup>th</sup> avenue. Often the Lake Merced Blvd. area and Sunset Blvd. area has seen increased traffic due to the Doyle Drive, and SFPUC pipeline work. Future routing of transit in the north to south direction on 19<sup>th</sup> and/or Sunset Blvd is not indicated, and should be a part of the discussion of elimination of traffic lanes and impacts, to ascertain the true effects of improved transit, and traffic lane REDUCTIONS based on any “transit-first-policy” of the city.
- 41) The intersections at 19<sup>th</sup> and Holloway, Junipero Serra and Holloway, Junipero Serra and Brotherhood, and Lake Merced and Brotherhood, cannot be accurate due to the increased quantity and frequency of drivers in these areas. Noted “readers” with clicking devices were stationed at some intersections however rarely is this an accurate counting at consistent levels of the impacts on traffic in these areas. The noted Parking and Traffic Evaluations were minimal and do not accurately portray the congestion and demand hours. To note that 1-3pm and 7-9pm are peak hours on parking is negligent and ignores the daily ongoing impacts of traffic that occur in Parkmerced during school hours.
- 42) The proposed elimination of the 88 line and 18/17 bus and M-Line service cuts, drastically affect the neighborhoods and communities surrounding Parkmerced, the cuts will increase auto use, and the numbers should be adjusted to recognize this fact.
- 43) The SFSU shuttle services were cut prior and operate at 136% capacity. There are often long lines for free shuttle service to students, and there has been NO (ZERO) impact fees assessed due to the impacts of increased student enrollment at SFSU/CSU per the MOU’s to date (see City of Marina vs. CSU).
- 44) The Parkmerced shuttle service existed at the initial construction of Parkmerced as a direct bus service downtown. The Proposed Shuttle would not sufficiently provide direct access to regional transit, the map on page 93 of 187 shows a very complex service route, outside of Parkmerced, that would be delayed due to traffic increases. This does not solve the concerns of the

54.E.1  
con't

community, and a shortened route directly to the M-Line at Cambon or SFSU/19<sup>th</sup> Ave. would suffice for residents requiring direct assistance to local transit, without building into Parkmerced.

- 45) Figure III.9: Tier 3 Transit Network – Page 96 of 187 – cuts services to six towers in Parkmerced that house many seniors and disabled residents in the parkmerced community that existed for years prior. This is a reduction in services, and should not be allowed per ADA and accessibility rights of the existing long term tenants.
- 46) Proposed drawings of the Parkmerced changes by SOM incorrectly noted a tower being demolished south of Cambon retail, and a corner of a tower on Chumaserro being “nicked” by a transit/roadway change. The majority of the proposed new changes of roadways into Parkmerced are a NEGATIVE impact on the community. They will increase auto vehicular cut-throughs in our neighborhood.
- 47) No proposal for Tier 4 included direct routing along the existing 19<sup>th</sup> Ave. / Junipero Serra Blvd. and across the 1952 interchange. Its is shown as a dog-leg inside of parkmerced, vs. on the far eastern side of the site, where the elimination or tear-down of the garage, gas-stations, and 5 south-east corner towers could easily increase the density or land needed to provide a solution without directly impacting the parkmerced communities low-scale nature.
- 48) Other Transportation Projects Defined but NOT ANALYZED – page 120 of 187 – The “collective determination” noted was non-inclusive of preservation, and neighborhood organizations such as PRO The Parkmerced Residents Organization. The meeting noted in documents obtained through a “public-records request” show SFMTA meetings with SOM, Parkmerced, and other groups ignoring the options and ideas proposed to eliminate affects on Parkmerced’s original layout and masterplan. The collective determination (members and groups) who made this decision is non-inclusive and NEGLIGENT in regards to community involvement. The SFPUC Rail Safety memo noted explicitly that the Tunneling option although cost-wise prohibitive was the BEST option available for all issues/impacts. The reconfiguration of Junipero Serra Blvd. and Brotherhood Way interchange did not include level tier-5 changes that could create layered systems of auto/transit/parking/development land due to the topography along 19<sup>th</sup> and Junipero Serra to Brotherhood from Sloat. There has NOT been any significant investigation, competition, open design concepts, or attempts seriously to look at the direct routing here and connection to regional transit. The widening of roads is negligent as a transit first policy, and the reconfiguration was done based on traffic modeling, and did not include any formal design or masterplanning of regional transit to bring to the table open positive solutions outside of the proposed property owners positions to date.
- 49) It was not noted that Peter Albert (SFMTA) often attended Parkmerceds and SFMTA TEP meetings and supported re-routing inside of Parkmerced of the M-Line. He did not state his affiliation, or connection to the SFMTA proposed routing and changes proposed. This is a deep concern due to the input recorded by Parkmerced management of comments that noted a wish or desire to route Muni inside of parkmerced, and to change the street layout from the radial to grid layout. The SF General plan notes distinctly the need to preserve and protect unique areas of the city, in terms of layout and design. The Parkmerced area is such a neighborhood and there was not a single design or proposal to date that recognizes the Parkmerced area as a

54.E.1  
con't



- National Register Site eligible for consideration. There has been considerable coordination between agencies and the SFSU/CSU Masterplanners, the Parkmerced "Vision" and Investment group, and the City agencies including the SFMTA and SFCTA to ensure that the proposal is moved forward, the lack of any community based limited impact proposal that directly deals with Tier 5 level improvements as a priority is again a negligent aspect of the rush to complete this document, and eliminate public discourse on the concerns of the neighborhoods affected.
- 50) The current tenant and resident position of the Parkmerced Residents Organization is that the Mass transit lines such as the M and J lines should NOT be re-routed through Parkmerced.
- 51) An alternative proposal is being prepared to re-route muni along the existing 19<sup>th</sup> Ave. corridor. Directly to the Daly City or Colma Sites, with (2 station stops). Eliminating both the SFSU/Parkmerced proposed stop and Stonestown stop for a central located new double ended stop mid-way between Buckingham and Holloway at the proposed "SFSU Hotel" or entry area to the SFSU Masterplan on the west side of 19<sup>th</sup>, and a stop directly above Camnon commercial area along the 19<sup>th</sup>/juniperro intersection prior to brotherhood Way. These two sites should be considered along with future circumventing extensions along brotherhood way and lake-merced blvd. to sunset blvd. to eliminate traffic and increase public transit as a priority. Direct right of way should be mandatory short term improvements for muni M-line routing through ocean ave. and crossing over 19<sup>th</sup>. Direct Tier 5 funding and planning should be required prior to ANY proposed increase in student CSU/SFSU population, or proposed developments as a transit first policy of the city of SF.
- 52) I have ignored the majority of LOS, and Hot Lane variations due to the negligent use of LOS service levels and road widening which is NOT transit first policy. These statements are negligent, and do not include adequate scientific support for the use of LOS to help determine traffic and transit needs. Future development requires future vision, and to date the 19<sup>th</sup> Ave. Corridor Survey does not propose or engender positive futuristic and planned transit improvement.
- 53) It should be noted that the inclusion of the Parkmerced project and District Survey per the SFMTA Transit and Sustainable Land-Use document, ignored community input and was not noticed with 30-day review for neighborhood organizations. The document submitted to ABAG by the SFMTA was filled in negligently, ignoring the SFSU Masterplan and noted EIR's submitted. The attachment of 081281 to 081004 and 081005 circumvented proper process, and should be noted to be deficient.
- 54) The proposed impacts disproportionately affect Parkmerced by programmatic EIR's by SFSU/CSU and long term planning EIR's with Parkmerced's Vision Project that ignore overall affects on a masterplanned community (Parkmerced) eligible for national register nomination.
- 55) The proposal for the treasure island and candlestick developments are pushed by developers ignoring FEMA maps that delineate deep concern for development on flood plain areas. The Parkmerced development proposal also ignores the construction of the towers which was in the 1940's and 1950's and indicates a negligent attitude towards building safety in the concrete work and age of the buildings in the community of Parkmerced. There is significant subsidence due to the proximity to the Lake Merced basin, the tower renovations to date caulked and painted over large gaps and cracks in the tower basements. The deterioration of the tower

54.E.1  
con't

structural stability is caused by movement OVER TIME, and the age and material composition of the existing towers should be reviewed by independent agencies to determine if there should be alternatives developed that recognize the inherent age and safety of the towers in Parkmerced. A sustainable based alternative focused on preservation would remove the existing towers vs. garden units, and rebuild them to a higher earthquake resistant construction, this could also help to make more equitable the development impacts through allowing more density on neighborhood adjacent developments such as Cambion, Stonestown, and SFSU/CSU along 19<sup>th</sup> ave. There also should be co-mandates to promote density on Ocean Ave. and West Portal to ensure foot-traffic and ongoing access to existing commercial corridors. Direct improvement to the regional transit on the cities western side, could easily be improved through looking at the Tier 5 improvement level NOW and not later. A simple open "ideas" competition, based on architectural, engineering, and masterplan concepts for regional transit and a new "entrance" to the cities western transit route could be implemented immediately to engender positive solutions that include the Mills-Act for the Parkmerced "garden-units" and landscape open space which is a UNIQUE design and landscape in San Francisco and the state of California.

The 19<sup>th</sup> Corridor Survey document as noted by Mr. Rick Cooper is NOT a CEQA document, and the discussion and proposed solutions DOES NOT MEET CEQA REQUIREMENTS FOR CUMMULATIVE ANALYSIS FOR THE TOTAL DEVELOPMENT AND MITIGATION FOR THE PROPOSED PROJECTS IN DISTRICT 7. The impacts alone on Parkmerced as an eligible national register site, have been ignored by both the CSU/SFSU masterplan, and Parkmerced Vision project, and are not addressed by local, state or national agencies in regards to the sites consistent negative impacts by developers, and state institutions impacts including the proposed transit solutions included in this document.

Mr. Cooper confirmed the "extension" of the comment period to March 12<sup>th</sup> 2010, however public notification was limited and did not serve the cities western side, to include multiple districts impacted by the proposed developments. Bi-county regional issues of traffic and transit were not addressed sufficiently, nor were organizations, and preservationist groups notified of this document besides from my personal efforts. This sadly is a part of the UPN notification changes occurring and indicates a problem that the Planning Dept. is working on correcting, however excludes the community of renter's whom are more focused on day to day survival currently than mass-development projects focused on private re-routing of public transit for personal gain.

The proposal ignores key issues, makes key errors in documents and information, and does not provide proper and accurate development of significant alternatives based on community input of significant alternatives that mandate analysis.

The Parkmerced EIR, will have an alternative design submitted by me which is not "all-inclusive" but represents a significant alternative that to date has not been seriously reviewed as an option and environmental and sustainable preservation and transportation based alternative that meets the

54.E.1  
con't



Parkmerced sponsors goals, and adjusts to address all regional and local concerns raised by community members.

I look at this issue as a positive one, where with further investigation significant improvement can be made through cooperative inclusion of property and neighborhood groups to significantly raise the bar on what is being proposed. I hope that the ongoing discourse with the planning dept. and developers will bring to the table a better more cumulative "vision" that takes into account the real impacts on Parkmerced, and adjacent neighborhoods, and the need to address the current insufficient transit, open space lack of vision, and inadequate housing rental development situation we have in SF. I look forward to your response, and hope that your ability to open and involve Tier 5 level improvements is fast-tracked to get the max. out of our proposed changes versus the proposed slow-stepped increase that would only disservice the existing district, city and regional impacts.

54.E.1  
con't

Sincerely



Aaron Goodman

Architect and Resident of Parkmerced – District 7

Cc: Parkmerced Residents Organization, SF Board of Supervisors, SF Planning Dept., Historic Preservation Commission, SF Planning Commission, BCC: Preservation and Tenant Organizations



*Letter 54*



# Parkmerced

May 25, 2010

Contact: PJ Johnston, (415) 260-8417

[pj@pjcommunications.com](mailto:pj@pjcommunications.com)

BVHP/LOBBYIST

## Statement from Seth Mallen, Executive Vice President at Stellar Management

SEE "LUX TOWN LIVING" WEBSITE

SAN FRANCISCO – Seth Mallen, Executive Vice President for Construction & Sustainability at Stellar Management in San Francisco, issued the following statement:

"Recently, Parkmerced and its lenders engaged a special servicer to support the payments of the loan on the property.

"This move is not uncommon for many commercial, residential and multi-family properties throughout the United States over the past several years. The current economic downturn has affected many properties that were purchased from 2005 to 2007, and many are currently in default.

"In fact, over the past two quarters, more than \$150 billion of commercial real estate loans have been transferred to special servicing. This is part of the overall de-leveraging of our nation's economy.

"The engagement of the special servicer ensures that the property's bills will be paid in their normal course and allows for the capital to be restructured to the benefit and long-term good of Parkmerced and the lender.

WHAT ABOUT THE RESIDENTS / COMMUNITY / + CITY

"We have assured the residents of Parkmerced that this will not impact their daily lives here. The property will continue to operate without interruption. The incredible progress we have made in the stewardship of Parkmerced – reversing decades of neglect and poor management – will not be abated. Phone calls will be answered and issues addressed, our maintenance team will respond to work orders, and the leasing team will continue to lease new apartments.

"Moreover, the entitlements process that Parkmerced is engaged in with the City of San Francisco will continue.

"As this is a fluid process that takes some time, we will endeavor to provide our residents with updates on the progress of the capital structuring over the next several weeks – in the meantime, life at Parkmerced will not change for the residents of Parkmerced."

###

54.F.1

(G)

**ENVIRONMENTAL IMPACT REPORT (EIR)  
GEOLOGIC, GEOTECHNICAL  
AND SEISMIC FINDINGS  
PARKMERCED DEVELOPMENT  
San Francisco, California**

**Stellar Management  
West Coast Operations  
San Francisco, California**

\* NOT AN INDEPENDENT  
ANALYSIS . . . .

54.G.1

I 9 May 2008  
Project No. 4596.02

#### 4.2 Liquefaction, Lateral Spreading and Differential Compaction

During a major earthquake on a segment of one of the nearby faults, strong to very strong shaking is expected to occur at the site. Strong shaking during an earthquake can result in ground failure such as that associated with soil liquefaction<sup>4</sup>, lateral spreading<sup>5</sup>, post-liquefaction settlement<sup>6</sup>, and cyclic differential compaction<sup>7</sup>.

\* The two lobes off Lake Merced that extend into the westernmost section of the site are mapped as zones with liquefaction potential in the City and County of San Francisco Seismic Hazard Zones map, as shown on Figure 7. Site specific investigation should be performed for new improvements in this area to evaluate liquefaction and lateral spreading potential. The performance of the towers during the Loma Prieta Earthquake has been addressed by Telesis Engineers (2006). The report indicates that structural damage was observed in some of the Buildings (15, 16, 17, and 18); however, all towers were found stable and safe for occupancy.

During a major earthquake on a nearby fault, new improvements underlain by saturated loose to medium dense sand will be susceptible to liquefaction-induced settlement. Furthermore, where medium dense sand will remain beneath the proposed below-grade parking areas and associated improvements, densification will likely occur during a major earthquake on a nearby fault. The available subsurface information indicates liquefaction and/or lateral spreading potential should not be an issue for the majority of the planned improvements. Where the hazard exists, it can be mitigated by designing the foundation system for the anticipated differential movements, or using deep foundations that transfer building loads to the soil below the susceptible layers. Potential for earthquake-induced ground movement should be evaluated with site specific investigations.

<sup>4</sup> Liquefaction is a transformation of soil from a solid to a liquefied state during which saturated soil temporarily loses strength resulting from the buildup of excess pore water pressure, especially during earthquake-induced cyclic loading. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits.

<sup>5</sup> Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The surficial soil is typically displaced in "blocks" that are transported downslope or in the direction of a free face by earthquake and gravitational forces.

<sup>6</sup> Post-liquefaction settlement is a phenomenon in which a previously liquefied sand layer settles into a denser soil arrangement after dissipation of pore water pressures.

<sup>7</sup> Cyclic soil densification is a phenomenon in which non-saturated, cohesionless soil is densified by earthquake vibrations, resulting in ground surface settlement.







# PLANNING DEPARTMENT

## Tree Disclosure Statement

### 1. REQUIREMENTS

The Department of Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant and street trees located on private and public property, and that they be shown on approved site plans. A completed disclosure statement must accompany all building permit applications that include building envelope expansion, new curbcuts, new garages, and all demolition or grading permit applications.

Protected trees include street trees and both significant trees and landmark trees on or over a development. Protected trees *must be protected* according to a protection plan developed by a certified arborist before demolition, grading or construction begins. Any tree identified in this Disclosure Statement must be shown on the Site Plans with size of the trunk diameter, tree height, and accurate canopy dripline.

If the protected tree is to remain and if activity occurs within the dripline, prior to building permit issuance, a tree protection plan prepared by an ISA certified arborist is to be submitted to the Planning Department for review and approval. The protection plan must state specific measures which if applied before construction can reasonably be expected to preserve the health of the tree. Additionally, the applicant must provide a written statement to the Department of Building Inspection (DBI) verifying that the specified protections will be in place before demolition, grading or building permit will be issued, unless the Department of Public Works (DPW) waives or modifies these requirements.

54.H.1


If the applicant seeks to remove a Protected Tree, the applicant must get a tree removal permit from DPW before the Planning Department permit is issued. Illegally removing a protected tree may constitute a violation of the San Francisco Public Works Code Section 8.11, which can lead to criminal and/or civil legal action and the imposition of administrative fines.

### 2. APPLICANT'S CERTIFICATION & CONTACT INFORMATION

I hereby attest under penalty of perjury that the information I have entered on this document is true and correct to the best of my knowledge, and that I have read and understood this form, and that I am the property owner or designee of the property owner, familiar with the property, and able to provide accurate and complete information herein.

  
Signature of Applicant/Permit Holder

11/7/08  
Date Signed

 Robert Rosania, Parkmerced Partners LLC  
Print Name

Chief Executive Officer  
Job Title

3711 19<sup>th</sup> Avenue  
Mailing Address: Street

(415) 584-4561  
Phone

San Francisco, CA 94132  
Mailing Address: City, State, Zip

(415) 584-8096  
Fax # or Email Address

## 3. PROTECTED TREES

The applicant must answer questions in the following table:

SIGNIFICANT TREES		Qty
1	Are there any trees within 10-feet of the property edge of the sidewalk that are above 20-feet in height, or with a canopy greater than 15-feet in diameter, or with a trunk diameter greater than 12-inches in diameter at breast height? (Check which boxes apply and document quantity of each tree type.)	
	<input checked="" type="checkbox"/> Trees on the subject property	298
	<input type="checkbox"/> Trees on adjacent property overhanging the project site	
	<input type="checkbox"/> There are no such trees at these locations.	

If there is no sidewalk, the 10-foot distance is measured from the property line edge of the street. If there are no trees of the above size, go to item #2. If any other above boxes are checked, the tree qualifies as a significant tree per DPW Code and is entitled to certain protections. The location and species of all such trees must be drawn on the site plans (if no plans are required for this application the trees must be drawn on the reverse side of this form).

LANDMARK TREES		Qty
1	Are there any Landmark Trees on the project lot or on lots adjacent to the property? (Check which boxes apply and document quantity of each tree type.)	
	<input type="checkbox"/> Trees on the subject property	
	<input type="checkbox"/> Trees on the adjacent City right-of-way (street trees);	
	<input type="checkbox"/> Trees on adjacent property overhanging the project site	
	<input checked="" type="checkbox"/> There are no such trees at these locations.	

Landmark trees are trees that meet criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character and have been found worthy of landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. Temporary landmark status is also afforded to nominated trees currently undergoing the public hearing process. The Department of Public Works maintains the official "Landmark Tree Book" with all designated landmark trees in San Francisco. The location and species of all such trees must be drawn on the site plans (if no plans are required for this application the trees must be drawn on the reverse side of this form).

STREET TREES		Qty
1	Are there any street trees on the public right-of-way adjacent to the property that are neither landmark trees nor significant trees? (Check which boxes apply and document quantity of each tree type.)	

54.H.1  
can't

# HORTSCIENCE TREE SURVEY

Villas Parkmerced  
San Francisco CA  
April 2007

Letter 54

Tree No.	Map No.	Species	Size		Canopy dripline >15'?	City of SF Status?	Condition 1=poor 5=excell.	Suitability for Preservation	Comments
			Trunk Diameter (in.)	Height >20'?					
183	102	Bushy yate	9	Yes	Yes	Significant	2	Poor	Basal cavity; poor form & structure.
184	102	Bushy yate	15	Yes	Yes	Significant	3	Moderate	Crook @ 4'; history of branch failure.
185	102	Bushy yate	12	Yes	Yes	Significant	4	Moderate	Codominant trunks @ 6'; upright form.
186	102	Bushy yate	13	Yes	Yes	Significant	4	Moderate	Crook @ 3'; upright form.
187	102	Bushy yate	11	Yes	Yes	Significant	3	Poor	Poor form & structure.
188	102	Bushy yate	12	Yes	Yes	Significant	3	Poor	Suppressed form; leans SW.
189	102	Bushy yate	10,9	Yes	Yes	Significant	2	Poor	Codominant trunks @ base; twig & branch dieback.
190	102	Bushy yate	14,9	Yes	Yes	Significant	3	Moderate	Codominant trunks @ 3'; narrow attachment.
191	102	Bushy yate	15	Yes	Yes	Significant	2	Poor	Upright form; twig & branch dieback.
192	102	Bushy yate	11,5	Yes	Yes	Significant	3	Poor	Codominant trunks @ 2'; twig & branch dieback.
193	102	Bushy yate	4,4,3	--	Yes	Significant	3	Poor	Stump sprout.
194	101	New Zealand tea tree	27 stems <6"	--	Yes	Significant	4	Good	Multiple attachments @ base; high crown.
195	90	Olive	18	--	--	Street tree	3	Moderate	Multiple attachments @ 5'; trunk wounds & root damage on S.
196	90	Olive	13	--	--	Street tree	1	Poor	Multiple attachments @ 5'; extensive dieback.
197	90	Olive	26	--	--	Street tree	2	Poor	Full crown; <i>Ganoderma</i> conk.

Page 13

54.H.1  
con't

Letter 54



54.H.1  
con't

"WHY DID THE  
TREE'S NEED TO  
BE REMOVED?"

— THE LORAX —

Tree Survey IV

Villas Parkmer  
San Francisco,

Prepar

Turnstone Consul  
San Francisco,

Mos.



*Letter 54*



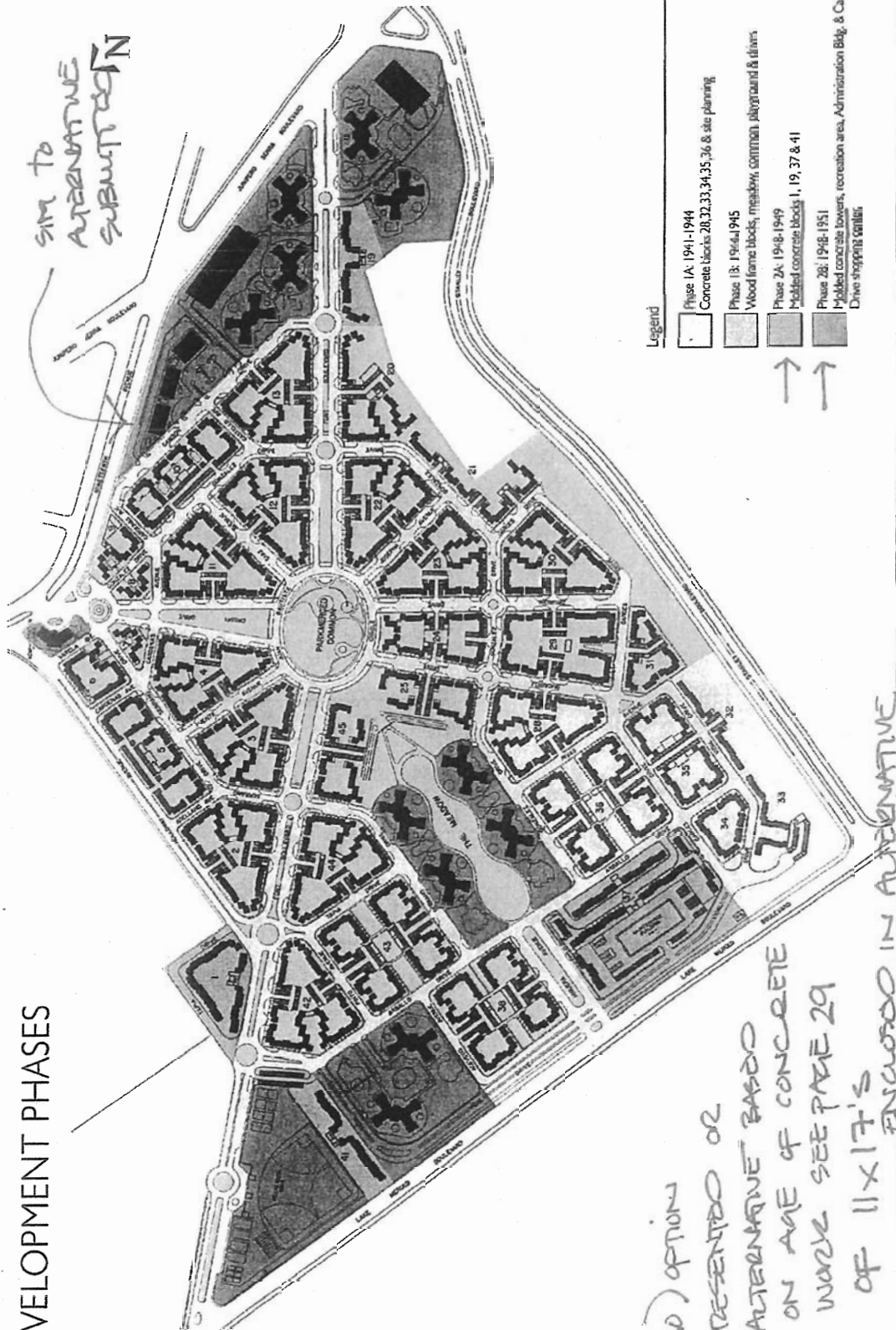


**Barthmored**  
 SAN FRANCISCO 27, CALIFORNIA  
 BUILT - OWNED - OPERATED  
 METROPOLITAN LIFE INSURANCE COMPANY

Letter 54

SHOWS ACCURATE THE "BUILT" AREA  
 TO OPEN/SPACE. NO INFO PROVIDED OR CALC'S.  
 OR DIAGRAMS THAT RE-AFFIRM THE LOSS.

# DEVELOPMENT PHASES



## Legend

- Phase 1A: 1941-1944  
Concrete blocks 28, 32, 33, 34, 35, 36 & site planning
- Phase 1B: 1944-1945  
Wood frame blocks, meadow, common, playground & diaries
- Phase 2A: 1948-1949  
Hollow concrete blocks 1, 19, 37 & 41
- Phase 2B: 1948-1951  
Hollow concrete blocks, recreation area, Administration Bldg. & Condon Drive shopping center

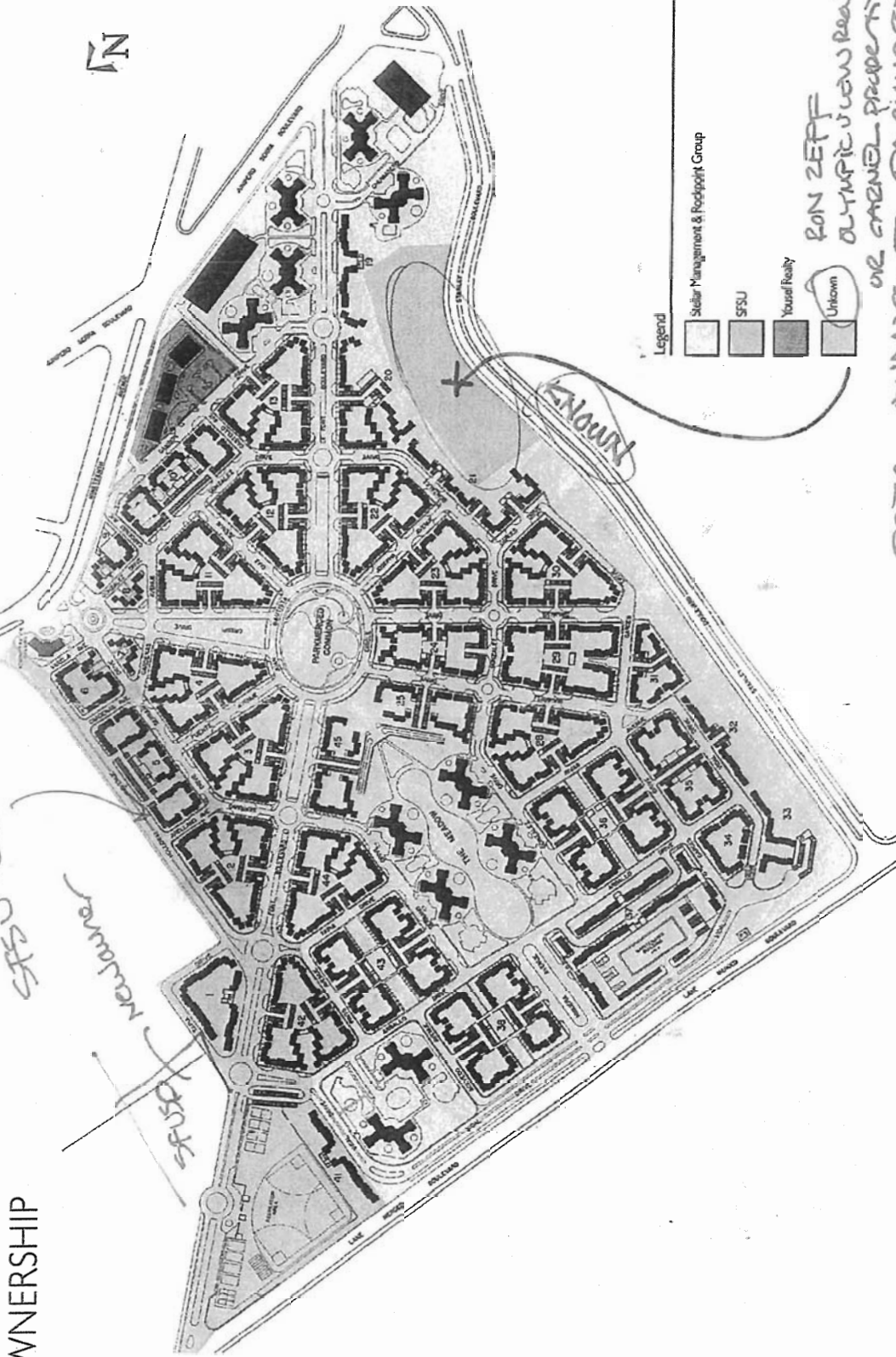
PARKMERCED  
San Francisco, California

PAGE & TURNBULL  
Architecture Historic Preservation Urban Planning

Letter 54

54.1.1  
con't

# OWNERSHIP



Legend

[White Box]	Stellar Management & Rodolph Group
[Light Gray Box]	SFSU
[Dark Gray Box]	Yousef Realty
[Medium Gray Box]	Unknown

RON ZEFF  
OLYMPIC VIEW REALTY  
OR CARNEL PROPERTIES  
PETER OWNERS OF PARKMERCED

PARKMERCED  
San Francisco, California

PAGE 54  
Architecture - Historic Preservation - Urban Planning

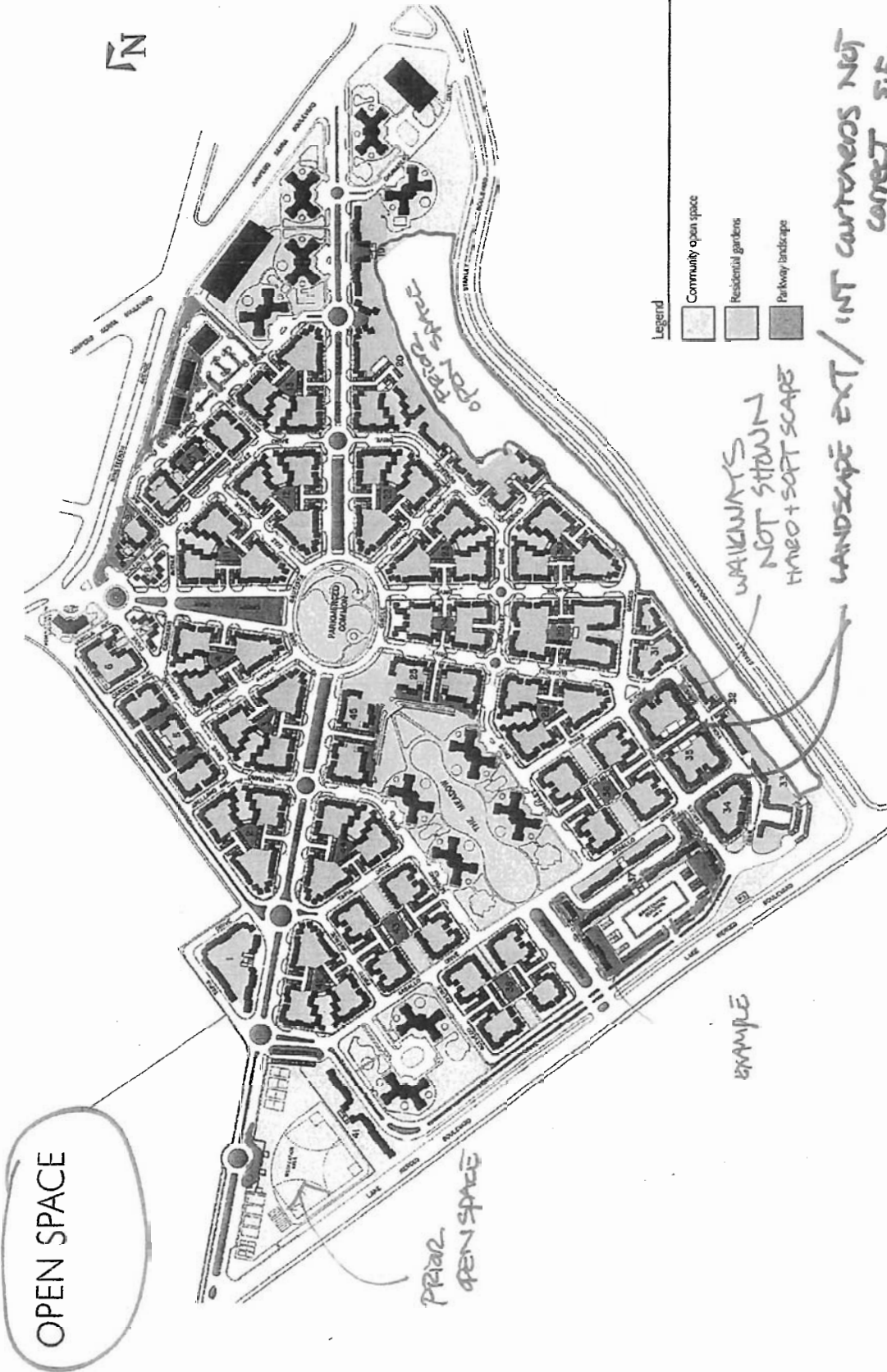
Letter 54

54.1.2

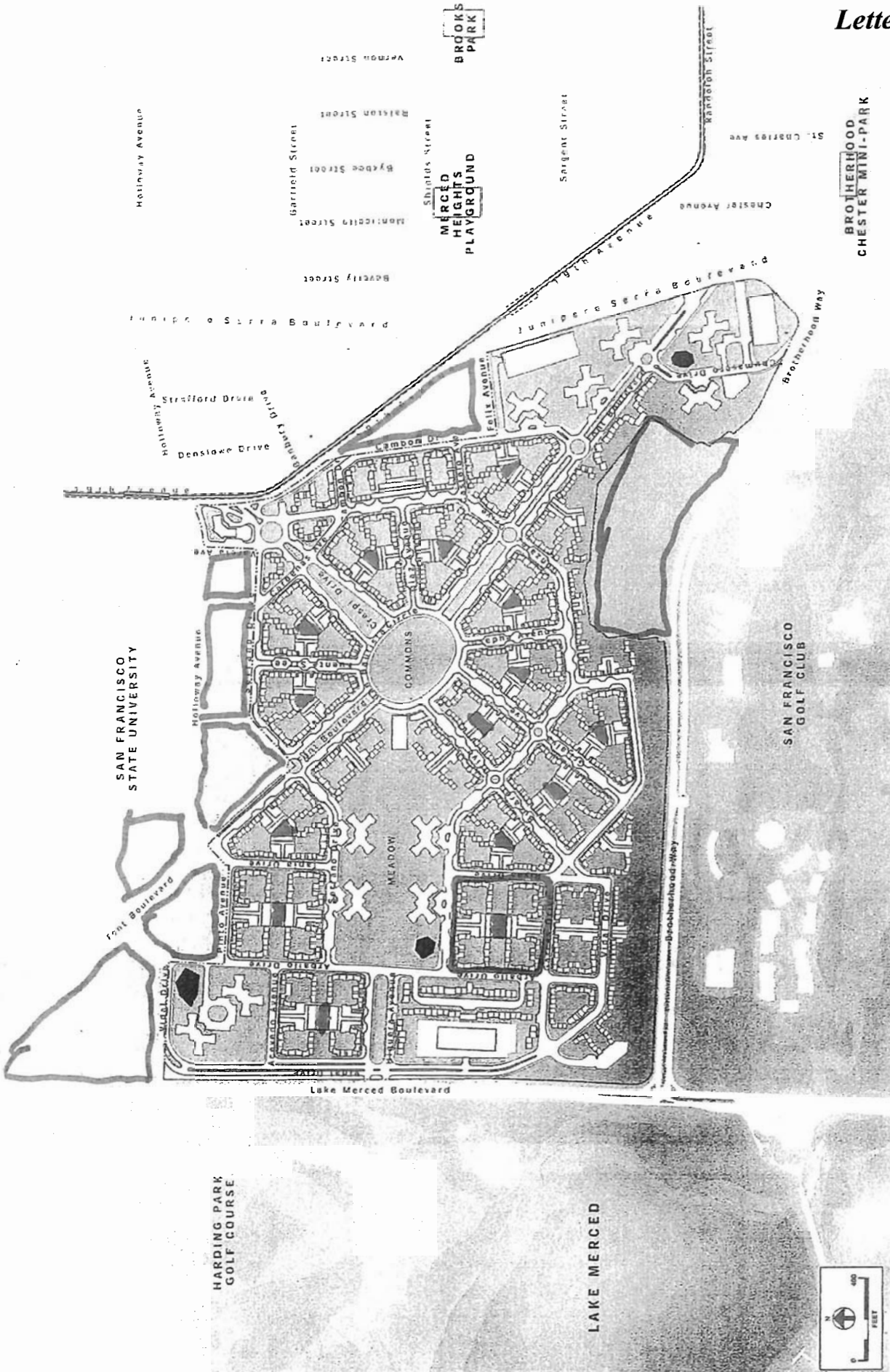
5

PAGE & TURNBULL  
Architecture Historic Preservation Urban Planning

PARK MERCED  
San Francisco, California







LOT 1507

OPEN SPACE PLAN

PLACES WANT AREAS SAN FRANCISCO STATE





NATIONAL TRUST  
for HISTORIC PRESERVATION®

September 10, 2007

Ms. Roberta Achtenberg, Chair  
California State University Board of Trustees  
c/o Trustee Secretariat  
401 Golden Shore, Suite 136  
Long Beach, CA 90802

Dear Ms. Achtenberg:

On behalf of the National Trust for Historic Preservation (National Trust), I am writing to express our concern about the potential impacts to cultural resources outlined in the California Environmental Quality Act (CEQA) documents for the San Francisco State University (SFSU) Campus Master Plan. The California State University (CSU) Board of Trustees will consider the Final Environmental Impact Report (EIR) for the Campus Master Plan at their meetings on September 18 and 19. The National Trust regrets that it was unable to participate in the CEQA process to date, but wishes to raise several key issues related to future environmental review for Campus Master Plan projects.

54.K.1

Congress chartered the National Trust in 1949 as a private nonprofit organization to "facilitate public participation" in historic preservation, and to further the purposes of federal historic preservation laws. 16 U.S.C. §§ 461, 486. With the strong support of our more than 284,000 members, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. In addition to our headquarters in Washington, D.C., we have eight regional and field offices throughout the country, including our Western Office in San Francisco, which is responsive to preservation issues in California. We also own and operate 28 historic sites open to the public.

After reviewing the CEQA documents for the SFSU Campus Master Plan, the National Trust is concerned about potential impacts, including demolition, to properties constructed as part of the Parkmerced residential development. The National Trust considers Parkmerced a potentially nationally significant example of mid twentieth-century residential housing and landscape design. Because of this potential significance, we believe that any projects proposed in the Campus Master Plan with the potential to impact Parkmerced should undergo further environmental analysis through a Project EIR, rather than the programmatic cultural resource mitigation plan outlined in the environmental documents.

*Protecting the Irreplaceable*

Western Office National Trust for Historic Preservation

(415) 947-0692; Fax (415) 947-0699

<http://www.nationaltrust.org>; E-mail: [wro@nthp.org](mailto:wro@nthp.org)

The Hearst Building, 5 Third Street, Suite 707, San Francisco, CA 94103

Ms. Roberta Achtenberg, Chair  
California State University Board of Trustees  
September 10, 2007  
Page 2

Parkmerced was one of four similar residential rental investment properties developed in the U.S. by the Metropolitan Life Insurance Company between the late 1930s and early 1950s. New York architectural firm Leonard Schultze and Associates and California landscape architect Thomas Dolliver Church collaborated on the design of Parkmerced, which was constructed in two phases between 1941 and 1945 and 1948 and 1951. Schultze and Church designed Parkmerced according to the principles of the Garden City movement, creating a planned, self-contained "city within a city" integrating housing, circulation, and landscape design. Parkmerced is potentially significant for its association with the history of planned residential development in San Francisco as well as for its association with Thomas Dolliver Church, an acknowledged founder of modern residential landscape design in the U.S. While Parkmerced has not been systematically evaluated for historic or architectural significance, Parkfairfax, the Metropolitan Life Insurance Company's similar development in Virginia, was listed on the National Register of Historic Places in 1999.

The EIR for the SFSU Campus Master Plan is limited in its acknowledgment of the potential historical significance of the Parkmerced development. The document confines discussion of the property solely to buildings controlled by SFSU, and offers no information about the potential for the entirety of Parkmerced to constitute a historic district. Similarly, the document makes no mention of the potential significance of site planning or landscape features associated with Parkmerced. The National Trust maintains that any analysis of resource significance or impacts to sites associated with Parkmerced should include consideration of the Parkmerced development as a historic district and include analysis of its site planning and landscape design features. We urge CSU and SFSU to conduct further environmental review of projects affecting Parkmerced through Project EIRs.

54.K.1  
con't

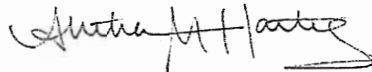
The National Trust takes an active interest in the preservation of all cultural resources potentially affected by projects in the SFSU Campus Master Plan. We acknowledge the detailed programmatic mitigation plan for cultural resource impacts in the Campus Master Plan EIR and believe it can adequately address cultural resource impacts in some circumstances. However, given the broad and non-specific analysis of potential impacts to cultural resources in the EIR, new information on specific impacts will undoubtedly be discovered in the course of carrying out the mitigation plan. Under the plan, SFSU will also engage in detailed conversations about avoidance and minimization of impacts to cultural resources and analyze project alternatives to maximize preservation. We urge CSU and SFSU to implement a reporting plan for cultural resource mitigation as part of its commitment to these actions, and to keep the public informed of its decisions.

The National Trust appreciates your consideration of our concerns raised in this letter, and we welcome the opportunity to participate in future conversations regarding the SFSU Master Plan and cultural resources. Please do not hesitate to contact me directly at (415) 947-0692.

Ms. Roberta Achtenberg, Chair  
California State University Board of Trustees  
September 10, 2007  
Page 3

54.K.1  
con't

Sincerely,



Anthea M. Hartig, PhD  
Director

cc: Dr. Charles B. Reed, Chancellor, California State University  
Dr. Robert A. Corrigan, President, San Francisco State University  
Leroy M. Morishita, Vice President for Administration and Finance, San Francisco State University  
Simon Y. Lam, Associate Vice President for Capital Planning, Design, and Construction, San Francisco State University  
Roger Fish, Director, Capital Planning, Design, and Construction, San Francisco State University  
Richard Macias, Campus Planner, San Francisco State University  
M. Wayne Donaldson, State Historic Preservation Officer  
M. Bridget Maley, President, San Francisco Landmarks Preservation Advisory Board  
Mark Luellen, Preservation Coordinator, City and County of San Francisco Planning Department  
Cindy Heitzman, Executive Director, California Preservation Foundation

JUL 12 2010

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

# SAVE - PARKMERCED

- 1) **NO PARKMERCED "VISION" IN MY "SHARED" COMMUNITY BACKYARD.**
  - It is 100% not sustainable to do a total tear-down of the landscape and garden homes ☐ 54.L.1
  - The developer has not changed his plans after numerous meetings and comments. ☐ 54.L.2
  - The current and prior management has worked with SFSU/CSU to engender gentrification and displacement of long term residents through large influxes of students and little fair or equal treatment of existing residents. 54.L.3
  - Many acres of land have been siphoned off from Parkmerced by previous owners including the sale of open recreation space without any reduction in rents to the existing tenants as a loss-of-use due to lack of notification. 54.L.4
  - There is no financial "equivalent" in terms of the open landscape, front and back yards, and open space of the garden units that can replace the urban retreat these units represent to working class renters in San Francisco. 54.L.5
  - The Garden units are some of the largest rental units in SF, and have prior served as family rental housing however price increases post "flipping" have made the larger units un-accessible price wise for many families existing in the neighborhood when increase in family size occurs. 54.L.6
  - Many amenities have been eliminated such as the prior public school site at 700 Font, and the open space at 800 Brotherhood Way that could have served as a walkable open space connector to the Lake Merced and Brotherhood Way Religious sites through the "peace-park" and prior creek bed that runs along the souther portion of the site. 54.L.7
- 2) **NO SAN FRANCISCO STATE UNIVERSITY CSU "MASTERPLAN."**
  - The University Park South is PART of Parkmerced's original masterplanned design.
  - The overall University Park South area and University Park North was sold off with a loss of -1,000 units of prior affordable rental community housing, without review of its effects or community organizations being involved in the negotiated Memorandum of Understanding of "fair-share" impacts per "City of Marina vs. CSU".
  - The SFSU Masterplan EIR was a "programmatic EIR, and NOT project specific" and should be reviewed on a case by case application of permits due to ongoing work that is NOT per the Dept. Sec. of the Interior Standards for possible historic properties and districts. SFSU/CSU has ignored this issue to date. 54.L.8
- 3) **I DO NOT WANT 300,000 g.s.f. OF RETAIL IN PARKMERCED**
  - That is equivalent to THREE walmarts!!!
  - We already have commercial corridors at West Portal and Ocean Ave.
  - We already have a commercial zoned core that is in revitalization at Cambon Drive.
  - We already have Stonestown, Westlake, and Lakeside Plaza, and the Retail area in the Merced Extension Triangle Area up Brotherhood Way. 54.L.9
  - Utilize the existing Commercial Cores in the future planning of Parkmerced.
  - We DO NOT want a "Vibrant" commercial district in a residential zoned neighborhood.
  - The SFSU Masterplan proposes also commercial corridors on Buckingham and Holloway this is overkill.
  - The Stonestown Site also has possible development proposal and should be built up prior to new commercial areas being installed in residential areas.
- 4) **DO NOT ALLOW A PRIVATE DEVELOPER TO ROUTE PUBLIC TRANSIT FOR THERE OWN BENEFIT THROUGH A RESIDENTIAL NEIGHBORHOOD.**
  - This smells like a rat, and back-room dealing for local and federal money for private development.
  - The SFMTA and TEP proposals cut transit drastically in our neighborhood prior to the proposed changes thus siphoning off transit to showcase new systems or proposals.
  - Would you allow a train line along your front or backyard?
  - Noise, Pollution, and increased population will result, along with crime, and deterioration of the quiet residential scale of the neighborhood.
  - The analysis of the routing through Parkmerced indicated by the SFPUC Rail Safety concerns about the on-street rail traffic, cross-overs into and out of Parkmerced, and the need to separate the pedestrian and rail traffic.
  - The SFPUC Rail Safety group noted the ALL AROUND benefit to Tunneling roadway or transit on 19th Ave. and Junipero Serra Blvd. vs. re-routing inside of Parkmerced. 54.L.10
- 5) **NO MUNI "DEAD-ENDED" OR "RUN-THROUGH" PARKMERCED!**
  - Parkmerced is currently and was one of the first Transit-Oriented-Design's and is MODEL of such planning.
  - We do not need MUNI run to everyone's doorstep, it's a walkable community, and the investment in transit should be located and spent to directly locate stops on 19th @ SFSU, at 19th and Junipero Serra's intersection, or at the 1952 Interchange @ Brotherhood Way and Junipero Serra.
  - Provide Tier 5 Federal Funding and build the direct connections to existing bi-county transit hubs. Look at future lines down Lake Merced Blvd., Sunset Blvd. or 19th Ave. and the possibility of layering and tunneling along 19th ave.
  - Why are we stopping transit and than waiting for future money to connect the dots, provide direct transit loops, and connections, and future new lines along brotherhood way, to district 11, district 1 and north-south, east-west., BRT or Rail systems to alleviate transit congestion and place mass-transit FIRST on the itinerary for development.
- 6) **THERE IS NO FORMAL PROTECTION FOR RENTER'S BASED ON THE RECENT PALMER DECISION LEGALLY AND NOTHING EQUITABLE IN WHAT THEY WILL LOSE IN THE GARDEN UNITS.**
  - Anything post 1979 is non-rent-controlled per the Palmer Decision. 54.L.11
  - There is no formal written analysis on what is being lost, vs. replaced and no formal value to what is the exchange.
  - There has been no financial reduction in rent's based on prior "loss-of-use" due to lack of notification to elderly, working class, and student renter's.
- 7) **THERE HAS ALREADY BEEN AN EXODUS BASED ON DISPLACEMENT AND GENTRIFICATION OF PARK MERCED'S RENTAL UNITS**
  - Many families faced with the ongoing onslaught of students, and a lack of flexibility in moving within the community have been forced out. This is gentrification, discrimination vs. familial class, and socio-economic gentrification of the neighborhood. 54.L.12
  - An analysis of displacement in Parkmerced, current vacancy over the past 10 years, and the forced migration must be accounted for by the SF Planning Dept. otherwise it's the fillmore again for low-mid income families.
- 8) **PARKMERCED IS A "MARVEL OF MODERNISM" AND LANDSCAPE AT RISK PER THE CULTURAL LANDSCAPE FOUNDATION [www.tclf.org](http://www.tclf.org)**
- 9) **PARKMERCED HAS BEEN SUBMITTED TO THE NATIONAL TRUSTS "11 MOST ENDANGERED SITES" FOR 2010 [www.preservationnation.org](http://www.preservationnation.org)**
- 10) **PARKMERCED IS MY HOME, MY NEIGHBORHOOD, I CARE ABOUT IT AND I DO NOT WANT TO SEE IT DEVELOPED** 54.L.13



San Francisco Planning Commissioners, Historic Preservation Commissioners, SF Rent Board, SF Board of Supervisors.

I, (print your name here) AARON GOODMAN  
on the date of (fill in the date month, day and year) 7.12.2010

Oppose the current proposal by the Parkmerced "Vision", and the SFSU-CSU Master-plan due to their combined effects on the masterplanned community of Parkmerced. This site is eligible for the National Register of Historic Sites as a Cultural Landscape, I want to see the planning commission, SF Board of Supervisors, HPC, and Rent Board work with the community and individuals who want to see a significant preservation based alternative in the solution of this proposal. I strongly wish to see the community's view's and preservation groups stance clearly integrated in the current designs for all proposals that affect Parkmerced's original design outline.

I am a San Francisco resident, and consider the issues on the opposite side of this sheet to be critical and important in regards to how our city is being planned without concern for open space, and the historical integrity of our modern city, and the distinct lack of rental housing that has been created in the city for low-middle income families, seniors, students, and disabled residents. Please follow the SF General Plan, include the OPTION of renting in equal consideration to typical housing development.

Please accept this memo and signature as my support for the comment's submitted by preservation organizations and individuals who have stood up for the rights of this community, and the distinct UNIQUE landscape that is represented by Parkmerced.

Sincerely

(Please sign your name here)

(Please print your name here)

(Please provide the date here)

(Please provide your address here)

(Please provide your contact information here)

(Tel: 415.452.8745 / Email: augodman@yahoo.com)

Please send copies of this signed memo, to;

The SF Planning Commission at 1650 Mission St. Suite 400 SF, CA 94103

The SF Historic Preservation Commission at 1650 Mission St. Suite 400 SF, CA 94103  
(email: linda.avery@sfgov.org)

The SF Board of Supervisors at 1 Dr. Carlton B. Goodlett Place Room 244, SF, CA

## **RESPONSES TO LETTER 54**

**Aaron Goodman, July 12, 2010**

---

### **Response 54.A.1**

The comment states that the discussion of alternatives in the Draft EIR is inadequate. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses, for a discussion of the adequacy of the alternatives.

### **Response 54.A.2**

The comment states that the Proposed Project does not consider preserving the historic district, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

### **Response 54.A.3**

The comment states that the Proposed Sponsor has not considered a preservation alternative for the site, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses, for a discussion of the alternatives considered in the DEIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

### **Response 54.A.4**

The comment raises concerns over the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses.

### **Response 54.A.5**

The comment raises concerns about the displacement of residents and socio-economic impacts to residents as a result of implementation of the Proposed Project. Please refer to Responses TR.2.2, TR.20.2, TR.20.3, and TR.25.7.

### **Response 54.A.6**

The comment states that the Draft EIR does not analyze the original boundary of the Parkmerced Project Site. Please refer to Response TR.7.3.

**Response 54.A.7**

The comment states that the discussion of the Infill Development within the Historic District Alternative in Chapter VII, Alternatives to the Proposed Project, in Section VII.G, Details of Alternatives Considered and Rejected, pp. VII.74-VII.78, is inadequate. Please see Master Response A.4, Alternatives.

**Response 54.A.8**

The comment asserts that a soundness report should be prepared for all buildings proposed for demolition. Soundness reports are typically required in the case of residential demolition and replacement when a sponsor claims that an existing structure is unsound. In some cases this may exempt the applicant from certain Planning Code requirements. The soundness report is used to support those claims. No such soundness report is required where, as here, the sponsor is not asserting that the structure(s) are unsound. Nor would a log of prior permits be needed

**Response 54.A.9**

Similar to Comment 54.A.8, above, the comment asserts that a soundness report should be prepared and also requests that a log of all permits issued for the buildings be prepared by the Building Department to assess the condition of the properties prior to any demolition. Please refer to Response 54.A.8.

**Response 54.A.10**

The comment disagrees with the conclusion that there are no feasible mitigation measures available to address Impacts AE-1, CR-1 and CR-2 in the Aesthetics and Historic Resources sections of the Draft EIR. Impact AE-1 concludes that demolition of the existing Parkmerced visual resource would cause a significant impact on a visual/scenic resource of the built environment. Impacts CR-1 and CR-2 conclude that demolition would transform the existing architectural character of the Project Site. These would be considered significant impacts under CEQA because implementation of the Proposed Project would impair the characteristics of the Parkmerced historical resource that convey its historic and architectural significance and that justify its inclusion in the CRHR. As stated in Section V.B, Aesthetics, pp. V.B.20-V.B.21, and in Master Response A.1, Historic Resources, in Section III.A, Master Responses, there are no feasible mitigation measures available that would preserve most of the Project Site's existing visual character or historic district and allow implementation of the Proposed Project. Therefore, these impacts are significant and unavoidable.

The comment adds that a viable mitigation measure is implementation of the Infill Development within the Historic District Alternative in Chapter VII, Alternatives to the Proposed Project, in

Section VII.G, Details of Alternatives Considered and Rejected, pp. VII.74-VII.78. Infill would not preserve the cultural landscape due to the number of buildings that would need to be constructed in the gardens and courtyards. For a discussion of the adequacy of analyzed alternatives, please see Master Response A.4, Alternatives.

**Response 54.A.11**

The comment states the Draft EIR ignores the option to connect transit to Daly City. See Response TR.5.3 for discussion of extending the M Ocean View to Daly City and Master Response A.2, Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.A.12**

The comment states that an analysis of the grade separation of the M Ocean View crossings of 19<sup>th</sup> Avenue should be included in the Draft EIR, as it would provide significant benefit for all modes. Please see Response TR.31.2 for discussion of grade separations for M Ocean View crossings of 19<sup>th</sup> Avenue and Master Response A.2, Transportation and Circulation, for further discussion of the relationship between the Proposed Project, the Draft EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.A.13**

The comment reiterates concerns raised in the previous comment that grade separation or tunneling of the M Ocean View are not analyzed in the Draft EIR. See Response TR.31.2 for discussion of grade separations for M Ocean View crossings of 19<sup>th</sup> Avenue and Master Response A.2, Transportation and Circulation, Section 3.1 for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.A.14**

The comment references a memo prepared at the onset of the *19<sup>th</sup> Avenue Corridor Study* to determine the adequacy of the San Francisco County Transportation Authority (SFCTA) Travel Demand Forecasting model at projecting forecasts of traffic growth in the study area. This detailed review is an appropriate and necessary first step in any analysis prior to using a travel demand forecasting model. This quality control check generally helps analysts to determine whether changes to the model structure are required or whether additional processing after the model output is made is appropriate.

In this case, a number of inconsistencies were identified by Planning Department staff and their consultants, which is relatively common in a travel demand model the size and complexity of the

SFCTA's model. The purpose of identifying the inconsistencies was so that corrections could be made and new forecasts prepared, based on the corrected model. The forecasts used in the Draft EIR analysis were based on the corrected version of the model, and the forecasts do account for both regional growth in travel demand, and for the specific projects listed in the comment, as noted in Section V.E, Transportation and Circulation, p. V.E.49.

**Response 54.A.15**

The comment states that informal meetings held at SFMTA on September 28, 2009, were not open to public input to staff-level meetings. The meetings referenced by the comment were internal coordination meetings with City staff and the Project Sponsor and were not required to be open to the public. However, there have been several neighborhood meetings, an EIR scoping meeting, and a number of Planning Commission meetings related to the Proposed Project, which were open to the public.

The comment also states that the Draft EIR does not include an analysis of alternatives for train storage at the tail tracks within the Parkmerced site. The site, as planned, was determined to be the optimal site by SFMTA staff and the Project Sponsor. No significant impacts were identified associated with the location and/or layout of these tracks, and therefore alternative locations are not required to be presented or analyzed in the EIR. However, it should also be noted that the EIR includes alternatives without these tail tracks, in which the M Ocean View would not be routed into the Proposed Project site.

Finally, the comment states that no analysis of safety issues associated with at-grade crossings were evaluated. The EIR, on p. V.E.99, does include a discussion of the benefits of the proposed realignment to pedestrians, including students from San Francisco State University, who would no longer have to cross 19<sup>th</sup> Avenue to reach the transit platform, and to all riders, who would have an adequate facility to wait for the train instead of the existing platform, which frequently experiences severe overcrowding. The light rail is expected to operate in dedicated right of way within the Proposed Project Site. Although specific design details have not yet been developed the light rail crossings into and within the Proposed Project site would be designed according to SFMTA's current design and safety standards, which would most likely entail similar or better treatments than the numerous other streets in San Francisco on which light rail, streetcars, and cable cars travel.

**Response 54.A.16**

The comment asserts that the rent protections proposed for the 1,538 replacement units are unenforceable under recent judicial decisions. Please see Responses TR.20.2 and TR.20.3.

**Response 54.A.17**

The comment requests the preparation of a socio-economic analysis. Please refer to Response TR.25.7.

**Response 54.A.18**

The comment asserts the Draft EIR fails to analyze mold-growth issues specific to the microclimate of the Project Site. To the extent that mold exists in any of the existing buildings it would be part of the baseline conditions of the site, and would likely be alleviated by new construction involved in the Proposed Project, which would be constructed using current design and Building Code Standards. Moreover, mold growth is not related to any CEQA issue. Furthermore, the Parkmerced site does not support a microclimate that is unique or different from any other site in western San Francisco.

**Response 54.A.19**

The comment asserts the Draft EIR fails to adequately analyze the historic district. Please refer to Master Response A.1, Historic Resources, for discussion on the adequacy of the evaluation of the historic district.

**Response 54.A.20**

The comment asserts that maintaining the existing towers and construction of new high rise buildings is problematic due to proximity to the San Andreas fault. Please refer to Master Response A.3, Seismic Hazards, for a discussion of seismic safety of the existing and proposed towers.

**Response 54.A.21**

The comment cites to additional historic resource mitigation measures needed in the Draft EIR. Please refer to Master Response A.1, Historic Resources, for a discussion on historic resources.

**Response 54.A.22**

The comment asserts the historic resource mitigation measures in the Draft EIR are inadequate and sufficient contextual information is not provided in the Draft EIR to show Parkmerced as significant for a "work of a master." Please refer to Master Response A.1, Historic Resources, for a discussion on historic resources.



**Response 54.A.23**

The comment asserts the historic resource mitigation measures in the Draft EIR are inadequate since they do not take into account the original boundary of Parkmerced. Please refer to Response TR.7.3.

**Response 54.A.24**

The comment asserts the Historic Resources Evaluation is inadequate in its analysis of alternatives and the existing gardens and courtyards. Please see Master Response A.4, Alternatives, for a discussion of the adequacy of the alternatives, and Master Response A.1, Historic Resources, for a discussion of the survey and evaluation of the Project Site.

**Response 54.A.25**

The comment states that the discussion of alternatives in the Draft EIR is inadequate. Please see Master Response A.4, Alternatives, for a discussion on the adequacy of the range of alternatives analyzed.

**Response 54.A.26**

The comment states that the alternatives in the Draft EIR should not preclude an alternative that is sustainable and provides historic preservation. Please see Master Response A.4, Alternatives, for a discussion of the adequacy of the alternatives.

**Response 54.A.27**

The comment raises concerns about the displacement of residents and need for a socio-economic analysis in the Draft EIR. Please refer to Responses TR2.2 and TR.25.7.

**Response 54.A.28**

The comment raises issues about the feasibility of alternatives in the Draft EIR. Please see Master Response A.4, Alternatives, for a discussion of the range of feasible alternatives.

**Response 54.A.29**

The comment states that the Draft EIR does not analyze the original boundary of the Parkmerced Project Site. Please refer to Response TR.7.3.

**Response 54.A.30**

The comment states that demolition of buildings and landscaped areas would result in quantifiable waste which is not included in the Draft EIR. Please refer to Response TR.25.6.

**Response 54.A.31**

The comment asserts that the analysis of the alternative is inadequate. Please see Master Response A.4, Alternatives, for a discussion of the range of the alternatives.

**Response 54.A.32**

The comment references the *19<sup>th</sup> Avenue Corridor Study* and states that the *19<sup>th</sup> Avenue Corridor Study* is not subject to CEQA. Please see Master Response A.2, Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.A.33**

The comment suggests that the Draft EIR should have analyzed additional Muni alignment alternatives outside of the Project Site boundary, including a “direct route on 19<sup>th</sup> Avenue,” which is assumed to refer to an extension of the M Ocean View to the Daly City BART Station, a light rail route that extends on Brotherhood Way, Lake Merced Boulevard, and Sunset Boulevard, and a light rail route down Font and Holloway. See Response TR.5.3 for discussion of extension of the M Ocean View to Daly City. Light rail routes on Brotherhood Way, Lake Merced Boulevard, Sunset Boulevard, Holloway Avenue, and Font Avenue are not proposed as part of the Proposed Project nor are they recommended as mitigation measures for significant project-related impacts. New rail service on these streets would generally duplicate existing bus service in the area. Ridership on these bus routes is relatively small in the study area, and replacing the existing bus service with new rail service would be expensive, but would not likely create a substantial increase in ridership. Therefore, alternative light rail routes along these streets would not reduce the project’s impacts and are not proposed as mitigation measures. Further, such measures need not be considered because CEQA does not require discussion of mitigation measures that are infeasible, including any mitigation measure that itself may constitute a project as complex, ambitious, and costly as the project evaluated by the EIR.

However, regional improvements to transportation in the study area could be considered as part of Tier 5 of the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.A.34**

The comment states that the alternatives in the Draft EIR should not preclude an alternative that is sustainable and provides historic preservation. Please see Master Response A.4, Alternatives, for a discussion on the range of alternatives analyzed.

**Response 54.A.35**

The comment states that Draft EIR does not sufficiently analyze consistency with San Francisco plans and policies. Please see Response 34.1.

**Response 54.A.36**

The comment correctly states per CEQA there is no distinction between being listed in or determined to be eligible for listing in the California Register of Historical Resources. This is not a comment on the Draft EIR.

**Response 54.A.37**

The comment asserts that changes to the parks and open space acreage on Parkmerced should be analyzed against the historic 191-acre Parkmerced boundary and its open space configurations baseline as opposed to the defined project site (152 acres) and the existing conditions. Please see Responses 7.3 and 28.5 for a description of the existing conditions which serve as the baseline for the Draft EIR impact analysis. The comment also states that open space loss is in direct conflict with Priority Policy 8. Please see Response 2.7 for an explanation regarding this Priority Policy and a summary of the open space analysis completed for Section V.J, Recreation, pp. V.J.7-V.J.10, of the EIR.

**Response 54.A.38**

The comment asserts that the mitigation measures described in the Draft EIR are inadequate. The comment appears to propose off-site mitigation, which would not be within the control of the Project Sponsor, and review by the San Francisco Historic Preservation Commission, which does not have permitting authority over the site because it is not a designated City landmark. Please see Response TR 7.3 for a discussion of the analysis of the original Parkmerced boundary. As described in the EIR in Section V.D.a, Historic Architectural Resources, pp. V.D.28-V.D.29, Mitigation Measure M-CR-1 would reduce the adverse impacts of the Proposed Project, but not to a less-than-significant level. The Proposed Project would still result in significant and unavoidable impacts to qualified historic resources present on the Project Site. Also, please see Master Response A.1, Historic Resources for a discussion of the adequacy of mitigation measures.

**Response 54.A.39**

The comment cites the *San Francisco General Plan* Urban Design Element, Objective 2 and Policy 4, but does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

**Response 54.A.40**

The comment states that the Project Site should be designated a local City landmark, but does not comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

**Response 54.A.41**

The comment cites to a 2007 Landmarks Evaluation Form for Parkmerced, but does not comment on the adequacy and accuracy of the analysis presented in the Draft EIR.

The comment also states that the Draft EIR should analyze the Project in relation to the original boundary of the Parkmerced Site. Please see Response TR.7.3.

**Response 54.A.42**

The comment raises concerns over the Project Sponsor's financial capability of completing the Proposed Project or implementing the alternatives. Please see Response TR.1.2.

**Response 54.A.43**

The comment asserts that the Draft EIR fails to consider a possibility of a land swap or alternative site swap for a development proposal. Please see Response TR.7.3 for a discussion of the Project Sponsor's control of off-site properties. Please see Master Response A.4, Alternatives, for a discussion on the range of alternatives analyzed.

The comment also notes that the Draft EIR fails to adequately review historic views and vistas, and wildlife impacts. Section V.B, Aesthetics, pp.V.B.20-V.B.21, identifies that the Proposed Project would have a significant and unavoidable visual impact since that the Project Site, including its associated landscaped setting, is considered a visual/scenic resource of the built environment. No feasible mitigation would reduce this impact to less than significant. Project impacts to wildlife are discussed in Section V.M, Biological Resources, pp. V.M.5-V.M.10, and in

Impacts BI-1, BI-2, BI-3, BI-4, BI-7, BI-8, and BI-9. Mitigation measures are identified to lessen or reduce significant and potentially significant impacts, where appropriate.

**Response 54.A.44**

The comment asserts that the Draft EIR contains too many 11-by-17-inch figures and appears self promotional. The purpose of the environmental document is to provide accurate, legible and readily understood information. Judgments are made in the course of the preparation the EIR as to how to best present the variety of information contained in the document, including graphics, figures etc. In some cases it was decided to put these in a larger format to make them easier to read and review, particularly given the size of the Project Site. The intent of the EIR is to provide information in the most accessible and user-friendly format.

**Response 54.A.45**

The comment states that the historic district is not defined in the Draft EIR. Please see Master Response A.1, Historic Resources, for a discussion on the historic district boundaries.

**Response 54.A.46**

The comment suggests reorganizing the Draft EIR, such as by vision plan phases, to make the document more understandable. Please see Response TR.26.1 for a discussion of this issue.

**Response 54.A.47**

The comment asserts that the Draft EIR does not consider cumulative development sites, such as Stonestown Galleria. Please see Response 30.3.

**Response 54.A.48**

The comment states that the Draft EIR fails to consider a reasonable range of alternatives. See Master Response A.4, Alternatives, for a discussion on the range of alternatives analyzed.

**Response 54.A.49**

The comment asserts that the analysis of alternatives is inadequate. See Master Response A.4, Alternatives, for a discussion on the range of considered and rejected alternatives analyzed.

**Response 54.A.50**

The comment states that Draft EIR does not sufficiently analyze consistency with San Francisco plans and policies. Please see Response TR.34.1.

**Response 54.A.51**

The comment asserts that the analysis of alternatives is inadequate. See Master Response A.4, Alternatives, for a discussion on the range of feasible alternatives analyzed.

**Response 54.A.52**

This comment expresses general opposition to the Proposed Project, specifically regarding the lack of preservation-based options, but does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

**Response 54.B.1**

The comment asserts that the analysis of alternatives is inadequate. See Master Response A.4, Alternatives, for a discussion on the range of feasible alternatives analyzed.

**Response 54.B.2**

The comment states that the Draft EIR improperly ignores the original boundary of the Parkmerced Project Site. Please refer to Response TR.7.3.

**Response 54.B.3**

The comment asserts that the analysis of alternatives is inadequate. Please see Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.4**

The comment states that the alternatives in the Draft EIR should not preclude an alternative that provides historic preservation. Please see Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.5**

The comment states that the alternatives in the Draft EIR should not preclude an alternative that provides historic preservation. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.



**Response 54.B.6**

The comment provides an outline for additional alternatives that should be studied in the Draft EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.7**

The comment asserts that the Draft EIR should analyze tunneling portions of 19<sup>th</sup> Avenue. A similar comment was raised during the public hearing. See Response TR.31.2 for a discussion of grade separation along 19<sup>th</sup> Avenue.

**Response 54.B.8**

The comment asserts there are seismic safety issues with existing buildings on the Project Site. See Master Response A.3, Seismic Hazards, for a discussion on the seismic safety.

**Response 54.B.9**

The comment provides a table citing cumulative development projects within District 7, but does not comment specifically on the Draft EIR. Much of the cited information in the table appears to be based on information provided in the *19<sup>th</sup> Avenue Corridor Study*. An accurate summary of cumulative development proposals within the vicinity of the Project Site is available in the *19<sup>th</sup> Avenue Corridor Study*, Chapter I, Table I.1: 19<sup>th</sup> Avenue Corridor Study Forseeable Development Projects. The projects listed in the comment table as detailed in Table I.1 of the *19<sup>th</sup> Avenue Corridor Study*, are included in the cumulative impacts analysis in the EIR, except the proposed 29-unit project located at Capitol Avenue. The 1 Capitol Avenue project application for review was submitted after the cumulative impact analysis was underway; the site is also located outside the Study Area boundary. Because it proposes a relatively small number of new residential units, and because of its distance from the project site, including this Proposed Project in the cumulative analysis, would not result in any substantial changes to the cumulative impacts analysis in the EIR, and no additional mitigation measures would be needed. Therefore, the cumulative impact analyses were not revised to specifically include this project. In addition, the cumulative transportation analyses, and the cumulative air quality and noise analyses based on the transportation information include regional growth forecasts that would account for smaller development projects like that at 1 Capitol Avenue, in addition to the list of potential development projects.

**Response 54.B.10**

The comment asserts that soundness reports should be prepared as an independent verification of building conditions stated by the Parkmerced ownership. Soundness reports are typically required in the case of residential demolition and replacement when the sponsor claims that existing structure are unsound. In some cases this may exempt the applicant from certain Planning Code requirements. The soundness report is used to support those claims. No such soundness report is required where the sponsor is not asserting that the structure(s) are unsound as defined by the Planning Code. The sponsor is not requesting any exemption from standard Planning Department or Planning Commission review based on the soundness of the Parkmerced structures. Therefore no soundness reports are required. See also Response 54.A.8.

The comment also expresses concerns over the safety of the towers in the event of a seismic event. The safety of existing towers is discussed in Master Response A.3, Seismic Hazards.

**Response 54.B.11**

The comment states that the discussion of alternatives in the Draft EIR is inadequate. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.12**

The comment asserts that soundness reports should be prepared as an independent verification of garden apartment building conditions stated by the Parkmerced ownership. Please see Responses 54.A.8 and 54.B.10.

**Response 54.B.13**

This comment expresses general opposition to the Proposed Project and specifically requests the need to preserve the Project Site, but does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.14**

This comment states that rerouting the M Ocean View line through the Project Site would destroy the quiet nature of the existing community and states that connections between transit and the existing commercial areas have not been fully evaluated. The comment suggests that rerouting will create a substantial degradation in the quality of life in the Parkmerced area. Noise impacts of the Proposed Project are discussed in Section V.F, Noise, in the EIR. Issues regarding the quality of life relate to an opinion on the Proposed Project, but do not address any CEQA

significance criteria relating to specific environmental impacts. This comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

The comment also references potential safety impacts associated with routing light rail through residential neighborhoods. Refer to Response 54.A.15 for discussion of rail safety.

The comment also references potential grade separation of light rail. Refer to Response TR.5.3 and Master Response A.2, Transportation and Circulation, for discussion of the relationship between the Proposed Project, the EIR, the *19<sup>th</sup> Avenue Corridor Study*, and major long-term transportation improvements in the area.

The comment also notes that other nearby property owners, including the Cambon Drive commercial core, have not been consulted and that they would like to be included in cumulative development plans. As noted on p. V.E.49 of the Draft EIR, the cumulative transportation analysis conducted for the EIR did include other projects, including the Cambon Drive site. The comment is interpreted to mean that long-term development and transportation plans should consider not just the Proposed Project, but other long-range development and transportation improvements. This is the primary purpose of the *19<sup>th</sup> Avenue Corridor Study*, which provides such analysis. Refer to Master Response A.2, Transportation and Circulation, for discussion of the relationship between the Proposed Project, the EIR, the *19<sup>th</sup> Avenue Corridor Study*, and major long-term transportation improvements in the area.

#### **Response 54.B.15**

The comment asserts that the retail and commercial spaces in the vicinity of the Project Site and their economic impacts on the Cambon Shopping Center, was not analyzed but does not comment specifically on the EIR or Proposed Project. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Project.

The comment suggests traffic access designs into the Cambon Shopping Center, but does not comment specifically on the EIR or Proposed Project. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Project.

#### **Response 54.B.16**

The comment suggests design proposals for the Cambon Shopping Center site, but does not comment specifically on the EIR or Proposed Project. The Cambon Shopping Center is not located within the Project Site and is not owned by the Project Sponsor. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.17**

The comment asserts that residential design proposals can be accommodated on the 800 Brotherhood Way site, but does not comment specifically on the EIR or Proposed Project. The 800 Brotherhood Way site is not located within the Project Site and is not owned by the Project Sponsor. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.18**

The comment asserts that the southern hillside is not stable or maintained and does not provide adequate access. As discussed in Master Response A.3, Seismic Hazards, the purpose of CEQA is to present decision-makers with information about the potential adverse environmental impacts of a proposed project. As noted on in Section V.N, Seismic Hazards, p. V.N.1, a geotechnical report was prepared for the Proposed Project by a California-licensed geotechnical engineer in order to evaluate site conditions and potential hazards, and to develop preliminary recommendations for shoring and construction.<sup>1</sup> It is not the purview of CEQA to analyze and/or mitigate pre-existing conditions that are not affected by the project. The EIR assesses the potential seismic hazards for the Proposed Project and concludes that there would be no significant impacts related to seismic hazards (see Impact GE-2, pp. V.N.12-V.N.13). Compliance with local and state codes and implementation of recommendations of site-specific soils reports as part of the permit review process would ensure that no significant adverse impacts due to seismic hazards would occur due to the Proposed Project. For more discussion of seismic safety on the Project Site, see Master Response A.3, Seismic Hazards.

**Response 54.B.19**

The comment suggests possibilities to integrate communities in the vicinity of the Project Site through the removal of roadway lanes and extension of light rail around Lake Merced to connect residential communities along Lake Merced Boulevard. As discussed in Response 54.A.33, large-scale regional transportation improvements, such as an entirely new light rail route around Lake Merced, are not proposed as part of the Project, nor are they recommended as mitigation measures for project-related impacts. However, such improvements could be considered as part of the 19<sup>th</sup> Avenue Corridor Study. See Master Response A.2, Transportation and Circulation,

---

<sup>1</sup> Treadwell & Rollo, 2008. *Environmental Impact Report (EIR), Geologic, Geotechnical and Seismic Findings, Parkmerced Development, San Francisco, California*, May 9, 2008 p.10 (hereinafter referred to as "Geologic, Geotechnical, and Seismic Findings"). A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2008.0021E.

Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the Draft EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.B.20**

The comment asserts that EIR does not adequately address areas beyond the Project Site boundary, such as 800 Brotherhood Way and SFPUC proposals. Please refer to Response TR.7.3.

**Response 54.B.21**

The comment suggests major changes to the area light rail transit network, including either a new route or an extension of an existing route along Brotherhood Way and extension of the T-Third route along Geneva Avenue. The comment states that these large-scale, regional projects would reduce congestion in the area such that additional travel lanes on 19<sup>th</sup> Avenue are unnecessary. As discussed in Response 54.A.33, large-scale regional transportation improvements, such as grade separation, extensions of the M Ocean View to Daly City, and/or creating entirely new transit routes, particularly for light rail, as suggested by the comment, are neither proposed as part of the Proposed Project, nor are they recommended as mitigation measures for project-related impacts. However, such improvements could be considered as part of the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the Draft EIR, and the *19<sup>th</sup> Avenue Corridor Study*. The comment also suggests eliminating stops proposed within the Parkmerced site to improve overall travel times. Impact TR-21 in the EIR identified an impact associated with the increased travel times to the M Ocean View. Mitigation Measures M-TR-21A and 21B would reduce the Proposed Project's impacts to travel times on the M Ocean View to less-than-significant levels.

**Response 54.B.22**

The comment states that the discussion of alternatives in the Draft EIR is inadequate. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.23**

The comment states that the Proposed Project does not reflect previous public input that called for increasing tower heights to minimize demolition of the Project Site, but does not comment specifically on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.24**

The comment suggests major changes to the area light rail transit network, including an extension of the M Ocean View south to Brotherhood Way, and a complete reconstruction of the Junipero Serra Boulevard/Brotherhood Way interchange to provide a new underground transit station, parking and development. As discussed in Response 54.A.33, large-scale regional transportation improvements, such as major re-routing of the transit system, particularly for light rail, as suggested by the comment, are neither proposed as part of the Proposed Project, nor are they recommended as mitigation measures for project-related impacts. However, such improvements could be considered as part of the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the Draft EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.B.25**

The comment suggests design alternatives to increase tower heights, but does not comment specifically on the EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.26**

This comment expresses general opposition to the Proposed Project, but does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.27**

The comment suggests alternative density and designs for the EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.28**

The comment suggests a range of different alternatives for the EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.29**

The comment cites a lack of preservation based alternatives and financial analysis in the EIR. CEQA does not require that financial analysis be included in the EIR since the document does not



state that any of the alternatives are economically infeasible. The *CEQA Guidelines* require that any alternative evaluated in an EIR be "potentially feasible," but financial evidence would only be required if the City explicitly finds when approving the Project that an alternative is financially infeasible.

See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.30**

The comment asserts that soundness reports should be prepared as an independent verification of building conditions. Please see Responses 54.A.10 and 54.B.10.

**Response 54.B.31**

The comment asserts that the Project Sponsor has not involved preservationists on alternatives that would preserve the site. See Master Response A.4, Alternatives, for a discussion on the reasonable range alternatives analyzed.

**Response 54.B.32**

The comment provides alternative infill designs. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.33**

The comment provides alternative infill designs. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.34**

The comment provides alternative transit routes. These types of large-scale regional transportation improvements should be evaluated as part of the *19<sup>th</sup> Avenue Corridor Study* Tier 5 improvements. See Master Response A.2, Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*. See also Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.35**

The comment provides alternative transit routes. These types of large-scale regional transportation improvements should be evaluated as part of the *19<sup>th</sup> Avenue Corridor Study* Tier 5

improvements. See Master Response A.2, Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the DEIR, and the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.36**

The comment provides alternative cumulative transit routes. These types of large-scale regional transportation improvements should be evaluated as part of the *19<sup>th</sup> Avenue Corridor Study* Tier 5 improvements. See Master Response A.2, Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the DEIR, and the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.37**

The comment provides alternative infill and demolition designs. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.38**

The comment provides alternative infill and demolition designs. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.B.39**

The comment raises concerns about the seismic safety of the existing towers. Please see Master Response A.3, Seismic Hazards, for a discussion on the seismic safety of the existing towers.

**Response 54.B.40**

The comment asks for analysis of the long-term longevity of the existing towers. Please refer to Master Response A.3, Seismic Hazards, for a discussion of seismic safety of the existing and proposed towers. See also Response 6.6 regarding recent improvements to the existing towers.

**Response 54.B.41**

The comment cites concerns that the existing towers are not retrofitted. Please see Master Response A.3, Seismic Hazards, for a discussion on seismic safety of the existing towers.

**Response 54.B.42**

The comment expresses general opposition to the Proposed Project, specifically over the demolition, but does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project.

**Response 54.B.43**

The comment raises seismic and safety concerns over the existing towers. See Master Response A.3, Seismic Hazards, for a discussion on seismic safety of the existing towers.

**Response 54.B.44**

The comment notes that a repair material identified as Sitka Plastiment may have been used for repair/rehabilitation of residential towers on site as long ago as 1940. See Master Response A.3, Seismic Hazards, for a discussion on seismic safety of the existing towers.

**Response 54.B.45**

The comment states that the EIR does not study the prior and current demand for affordable rental units for families. As stated in Chapter III, Project Description, p.III.15, development of the Proposed Project would not displace existing Parkmerced residents and the proposed Development Agreement would address the issue of the loss of rent controlled units. Please see Master Response A.1, Historic Resources, for a discussion the social significance of Parkmerced in the historic context of private investment and middle-income housing projects, and within a portion of the significance statement. Also see Response TR.2.2.

**Response 54.B.46**

The comment expresses general opposition to the Proposed Project, and states that there are better alternatives that should be considered. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.1**

The comment raises several comments on the *Historic Resource Evaluation & Cultural Landscape Assessment* (the "HRE") prepared by Page & Turnbull, Inc., an independent historic

architectural resources consultant.<sup>2</sup> The following responses address each comment made on the HRE, and is organized by page number, as noted by the comment.

HRE, p. 3. The comments note several facts about Parkmerced and assert that the HRE was not comprehensive and did not examine portions of the original Parkmerced that have been sold off to other owners. The HRE reviewed all parcels associated with the original Parkmerced, as completed in 1951, and did identify a potential historic district based upon this original development. See Master Response A.1, Historic Resources, for a discussion of survey methodology employed in the HRE, and the significance of Parkmerced.

HRE, p. 6. The comment asserts that Charles Birnbaum of the Cultural Landscape Foundation was not consulted in the production of the HRE or in the development of the alternatives to the Project Site. Charles Birnbaum was not consulted in the production of the HRE. The HRE, however, did include research from resources authored by Charles Birnbaum to complete the Cultural Landscape Assessment. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

HRE, p. 7. The comments assert that the HRE did not mention the number of “modern” sites or landscapes or cultural landscapes that include housing development listed in the National Register of Historic Places, and that “on-site” archives in the Administration Building was inaccessible to the public. The number of National Register-listed “modern” sites, or landscapes, or cultural landscapes, including the number of housing developments, is not necessary to conduct an evaluation of Parkmerced for its eligibility for listing in the California Register. Sufficient information to determine if Parkmerced is a historic resource (as defined by CEQA) has been provided in the EIR and HRE.

Access to the “on-site” archives in the Administration Building is not a specific comment on the EIR or HRE, and therefore requires no further response.

HRE, p. 8. The comment asserts that the HRE did not evaluate individual buildings and landscapes features on the Parkmerced Site, and therefore a total understanding of the quality and condition of the site is not known. The survey and evaluation of Parkmerced was completed in consultation by the San Francisco Planning Department, and meets local, state, and national standards for the evaluation of historic resources. Please refer to

---

<sup>2</sup> Page & Turnbull Inc., *Parkmerced Historic Resource Evaluation & Cultural Landscape Assessment*, November 13, 2009.

Master Response A.1, Historic Resources, for a discussion of survey methodology used in the HRE.

HRE, p. 12. The comment questions the factual inaccuracies of the past historical studies of Parkmerced, as noted in the HRE, and questions the *SFSU Campus Master Plan EIR*. The past historical studies of Parkmerced were reviewed and considered in the production of the HRE. However, the HRE offers a more thorough analysis of Parkmerced as a historic resource. The HRE should be considered as the primary guiding document for the evaluation of historic resources, as contained within the EIR for the Proposed Project. The past historical studies of Parkmerced were only used for research purposes. Comments on the *SFSU Campus Master Plan EIR* are not a specific comment on this Draft EIR or HRE.

HRE, p. 16. The comment states that the HRS does not address the building material longevity and seismic safety concerns of the garden units and tower buildings. The comment also proposes a new alternative that would demolish the towers. Please refer to Master Response A.3, Seismic Hazards, for a discussion of seismic safety of the tower buildings, and refer to Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

HRE, p. 17. The comment identifies the HRE's discussion of undeveloped parcels adjacent to the Project Site and further states that these empty lots were originally intended to be a walkable section and may have need a primary nursery for the community and the Parkmerced Site. These comments do not raise concerns about the adequacy and accuracy of the analysis presented in the EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, p. 21. The comment states that the HRE incorrectly states that the SFSU Foundation acquired their blocks in the 1940's. The comment is correct. The SFSU Foundation acquired portions of Parkmerced in the 2000's.

HRE, p. 22. The comment states that the Proposed Project does not provide any options for reuse of the landscape designs and patterns. Please refer to Master Response A.4, Alternatives, for a discussion of the reasonable range and adequacy of alternatives analyzed.

The comment also cites to the Proposed Project's loss of open space. Proposed Project open space is discussed in Chapter III, Project Description, on pp. III.16-III.29, and in Section V.J, Recreation, on pp. V.J.6-V.J.10.

HRE, p. 24. This comment discusses the walkability of the Proposed Project Site, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, pp. 26-27. The comment provides an opinion on the role of SFHA and USHA, to create and foster social and community connections, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, p. 28. The comment asserts that the Draft EIR and HRE have not determined the correct calculations for open space at Parkmerced, and further adds that the total acreage calculations fail to include the original Parkmerced boundary. Existing and proposed open space acreage totals are identified in Chapter III, Project Description, on p. III.16, and open-space-per-resident ratios are discussed in Section V.J, Recreation, pp.V.J.5. and V.J.7-V.J.10. Please also refer to Response TR.7.3 for a discussion on the analysis of the original Parkmerced boundary.

HRE, p. 30. The comment summarizes the original Parkmerced developer's (MetLife Insurance) goals to provide low-mid income housing and opines that the Proposed Project does not provide housing options for families, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, p. 33. The comment discusses Thomas Church's repertoire and inventiveness as a modern landscape architect, particularly the accessible Parkmerced landscape, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, pp. 34, 41. The comment asserts that the HRE did not fully survey the landscape of internal courtyards. Please refer to Master Response A.1, Historic Resources, for a discussion of the survey methodology and cultural landscape assessment of Parkmerced.

HRE, p. 42. The comment asserts that the HRE did not adequately survey the individual landscape of the Project Site. Evaluation of individual landscape features and blocks are not necessary to determine if a historic resource is present on the Project Site, and to ascertain their character-defining features. Survey and research of a resource is conducted in order to determine if a historic resource is present on the Project Site. Please refer to Master Response A.1, Historic Resources, for a discussion of the survey methodology and cultural landscape assessment of the Project Site.



HRE, p. 43. The comment cites to the tree survey and questions whether significant landscape trees are located on the Project Site. As discussed in Section V.M, Biological Resources, p. V.M13, the City and County of San Francisco currently considers "Protected Trees" as those that have been determined to be landmark trees, significant trees, and street trees. Chapter III, Project Description, p. III.6, states that the Project Site contains over 1,500 trees: 298 significant trees, 189 street trees, and over 1,000 interior trees. There are no designated landmark trees on the Project Site.

The comment adds that the HRE did not adequately survey the inner courts and recreation areas of Parkmerced. Please refer to Master Response A.1, Historic Resources, for a discussion of the survey methodology and cultural landscape assessment of Parkmerced.

HRE, Diagram 1. The comment cites to Diagram 1 in the HRE (p. 47) and asserts that the original outline of Parkmerced is not shown. Diagram 1 is entitled "Current Land Use Diagram of Parkmerced," and is not intended to show the original boundaries of the site.

HRE, p. 48. The comment asserts that the survey methodology employed in the HRE was not adequate to determine the cultural landscape characteristics of the Project Site. Please refer to Master Response A.1, Historic Resources, for a discussion of the survey methodology and cultural landscape assessment of Parkmerced.

HRE, p. 50. The comment states that the HRE does not address actions by both SFSU and the Project Sponsor to change and destroy key elements of the Project Site, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The SFSU Master Plan is a separate development over which the Parkmerced Project Sponsor has no control over. Please refer to Response TR 7.3 for a discussion on analysis of the original Parkmerced boundary.

HRE, p. 51. The comment asserts that the HRE does not adequately identify the property's significance with rental housing history and significant people. The HRE does identify Parkmerced as significant under National Register Criterion A (Events) for its association with an important trend in the development of middle-income housing in San Francisco. The HRE does discuss the development of Parkmerced as rental housing, and also includes adequate information to support this conclusion (HRE, pp. 26-38).

As identified in Section V.D, Historic Architectural Resources, p. V.D.20, based upon the level of research completed for the HRE, no significant persons, as defined by the National Park Service, were identified as associated with the historic resource. The HRE adequately evaluated Parkmerced under National Register Criterion B (Persons), and no significant individuals have been identified within the history of Parkmerced, as defined by the National Park Service.

The comment also asserts that the HRE should have identified Robert Pender as a “significant person” associated with Parkmerced. Robert Pender was honored by the San Francisco Board of Supervisors on May 3, 2009, and was noted as a resident of Parkmerced since 1973. He is noted for his contributions to the residents of Parkmerced through his volunteerism and civic activism. His association with Parkmerced is less than 50 years old, and does not meet the criteria for the evaluation of historic resources, as defined by the National Park Service for significant persons. The HRE is correct in its conclusion that no significant persons were associated with Parkmerced, as defined by National Register Criterion B (Persons).

HRE, p. 54. The comment asserts that the HRE did not sufficiently define “circulation.” Circulation is described under the “Cultural Landscape Characteristics” of the HRE, and is defined in detail in the HRE, pp. 54-55. Please also refer to Master Response A.1, Historic Resources, for a discussion of the cultural landscape assessment of Parkmerced.

HRE, p. 60. The comment provides an opinion of the inadequacies of the playground equipment at Parkmerced and its promotion of “dog-owners,” but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, p. 62. The comment asserts that the HRE portrays Parkmerced in a “negative” light. The purpose of the HRE is to determine if a historic resource is present on the Project Site, and evaluate the Project’s effects upon any historic resources. The HRE provides an objective view of the resources present on the Project Site.

HRE, p. 64. The comment asserts that the HRE did not examine the project site for “individual” resources, and questions the survey methodology employed by the HRE consultation. Please refer to Master Response A.1, Historic Resources, for a discussion of the survey methodology.

HRE, p. 65. The comment asserts that the HRE did not identify Parkmerced as significant for its association with Robert Pender, as noted under Criterion B (Person). Please refer to the Response 54.C.1, and the HRE, p. 51.

HRE, p. 70. The comments assert that the HRE did not identify Parkmerced as significant for its association with Thomas Church and his landscape designs, and that Parkmerced’s archives should have additional information on “covenants” and other “restrictive documents.” The HRE reviewed available documents at the Parkmerced Archives in the Administration Building, and no additional information was uncovered regarding “covenants” and other “restrictive documents.” Please refer to Master Response A.1, Historic Resources, for a discussion of the significance of Parkmerced and its association with Thomas Church.

HRE, pp. 76-85. The comment provides an opinion of the evaluation of Parkmerced as a historic resource and the project alternatives. Please refer to Master Response A.1, Historic Resources, for a discussion of the significance of Parkmerced, and refer to Master Response A.4, Alternatives, for a discussion of the adequacy of the range of alternatives.

HRE, p. 87. The comment provides an opinion on the interiors of the many units, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, pp. 91-101. The comment provides an opinion on the photographs contained within the HRE and asserts that the HRE does not portray Parkmerced in a “positive” light. The purpose of the HRE is to determine if a historic resource is present on the Project Site, and evaluate the Project’s effects upon any historic resources. The HRE provides an objective view of the resources present on the Project Site.

HRE, Appendix 9 – pp. 112-AA-96. The comment provides an opinion on the HRE survey methodology. Please refer to Master Response A.1, Historic Resources, for a discussion of the HRE survey methodology.

HRE, Appendix 1 – Article 1. The comment provides an opinion on an article showing preliminary design sketches for the original Parkmerced design, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, Appendix 1 – Article 5. The comment provides an opinion on an article describing the original Parkmerced development, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, Appendix 1 – Article 6. The comment provides an opinion on an article describing the original Parkmerced development, but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR or HRE. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

HRE, Appendix E. The comment asserts that the HRE does not accurately indicate open-space elements of the site, and also questions the survey methodology of the HRE. As part of Appendix E of the HRE, a number of existing conditions and site analysis maps were produced to illustrate the history and character of Parkmerced. These maps included a site plan, construction phases

diagram, ownership diagram, and open space diagram. The open space diagram illustrates an interpretation by the HRE consultant regarding three open space elements at Parkmerced: “community open space,” “residential gardens,” and “parkway landscape.” These diagrams were intended to illustrate the landscape character of Parkmerced, as it relates to its cultural landscape characteristics. The comment incorrectly interprets this diagram. The internal courtyards are noted as “residential gardens,” and in-between areas were not characterized in this diagram. Please refer to Master Response A.1, Historic Resources, for a discussion of the HRE survey methodology.

**Response 54.C.2**

The comment provides new alternatives and analysis of these alternatives for consideration, and also raises several comments on the Historic Resource Evaluation and Landscape Assessment: See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.3**

The comment states that the No Project Alternative is unrealistic and should be excluded from the EIR. *CEQA Guidelines* Section 15126.6 (e) requires inclusion of a ‘No Project’ alternative in the EIR to allow decision-makers to compare the impacts of approving a project with the impacts of not approving the project.

**Response 54.C.4**

The comment states that the Buildout Under Current Zoning Regulations Alternative is unrealistic. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.5**

The comment states that the Retention of the Historic District Central Code Alternative ignores the priority of preserving the entire cultural landscape. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.6**

The comment states that the Partial Historic District Alternative should be excluded because it precludes eligibility of the site as a historic district. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.7**

The comment states that the Full Build-Out with Transit Options Alternative should be excluded because it ignores the cultural landscape. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.8**

The comment states that the No Muni Realignment Alternative should be excluded because it ignores the cultural landscape. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.9**

The comment states that the details of the Alternatives Considered and Rejected need more thorough review in the EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.10**

The comment states that the details of the Infill Development Within the Historic District is the most successful proposal and should be considered the environmentally superior alternative. See Master Response A.4, Alternatives, for a discussion on the range and adequacy of the alternatives and determination of the most environmentally superior alternative.

**Response 54.C.11**

The comment states that the West Side – Partial Historic District should be excluded from the EIR as it ignores the entirety of the Project Site as a cultural landscape. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.12**

The comment states that the Infill Development Within the Historic District is the superior alternative. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Project. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.13**

The comment cites to a figure in the HRE and states that a cultural landscape eligible to state and national registers was not reviewed in the HRE. Please see Master Response A.1, Historic

Resources, for a discussion on the significance and evaluation of Parkmerced as cultural Landscape.

**Response 54.C.14**

The comment states that the Infill Development Within the Historic District should be a considered alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.15**

The comment questions states that the Buildout Under Current Zoning Regulations Alternative is inadequate. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.16**

The comment cites to inadequacies of the Retention of the Historic District Central Code Alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.17**

The comment states that the existing towers are not considered part of the cultural landscape. This comment is incorrect. The HRE accurately assesses the property's cultural landscape characteristics, including the Natural Systems & Features, Spatial Organization, Cluster Arrangement, Circulation, Topography, Vegetation, Building and Structures, Views and Vistas, and Small-Scale Features. See Master Response A.1, Historic Resources, for a discussion on the significance and evaluation of Parkmerced as cultural landscape

**Response 54.C.18**

The comment cites to inadequacies of the Partial Historic District Alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.19**

The comment cites to inadequacies of the Full Build-Out with Transit Options Alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.



**Response 54.C.20**

The comment cites to inadequacies of the No Muni Realignment Alternative. Specifically, the comment notes that San Francisco has adopted a “Transit First” policy, yet traffic congestion along 19<sup>th</sup> Avenue and Junipero Serra Boulevard is expected to be severe. This comment expresses general opposition to the Proposed Project but does not raise any specific issue related to the adequacy and accuracy of the analysis presented in the Draft EIR. See Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for discussion of the number of significant transportation-related impacts, including traffic impacts along 19<sup>th</sup> Avenue and Junipero Serra Boulevard.

The comment also suggests that Tier 5 improvements from the 19<sup>th</sup> Avenue Corridor Study should be applied along 19<sup>th</sup> Avenue and Junipero Serra Boulevard, south of Cambon Drive. See Master Response A.2, Transportation and Circulation, Section 3.1, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.C.21**

The comment cites to inadequacies of the No Muni Realignment Alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.22**

The comment cites to the Infill Development within the Historic District Alternative as the preferred alternative in the EIR. See Master Response A.4, Alternatives, for a discussion of the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.23**

The comment cites to inadequacies of the West Site Partial Historic District Alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.24**

The comment cites to the original outline of the of the Parkmerced boundary and identifies and designs an alternative for inclusion in the EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.25**

The comment asserts that there are errors in the open space calculation because the open space areas that existed within the original 191-acre development are not counted as project-related loss of open space. Please refer to Response TR.7.3.

**Response 54.C.26**

The comment cites to a figure in the HRE and asserts that there HRE inaccurately identifies open space areas on the Project Site. The comment incorrectly interprets the figure in the HRE. The HRE diagram of Block 11 (Old Block 33) illustrates the integrity of the landscape resources in the garden apartment courtyards at Parkmerced, and does not illustrate open space areas on the Project Site. Included in the diagram are extant historic trees, historic shrub planting, extant lawn, and extant paving.

**Response 54.C.27**

The comment states that Infill Development Within the Historic District is not fully explored in the EIR. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.28**

The comment includes a marked-up version of a map entitled "Existing Zoning." The comment notes that the intersection of 19<sup>th</sup> Avenue and Junipero Serra Boulevard is a traffic bottleneck and suggests expansion of the roadway to solve the problem. The Proposed Project does include an additional southbound travel lane and an additional northbound turn lane at this location to compensate for the loss of vehicular capacity imparted by light rail crossings. Although it is not the intent of the additional travel lanes proposed, the effect of the lanes would be that auto delay would decrease with implementation of the Proposed Project compared to conditions without the Proposed Project. See discussion under Impact TR-4 on pp. V.E.68-V.E.69 in the EIR, which discusses impacts to the intersection of 19<sup>th</sup> Avenue and Junipero Serra Boulevard associated with the Proposed Project.

**Response 54.C.29**

The comment states that the proposed rezoning of the Parkmerced Project Site fails to address off-site possibilities. Please refer to Response TR.7.3.

The comment also implies that regional transportation type improvements should be evaluated as part of the *19<sup>th</sup> Avenue Corridor Study* Tier 5 improvements. See Master Response A.2,

Transportation and Circulation, for more discussion of the relationship between the Proposed Project, the EIR, and the 19<sup>th</sup> Avenue Corridor Study.

**Response 54.C.30**

The comment states that the proposed Full Buildout with Transit Options Alternative fails to include the original Parkmerced boundary. Please refer to Response TR.7.3.

**Response 54.C.31**

The comment suggests regional transit changes, including a transit tunnel project. See Response TR.31.2 for a discussion of grade separation along 19<sup>th</sup> Avenue and Response 54.A.33 for a discussion of regional transportation improvements.

**Response 54.C.32**

The comment states that the EIR fails to analyze off-site water retention alternatives. See Master Response A.4, Alternatives, for a discussion on the reasonable range and adequacy of alternatives analyzed.

**Response 54.C.33**

The comment states that the prior SFMTA routes are not shown in Figure III.4: Existing Transit Plan from the Draft EIR and suggests that the 17 Parkmerced has been eliminated as part of SFMTA's service cuts. However,, the 17 Parkmerced is still in operation along the route shown in the EIR figure. The EIR does include a discussion regarding planned service changes to the 17 Parkmerced as part of SFMTA's Transit Effectiveness Project (TEP) in Section V.E, Transportation and Circulation, pp. V.E.29-V.E.30. These changes would optimize service on the 17 Parkmerced to better serve existing transit demand from the community based on extensive public outreach conducted by SFMTA staff. The analysis conducted as part of the EIR assumes the existing 17 Parkmerced operations in the near-term impacts analysis, but assumes implementation of the TEP improvements as part of the cumulative conditions analysis.

Finally, the comment suggests that travel times between the Proposed Project site and Downtown San Francisco are 20 minutes compared to 60 minutes on light rail. There are currently no direct express bus routes between the Proposed Project site and Downtown San Francisco. It is unclear from the comment the source of the travel time data; however, even if express bus service were to be provided, it is unlikely that travel by bus through mixed-flow traffic across the entire width of San Francisco would have a substantially shorter travel time than via light rail, within exclusive right of way and limited stops.

**Response 54.C.34**

The comment includes a marked-up map depicting new, alternative transit service in the study area. Specific proposals include retaining the existing SFSU station area platform in the middle of 19<sup>th</sup> Avenue, extension of the M Ocean View light rail line to Daly City BART, and potential additional light rail routes along Lake Merced Boulevard, Brotherhood Way, and Holloway Avenue.

With respect to the maintenance of the SFSU station in the middle of 19<sup>th</sup> Avenue, this would substantially worsen conditions for SFSU students than that of the Proposed Project. The relocated station would provide substantially more waiting area, eliminating overcrowded conditions that frequently occur on the existing platform. Additionally, the relocated station would no longer require students to cross 19<sup>th</sup> Avenue; instead, they would cross the much shorter and less busy Holloway Avenue, reducing the number of pedestrian-vehicle conflicts. Overall, the distance of the new station would be nearly identical to the existing station and there would be no negative impact to SFSU students.

See Response TR.5.3 for discussion of extending the M Ocean View to Daly City BART. With respect to other extensions of existing transit routes through the study area, as discussed in Response 54.A.33, large-scale regional transportation improvements, such as those referenced in the comment, are neither proposed as part of the Proposed Project, nor are they recommended as mitigation measures for project-related impacts. However, such improvements could be considered as part of the *19<sup>th</sup> Avenue Corridor Study*. See Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the EIR, and the *19<sup>th</sup> Avenue Corridor Study*.

**Response 54.C.35**

The comment states that the HRE inaccurately excludes interior courtyards between the garden apartments from open space calculations. The comment incorrectly identifies concrete drying racks and clothesline areas adjacent to laundry rooms as open space. Figure III.5: Existing Open Space Plan, in Chapter III, Project Description, p. III.13, correctly identifies all existing open space on the Project Site.

**Response 54.C.36**

The comment states that the HRE does not identify the owner of 800 Brotherhood Way. The comment is correct noting this omission. The owner of 800 Brotherhood Way is Olympic View Realty, LLC.

**Response 54.C.37**

The comment introduces a landscape preservation alternative. See Master Response A.4, Alternatives, for a discussion of the reasonable range of alternatives analyzed.

**Response 54.C.38**

The comment introduces a reduced Muni stop and direct regional transportation alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.C.39**

The comment introduces a transportation alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.C.40**

The comment introduces an equity density development alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.C.41**

The comment introduces an upzoning of adjacent land alternative. Please refer to Response TR.7.3 for a discussion on the analysis of the original Parkmerced boundary. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.C.42**

The comment introduces a tower demolition alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.C.43**

The comment introduces a tower demolition alternative. See Master Response A.4, Alternatives, for a discussion on the reasonable range of alternatives analyzed.

**Response 54.D.1**

The comment cites to a June 18, 2009 Notice of Preparation ('NOP') scoping letter. As described in Chapter I, Introduction, pp. I.3-I.4 in the EIR, the Planning Department distributed a Notice of Preparation on May 20, 2009. The Public Scoping Summary Report is included as Appendix A of

the EIR. Comments received on the NOP that were directly related to environmental topics of an EIR were evaluated and incorporated into the scope of analysis, as appropriate. Therefore, relevant comments raised in the letter referenced in Comment 54.D.1 were considered for the EIR.

**Response 54.E.1**

The comment cites to a March 10, 2010, letter submitted on the *19<sup>th</sup> Avenue Corridor Study*. This letter was submitted before publication of the Parkmerced Project Draft EIR. Furthermore, it comments on a separate document, and therefore no response is required.

**Response 54.F.1**

The comment cites to a May 25, 2010, press release from Seth Mallen, Executive Vice President at Stellar Management. The comment expresses concern about whether the Project Sponsor is financially capable of completing the Proposed Project. Please see Response TR.1.2 for a discussion of this issue.

**Response 54.G.1**

The comment states that the Treadwell & Rollo, 2008. *Environmental Impact Report (EIR), Geologic, Geotechnical and Seismic Findings, Parkmerced Development, San Francisco, California*, May 9, 2008, document is not an independent analysis. This report was prepared by a California-licensed engineer from a local engineering firm and represents the independent professional judgment of the preparers.

**Response 54.H.1**

The comment cites to a copy of the Tree Disclosure Statement submitted by the Project Sponsor on January 7, 2008, and asserts that trees have been removed without permit. Section V.M, Biological Resources, p. V.M.29, states that many of the existing trees on the Project Site are in poor condition, and trees are regularly assessed for removal and replacement in an existing, ongoing maintenance program for the Project Site. Permits for tree removal have been obtained, when required

**Response 54.I.1**

The comment cites to a figure in the HRE and asserts that a soundness report should be based on the age of concrete work of the buildings. Please refer to Response 54.A.8 for a discussion on preparation of a soundness report.

**Response 54.I.2**

The comment cites to a figure in the HRE and correctly states that the owner of 800 Brotherhood Way is not identified. This is an omission in the HRE. The owner of 800 Brotherhood Way is Olympic View Realty, LLC

**Response 54.J.1**

The comment cites to a figure in the HRE and asserts that the figure inaccurately excludes interior courtyards between the garden apartments from open space calculations. The comment incorrectly identifies concrete drying racks and clothesline areas adjacent to laundry rooms as open space. Figure III.5: Existing Open Space Plan, in Chapter III, Project Description, p. III.13, correctly identifies all existing open space on the Project Site.

**Response 54.J.2**

The comment cites to a figure and asserts that the figure inaccurately excludes off site properties, those which were part of the original Parkmerced boundary, as well as interior courtyards between the garden apartments from open space calculations. Please refer to Response TR.7.3 for a discussion on this topic. The comment incorrectly identifies concrete drying racks and clothesline areas adjacent to laundry rooms as open space. Figure III.5: Existing Open Space Plan, in Chapter III, Project Description, p. III.13, correctly identifies all existing open space on the Project Site.

**Response 54.K.1**

The comment cites to a September 10, 2007, letter from the National Trust for Historic Preservation that was submitted on the SFSU Campus Master Plan proposal. This letter was submitted before publication of the *Parkmerced Project Draft EIR*. Furthermore, it comments on a separate document, and therefore no response is required.

**Response 54.L.1**

The comment states that demolition of the landscape and garden units is not an environmentally sustainable feature. Please refer to Response TR.25.6.

**Response 54.L.2**

The comment states that the Project Sponsor had not changed his plans after numerous meetings. The EIR is required to analyze the Project as proposed by the Project Sponsor, along with appropriate alternatives as required by CEQA.



**Response 54.L.3**

The comment states that Parkmerced management has “worked with” SFSU/CSU to cause gentrification and displacement of long-term residents with students. Please refer to Response TR.2.2.

**Response 54.L.4**

The comment expresses concern that acres of land have been ‘siphoned off’ by prior owners without a reduction in Parkmerced rents. The rents at Parkmerced are not environmental effects and are therefore not the subject of CEQA analysis. The EIR analyzes the project based on existing conditions and the Proposed Project as presented in an Environmental Evaluation application, with any subsequent revisions to the application provided by the Project Sponsor. Please refer to Response TR 7.3 for a discussion on analysis of the original Parkmerced boundary. Residential rental rates vary depending on a variety of market forces and are not tied to any one aspect of a development such as the sale of some part of a site, nor is there a notification requirement for such sale. Older units in San Francisco are subject to rent control. The proposed Development Agreement associated with this project will address issues related to existing tenants and rent control. Please refer to Responses TR 2.2 and TR 20.2.

**Response 54.L.5**

The comment states there is no “financial equivalent” in terms of amenities provided to residents comparable to the loss of various types of existing open space of the garden units. CEQA does not require assessment of the implicit financial value of open space or other amenities. Please refer to **Response 28.5** for a discussion of changes in open space under existing and proposed conditions.

**Response 54.L.6**

The comment indicates that larger units on the Project Site that have been a resource of low priced housing for families have become too expensive for many families due to “flipping”. Housing affordability, including compliance with the City’s affordable housing and rent control requirements and the replacement of rent-controlled units is described in Responses TR.2.2 and 20.2.

**Response 54.L.7**

The comment expresses concern over the loss of amenities in the form of the former school at 700 Font Boulevard and open space at 800 Brotherhood Way. The 800 Brotherhood Way site is outside of the Project Site. The school site at 700 Font Boulevard is also outside the Project Site

and the school was previously relocated by the San Francisco Unified School District independent of the Proposed Project. The existing conditions described in the EIR reflect the current conditions at the Project Site. As discussed in Chapter III, Project Description, p. III.16, it should be noted that a new private school is proposed as part of the Project. Please refer to Response 28.5 for a discussion of changes in opens space under existing and proposed conditions.

**Response 54.L.8**

The comment raises a concern that the Draft EIR does not include analysis of the SFSU Campus Master Plan. The SFSU Master Plan is a separate development with which the Parkmerced Project Sponsor is not involved. Please refer to Response TR 7.3 for a discussion on analysis of the original Parkmerced boundary. Also see Master Response A.1, Historic Resources.

Cumulative analysis in the EIR, however, does consider the SFSU Campus Master Plan project for the topics of Land Use, Aesthetics, Population and Housing, Transportation and Circulation, Noise, Air Quality, Wind and Shadow, Recreation, Utilities and Services Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, and Hazards and Hazardous Materials.

**Response 54.L.9**

The comment expresses disapproval of the proposed increase in retail space and questions its necessity but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project. Please refer to Response TR.11.3 for a discussion of project retail space impacts in relation to surrounding retail districts.

**Response 54.L.10**

The comment expresses a variety of concerns about proposed changes to transit service as part of the Proposed Project. See Master Response A.2, Transportation and Circulation.

**Response 54.L.11**

The comment expresses concern that proposed rent protections cannot be implemented due to recent court decisions. Please refer to Response 20.3 for a discussion of enforceability of maintaining rent controlled units.

**Response 54.L.12**

The comment expresses concern regarding ongoing gentrification in the Parkmerced area. The concern is directed towards conditions of the present and recent past rather than potential impacts of the Proposed Project. Gentrification in relation to the Proposed Project is discussed in Response TR 2.2.

**Response 54.L.13**

The comment states that Parkmerced is his home and he does not want it developed. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

